

RSPO PRINCIPLE AND CRITERIA PUBLIC SUMMARY REPORT

☐ Initial Assessment

☒ Annual Surveillance Assessment (2_1)

☐ Recertification Assessment (Choose an item.)

☐ Extension of Scope

Client Company Name / Parent Company: J.C. Chang Holdings Sdn Bhd
Client Company / Parent Company Address: Unit 30-01, Level 30, Menara Landmark, No. 12, Jalan Ngee Heng, 80000 Johor Bahru, Johor, Malaysia
Certification Unit: J.C Chang Holdings Sdn Bhd / Asia Production Unit
Location of Certification Unit: KM 45, Off Jalan Lahad Datu – Sandakan, 91100 Lahad Datu, Sabah, Malaysia
Date of Final Report: 18/04/2024

TABLE of CONTENTS
Page No

Section 1: Scope of the Assessment.....	3
1. Company Details	3
2. Certification Information	3
3. Other Certifications.....	4
4. Location(s) of Mill & Supply Bases	4
5. Description of Supply Base	4
6. Plantings & Cycle.....	5
7. Summary of Certified Tonnage of FFB (Own Certified Scope)	5
8. Summary of Certified Tonnage of FFB (from other certified unit(s))	5
9. Summary of Non-Certified Tonnage of FFB (outside supplier – excluded from certificate).....	6
10. Summary of Certified Tonnage (not applicable for ISS)	6
11. Summary of Actual Volume sold	7
12. Independent Smallholders Certified Tonnage / Volume	10
13. Independent Smallholders Actual Sold Tonnage / Volume	10
Section 2: Assessment Process	12
2.1 Assessment Methodology, Programme, Site Visits.....	12
2.2 BSI Assessment Team	13
2.3 Assessment Plan.....	15
Section 3: Assessment Findings	19
3.1 Multiple Management Units and Time Bound Plan.....	19
3.2 Progress of scheme smallholders and/or outgrowers.....	21
3.3 Details of Nonconformities	26
3.3.1 Status of Nonconformities Previously Identified and Observations.....	34
3.3.2 Summary of the Nonconformities and Status	40
3.4 Stakeholders and previous land owner / user consultation.....	41
3.5 Impartiality and conflict of interest	43
Formal Signing-off of Assessment Conclusion and Recommendation	44
Appendix A: Summary of Findings	45
Appendix B: GHG Reporting Executive Summary	154
Appendix C: Location Map of Certification Unit and Supply bases.....	156
Appendix D: Estate Field Map	157
Appendix E: List of Smallholder Registered and/or sampled	160
Appendix F: List of Abbreviations	161

Section 1: Scope of the Assessment

1. Company Details			
Parent Company	J.C. Chang Holdings Sdn Bhd		
RSPO Membership Number	2-0029-06-000-00	Membership Approval Date	10/05/2006
Address	Unit 30-01, Level 30, Menara Landmark, No.12, Jalan Ngee Heng 80000 Johor Bahru, Johor, Malaysia		
Palm Oil Mill / Group Manager / Estate (Certification Unit)	J.C. Chang Holdings Sdn Bhd / Asia Production Unit Asia Palm Oil Mill		
Location / Address	KM 45, Off Jalan Lahad Datu 91000 Sandakan, Sabah, Malaysia		
Website	www.carotino.com		
Management Representative	Mr Wong Chun Wei	E-mail	wongcw@jcc.com.my
Telephone	+607 223 1633 (Head Office) +6010 965 4828 (Mill)	Facsimile	+607 224 1546

2. Certification Information			
Certificate Number	RSPO 651278	Certificate Start Date	31/01/2023
Date of First Certification	31/01/2013	Certificate Expiry Date	30/01/2028
Scope of Certification	Production of Sustainable Crude Palm Oil (CPO) and Palm Kernel (PK)		
Visit Objectives	<ul style="list-style-type: none"> • Determination of the conformity of the client's management system, or parts of it, with audit criteria. • Evaluation of the ability of the management system to ensure the client organization meets applicable statutory, regulatory and contractual requirements. 		
Assessment Cycle	<input type="checkbox"/> Pre Assessment (Choose an item.) <input type="checkbox"/> Initial Assessment <input checked="" type="checkbox"/> Annual Surveillance Assessment (ASA 2_1) <input type="checkbox"/> Recertification Assessment (Choose an item.) <input type="checkbox"/> Scope Extension		
Applicable Standards / Normative Reference	RSPO Certification System for P&C and RSPO ISH 2020 <input checked="" type="checkbox"/> Malaysia National Interpretation 2019 of the RSPO P&C 2018		
Supply Chain Module	<input type="checkbox"/> Identity Preserved; <input checked="" type="checkbox"/> Mass Balance	Mill Capacity	60 mt/Hour
ISH certification Phase	<input type="checkbox"/> Eligibility <input type="checkbox"/> Milestone A <input type="checkbox"/> Milestone B <input checked="" type="checkbox"/> Not Applicable		
Is this a remote audit or on-site audit	<input checked="" type="checkbox"/> On-site audit (Option AI)	<input type="checkbox"/> On-site audit (Option AII)	<input type="checkbox"/> Remote audit (Option B)

RSPO P&C Public Summary Report

Revision 15 (Nov 2023)

3. Other Certifications			
Certificate Number	Standard(s)	Certificate Issued by	Expiry Date
EU-ISCC-Cert-DE119-60223405	ISCC EU (International Sustainability and Carbon Certification)	SCS Global Services	20.12.2023
50450981 MSPO3	MSPO 2530-3:2013 General Principles for Oil Palm Plantations and Organized Smallholders	DQS Certification (M) Sdn Bhd	09.01.2026
50450207 MSPO4	MSPO 2530-4:2013 General Principles for Palm Oil Mills		09.01.2026
50450207 MSPO SCCS	MSPO Supply Chain Certification Standard 2018		13.11.2025

4. Location(s) of Mill & Supply Bases			
Name (Mill / Supply Base / Group Manager / Smallholders)	Location	GPS Coordinates	
		Latitude	Longitude
Asia Palm Oil Mill	KM45 Off Jalan Lahad Datu-Sandakan, 91100 Lahad Datu, Sabah	5° 17' 34.01" N	118° 12' 24.54" E
Asia Oil Palm Estate Div.2	Sungai Tenegang, CL 095317383, Tenegang/ Koyah, Kinabatangan, Sabah, Malaysia.	5° 18' 16.63" N	118° 11' 56.53" E
Melewar Estate Div.2	KM45, Jalan Lahad Datu-Sandakan, 91100 Lahad Datu, Sabah, Malaysia	5° 15' 58.70" N	118° 09' 35.99" E
Hwa Li Estate Div.3	KM45, Jalan Lahad Datu-Sandakan, 91100 Lahad Datu, Sabah, Malaysia	5° 20' 41.59" N	118° 18' 19.32" E

5. Description of Supply Base					
New Planting Development	<input checked="" type="checkbox"/> No		<input type="checkbox"/> Yes		
Estate / Smallholders	Total Planted (Mature + Immature) (ha)	HCV (ha)	Infrastructure & Other (ha)	Total Area (ha)	% of Planted
Asia Oil Palm Estate Div.2	2,720.72	-	303.28	3,024.00	89.97
Melewar Estate Div.2	1,770.41	-	252.99	2,023.40	87.50
Hwa Li Estate Div.3	3,953.24	-	435.47	4,388.71	90.08
Total	8,444.37	-	991.74	9,436.11	89.49

6. Plantings & Cycle						
Estate / Smallholders	Age (Years) - ha				Mature	Immature
	0 - 3	4 - 14	15 - 25	>25		
Asia Oil Palm Estate Div.2	693.78	724.46	22.52	1,279.96	2,026.94	693.78
Melewar Estate Div.2	494.23	354.22	-	921.96	1,276.18	494.23
Hwa Li Estate Div.3	899.8	-	1,414.3	1,639.14	3,053.44	899.8
Total (ha)	2,087.81	1,078.68	1,436.82	3,841.06	6,356.56	2,087.81
Note: Total immature are increased due to massive replanting activities in 2023.						

7. Summary of Certified Tonnage of FFB (Own Certified Scope)				
Estate / Smallholders	Tonnage (MT) / year			
	Estimated last year (Jan 2023 – Dec 2023)	Actual (Nov 22 – Oct 23)		Forecast (Jan 2024 – Dec 2024)
		Previous license period (Nov – Dec 2022)	Previous license period (Jan 23 – Oct 23)	
Asia Oil Palm Estate Div.2	41,116.89	5,934.93	30,851.47	40,895.03
Melewar Estate Div.2	25,849.81	4294.78	18,671.02	29,453.95
Hwa Li Estate Div.3	63,726.35	9,690.12	43,993.99	54,786.81
Total	130,693.05	113,436.31		125,135.79

8. Summary of Certified Tonnage of FFB (from other certified unit(s))				
Estate / Smallholders	Tonnage (MT) / year			
	Estimated last year (Jan 2023 – Dec 2023)	Actual (Nov 22 – Oct 23)		Forecast (Jan 2024 – Dec 2024)
		Previous license period (Nov – Dec 2022)	Previous license period (Jan 23 – Oct 23)	
Pahang Oil Palm Estate Div.2		7,838.84	35,965.15	
Pahang Oil Palm Estate Div.3		-	14,305.74	
Gerola Estate		-	236.98	
Tye Yang Estate		-	500.80	
Total		58,847.51		

9. Summary of Non-Certified Tonnage of FFB (outside supplier – excluded from certificate)				
Out growers / smallholders	Tonnage (MT) / year			
	Estimated last year (Jan 2023 – Dec 2023)	Actual (Nov 22 – Oct 23)		Forecast (Jan 2024 – Dec 2024)
		Previous license period (Nov – Dec 2022)	Previous license period (Jan 23 – Oct 23)	
Independent FFB Supplier / Outgrowers		4,302.48	18,362.25	
Total		22,664.73		

9A. Monthly Records of Certified and Uncertified FFB Received since the last audit				
No.	Month - Year	Volume of FFB from certified supply base (mt)	Volume of FFB from uncertified supply base (mt)	Total FFB/Month (mt)
1	Nov 22	12,852.940	2221.62	15,074.560
2	Dec 22	14,905.730	2080.86	16,986.590
3	Jan 23	14,542.790	1701.96	16,244.750
4	Feb 23	13,183.240	1590.92	14,774.160
5	Mar 23	13,272.120	1455.00	14,727.120
6	Apr 23	11,415.920	957.44	12,373.360
7	May 23	13,013.950	1497.14	14,511.090
8	June 23	14,189.950	2480.25	16,670.200
9	July 23	14,162.800	1817.04	15,979.840
10	Aug 23	15,062.810	2058.35	17,121.160
11	Sept 23	16,596.760	2159.20	18,755.960
12	Oct 23	19,084.810	2644.95	21,729.760
TOTAL		172,283.82	22,664.73	194,948.55

10. Summary of Certified Tonnage (MT) (not applicable for ISS)			
Estimated last year (Jan 2023 – Dec 2023)	Actual (Nov 22 – Oct 23)		Forecast (Jan 2024 – Dec 2024)
	Previous license period (Nov – Dec 2022)	Previous license period (Jan 23 – Oct 23)	
FFB	FFB		FFB
292,457.39 mt	27,758.67 mt	144,525.15 mt	125,135.79 mt
	TOTAL	172,283.82 mt	

RSPO P&C Public Summary Report

Revision 15 (Nov 2023)

CPO (OER: 19.73 %)	CPO (OER: 20.66 %)		CPO (OER: 20.24 %)
60,712.24 mt	5,802.86 mt	29,790.75 mt	25,328.08 mt
	TOTAL	35,593.62 mt	
PK (KER: 5.29 %)	PK (KER: 4.61%)		PK (KER: 5.44 %)
15,930.19 mt	1,216.862 mt	6,730.752 mt	6,802.22 mt
	TOTAL	7,947.61 mt	
<i>Note: Volume extension under license ID CB146067; FFB: 152,000 mt, CPO:33,000 mt PK: 8,500</i>			

10A. Monthly Records of Certified CPO & PK since the last audit			
No.	Month - Year	Certified CPO (MT)	Certified PK (MT)
1	Nov 22	2,691.255	580.775
2	Dec 22	3,111.610	636.087
3	Jan 23	2,965.502	613.258
4	Feb 23	2,659.633	612.532
5	Mar 23	2,702.745	598.215
6	Apr 23	2,361.918	532.104
7	May 23	2,761.067	627.869
8	June 23	2,969.160	604.565
9	July 23	2,851.139	648.093
10	Aug 23	3,096.479	737.165
11	Sept 23	3,430.269	783.834
12	Oct 23	3,992.843	973.117
TOTAL		35,593.62	7,947.614

11. Summary of Actual Volume sold					
Current License period (Jan 23 – Oct 23)					
	RSPO Certified	Other Schemes Certified		Conventional	Total
		ISCC	Others		
CPO (MT)	2,772.120	0.00	0.00	19,042.619	21,814.739
PK (MT)	6,160.020	0.00	0.00	562.700	6,722.72
Credits	9,000.000	0.00	0.00	0.00	9,000.000
<i>Note: Carry forward volume from Dec 22: CPO: 2,863.784 mt PK: 421.354 mt</i>					
Previous License period (Nov 22 – Dec 22)					
CPO (MT)	3,221.720	0.00	0.00	2,141.105	5,362.830

RSPO P&C Public Summary Report

Revision 15 (Nov 2023)

PK (MT)	1,163.550	0.00	0.00	40.231	1,203.781
Credits	0.00	0.00	0.00	0.00	0.00
Note: Conventional is RSPO certified material but sold as non-RSPO.					

11A. Records of Certified CPO & PK Sold under PalmTrace since the last audit (if any)				
No.	Buyers Name	PalmTrace Trading License Number	Certified CPO Sold (MT)	Certified PK Sold (MT)
1	Non-disclosure	TR-230590d4-ac6a	765.76	-
2	Non-disclosure	TR-423967c2-7528	950.77	-
3	Non-disclosure	TR-607f4dc0-e7b0	1,034.24	-
4	Non-disclosure	TR-b7fd595b-5daa	470.95	-
5	Non-disclosure	TR-577f3e66-64b8	1,129.05	-
6	Non-disclosure	TR-8fc1bb80-1d5f	226.07	-
7	Non-disclosure	TR-5c95579a-73af	1,417.00	-
8	Non-disclosure	TR-f6a5ccad-59b0	-	211.10
9	Non-disclosure	TR-fce1504e-bb25	-	261.64
10	Non-disclosure	TR-8e037382-c69a	-	438.90
11	Non-disclosure	TR-fe2b4fbe-2b3a	-	251.91
12	Non-disclosure	TR-c82a419f-2eb2	-	248.09
13	Non-disclosure	TR-2428c2b6-4415	-	213.74
14	Non-disclosure	TR-58d84a07-d5a7	-	336.26
15	Non-disclosure	TR-07284d42-9c29	-	304.88
16	Non-disclosure	TR-94e1a4c8-0590	-	245.12
17	Non-disclosure	TR-fcfba2a8-0d02	-	463.27
18	Non-disclosure	TR-e60d0b3a-8aa3	-	186.73
19	Non-disclosure	TR-caaa5c14-c034	-	174.79
20	Non-disclosure	TR-4471ec1f-a24d	-	325.21
21	Non-disclosure	TR-cc09eddf-6c13	-	226.33
22	Non-disclosure	TR-4c55647b-221a	-	123.67
23	Non-disclosure	TR-d2e38437-15ce	-	545.66
24	Non-disclosure	TR-165c8dec-d0e9	-	154.34
25	Non-disclosure	TR-bf8ed0a4-a618	-	589.87
26	Non-disclosure	TR-2da1422f-8730	-	10.13
27	Non-disclosure	TR-7250ddcc-a2b3	-	576.27

RSPO P&C Public Summary Report

Revision 15 (Nov 2023)

28	Non-disclosure	TR-ca3c3686-7e33	-	23.73
29	Non-disclosure	TR-af22a469-b90c	-	617.53
30	Non-disclosure	TR-6697e4f8-dec5	-	182.47
31	Non-disclosure	TR-799b7861-02aa	-	611.93
TOTAL			5,993.84	7,323.57

11B. Records of certified CPO & PK Sold under other schemes since the last audit (Nov 22 – Oct 23)				
No.	Buyers Name	Scheme Name	Certified CPO Sold (MT)	Certified PK Sold (MT)
1	N/A	N/A	N/A	N/A
TOTAL			N/A	N/A

11C. Records of CPO & PK Sold as conventional since the last audit (Nov 22 – Oct 23)			
No.	Buyers Name	CPO Sold (MT)	PK Sold (MT)
1	Non-disclosure	1,095.466	24.883
2	Non-disclosure	1,045.639	65.348
3	Non-disclosure	882.568	58.110
4	Non-disclosure	3,183.902	0.00
5	Non-disclosure	2,977.556	101.346
6	Non-disclosure	2,283.696	45.904
7	Non-disclosure	2,928.387	46.913
8	Non-disclosure	3,099.063	13.736
9	Non-disclosure	3,188.957	8.163
10	Non-disclosure	2,523.331	76.465
11	Non-disclosure	2,874.849	54.003
12	Non-disclosure	4,100.310	108.060
TOTAL		30,183.72	602.93

11D. Records of Certified CPO Sold under RSPO Credits since the last audit (Nov 22 – Oct 23)			
No.	Buyers Name	PalmTrace Trading License Number	RSPO Credits of Certified CPO Sold
1	Non-disclosure	12251	2,842.00
2	Non-disclosure	12252	2.00

RSPO P&C Public Summary Report
Revision 15 (Nov 2023)

3	Non-disclosure	12253	3.00
4	Non-disclosure	12255	60.00
5	Non-disclosure	12256	15.00
6	Non-disclosure	12257	63.00
7	Non-disclosure	12419	15.00
8	Non-disclosure	12608	6,000.00
TOTAL			9,000.00

12. Independent Smallholders Certified Tonnage (MT) / Volume

Phase	Estimated last year (key in period)			Actual (key in period)			Forecast (key in period)		
	Eligibility	MS A	MS B	Eligibility	MS A	MS B	Eligibility	MS A	MS B
	40%	70%	100%	40%	70%	100%	40%	70%	100%
FFB			N/A						
IS-CSPO	N/A	N/A		N/A	N/A		N/A	N/A	
IS-CSPKO	N/A	N/A		N/A	N/A		N/A	N/A	
IS-CSPKE	N/A	N/A		N/A	N/A		N/A	N/A	
CSPK	N/A	N/A		N/A	N/A		N/A	N/A	

12A. Monthly Records of Certified CPO, PK & PKE (equivalent) produced since the last audit

No.	Month - Year	FFB (MT)	Certified CPO (MT)	Certified PK (MT)	Certified PKO (MT)	Certified PKE (MT)
1	N/A	N/A	N/A	N/A	N/A	N/A
TOTAL		N/A	N/A	N/A	N/A	N/A

Note: 1 mt = 1 credit

13. Independent Smallholders Actual Sold Tonnage / Volume

	FFB	FFB Conventional	FFB Other schemes	IS-CSPO	CSPK	IS-CSPKO	IS-CSPKE
Current License period (key in period)							
Credits				N/A	N/A	N/A	N/A
Physical	N/A	N/A	N/A				
Previous License period (key in period)							
Credits				N/A	N/A	N/A	N/A
Physical	N/A	N/A	N/A				

13A. Records of Certified FFB, CPO, PK & PKE (including credits) sold since the last audit							
No.	Buyers Name	PalmTrace Trading License Number	FFB Sold (MT)	Certified CPO Sold (MT/credit)	Certified PK Sold (MT/credit)	Certified PKO Sold (MT/credit)	Certified PKE Sold (MT/credit)
1	N/A	N/A	N/A	N/A	N/A	N/A	N/A
TOTAL			N/A	N/A	N/A	N/A	N/A

Section 2: Assessment Process

Certification Body:

BSI Services Malaysia Sdn. Bhd. (ASI Accreditation Number: ASI-ACC-067)

Suite 29.01 Level 29, The Gardens North Tower,

Mid Valley City, Lingkaran Syed Putra,

59200 Kuala Lumpur, Malaysia.

Tel +60 (3) 9212 9638; Fax +60 (3) 9212 9639

Representative: Dr. Chaiyaporn Seekao (Chaiyaporn.Seekao@bsigroup.com)

Website: www.bsigroup.com

BSI is a leading global provider of management systems assessment and certification, with more than 92,000 certified locations and clients in over 193 countries. BSI is the UK's National Standards Body. BSI provides independent, third-party certification of management systems. BSI is ASI Accredited (ASI-ACC-067) to conduct RSPO assessment since 31/10/2014 with accredited office located at Kuala Lumpur, Malaysia.

2.1 Assessment Methodology, Programme, Site Visits

The on-site assessment was conducted on **04/12/2023 – 07/12/2023**. The audit programme is included as Section 2.3.

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

The Critical NC close out on-site assessment was conducted on **06/02/2024**. The audit programs are included in Section 2.3.

The methodology for collection of objective evidence included physical site inspections, observation of tasks and processes, interviews of staff, workers and their families and external stakeholders, review of documentation and monitoring data. Malaysia National Interpretation 2019 of the RSPO P&C 2018 was used as the normative reference to assess compliance. The comments made by external stakeholders were also taken into account in the assessment.

The minimum sample size is four estates. Sample size for certification unit with more than four (4) estates were determined based on formula $N = (\sqrt{y}) \times (z)$ where y is the number of estates and where z is the multiplier defined by risk assessment. While, the sampling of smallholders were based on the formula $(\sqrt{y}) \times (z)$; where y is total number of group member and where z is the multiplier defined by the risk assessment. The sampled smallholder listed in Appendix E.

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

Structured worker interviews with male and female workers and staff were held in private at the workplace in the mill and the estates. Fieldworkers were interviewed informally in small groups in the field. In addition, the wives of workers and staff were interviewed in informal group meetings at their housing. Separate visits were made to each of the local communities to meet with the village head and residents. Company officials were not present at any of the internal or external stakeholder interviews. A list of Stakeholders contacted is included as Section 3.4.

The non-conformities for this audit are detailed in Section 3.3 and unless it is stated in this section, all previous nonconformities including minor nonconformities are remains closed.

RSPO P&C Public Summary Report **Revision 15 (Nov 2023)**

This report is structured to provide a summary of assessment finding as provided in Appendix A. The assessment was conducted based on risk based approach sampling and therefore nonconformities may exist.

For Initial, Re-certification and Extension of Scope assessment, the report was externally reviewed by approved external peer reviewer prior to certification decision by BSI.

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

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

Assessment Program					
Name (Mill / Supply Base)	Year 1 (Re- Certification)	Year 2 (ASA2-1)	Year 3 (ASA2-2)	Year 4 (ASA2-3)	Year 5 (ASA2-4)
Asia Palm Oil Mill	✓	✓	✓	✓	✓
Asia Oil Palm Estate Div.2	✓	✓	✓	✓	✓
Melewar Estate Div.2	✓	✓	✓	✓	✓
Hwa Li Estate Div.2	✓	✓	✓	✓	✓

Tentative Date of Next Visit: November 27, 2024 - November 30, 2024

Total Number of Mandays: 12 Mandays

2.2 BSI Assessment Team

Name	Role	Competency
Mohamed Zainal (MHZ)	Hidhir Abidin Team Leader	<p>Education: Bachelor Degree in Chemical Engineering, National University of Malaysia, 2006</p> <p>Work Experience:</p> <ol style="list-style-type: none"> 1) 7 years working experience in palm oil industry specifically on palm oil milling for 5 years 2) Auditor for several standards including ISO 9001, ISO 140001, OHSAS 18001, MSPO and RSPO since 2012 <p>Training attended:</p> <ol style="list-style-type: none"> 1) ISO 9001 Lead Auditor Course 2) ISO 14001 Lead Auditor Course 3) OHSAS 18001 Lead Auditor Course in 2012 4) Endorsed RSPO P&C Lead Auditor Course in 2013 5) MSPO Awareness Training in 2014 6) Endorsed RSPO SCCS Lead Auditor Course 7) SMETA Auditor training <p>Language proficiency:</p> <p>Fluent in in both verbal/written Bahasa Malaysia and English.</p> <p>Aspect covered in this audit:</p> <p><input type="checkbox"/> Good Agriculture Practice <input type="checkbox"/> Health and Safety <input type="checkbox"/> Supply chain requirements</p>

		<input checked="" type="checkbox"/> Social <input type="checkbox"/> Environmental <input type="checkbox"/> Market Communication and claim requirements <input type="checkbox"/> ISH context (ICS, internal audit, policy, business planning and trading system)
Nor Halis Abu Zar (NHA)	Team Member	<p>Education: Bachelor of Science, Plantation Technology and Management, graduated from UiTM in 2012 and Diploma in Plantation and Industry Management from UiTM in 2009.</p> <p>Work Experience: He started his career as Assistant Manager at Kulim Plantations Sdn. Bhd. managing the day-to-day plantation operations. In his career at Kulim Plantation. He had accumulated more than 6 years of sustainability implementation experience. He is a qualified Lead Auditor for RSPO P&C 2018 MYNI 2019 and MS2530:2013. He mainly covered for ENV and OSH and has accumulated more than 500 audit days throughout his current career as the auditor for multiple disciplines covering Malaysia and International Level.</p> <p>Training attended: He has completed RSPO P&C Lead Auditor Course in Oct 2020, Refresher RSPO P&C Lead Auditor Course in May 2022, RSPO ISH Standard 2019 in December 2021 and August 2023, RSPO SCC 2020 in September 2022, QMS 9001:2015 Lead Auditor Course in April 2019, OSH 45001:2018 Lead Auditor Course in June 2021, IMS (ISO 9001:2015 & ISO 14001:2015) Lead Auditor Course, HCV & HCS Training in August 2022, MSPO 2530:2013 Lead Auditor Course in February 2019, , MSPO SCCS Auditor in February 2019 and also trained in SMETA Requirement Training on May 2021</p> <p>Aspect covered in this audit:</p> <input checked="" type="checkbox"/> Good Agriculture Practice <input type="checkbox"/> Health and Safety <input checked="" type="checkbox"/> Supply chain requirements <input type="checkbox"/> Social <input checked="" type="checkbox"/> Environmental <input checked="" type="checkbox"/> Market Communication and claim requirements <input type="checkbox"/> ISH context (ICS, internal audit, policy, business planning and trading system)
Yusof Khairan Nizar (YKN)	Team Member	<p>Education: Holds a Diploma in Public Administration-ITM (1991), Certificate of Safety and Health Officer-MII (2003), Bachelor of Corporate Administration (Hons), MARA University of Technology and a Master of Science in Occupational Safety and Health Management-Northern University of Malaysia.</p> <p>Work Experience: Has more than 30 years of working experience in varies industries including as safety officer in manufacturing company; consultant and trainer for management systems including ISO 9001:2015, ISO 14001:2015, ISO 45001:2018, OHSAS 18001:2007, MS1722:2011, Environmental Legislation; contract auditor with varies accredited certification bodies for scheme including Malaysia Sustainable Palm Oil (MSPO), RSPO Principles & Criteria; MPOCC Registered Peer Reviewer and was a Certificate of Safety and Health Officer-Malaysian Insurance Institute.</p> <p>Training attended: He has completed ISO 9001:2000 IRCA/IATC A Lead Auditor Training; ISO 14001:2004 IEMA Approved EMS Advanced Lead Auditor Training Course; OH&SMS IRCA Certified Lead Auditor Training Course; MS 1722 Lead Auditor Training; MSPO Auditing; Endorsed RSPO P&C 2018 Lead Auditor Course; SMETA Requirements Training; HCV & HCS Introductory Training, RSPO Independent Smallholder (IHS) Auditor Training and Endorsed RSPO Refresher Trainings (P&C).</p>

		<p>. Also attended the Quality & Environmental MS Auditing Skills Based on Risk Management, Conformity Assessment – For Bodied Providing Audit and Certification (ISO/IEC 17021:2015) collaboration with Institute of Quality Malaysia, ISO/IEC 17021. MSPO Peer Reviewer Training (MPOCC).</p> <p>Language Proficiency: Fluent in in both verbal/written Bahasa Malaysia and English.</p> <p>Aspect covered in this audit:</p> <p><input checked="" type="checkbox"/> Good Agriculture Practice <input checked="" type="checkbox"/> Health and Safety <input type="checkbox"/> Supply chain requirements</p> <p><input type="checkbox"/> Social <input type="checkbox"/> Environmental <input type="checkbox"/> Market Communication and claim requirements</p> <p><input type="checkbox"/> ISH context (ICS, internal audit, policy, business planning and trading system)</p>
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Accompanying Persons:

Name	Role
Fahmi Othman	Observer

2.3 Assessment Plan

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

PRELIMINARY AGENDA					
Date	Time	Subjects	MHZ	NHA	YKN
Sunday 3/12/2023	PM	Audit team travel to Sandakan via AK5196 ETA2105. Check in at Pavilion Hotel, Sandakan	√	√	√
Monday 4/12/2023 Melewar Estate 2	0700	Audit Team travelling to Melewar Estate 2			
	09.00 – 09.30	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 	√	√	√
	09.30 – 12.30	Melewar Estate 2 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.	√	√	√
	12.30 - 13.30	Lunch break	√	√	√

PRELIMINARY AGENDA					
Date	Time	Subjects	MHZ	NHA	YKN
	13.30 - 16.30	Melewar Estate 2 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)	√	√	√
	16.30 – 17.00	Interim Closing briefing (end of day 1)	√	√	√
Tuesday 5/12/2023 Hwa Li Estate Div.3	0730	Audit team travel to Hwa Li Estate Div.3	√	√	√
	8.30 – 12.00	Hwa Li Estate Div.3 Field visit, boundary inspection, field operations, staff & workers interview, buffer zone, HCV area, IPM implementation, OSH&ERP, workshop, storage area (agrochemical, fertilizer, lubricant etc), agrochemical mixing area, Schedule waste management, worker housing, clinic, Landfill, etc.			
	10.30 – 12.30	Meeting with stakeholders (Government, village rep, smallholders, Union Leader, contractor etc.)	√	-	-
	12.30 - 13.30	Lunch break	√	√	√
	13.30 - 16.30	Hwa Li Estate Div.3 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)	√	√	√
	16.30 – 17.00	Interim Closing briefing (end of day 2)	√	√	√
Wednesday 6/12/2023 Asia POM	07.30	Audit team travel to Asia POM	√	√	√
	09.00 – 12.30	Asia POM Inspection: FFB receiving, warehouse, workshop, wastes management & Landfill, Effluent Ponds, OSH & ERP, Environment issues, POME application, water treatment, staff, workers and contractor interview, housing and facility inspection, clinic, meeting stakeholders etc.			

PRELIMINARY AGENDA					
Date	Time	Subjects	MHZ	NHA	YKN
	10.00 – 12.30	RSPO Supply chain requirements for mill - Mass Balance Module - Internal Audit - Outsourcing activities - Purchasing and Goods In - Sales and Goods Out - Outsourcing Activities - Record keeping - Extraction Rate - Processing - Registration of transaction - Claims	-	√	√
	10.30 – 12.30	Meeting with stakeholders (Government, village rep, smallholders, Union Leader, contractor etc.)	√	-	-
	12.30 - 13.30	Lunch break	√	√	√
	13.30 - 16.30	Asia POM 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)	√	√	√
	16.30 – 17.00	Interim Closing briefing (end of day 3)	√	√	√
Thursday 7/12/2023	07.30	Audit team travel to Asia Oil Palm Estate Div.2	√	√	√
Asia Oil Palm Estate Div.2	08.30 – 13.00	Asia Oil Palm Estate Div.2 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.			
	13.00 - 14.00	Lunch	√	√	√
	14.00 – 15.30	Asia Oil Palm Estate Div.2 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)	√	√	√
	15.30 – 16.00	Audit team discussion	√	√	√
	16.00 – 17.00	Closing meeting – presentation of finding and recommendation	√	√	√
	1700	Audit team travel back to Sandakan. Hotel check in at Pavilion hotel	√	√	√
Friday 8/12/2023	AM	Audit team travel back to Kuala Lumpur via AK5193, ETD 1020	√	√	√

RSPO P&C Public Summary Report **Revision 15 (Nov 2023)**

Major NC Close Out

PRELIMINARY AGENDA		
Time	Subjects	MHZ
Tuesday 6/02/2024		
0730	Auditor travel to Asia Palm Oil Mill from MB Hotel, Lahad Datu	√
0830 – 0845	Opening Meeting <ul style="list-style-type: none"> Opening Presentation by Audit team leader. Briefing on the verification plan 	
0845 – 1230	Major NC verification <ul style="list-style-type: none"> 2432181-202309-M1 – Document review and management/worker's interview 2432181-202309-M2 – Document review and management/worker's interview 2432181-202309-M3 – Document review and management/worker's interview 	√
1130 - 1230	Closing meeting - conclusion and recommendation	√
1230	Auditor travel to Sandakan and travel back to KL via AK5195 ETD 1735	√

Section 3: Assessment Findings

3.1 Multiple Management Units and Time Bound Plan

Requirement	Assessment	Compliance
Does the time bound plan include all current subsidiaries, estates and mills that is under the control and/or minor shareholding of the holding company?	The plan includes all current subsidiaries, estates and mills that is under management control.	Complied
Have all the estates and mills certified within five (5) years after obtaining RSPO membership? If no, has RSPO Secretariat approval obtained? Was the submission according to the template as announced by the RSPO Secretariat on 21/12/2021	The Group has achieved 100% RSPO certification for all existing Operating Units under the management of JC Chang Group at ended year of 2021. However, recently JC Chang Group have purchased properties from a RSPO certified company i.e. TSH Resources Berhad namely Lahad Datu Palm Oil Mill, Ong Yah Ho Estate and Gomantong Estate and the estates has been renamed as Hwa Li 2. Other than that, purchase done from 3 outgrowers (Raygold Gold Trading, Segar Teguh Sdn Bhd and Jaguhamoni Sdn Bhd) with total area of 180.92ha which take over process was carried out on 23rd February 2022. Disclosure form has been submitted to RSPO on 22/09/2022 and obtained approval by RSPO on 15/06/2023. Scope extension has been conducted on 28-30/08/2023 and the estates has been RSPO certified. For Lahad Datu Palm Oil Mill, plan for certification is in year 2025.	Complied
Have there been any new acquisitions? If yes, the new acquisitions shall be certified within three (3) years from the date of acquisition. Certification plan for the new acquisition shall be available. If no, has RSPO Secretariat approval obtained? Was the submission according to the template as announced by the RSPO Secretariat on 21/12/2021.	The Group has achieved 100% RSPO certification for all existing Operating Units under the management of JC Chang Group at ended year of 2021. However, recently JC Chang Group have purchased properties from a RSPO certified company i.e. TSH Resources Berhad namely Lahad Datu Palm Oil Mill, Ong Yah Ho Estate and Gomantong Estate and the estates has been renamed as Hwa Li 2. Other than that, purchase done from 3 outgrowers (Raygold Gold Trading, Segar Teguh Sdn Bhd and Jaguhamoni Sdn Bhd) with total area of 180.92ha which take over process was carried out on 23rd February 2022. Disclosure form has been submitted to RSPO on 22/09/2022 and obtained approval by RSPO on 15/06/2023. Scope extension has been conducted on 28-30/08/2023 and the estates has been RSPO certified. For Lahad Datu Palm Oil Mill, plan for certification is in year 2025.	Complied

Any deviations from the maximum periods requires approval by the RSPO Secretariat.	No, scope extension has been conducted on 28-30/08/2023 as per mentioned in the time bound plan and approved by RSPO on 15/06/2023.	Complied
Have there been any changes to the time-bound plan since the last audit (both new acquisition and existing)? If yes, justification is required. Is this consistent with the ACOP reporting?	No, there is no changes. The Group has achieved 100% RSPO certification for all existing Operating Units under the management of JC Chang Group at ended year of 2021. Scope extension for 2 estates (Hwa Li 2 and Pahang Oil Palm Estate 2) which has been purchased in 2021 has been conducted on 28-30/08/2023.	Complied
Have there been any isolated lapses in implementation of the plan? If yes a Minor non-compliance shall be raised	No, there is no lapses. The Group has achieved 100% RSPO certification for all existing Operating Units under the management of JC Chang Group at ended year of 2021. Scope extension for 2 estates (Hwa Li 2 and Pahang Oil Palm Estate 2) which has been purchased in 2021 has been conducted on 28-30/08/2023.	Complied
Have there been any fundamental failure (e.g. unable to justify delay in planning the assessments) to proceed with implementation of the plan? If yes a Major non-compliance shall be raised	No, there is no fundamental failure. The Group has achieved 100% RSPO certification for all existing Operating Units under the management of JC Chang Group at ended year of 2021. Scope extension for 2 estates (Hwa Li 2 and Pahang Oil Palm Estate 2) which has been purchased in 2021 has been conducted on 28-30/08/2023.	Complied
Un-Certified Units or Holdings		
No replacement of primary forest or any area required to maintain or enhance HCVs and HCS in accordance with RSPO P&C criterion 7.12.	As of to date there are no replacement of primary forest or any area required to maintain or enhance HCVs and HCS in accordance with RSPO P&C criterion 7.12. It has been further confirmed through Global Risk Assessment Systems (GRAS).	Complied
Any new plantings since January 1 st 2010 shall comply with the RSPO New Plantings Procedure.	No new development since January 1 st 2010. It has been further confirmed through Global Risk Assessment Systems (GRAS).	Complied
Any Land conflicts are being resolved through a mutually agreed process, such as RSPO Complaints System or Dispute Settlement Facility, in accordance with RSPO P&C criteria 4.4, 4.5, 4.6, 4.7 and 4.8.	No land conflict.	Complied
Any Labor disputes are being resolved through a mutually agreed process, in accordance with RSPO P&C criterion 4.2	No labour dispute reported.	Complied
Any Legal non- compliance is being addressed through measures consistent with the requirements of RSPO	No legal non-compliance reported and found during the onsite audit.	Complied

RSPO P&C Public Summary Report **Revision 15 (Nov 2023)**

P&C criteria 2.1		
Did the company conduct internal audit for those uncertified estates against the uncertified management units requirement and covering the RSPO P&C criterion 2.1 4.2, 4.4, 4.5, 4.6, 4.7, 4.8 and 7.12? If yes, a positive assurance statement shall be available and justified.	Lahad Datu POM IA has yet to be conducted due to the mill has been ceasing its operation since its acquisition on 24/02/2022. Recomencing operation on 17/10/2023 – therefore IA expected to be conducted in January 2023.	Complied
Are there any Critical (Major) non-compliance raised against any of the RSPO P&C criterion 2.1 4.2, 4.4, 4.5, 4.6, 4.7, 4.8 and 7.12 during the last internal audit of the uncertified estates? If yes is the NC(s) actively addressed with RSPO?	No.	Complied
Have there been any stakeholder (including NGO) consultation conducted?	Yes.	Complied

3.2 Progress of scheme smallholders and/or outgrowers

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 as there are no scheme smallholders or scheme outgrowers under the certification unit.	Not Applicable

RSPO P&C Public Summary Report
Revision 15 (Nov 2023)

Approved Time Bound Plan

Name of the Unit of Certification (UoC)	Country	Name of the Mills and Supply Bases	Location Address	GPS Coordinates (in decimal degree)		Total Managed Area (Ha)	Certification Status (Certified / Not certified)	Plan Year for Certification	Actual Certification Year
				Latitude	Longitude				
Asia Production Unit	Malaysia	Asia Palm Oil Mill	KM45 Off Jalan Lahad Datu-Sandakan, 91100 Lahad Datu, Sabah	5.2923	118.2076	43.3800	Certified		2013
		Asia Oil Palm Estate 2	Sungai Tenegang, CL 095317383, Tenegang / Koyah, Kinabatangan, Sabah, Malaysia.	5.3047	118.1991	2,980.6200	Certified		2013
		Hwa Li 3	KM45, Jalan Lahad Datu-Sandakan	5.3449	118.3054	4,388.7100	Certified		2013
		Melewar Estate 2	KM45, Jalan Lahad Datu-Sandakan	5.2662	118.1598	2,023.4000	Certified		2013
Carotino Production Unit	Malaysia	Carotino Palm Oil Mill	PT 116, Lot No. 3840, Mukim Ulu Lepar, 26500 Kuantan, Pahang.	3.8162	102.8174	16.8000	Certified		2010
		Asia Oil Palm Estate 1	Lot 23599,23594,23595,23596,23597,23598, Mukim Ulu lepar, 26500 Kuantan, Pahang.	3.8279	102.7972	2,167.4200	Certified		2010
		Carotino Estate	Lot 2389, Mukim Bera, Bera, Pahang.	2.8453	102.7248	1,659.2100	Certified		2010

RSPO P&C Public Summary Report
Revision 15 (Nov 2023)

		Hwa Li 1	LOT 51, 52, 53, 54, 55, 56, 415, 406, 513, 523, 524, 317, 318, Mukim Keratong, Rompin, Pahang.	2.7440	103.0330	2,157.4000	Certified		2010
		Maran Estate	Lot 929, 6460, 245, 351, 957, 930, Mukim Ulu Lepar, 26500 Kuantan, Pahang.	3.7426	102.8454	2,120.4000	Certified		2010
		Pahang Oil Palm Estate 1	Lot No 23604, 23605, 23600, 23601, 23602, 23603, 23606, 23607 & 23608, Mukim Ulu Lepar, 26500 Kuantan, Pahang.	3.8098	102.8206	2,153.1000	Certified		2010
Melewar Palm Oil Mill	Malaysia	Melewar Palm Oil Mill	CL 095310400, KM46, Jalan Sandakan - Lahad Datu, Kinabatangan, Sabah, Malaysia	5.2726	118.0534	70.7700	Certified		2014
		Gerola Estate	CL 095310919, Mukim Sg. Koyah, Kinabatangan, Sabah, Malaysia	5.2052	118.0346	1,587.4000	Certified		2014
		Hwa Li 2	CL 095327218, CL 095310731, Mukim Tenegang Koyah, Kinabatangan 90200, Kinabatangan Sabah	5.3247	118.0458	3,007.2600	Certified		2023
		Melewar Estate 1	CL 095310400, Mukim Sg. Koyah, Kinabatangan, Sabah, Malaysia	5.2636	118.0635	2,252.4100	Certified		2014
		Muis Melewar Plantation 1	CL 105426784, Tawau, Sabah	4.4592	117.8484	2,320.0000	Certified		2022
		Muis Melewar Plantation 2	CL 245360523, Mukim Sungai Binuang, Ulu Tingkayu, Kunak, Sabah	4.6643	117.9022	1,793.0000	Certified		2022

RSPO P&C Public Summary Report
Revision 15 (Nov 2023)

		Pahang Oil Palm Estate 2	CL095317285, 17490, 17516, 17507, 17534, 17525, 25983, 38695, 38702, 38711, 38720, 38757, 38739, 39012, 38999, 39003, 38748, Kinabatangan, Sabah, Malaysia	5.2939	118.1394	2,852.7200	Certified		2014
		Pahang Oil Palm Estate 3	CL095317285, 17490, 17516, 17507, 17534, 17525, 25983, 38695, 38702, 38711, 38720, 38757, 38739, 39012, 38999, 39003, 38748, Kinabatangan, Sabah, Malaysia	5.3744	118.1385	2,619.3000	Certified		2014
		Tye Yang Estate	CL 095311407, Mukim Sg. Koyah, Kinabatangan, Sabah, Malaysia	5.2425	117.9996	3,759.9000	Certified		2014
	Malaysia	Lahad Datu Palm Oil Mill	CL 095327218, Mukim Tenegang Koyah, Kinabatangan 90200, Kinabatangan Sabah	5.3197	118.0425	15.7300	Not Certified	2025	

RSPO P&C Public Summary Report

Revision 15 (Nov 2023)

3.3 Details of Nonconformities

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

During this Assessment there were three (3) Critical; three (3) Minor nonconformities and none Opportunity For Improvement raised. The Asia Production Unit Certification unit submitted Corrective Action Plans for the nonconformity. Corrective action plans with respect to the nonconformity was reviewed by the BSI audit team and accepted.

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

Non-conformity			
NCR Ref #	2432181-202309-M1	Issued Date	07/12/2023
Due Date	06/03/2024	Closure Date	17/02/2024
Indicator & Category (Critical / Minor)	3.4.3 – Critical		
Statement of Nonconformity:	Social management and monitoring plan was not effectively implemented.		
Requirement Reference:	The social and environmental management and monitoring plan is implemented, reviewed and updated regularly in a participatory way.		
Objective Evidence:	Based on house census record for 1st half of 2023, 3 persons (1 worker and 2 dependents) were recorded under house #A05. Only one (1) dependent has been legalized and obtained a valid dependent pass/stay permit and the spouse has yet to be legalized. Discrepancy of information was evident based on the interview with management team and the said worker against house census record to identify the actual total occupancy per house/dwelling. Reference document: Environmental and Social Improvement Plan for 2023-2025 date review: 17/8/2023 Social aspect: Recruitment under dependent pass and stay permit Social impact: Delay/non-documented dependents affected the status of legalization.		
Corrections:	<p>The worker's occupancy per house census data will be updated on a monthly basis to ensure all house occupants are recorded accordingly. The compilation of house occupancy data then will be compiled by office clerk in charge and will be checked and verified by the management to avoid any discrepancy of data from actual census and compiled data census.</p> <p>Latest house census was performed on 07/12/2023. Management have confirmed that no other dependents that yet to be legalized. Re-briefing to all estate workers with regards to the company Sustainability Standard has been carried out on 07/12/2023.</p>		
Root Cause Analysis:	The worker's occupancy per house census data collection was carried out twice a year at 6-month intervals which had causes the discrepancy of the data obtained due to gap of period of census. Other than that, the actual data collected from the staffs in charge for census were not properly compiled by office clerks in charge with the compilations of census data. Legalization of the said dependent so that		

RSPO P&C Public Summary Report

Revision 15 (Nov 2023)

	the dependent is able to work was not able to be performed since the dependent was only visiting during the period of the visit pass.
Corrective Actions:	<ol style="list-style-type: none"> 1. Social management plan will be reviewed to capture on the issue of incoming dependent to the estate, their status of legalization and house census recording. 2. All incoming dependents that are planning to come and work or stay longer than the visiting pass (3 months) with the estate worker; husband/wife or family in the estates will require to provide data and copy of visit pass or relevant documents for work permit approval and long stay approval. Monitoring of dependents staying in the estate will be carried out during monthly housing census. 3. Should estate encounter any situation where dependent without having any valid pass/stay permit, management shall include those dependents in legalization programme. 4. Update on the legalization status of the dependents should be recorded properly. Communication with the recruitment agency will be performed closely.
Assessment Conclusion:	<p>Major NC close out verification:</p> <ol style="list-style-type: none"> 1) Latest census records dated 7/1/24 was verified. Total 345 occupants recorded and similar headcount recorded for December 2023 monitoring dated 7/12/23. 2) Re-briefing was carried out on 6/12/23 for all workers during muster briefing. Related records of attendance were verified. 3) Social Management Plan (SMP) review dated 7/12/23 was verified. Frequency of census from 6 monthly basis has been reviewed to monthly basis as to frequently monitor movement of occupants (workers and dependents) in the estate. 4) No additional occupants recorded based on latest census in January 2024. Previous legalization process is referred to; ref: MNK-RO/29/023 dated 26/10/23 for total of 13 dependents. The latest status as at 1/2/24 is still pending under Indonesian Consulate. <p>Implemented actions were found to be sufficient to close the major NC on 17/02/2024. Continuous implementation will be further verified in the next assessment.</p>

Non-conformity			
NCR Ref #	2432181-202309-M2	Issued Date	07/12/2023
Due Date	06/03/2024	Closure Date	17/02/2024
Indicator & Category (Critical / Minor)	3.8.16 – Critical		
Statement of Nonconformity:	RSPO certified volume sold under conventional was not removed in the RSPO IT Platform.		
Requirement Reference:	Registration of Transactions i) Shipping Announcement in the RSPO IT platform shall be carried out by the mills when RSPO certified products are sold as certified to refineries, crushers, and traders not more than three months after dispatch with the dispatch date being the Bill of Lading or the dispatch documentation date. ii) Remove: RSPO certified volumes sold under different scheme or as conventional,		

RSPO P&C Public Summary Report

Revision 15 (Nov 2023)

	or in case of underproduction, loss or damage shall be removed in the RSPO IT platform
Objective Evidence:	Based on verification of Mass Balance Record 2022/2023 and CPO Delivery Record; RSPO Certified CPO sold as conventional: 2,141.105 MT RSPO Certified PK sold as conventional: 90.231 MT Nov 2022 until Dec 2022 (expired license ID CB131083) However, based on verification through RSPO IT Platform Palm Trace, there was no evidence of removal made for both transactions.
Corrections:	Mill to execute removals starting from the accumulation of those RSPO certified products that are sold as conventional in RSPO IT Platform within current certificate period (License ID: CB146067, Validity: 15/04/2023 to 30/01/2024). A total of RSPO certified products sold as conventional which starts from 15/04/2023 to November 2023 will be removed immediately while the remaining removals will be carried out within 3 months after dispatch with the dispatch date being the Bill of Lading or the dispatch documentation date or upon reaching one or two months before license expiry, the removal of total transactions must be performed prior to license expiry.
Root Cause Analysis:	Person responsible for the shipping announcement is not fully aware of the RSPO certified products sold under conventional should be removed in the RSPO IT Platform where there is no specific reference of removal in Mill procedure.
Corrective Actions:	<ol style="list-style-type: none"> 1. Mill to review the Standard Operating Procedure of SCC Standard Mass Balance Calculation to capture the specific requirements of person responsible to perform removal on RSPO IT platform when RSPO certified products (CSPO & CSPK) are sold as conventional within 3 months the date of dispatch shipment documentation. If any RSPO certified products were sold as conventional upon reaching one or two months before license expiry, the removal of total transaction must be performed prior to license expiry. 2. Mill Manager to provide retraining to the person responsible on the specific changes of the procedure. 3. Mill to prepare the updated appointment letter and distribution list of the acceptance letter of a standard operating procedure (SOP) that have been updated. 4. Mill to update Weekly Critical Control Point (CCP) monitoring form to specifically insert the requirement of removal should such occasions arises. 5. All related records (communication, training, monitoring, etc.) to be kept accordingly.
Assessment Conclusion:	<p>Major NC close out verification:</p> <ol style="list-style-type: none"> 1) Removal record as at 6/2/2024 was verified via palmtrace. Total of 7,794.33 mt of CSPK, 22,773.46 mt of CSPO has been removed from account. 2) Review of SOP, SC/MBC-10/2023-MOM dated 12/12/2023 under clause 6.14: shipping announcement shall be carried out not more than 2 months after dispatch. 3) Distribution of the review SOP, date 12/12/2023 was sighted together with the record of briefing and training for the relevant PIC 4) Weekly critical control point monitoring (ref: CCP monitoring/01-03/2023) for December 2023 and January 2024 was verified.

RSPO P&C Public Summary Report

Revision 15 (Nov 2023)

	Implemented actions were found to be sufficient to close the major NC on 17/02/2024. Continuous implementation will be further verified in the next assessment.
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Non-conformity			
NCR Ref #	2432181-202309-M3	Issued Date	07/12/2023
Due Date	06/03/2024	Closure Date	17/02/2024
Indicator & Category (Critical / Minor)	2.1.1 – Critical		
Statement of Nonconformity:	Operating of fuel burning equipment in the estate not complying with applicable legal requirements.		
Requirement Reference:	The Unit of Certification complies with legal requirements.		
Objective Evidence:	<ul style="list-style-type: none"> • 2 Units of Diesel Genset (220 kW and 327 kW) at Melewar Estate Division 2 not having Written Notification under Regulation 5 of Environmental Quality (Clean Air) Regulations 2014. • 2 Units of Genset (112 kW & 150 kW) at Hwa Li Estate Division 3 Not having Written Notification under Regulation 5 of Environmental Quality (Clean Air) Regulations 2014. 		
Corrections:	Internal Control Team (ICT) and Sustainability/Administrative Manager have immediately generated a time bound plan to implement the said requirement. The implementation plan is inclusive of Asia Production Unit (Melewar Estate 2 and Hwa Li 3) and Melewar Production Unit.		
Root Cause Analysis:	Estate management was not fully aware on the requirement involving the application of written notification to Department of Environmental (DOE). Previously, it was known that the private installation license (Lesen bagi Pemasangan Persendirian) acquisition from Energy Commission is assumingly sufficient to adhere applicable laws related to estate's Genset.		
Corrective Actions:	<p>Any New Law/Regulations/Law Changes Compliances:</p> <ol style="list-style-type: none"> 1. Estate to re-read the updated list of law applicable to oil palm estate provided by the Internal Control Team/Sustainability Manager. Should there is any new law/regulations/law changes related to the estate, Internal Control Team/Sustainability Manager will discuss with Head Office/top management on the implementation of the law/regulations. Next step will be communication to the estates on the plan of the new law/regulations/law changes compliances. 2. Internal Control Team/Sustainability Manager will highlight specifically on the law list provided to the estates on new any law/regulations/law changes to be adhered to ensure estate management aware on the requirements. Estate may engage with Internal Control Team/Sustainability Manager for further clarification. <p>Specific Action Plan for Genset Written Notification:</p> <ol style="list-style-type: none"> 1. To study the requirement of written notification for Genset under Regulation 5 of Environmental Quality (Clean Air) Regulations 2014. 2. To obtain information with regards to the Genset available in the estates within the stipulated time frame. 		

RSPO P&C Public Summary Report

Revision 15 (Nov 2023)

	<p>3. To obtain at least three separate quotations from several service providers. The price and service offered will be discussed and analyzed.</p> <p>4. Selection of service provider to assist with the application submission to Department of Environmental (DOE).</p> <p>5. To generate a 3-year or 5-year progressive plan for each operating unit on the written notification submission to DOE. The selected service provider will help on the preparation and planning.</p> <p>6. Selected service provider to commence data gathering, document preparations and submission to DOE. Communication with the service provider with the estates on the progress must be documented properly.</p>
Assessment Conclusion:	<p>Major NC close out verification:</p> <p>1) Requirement under EQ, Clean Air Regulation 2014 has been reviewed by management team and a company wide time bound plan (TBP) is established to achieve 100% compliance in obtaining genset's written notification for all JC Chang/Carotino estates. Sherman Services & Supply has been appointed to assist the application submission to DOE. Refer to PO ref: PO00020357 dated 8/2/24 under Hwa Li 3 Estate was verified. Under JC Chang (TBP) dated 17/2/24, timeline for 2024 completion as per below:</p> <ul style="list-style-type: none"> - Onsite data collection/visit (March - April 2024) - Submission to DOE (May - August 2024) <p>2) Latest revision of legal register dated 17/2/24 was verified with the inclusion of EQ, Clean Air Regulation 2014. Email circulation from HQ dated 3/2/23 to all operating units were sighted.</p> <p>Implemented actions were found to be sufficient to close the major NC on 17/02/2024. Continuous implementation will be further verified in the next assessment.</p>

Non-conformity			
NCR Ref #	2432181-202309-N1	Issued Date	07/12/2023
Due Date	06/01/2024	Closure Date	"Open"
Indicator & Category (Critical / Minor)	6.4.1 – Minor		
Statement of Nonconformity:	Remediation for prohibition of child labour was not clearly defined in the established policy		
Requirement Reference:	A formal policy for the protection of children, including prohibition of child labour and remediation is in place, and included into service contracts and supplier agreements.		
Objective Evidence:	Child protection policy dated 20th February 2020 has yet to include remediation procedure to assist underage workers which found to be working in the plantation.		
Corrections:	Internal Control Team (ICT) and Sustainability/Administrative Manager from Head Office to immediately establish group guideline for the child labour remediation procedure.		

RSPO P&C Public Summary Report

Revision 15 (Nov 2023)

Root Cause Analysis:	Management unable to provide specific remediation procedure in such circumstances that child labour is happened to be present in the estate premises due to the internal audit checklist was not updated properly during the internal review of RSPO P&C MYNI.
Corrective Actions:	<ol style="list-style-type: none"> 1. ICT to generate proposal of the said guideline to Sustainability/Administrative Manager to capture the remediation procedure to assist underage workers which are found to be working in the plantation. 2. Sustainability/Administrative Manager will then review the updated guidelines and make improvement wherever necessary. 3. The updated guideline will be registered and circulated to all estate and mill via email. Estate and mill management should acknowledge the receipt of the said guideline and communicate the changes to all relevant personnel. Record of communication to be maintained properly. 4. Estate management should follow the established remediation procedure should there is any child labour detected on their premises. The management can request further advice from ICT or Sustainability/Administrative Manager whenever necessary. 5. All evidence of remediation (if any) should be documented and maintained accordingly. 6. Estate management to remind all workers with regards to the prohibition of child labour during muster call briefing. 7. Internal Control Team/Sustainability Manager will read thoroughly all requirements of the current RSPO P&C MYNI and future updates on the said documents prior to making decision of implementation and the revision of group Audit Checklist (T010).
Assessment Conclusion:	The corrective action is accepted. Effectiveness of corrective action taken will be further verified in the next assessment.

Non-conformity			
NCR Ref #	2432181-202309-N2	Issued Date	07/12/2023
Due Date	06/01/2024	Closure Date	"Open"
Indicator & Category (Critical / Minor)	7.11.3 – Minor		
Statement of Nonconformity:	Engagement on fire prevention between estates and adjacent stakeholders was not fully executed as per procedure established		
Requirement Reference:	The unit of certification engages with adjacent stakeholders on fire prevention and control measures.		
Objective Evidence:	Based on Stakeholder's Minutes of Meeting dated 20/09/2023 for Asia Production Unit, verification made at Hwa Li Estate Div.3 on the communication for fire prevention was only related to Drain Field Barrier for Fire Prevention. However it was not in accordance with procedure under Section Engagement of Stakeholder for Fire Prevention and Control Measures dated 18/10/2019 "This exercise should be performed only to those stakeholders where their property is adjacent to our property and with risk of fire encountered. During the stakeholder consultation, the management should discuss issue such as: Risk of fire encounter, method of		

RSPO P&C Public Summary Report

Revision 15 (Nov 2023)

	fire prevention and control and type of engagement request and agreed by stakeholder. The record of consultation and evidence of implementation should be properly documented and file accordingly." The above records was not evident for verification.
Corrections:	Stakeholder consultation will be carried out with the adjacent neighbouring stakeholders focusing on the issues such as Risk of fire encounter, method of fire prevention and control and type of engagement request which agreed by stakeholders.
Root Cause Analysis:	During the meeting with stakeholders meeting, specific agenda pertaining on fire prevention plan and control measure were not discussed thoroughly; hence, the issues such as Risk of fire encounter, method of fire prevention and control and type of engagement request and agreed by stakeholder were not communicated and discussed accordingly.
Corrective Actions:	<ol style="list-style-type: none"> 1. This exercise will be performed during every Stakeholder Meeting. Risk of fire encounter, method of fire prevention and control and type of engagement request and agreed by stakeholder. 2. Feedback from the neighbouring stakeholders including their method of fire prevention, the availability of manpower and equipment and risk control with regards to field fire should be acquired from them. If necessary, a detailed discussion could be performed should such occasion arises. 3. The record of consultation and evidence of implementation will be documented properly and file accordingly.
Assessment Conclusion:	The corrective action is accepted. Effectiveness of corrective action taken will be further verified in the next assessment.

Non-conformity			
NCR Ref #	2432181-202309-N3	Issued Date	07/12/2023
Due Date	06/01/2024	Closure Date	"Open"
Indicator & Category (Critical / Minor)	2.1.2 – Minor		
Statement of Nonconformity:	The documented system and means to track updated and changes of applicable legal requirements not effectively implemented and specific details requirements not clearly established for compliance monitoring purpose.		
Requirement Reference:	A documented system for ensuring legal compliance is in place. This system has a means to track changes to the laws and regulations.		
Objective Evidence:	<ul style="list-style-type: none"> • Environmental Quality Order (Prohibition On The Use Of Chlorofluorocarbons And Other Gases As Propellants And Expanding Agents) 1993 • Environmental Quality (Refrigerant Management) Regulations 2020 • Factories and Machinery Regulations such as Person In-charge (amendment) Regulations 2014, Notification, Certificate Of Fitness And Inspection Regulations, 1970 • Occupational Safety and Health such as CLASS Regulations 2013, NADOPOD Regulations 2004, SHC Regulations 1996. • Fire Services (Fire Certificate) (Amendment) Regulations 2020 		

RSPO P&C Public Summary Report

Revision 15 (Nov 2023)

	<ul style="list-style-type: none"> • Fire Services (Designated Premise) (Amendment) Orders 2020 • Fire Services (Halon) Regulations 1999 • Poisons Act 1952 • Poison (Sodium Hydroxide) Regulations 1962. • Pesticides (Labelling) Regulations 1984 • Sabah Water Resources Enactment 1998 (Sabah No. 6 of 1998) for extracting water body (Reg. 17)
Corrections:	Legal register to be reviewed in detail to ensure all laws and regulations are captured and to summarize the requirement to be complied for each law and regulations.
Root Cause Analysis:	System to track changes to the laws and regulations is in place but however, the legal register including specific detail requirements was not comprehensively updated to capture all laws and regulations which are applicable to oil palm industry.
Corrective Actions:	<ol style="list-style-type: none"> 1. A standardized legal register will be established to ensure the register is updated consistently throughout the Group. The list will be further checked by the Sustainability Manager. The legal register will then be circulated to all operating units via email. 2. To ensure the legal register is updated comprehensively, Lead Auditor for each operating unit will access the subscribed website (www.lawnet.com.my) at the end of every month to track for any relevant changes that will affect the oil palm industry, both for estates and mill. This practice should be continued as per group guideline E005 (Mechanism to Trace Changes in Legal Requirements) requirement. 3. Internal Control Team (ICT) and Sustainability/Administrative Manager will update the register should there is any amendment/changes/additional of laws and regulations applicable to oil palm industry and will communicate with all operating units via email. 4. Upon receiving the updates, estate/mill will treat the information as law changes or new law. Communication with all relevant personnel will be performed with regards to the law changes/new law requirement wherever necessary. 5. Evidence of law changes communication will be recorded and documented properly.
Assessment Conclusion:	The corrective action is accepted. Effectiveness of corrective action taken will be further verified in the next assessment.

Opportunity for Improvements	
OFI #	Description
OFI 1	N/A

Positive Findings	
PF #	Description
PF 1	Good cooperation given by ICT and site management team

PF 2	Good estate and mill management practices effectively demonstrated
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3.3.1 Status of Nonconformities Previously Identified and Opportunity for Improvement

Previous Audit Critical (Major) Non-conformity			
NCR Ref #	2281103-202212-M1	Issued Date	01/12/2022
Due Date	30/02/2023	Closure Date	22/02/2023
Indicator & Category (Critical / Minor)	3.6.1 - Critical		
Statement of Nonconformity:	Hazards were not effectively identified and controlled.		
Requirement Reference:	All operations are risk assessed to identify H&S issues. Mitigation plans and procedures are documented and implemented.		
Objective Evidence:	<u>Asia POM</u> 1. During the site visit to the Boiler Station, it was seen that 2 shovels were in motion without reverse siren. The hazards and risk controls related to this operation were not fully identified and assessed in the HIRARC. 2. During the site visit to the FFB Ramp it was sighted that the FFB graders were wearing Gardener Hats. This was not in line with the HIRARC for Grading which states; Suitable PPE is provided: Safety Helmet & Gardener Hat.		
Corrections:	1. Person responsible for monitoring HIRARC (Hazard Identification, Risk Assessment & Risk Control) was appointed to ensure all hazards and risk controls in the mill are properly captured. 2. Mill has prepared a Safety Operation Procedures for Vehicle (Doc. No. Mill vehicle ORA2022 dated 30th November 2022) to cover safety aspects of mill vehicle operations. 3. Mill Vehicle Management Briefing and Training was carried out immediately to all related workforce on 30th November 2022. 4. Mill has submitted Purchase Order dated 29th November 2022 on the list of materials for the purpose of repairing of the shovel's faulty equipment and the issues have been rectified on 9th December 2022. 5. Interview with workers to review the FFB Grading HIRARC and FFB Grader Training and Briefing (Safety & Use of PPE) were carried out on 30th November 2022. 6. Person responsible for monitoring of PPE (Personal Protective Equipment) at Grading Station was appointed to ensure the issuance, maintenance and implementation of PPE for FFB Graders are in line with the HIRARC requirement.		
Root Cause Analysis:	Review of mill HIRARC was not comprehensive to cover all work activity in the mill. The implementation of mill HIRARC was not properly adhered due to miscommunication between management and the workers.		
Corrective Actions:	1. Mill to review existing mill HIRARC to ensure all work activities in the mill are properly captured and addressed. 2. Mill to follow all risk control available in the HIRARC without fail.		

	<p>3. All records of mill vehicle inspection and repair to be kept properly. Operation of any damaged vehicle will be stop temporarily until the issues have been rectified.</p> <p>4. Mill to immediately review HIRARC should there is any new activity/process/changes in operation.</p> <p>5. All record of related documentation to be kept accordingly.</p>
Assessment Conclusion:	<p>Critical NC Onsite Close Out Verification</p> <p>1. Appointment of person in charge for monitoring of HIRARC dated 30/11/2022 was sighted. Details of duties and responsibilities as person in charge clearly written in the appointment letter.</p> <p>2. Safety Operation Procedures for Vehicle (Doc. No. Mill vehicle ORA2022 dated 30/11/2022 was verified. Related safety precaution for vehicle operation and maintenance detailed out in the SOP.</p> <p>3. Vehicle Management Briefing and Training was carried out immediately to all related workforce on 30/11/2022. Related training records were made available for verification.</p> <p>4. Purchase Order dated 29/11/2022 on the list of materials for the purpose of repairing of the shovel's faulty equipment and the issues have been rectified on 9th December 2022. Inspection was carried during site visit and found all safety features for shovel are fully functional.</p> <p>5. FFB Grading HIRARC and FFB Grader Training and Briefing (Safety & Use of PPE) were carried out on 30/11/2022. Related records for briefing was made available for verification.</p> <p>6. Person responsible for monitoring of PPE (Personal Protective Equipment) at Grading Station was appointed to ensure the issuance, maintenance and implementation of PPE for FFB Graders are in line with the HIRARC requirement. Refer to appointment letter dated 30/11/2022.</p> <p>7. To ensure all activities and operations capture under HIRARC, quarterly safety meeting is used for frequent review process. One of mandatory agenda pertaining to HIRARC has been included beginning the first quarterly safety meeting for 2023. Meeting of meeting dated 01/02/2023 was sighted and included HIRARC review for first quarter of 2023.</p> <p>8. Vehicle inspection and repair records for prime movers were sighted. Logbook/sheet of shovel repair request was sighted. Latest repair recorded on 18/01/2023 due to problem with starter and rectified on 20/01/2023. Preventive maintenance programme was sighted and related maintenance records were properly kept for reference.</p> <p>9. HIRARC register, latest review on 16/01/2023 was sighted. Specific HIRARC for vehicle operation and loading ramp activities were included in the register. Risk rating and control measure clearly determined to ensure properly control were in place.</p> <p>Implemented corrective action found to be sufficient to close the major NC effectively on 22/02/2023. Continuous implementation will be further verified in the next assessment.</p>
Effectiveness Closure (for previous audit closed Critical NC):	<p>Showel sighted operating with emergency light and buzzer. As verified Hirarc reviewed on 09/01/2023 and next review on 09/01/2024. Approved by Stephene Lee Khing Wen (Manager/Engineer) that include Showel Operation accordingly.</p> <p>Observed at FFB Ramp sighted that the FFB graders were wearing Safety Helmet as HIRARC for Grading and PPE Matrix. Thus, the previous major NC is remained closed.</p>

RSPO P&C Public Summary Report

Revision 15 (Nov 2023)

Previous Audit Critical (Major) Non-conformity															
NCR Ref #	2281103-202212-M2	Issued Date	01/12/2022												
Due Date	30/02/2023	Closure Date	22/02/2023												
Indicator & Category (Critical / Minor)	3.8.7 (Critical)														
Statement of Nonconformity:	Mill has not informed CB on projected overproduction of certified tonnage.														
Requirement Reference:	Purchasing and Goods In ii. The mill shall inform the CB immediately if there is a projected overproduction of certified tonnage.														
Objective Evidence:	<p>There has been an over production of CPO, PK and FFB as stated in the table below.</p> <table border="1"> <thead> <tr> <th>Period</th><th>CPO</th><th>PK</th><th>FFB</th></tr> </thead> <tbody> <tr> <td>Forecast (Jan 22 – Dec 22)</td><td>22,730.25</td><td>5,697.87</td><td>122,535.00</td></tr> <tr> <td>Actual Produced (Jan 22 – Oct 22)</td><td>25,303.62</td><td>6,204.62</td><td>124,290.10</td></tr> </tbody> </table> <p>It was verified that Asia POM have not informed the CB on the overproduction of the certified tonnage despite the volume already surpassing the forecast provided.</p>			Period	CPO	PK	FFB	Forecast (Jan 22 – Dec 22)	22,730.25	5,697.87	122,535.00	Actual Produced (Jan 22 – Oct 22)	25,303.62	6,204.62	124,290.10
Period	CPO	PK	FFB												
Forecast (Jan 22 – Dec 22)	22,730.25	5,697.87	122,535.00												
Actual Produced (Jan 22 – Oct 22)	25,303.62	6,204.62	124,290.10												
Corrections:	Email to request CPO, PK and FFB extension for the month of October 2022 to December 2022 has been sent to CB on 2nd December 2022 by management representative, Mr. Wong Chun Wei. The volume extension for Asia Palm Oil Mill has been approved by RSPO via email dated 13th December 2022.														
Root Cause Analysis:	Person responsible on documentation was not fully aware on the overproduction of CPO & PK where no specific indication of notification to CB in mill procedure.														
Corrective Actions:	<p>1. Mill to review the SOP of MB methodology to capture the specific requirement to notify CB should there is any overproduction. Mill to immediately notify ICT (Internal Control Team) should the quantity produced is reaching 80% of the quantity of CSPO & CSPK claimed for certification via email. ICT will forward the issue to Head Office for further process.</p> <p>2. Mill to review the appointment letter of the person responsible and CCP monitoring in order to monitor the production of CPO & PK on monthly basis in detail.</p> <p>3. Retraining to the person responsible on the specific changes on the procedure and CCP monitoring form to be performed.</p> <p>All related records (communication, training, monitoring, etc.) to be kept accordingly.</p>														
Assessment Conclusion:	1. CPO, PK and FFB extension request for the month of October 2022 to December 2022 has been sent to CB on 02/12/2022 by management representative, Mr. Wong Chun Wei. The volume extension for Asia Palm Oil Mill has been approved by RSPO via email dated 13/12/2022. Total of FFB volume including 3 months extension recorded at 157,000 mt. Monitoring of FFB received and RSPO product sold was														

RSPO P&C Public Summary Report

Revision 15 (Nov 2023)

	<p>done on monthly basis and as at 09/02/2023, total FFB received has reached 85.87% of allocated volume (certificate and volume extension) and a request was made to HQ for additional volume extension. The monitoring has triggered the needs to initiate volume extension request once hit 80% of the allocated volume.</p> <p>2. Appointment for person in charge responsible on the specific changes on the procedure and CCP monitoring form to be performed was sighted. Refer to letter dated 10/12/2022 issued by mill manager.</p> <p>3. SOP for has been revised under section 5.12 to include statement " Mill to immediately notify ICT (Internal Control Team) should the quantity produced reaching 80% of the quantity of CSPO and CSPK claimed for certification via emails. ICT will forward the issue to head office for further process.</p> <p>Implemented corrective action found to be sufficient to close the major NC effectively on 22/2/2023. Continuous implementation will be further verified in the next assessment.</p>
Effectiveness Closure (for previous audit closed Critical NC):	Based on verification of Mass Balance Sheet and RSPO It Platform, there is no overproduction of CPO and PK. Cross check with production based on licence period found in order. For upcoming, management has sent Request for volume extension for period Dec 2023 until Jan 2024 as per email dated 04/12/2023. Latest communication with CB for volume extension was verified on 06/12/2023. Based on interview with person in charge, she aware on to notify CB id any extension volume issue. Thus, the previous major NC is remained closed.

Previous Audit Minor Non-conformity			
NCR Ref #	2281103-202212-N1	Issued Date	01/12/2022
Due Date	07/12/2023	Closure Date	07/12/2023
Indicator & Category (Critical / Minor)	3.3.2 – Minor		
Statement of Nonconformity:	The procedures were not effectively implemented.		
Requirement Reference:	A mechanism to check consistent implementation of procedures is in place.		
Objective Evidence:	<u>Hwa Li Estate Div.3 Estate</u> During the visit to the Spraying Gang at Hwa Li Estate Div.3, the first aid box was inspected. It was sighted that the first aid box contained an expired item (Eye Medicine – Expired July 2022). This was not in line with the procedure – Guidelines on First Aid in the Workplace; Doc. Ref. No.: M/025-02/2014; Subject: First Aid Guidelines; Document Date: 21/09/2014 which states "materials used, expired or spoiled medication should be replaced as soon as possible". It was noted that monthly monitoring has been done yet the expired item has not been replaced.		
Corrections:	All first aid boxes were gathered by estate HA (Hospital Assistant) to recheck in detail on all first aid items especially items with expiry dates and replacement of the mentioned eye medicine have been carried out.		
Root Cause Analysis:	SOP monitoring for Spraying operation (specific on the First Aid inspection prior work commence) was not implemented effectively where one worker of the Spraying Gang was accidentally replaced the first aid item i.e. eye medicine with the expired one without informing the first aider/HA.		

Corrective Actions:	<p>1. Weekly SOP monitoring for Spraying operation to be amended specifically to include the requirement of First Aid inspection prior work commencement. Staff in charge/First Aider must ensure First Aid is in good condition as per Group Guideline M025 (Guideline on First Aid in the Workplace) and will be safely brought at all times during work. Staff in charge/First Aider will inform HA of any missing/expired First Aid item and will be rectified immediately.</p> <p>2. Estate to perform re-briefing to all estate workers on the first aid items to ensure that no replacement of any item by their own except estate HA and to properly record in the form should there is any usage of first aid box items. Record of briefing to be kept in the muster call briefing book.</p> <p>3. HA to perform retraining to all first aiders who fully in charge of first aid box to prevent repeating issue.</p> <p>4. HA to ensure all first aid box are inspected thoroughly during monthly first aid box inspection as per group guideline M025. Any expired item should be replaced immediately and recorded properly.</p> <p>5. All related records to be kept accordingly.</p>
Assessment Conclusion:	<p>The submitted CAP detailing on proposed actions to be taken to address the raised minor nonconformity, based on the root cause identified were reviewed and deemed to be appropriate. Thus, the effectiveness of the CAP will be verified during the next surveillance assessment.</p> <p>Monthly inspection by EHA for Workshop (No. 35) was conducted accordingly. First Aid Training was conducted on 19/05/2023 attended by 52 workers and staff all passed.</p>

Previous Audit Minor Non-conformity			
NCR Ref #	2281103-202212-N2	Issued Date	01/12/2022
Due Date	07/12/2023	Closure Date	07/12/2023
Indicator & Category (Critical / Minor)	3.5.2 (Minor)		
Statement of Nonconformity:	Employment contracts from all sampled based are not being monitor for using the latest revise version.		
Requirement Reference:	<p>Criterion 3.5 - A system for managing human resources is in place.</p> <p>- Employment procedures are implemented, and records are maintained.</p>		
Objective Evidence:	<p>Document review of employment contract for foreign worker found that Asia Palm Oil Mill, Asia Oil Palm Estate 2, Hwa Li Estate 3 and Melewar Estate 2 still used the old version of 'Perjanjian Pekerjaan (Bukan Warganegara) which is still exist with Clause 13.</p> <p>The old version is not in line with the latest revise version of Appendix 2, Employment Contract (Perjanjian Pekerjaan - Bukan Warganegara) as per Guidelines on Workers Employment Terms and Conditions for Sabah Estate Workers, Doc. No.: E/009-08/2021 updated 22/12/2021 issued by HR Department.</p>		
Corrections:	Amendment on the Appendix 2, Employment Contract (Perjanjian Pekerjaan – Bukan Warganegara) as per Guidelines on Workers Employment Terms and Conditions for Sabah Estate Workers, E009 and Guidelines on terms & conditions		

	of employment for Sabah's Mill workers, E013 were carried out and circulated to all operating units via email on 28th November 2022 and 1st December 2022 respectively. Date of review was added on the revised version of contract agreement for systematic monitoring approach.
Root Cause Analysis:	Old version of contract agreement was used during contract agreement issuance due to operating units were unaware of the latest version of contract agreement circulated by Head Office and no specific date of review stated on the contract agreement itself.
Corrective Actions:	<ol style="list-style-type: none"> 1. Operating units to be more aware on any updates on procedure/guideline circulated by Head Office via daily checking of company email by person in charge. New and changes of group procedure/guideline must be communicated to the management and/or relevant personnel and implement it wherever necessary. 2. Existing current contract agreement to be maintained thus, no contract substitution is allowed. Any amendment on the contract agreement to be captured in the detail of changes of contract agreement which appended together with the contract agreement. Operating unit to communicate with all foreign workers on the changes of the Clause 13. 3. New version of contract agreement to be used whenever there is any new workers recruited by the operating unit. 4. Operating unit to ensure all details in the contract agreement are complete and precise.
Assessment Conclusion:	For the recruitment and extension of contract, clause 13 of the contract has been removed to ensure consistent implementation with the Guidelines on Workers Employment Terms and Conditions for Sabah Estate Workers, Doc. No.: E/009-08/2021 updated 22/12/2021. From the sample of contracts reviewed, no evidence of the old contract has been used thus the previous minor NC was closed on 7/12/2023. Continuous implementation will be further verified in the next assessment.

Previous Audit Opportunity for Improvement	
OFI#	Description
OFI 1	<p>OFI Statement: 2281103-202212-I1 <u>Indicator 7.3.1</u> Asia Oil Palm Estate 2 The implementation of waste management plan for clinical waste could be further improved on promptness of collection from temporary location to designated storage area.</p> <p>Verification / Follow-up actions: Sighted evidence on inventory record for SW404 Clinical waste was updated. Sample verification, disposal has been made at Hwa Li 3</p> <ul style="list-style-type: none"> • Disposal consignment note: JASSHQ600338. • Date Disposal: 30/11/2023 • SW404: Clinical waste: 0.025 MT by Sedafiat Sdn Bhd

	The temporary storage for clinical waste was verified at sampled estates and found in accordance with waste management plan.
OFI 2	<p>OFI Statement: 2281103-202212-I2 Indicator 2.2.2 Asia Oil Palm Estate 2, Hwa Li Estate 3 and Melewar Estate 2 The replanting contractor shall improve on their worker's payslip to include employer contribution on EPF, SOCSO and SIP Insurance.</p> <p>Verification / Follow-up actions: As part of contractor's due diligence process, contractor's workers payslip has been vet through to ensure that the format is standardize for all.</p>
OFI 3	<p>OFI Statement: 2281103-202212-I3 Indicator 6.2.6 Asia Production Unit The management may enhance the assessment to include calculation with latest revised minimum wages of MYR 1,500.00 per month into Guideline of Implementation Plan for Decent Living Wage for better understanding.</p> <p>Verification / Follow-up actions: SOP Living wages (LW) has been established and documented in the document title "Implementation plan for living wage (LW)" document number E/027-02/2023 and 07/11/2023. The assessment has been done through data collection from financial year 20/21 until financial year 22/23. Information that has been collected is average wages received for all operating units located Pahang and Sabah states (Mill and Estate) and benefits in kinds that has been provided by the operating. This review has incorporated the latest revised minimum wages of MYR 1,500.00 in the said assessment.</p>
OFI 4	<p>OFI Statement: 2281103-202212-I4 Indicator 6.2.2. Asia Production Unit The worker master list can be improved on the monitoring period of workers passport and work permits validity.</p> <p>Verification / Follow-up actions: Master list of workers has included the information required for monitoring of workers passport and work permits validity.</p>

3.3.2 Summary of the Nonconformities and Status

CAR Ref.	Category (Critical / Minor)	P&C Indicator	Issued Date	Status & Date (Closure)
2281103-202212-M1	Critical	3.6.1	01/12/2022	Closed on 22/02/2023

RSPO P&C Public Summary Report

Revision 15 (Nov 2023)

2281103-202212-M2	Critical	3.8.7	01/12/2022	Closed on 22/02/2023
2281103-202212-N1	Minor	3.3.2	01/12/2022	Closed on 07/12/2023
2281103-202212-N2	Minor	3.5.2	01/12/2022	Closed on 07/12/2023
2432181-202309-M1	Critical	3.4.3	07/12/2023	Closed on 17/02/2024
2432181-202309-M2	Critical	3.8.16	07/12/2023	Closed on 17/02/2024
2432181-202309-M3	Critical	2.1.1	07/12/2023	Closed on 17/02/2024
2432181-202309-N1	Minor	6.4.1	07/12/2023	"Open"
2432181-202309-N2	Minor	7.11.3	07/12/2023	"Open"
2432181-202309-N3	Minor	2.1.2	07/12/2023	"Open"

3.4 Stakeholders and previous land owner / user consultation

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

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

Structured worker interviews with male and female workers and staff were held in private at the workplace. 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.

Stakeholders contacted		
Type of Stakeholder (e.g. Internal, Union, Contractor, Governmental Department, NGO, External, Communities)	Stakeholder name / organization	Means of communication (e.g. face to face interview, email, phone interview, comment from public notice)
Contractor	Kong Cheng Co	Face to face meeting
External FFB suppliers/smallholders	Kebaco Sdn Bhd, Benar Waris, Jayatas	Face to face meeting
External (neighbouring estate)	Sentrabayu Estate, Sayongmas Plantation Sdn Bhd	Face to face meeting
External/communities	Kg Koyah B, Benar Waris	Face to face meeting
Internal	Estate/mill workers, JCC committee, gender committee	Face to face meeting

Stakeholders comment	
1	Feedbacks: Contractors & suppliers (Kong Cheng Co,) The contractor/supplier confirmed good relationship with the certification units. Contracts are available and all terms of the contract are understood. The terms of the contract are fair, and the contract sum was freely negotiated. Payments are received on time, i.e., paid within a month after issuance of invoice.
	Audit Team verification and response: No further issue.
2	Feedbacks: Gender Representatives – They are aware of the function of the committee and reported that there was no sexual harassment case reported. New mothers needs assessment were also discussed during every gender committee meetings.
	Audit Team verification and response: No further issue.
3	Feedbacks: Joint Consultative Council (JCC) (Indonesia, Philippines): No issue with the management and always open for consultation and assistance. Equal opportunity to all workers regardless of their nationality, gender and race. Appointment of JCC members are by election process and no involvement of management in the process.
	Audit Team verification and response: No further issue.
4	Feedbacks: CLC teacher/tutor: CLC is located within all visited estate. Good cooperation given by the estate management towards maintaining the school building and any other assistance as and when required.
	Audit Team verification and response: No further issue.
5	Feedbacks: Neighbouring Estate: They are boundaries established with trenches and markings. There was no land dispute which both estates have their own legal ownership from Sabah state government. Good relationships has been maintained and issues will be discussed through meeting and phone call. He also aware method/mechanism of communication if there is any issues related to land. Access roads have been well maintained by users/estates (cost sharing basis) and prompt response done by management in handling any request and complaints.
	Audit Team verification and response: No further issue.
6	Feedbacks: External FFB suppliers/smallholders (Kebaco Sdn Bhd, Benar Waris, Jayatas) They have option to sell their crop to other palm oil mill as there was no exclusivity or binding contract between both parties. On the pricing mechanism, regular meetings either group or one to one session were carried out by mill management team. Past and current price are accessible by them and displayed at weighbridge. Payment was promptly done as per the agreed time frame. The also aware on the

RSPO P&C Public Summary Report

Revision 15 (Nov 2023)

	"Smallholder Support Program" established by JC Chang. Based on interview, the have no interest in getting RSPO certification as for now.
	Audit Team verification and response: No further issue.



List of land owner / user contacted					
Name	Years of ownership / used	Land area (ha)	Agreement (Yes / No)	Agreement base on FPIC (Yes/No)	Compliance on the agreement terms and conditions
Not Applicable as all estates under Asia Production Unit have undergone 2 nd Cycle of Replanting.					

Previous land owner / user comment	
NA	Feedbacks:
	Audit Team verification and response:

3.5 Impartiality and conflict of interest

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

Formal Signing-off of Assessment Conclusion and Recommendation

<p>The audit objectives have been achieved and the certificate scope is appropriate. Based on the results of this audit, it is concluded that Asia Production Unit has complied with the Malaysia National Interpretation 2019 of the RSPO P&C 2018 and audit criteria identified within the audit report. It is deemed that the management system has achieved its intended outcomes. Therefore, it is recommended that Asia Production Unit is certified.</p>	
Report prepared by	Acceptance of Assessment Conclusion
Name: Mohamed Hidhir Bin Zainal Abidin	Name: Stephen Lee Khing Wen
Company Name: BSI Services Malaysia Sdn Bhd	Company Name: Asia Palm Oil Mill
Title: Lead Auditor	Title: Mill Manager
Signature: 	Signature: <i>(I the undersigned, being the most senior relevant management representative of the operation seeking or holding certification, agree with the contents of this report and accept the liability in execution of the procedure in the report.)</i> 
Date: 8 th April 2024	Date: 8/4/24

RSPO P&C Public Summary Report
Revision 15 (Nov 2023)

Appendix A: Summary of Findings

Criterion / Indicator		Assessment Findings	Compliance
Principle 1: Behave ethically and transparently			
Criterion 1.1: The unit of certification provides adequate information to relevant stakeholders on environmental, social and legal issues relevant to RSPO Criteria, in appropriate languages and forms to allow for effective participation in decision making.			
1.1.1	(C) Documents that are specified in the RSPO P&C are made available to the public. - Critical (Major) compliance -	<p>Similarly compared to previous assessment, JC Chang Group has continued to made available public information relating to RSPO P&C such as land titles, safety and health plans, Good Agricultural Practices, SOP on Mechanism for Communication and Consultation, SOP For Identifying Legal And Customary Rights and Identifying People Entitled to Compensation, HCV documentation, pollution prevention plans, SEIA report, details of complaints and grievances, negotiation procedures, continuous improvement plans, public summary of RSPO audit reports, human rights policy. Some of these are available on the notice boards such as the human rights policy, grievance procedures, and the rest are available and accessible at the office.</p> <p>Guidelines on Mechanism for Information Requests by Stakeholders (Doc. Ref. No. E/006-08/2019) dated 18 August 2019 is still valid and similar compared to previous assessment. This document identifies stakeholders eligible for information as those listed in the list of stakeholders. The Guidelines also lists the information that can be requested which include environmental (Soil and water conservation, riparian zone management, HCV) social information (social impacts and improvement, safety, health and welfare, details of complaints and grievance, consultation and communication procedure, JCC and gender committee meeting minutes, etc) legal information (licenses and permits, land rights, estate map,</p>	Complied

RSPO P&C Public Summary Report
Revision 15 (Nov 2023)

		continuous improvement plan, policies, public summary of certification assessment reports). The Guidelines also identifies restricted documents such as data that affects personal privacy, records of account, revenue, legal documents, yield data, and ongoing disputes where disclosure would result in potential negative outcomes. All the above information is also available on the Company's website www.carotino.com	
1.1.2	Information is provided in appropriate languages and accessible to relevant stakeholders. - Minor compliance -	Information provided in appropriate languages and accessible to relevant stakeholders in the mill and all estate within APU. Other public information relevant to sustainability also available from the company's website as per link http://www.carotino.com/group-mission-and-management-plan-16.aspx .	Complied
1.1.3	(C) Records of requests for information and responses are maintained. - Critical (Major) compliance -	Records of request for such information and copies of the responses are being maintained in the relevant files and verified during the audit. No specific request for information recorded in the request book and verified at all visited operating units. Details of other request such as donation reported under indicator 4.3.1	Complied
1.1.4	(C) Consultation and communication procedures are documented, disclosed, implemented, made available, and explained to all relevant stakeholders by nominated representative. - Critical (Major) compliance -	The consultation and communication procedure available for the JC Chang Group is the SOP on Mechanism for Communication and Consultation (Doc. Ref. No. E/004-08/2019) dated 12 August 2019. This procedure specifies the mechanism of communication and consultation with all its stakeholders. There are three methods of communication and consultations; i.e. via the Joint Consultative Meeting (for workers), verbal or written complaints and using the complaint box located outside the office of each unit (for all stakeholders including all employees, neighbouring estates, smallholders, NGOs, business associates, NGOs, etc). Nominated representative is the estate manager and assisted by estate assistant manager. Consultation and communication	Complied

RSPO P&C Public Summary Report
Revision 15 (Nov 2023)

		procedures explained during stakeholder meeting. For example the latest stakeholder meeting was carried out on 20/09/23 for Asia Production Unit @ APU.									
1.1.5	There is a current list of contact and details of stakeholders and their nominated representatives. - Minor compliance -	<div>Current list of contact and details of stakeholders and the nominated representatives available for verification. A few categories of stakeholders have been identified in the list, i.e contractor, villagers/communities, NGOs etc. Updated list for verified as per the following:</div> <table><tr><td>Estate</td><td>Date review/update</td></tr><tr><td>Melewar Estate 2</td><td>24/11/2023</td></tr><tr><td>Hwa Li 3</td><td>15/11/2023</td></tr><tr><td>Asia Oil Palm Estate 2</td><td>1/10/2023</td></tr></table>	Estate	Date review/update	Melewar Estate 2	24/11/2023	Hwa Li 3	15/11/2023	Asia Oil Palm Estate 2	1/10/2023	Complied
Estate	Date review/update										
Melewar Estate 2	24/11/2023										
Hwa Li 3	15/11/2023										
Asia Oil Palm Estate 2	1/10/2023										
Criterion 1.2: The unit of certification commits to ethical conduct in all business operations and transactions.											
1.2.1	A policy for ethical conduct is in place and implemented in all business operations and transactions, including recruitment and contracts. - Minor compliance -	JC Chang Group has established as few policies with regards to ethical conduct in all business operations and transactions, including recruitment and contracts. Among established policies sighted: i) Corruption Prevention Policy dated 4 th September 2015. ii) Social and Human Rights Policy dated 14 th November 2019 iii) Equal Opportunities dated 12 th August 2019	Complied								
1.2.2	A system is in place to monitor compliance and the implementation of the policy and overall ethical business practice. - Minor compliance -	System to monitor compliance and implementation of policy and ethical business practice is based on sustainability compliance clause, E023-01/2019 and due diligence and ethical conduct questionnaire contract, E024-02/2020. Self-declaration shall be made by the contractor/vendor/supplier to ensure that business partner is fully informed with the intent of JC Chang Group Policy on fair business conduct.	Complied								

RSPO P&C Public Summary Report
Revision 15 (Nov 2023)

		Sample of self-declaration for labour supplier (<i>Agensi Pekerjaan MNK SDN BHD</i>) signed on 17/3/2020, Fong Cheng Co – replanting contractor signed on 2/10/23 were made available for verification.	
Principle 2: Operate legally and respect rights			
Criterion 2.1: There is compliance with all applicable local, national and ratified international laws and regulations.			
2.1.1	(C) The Unit of Certification complies with legal requirements - Critical (Major) compliance -	<u>Melewar 2 Estate</u> <ul style="list-style-type: none"> Nurfazerah Wati (EHA) was registered with Estate Hospital Assistant Board on 18/08/2020 as required under Term of Registration of Estate Hospital Assistant, Act of Parliament No. 12 of 1965. Diesel Storage ref: KPDNKKHEP.LDT.600.4/4(22/2009)P for 18,000 litres valid from 25/02/2022-24/02/2025. Petrol Storage ref: KPDNHEP/LDT.600.5/4(16/2018) PK for 200 litres valid from 18/05/2023-18/05/2024. MPOB License No. 502932802000 for CL 095311201, Tenegang Koyah, Kinabatangan for size of 2023.4 Ha valid from 01/10/2023-30/09/2024. JTK License No. JTK.H.KBN.600-4/1/01261/0066 for hiring foreign workers (Indonesia: 158, Philippines: 5) valid from 05/12/2023-04/12/2024. 2 Units of Diesel Genset (220 kWh and 327 kWh) was having License to generate Electricity under Electricity Supply Act 1990 for private installation. Both not having Written Notification under Clean Air Regulations 2014. Audiometric Test was conducted by Klinik Mabello for 7 workers and 1 hearing impairment (Hariadi) case referred to Hospital Lahad Datu as verified by Dr. Sithtarrthen A/L K. Arumugam (MD) 	Non-compliance

RSPO P&C Public Summary Report
Revision 15 (Nov 2023)

		<p>on 22/12/2022. Need Annual Follow up and pure tone audiometric Test.</p> <p><u>Hwa Li 3 Estate</u></p> <ul style="list-style-type: none"> • EHA Suzy bt. Ayadun Grade 3 Dresser having Dressers (Licensing) Ordinance 1928 for period expiring December 2023. The license is to practice as dresser in Sabah. • 2 Units of Genset (112 kW & 150 kW) valid license from 15/07/2023-14/07/2024 under (Form F) Electricity Supply Act 1990. No Written Notification under Clean Air Regulation 2014 made accordingly. • Diesel Storage for 41,000 Litres from KPDNKK (Ref: KPDNKKHEP/LDT.600-4/4(17/2004)P valid from 19/01/2021-18/01/2024. • MPOB License No. 503266302000 under CL095324502 Mukim Tenegang, CL095327138 Mukim Sungai Koyah with size 4277.6 Ha valid from 01/12/2022-30/11/2023. (Renewed) • Petrol Storage for 200 litres/2 times a week (Ref: KPDNHEP.LDT.600.5/4 (89/2018)PK. Valid 18/05/2022-17/05/2023. • Permit to hire Foreign Workers from JTK unse Section 118B Sabah Labor Ordinance (Sabah Bab 67): Indomesia 349 and Philippines 102. Valid from 18/01/2023-17/01/2024. • CF for Air Compressor SB PMT 10251 and SB PMT 1240 inspected by DOSH Officer on 05/010/2023 <p><u>Asia POM</u></p> <ul style="list-style-type: none"> • Weight bridge Stamping 60,000 kgs with Serial No. 222351747 calibrated and expiring on 20/01/2024. 	
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RSPO P&C Public Summary Report
Revision 15 (Nov 2023)

		<ul style="list-style-type: none"> • Permit to hire foreign workers by JTK Sabah (License No. JTK.H.KBN.600-4/1/10401/0063. Indonesia: 63, Philippines: 9, valid from 04/01/2022- • Permit to deduct salary from JTK under Section 113(4) Sabah Labor Ordinance (Sabah Bab 67) for Payment of document processing, Payment for Passport (Under care), Payment Medical (Under care) and Fees Sport and recreational club. Valid from 08/08/2022-07/08/2024. • MPOB License No. 500143104000 valid from 01/12/2023-30/11/2024 processing 330000 MT per year. • License under Section 18(1) Environmental Quality Act 1974 (License No. 003557) valid from 01/07/2023-30/06/2024. (Land irrigation) • Fire Certificate under Fire Services Act 1988 (No. JBPM:SB/7/111/2023) valid from 18/07/2023-17/07/2024. • Permit from KPDNKK (PPDNKK.SDK.07/2018(SK) for purchase and storage of 24,000 Litres of Diesel valid from 25/10/2021-24/10/2024. • 2 units of Fume Hood in the lab having Written Notification required under Regulation 5 of CAR 2014 issued by DOE Sabah as letter dated 05/12/2022. • Inspection by Higen Technician on both LEV under USECHH 2000 was conducted by Rickly Omintoh (HQ/14/JHII/00/197) on 15/09/2023. • Permit No. 000977 to purchase, store and use of Sodium Hydroxide (Solid 28000 Kg) for purpose of Desulphurization Process under Poisons Ordinance 1952 and Poison (Sodium Hydroxide) Regulations 1962. Expiring 31/12/2023. 	
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RSPO P&C Public Summary Report
Revision 15 (Nov 2023)

		<ul style="list-style-type: none"> • 8 workers sent to Medical Surveillance at Klinik Marbello (Paris) Sdn. Bhd. in 2023 That selected as recommended by CHRA Assessor for exposure of Chemicals Hazardous to Health. • Audiometric Test was conducted on July 2023 for 85 employees at Klinik Marbello (Paris) Sdn. Bhd. in 2023 and 3 employees on Oct 2023. • Zarinah bt. Dakulah was registered as Estate Hospital Assistant (Registration No. Q2190) on 01/03/2019. Level: Grade Three (III). <p><u>Asia Oil Palm 2 Estate</u></p> <ul style="list-style-type: none"> • SB PMT 1238 for Air Receiver (Compressor) valid from 11/08/2023-09/11/2024. • MPOB License No. 618070011000 under CL 095317383 valid from 01/04/2023-31/003/2024. • Petrol Permit Ron 95 for quantity 200 litres ref No. KPDNHEP.LDT.600.5/4(37/20210PK valid from 05/004/2023-04/04/2024. • Permit hiring Foreign workers from JTK No. 007488U for Indonesia: 181, Philippines: 27 valid from 03/08/2023-02/08/2024. • Audiometric Test was conducted on June 2023 with total of 9 workers tested at Klinik Mabello under supervision of OHD Dr. Mohamad Fikri Zanal Abidin (HQ/16/DOC/00/557). Result all 9 abnormal hearing and action taken as recommended. 	
2.1.2	<p>A documented system for ensuring legal compliance is in place. This system has a means to track changes to the laws and regulations.</p> <p>- Minor compliance -</p>	<p>Sighted in Melewar 2 Estate, Hwa Li 3 Estate, List of applicable law changes as at 21/10/2023. However found not included and updated such as:</p> <ul style="list-style-type: none"> • Pesticides (Labelling) Regulations 1984 	Non-compliance

RSPO P&C Public Summary Report
Revision 15 (Nov 2023)

		<ul style="list-style-type: none"> • Environmental Quality (Refrigerant Management) Regulations 2020 • Sabah Water Resources Enactment 1998 (Sabah No. 6 of 1998) for extracting water body (Reg. 17) • Factories And Machinery (Notification, Certificate Of Fitness And Inspection) Regulations, 1970 • Occupational Safety and Health (Classification, labelling, safety Data Sheet) Regulations 2013. • Occupational Safety and Health (Nadoopod) Regulations 2004 • Occupational Safety and Health (SHC) Regulations 2006 <p><u>Asia POM</u></p> <p>As at 10/07/2023 a list of title of legal identified found not included:</p> <ul style="list-style-type: none"> • Environmental Quality Order (Prohibition On The Use Of Chlorofluorocarbons And Other Gases As Propellants And Expanding Agents) 1993 • Factories and Machinery (Person In-charge) (amendment) Regulations 2014. • Fire Services (Fire Certificate) (Amendment) Regulations 2020 • Fire Services (Designated Premise) (Amendment) Orders 2020. • Poisons Ordinance 1952 • Poison (Sodium Hydroxide) Regulations 1962. • Diesel Permit Ron for quantity 400 litres ref No. KPDNHEP.LDT.600.4/4(09/2018)P Valid from 21/11/2021-20/11/2024. 	
2.1.3	Legal or authorised boundaries are clearly demarcated and visibly maintained, and there is no planting beyond these legal or authorised boundaries.	<p><u>Sighted in Melewar 2 Estate</u></p> <p>Sighted a map of boundary location and clearly demarcated as visit at site:</p>	Complied

RSPO P&C Public Summary Report
Revision 15 (Nov 2023)

	- Minor compliance -	<ul style="list-style-type: none">• Boundary Stone No. 959/221 adjacent to Genting Bahagia Estate• Boundary Stone No. 964/255 adjacent to Timora Estate• Boundary Stone No. 951/091 adjacent to Motrisem Estate 2 <u>Hwa Li Estate</u> Has maintained a boundary stone as verified in Boundary Stone Map. At boundary to IOI Morisem Estate with GPS: 50 21' 35.74656" N; 118O 18' 24.77304"; Block A found a marking of pole maintained. <u>Asia Palm Oil 2 Estate</u> Sighted a Boundary Stone Map showing location of boundary adjacent to North (Genting Sri Layang Estate, Genting Tenegang Estate, Genting Sri Bahagia Estate), East (Ikhlas Mantap Estate, See Hoy Chan Plantation), West (Sentra Bayu Estate, Pahang Estate, Jiang Sun Estate, South (Melewar 2 Estate). A boundary Stone No. 921/549, 921/883.									
Criterion 2.2: All contractors providing operational services and supplying labour, and Fresh Fruit Bunch (FFB) suppliers, comply with legal requirements.											
2.2.1	A list of contracted parties is maintained. - Minor compliance -	J.C Chang Group of Estates and mill have continued to maintain list of all contracted parties and incorporated in the stakeholder list. The list was available in the stakeholder list provided for verification during audit as per the following details: <table><tr><td>Estate</td><td>Date review/update</td></tr><tr><td>Melewar Estate 2</td><td>24/11/2023</td></tr><tr><td>Hwa Li 3</td><td>15/11/2023</td></tr><tr><td>Asia Oil Palm Estate 2</td><td>1/10/2023</td></tr></table>	Estate	Date review/update	Melewar Estate 2	24/11/2023	Hwa Li 3	15/11/2023	Asia Oil Palm Estate 2	1/10/2023	Complied
Estate	Date review/update										
Melewar Estate 2	24/11/2023										
Hwa Li 3	15/11/2023										
Asia Oil Palm Estate 2	1/10/2023										

RSPO P&C Public Summary Report
Revision 15 (Nov 2023)

2.2.2	<p>All contracts, including those for FFB supply, contain specific clauses on meeting applicable legal requirements, and this can be demonstrated by the third party.</p> <p>Evidence of legal due diligence of all contracted third parties, recruitment agencies (licensed/ accredited) for migrant workers, service providers and labour contractors, is available.</p> <p>- Minor compliance -</p>	<p>All contracts (short and long term), contain specific clauses on meeting applicable legal requirements were spelled out in the contract. For example, contractor named Fong Cheng Co; contract date 1/12/2023. Evidence of due diligence is demonstrated via declaration between contractor based on Sustainability contract, E023-012019 with reference to Procedure of Due Diligence and Improvement, E/019- 01/2019 dated 12/8/2019. Refer the document dated 2/10/23.</p> <p><u>Hwa Li 3 estate</u></p> <p>Replanting contractor – Matahari & SAM Sdn Bhd, Sustainability compliance contract, E023-01/2019 signed on 14/6/2023.</p>	Complied
2.2.3	<p>All contracts, including those for FFB supply, contain clauses disallowing child, forced and trafficked labour. Where young workers are employed, the contracts include a clause for their protection.</p> <p>- Minor compliance -</p>	<p>Sampled contract including FFB suppliers are required to sign Sustainability Compliance Contract with Operating Unit under J.C Chang Group of Estates. In the contract stated that all contractors must comply as follows:</p> <ul style="list-style-type: none"> • Meeting applicable legal requirements, which can be demonstrated by contracted party in running the business activities on lawful way. • Disallowing child labour forced labour and trafficked labour in running contracted party's business activities. If young workers are employed, protection clause should be made available for them in running contracted party's business activities. 	Complied
Criterion 2.3: All FFB supplies from outside the unit of certification are from legal sources.			
2.3.1	<p>(C) For all directly sourced FFB, the mill requires:</p> <ul style="list-style-type: none"> • Information on geo-location of FFB origins 	<p>Sighted a list of FFB Supplier (Own estates)</p> <p>Total 6 J.C Chang Group of estates as below:</p> <ul style="list-style-type: none"> • Asia Oil Palm 2 Estate 	Complied

RSPO P&C Public Summary Report
Revision 15 (Nov 2023)

	<ul style="list-style-type: none"> • Evidence of the ownership status or the right/claim to the land, or valid use of land by the grower/smallholder • One or more supporting documents for claims • Valid MPOB license <p>- Critical (Major) compliance -</p>	<ul style="list-style-type: none"> • Hwa Li 3 Estate • Asia Ecogreen Sdn. Bhd • Melewar 2 Estate • Pahang Estate Division 2 • Pahang Estate Division 3 <p>All above own supply estate have valid information as required. Among sampled:</p> <p>Supplier: Asia Oil Estate Division 2</p> <p>Information on geo-location: E 118° 11' 56.7" and N 5° 18' 16.9"</p> <p>Evidence of the land ownership: (095317383)</p> <p>Valid MPOB license: 5023302000 (Exp: 30/06/2024)</p> <p>Supplier: Pahang Estate Division 3</p> <p>Information on geo-location: E 118° 08' 19.1" and N 5° 22' 27.6"</p> <p>Evidence of the land ownership: (CI 095317285, CL 095317525, CI CL 095325983)</p> <p>One or more supporting documents for claims:</p> <p>Valid MPOB license: 502246302000 (Exp: 31/07/2024)</p> <p>J.C.Chang Group established Guidelines on Mechanism for Information Requests by Stakeholders (E/006-08/2019), dated 12/08/2019. This document provided guidance on information required to be obtain from FFB Suppliers.</p> <p>The mill also receives non-certified FFB from 3rd party Outgrowers and Estates. FFB obtains from 7 suppliers such as in the Mater list last updated 29/11/2023:</p> <ul style="list-style-type: none"> • Meran Sdn Bhd • Kebaco Sdn Bhd • Sentrabayu Sdn Bhd. 	
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RSPO P&C Public Summary Report
Revision 15 (Nov 2023)

		<ul style="list-style-type: none"> • KJS Resources Sdn Bhd. • Benar Waris • Tapak Jutamas Sdn. Bhd. • Jayatas Sdn. <p>All above suppliers were sampled and found having a valid information required as FFB Supplier Master List last updated 29/11/2023. Among sampled included: Supplier: Meran Sdn. Bhd Information on geo-location: E 118° 7' 9.696" and N 5° 20' 36.312" Evidence of the land ownership: (CL 095331909, CL 095331883) Valid MPOB license: 522051002000 (Exp: 30/06/2024)</p> <p>Supplier: Jayatas Sdn Bhd Information on geo-location: E 118° 08' 44" and N 5° 21' 58" Evidence of the land ownership: (CL 095316260) One or more supporting documents for claims: Valid MPOB license: 502334602000 (Exp: 31/07/2024)</p>	
2.3.2	<p>For all indirectly sourced FFB, the unit of certification obtains from the collection centres, agents or other intermediaries, the evidence as listed in Indicator 2.3.1.</p> <p>- Minor compliance -</p>	<p>The mill only receives FFB from its own supply base estates, its sister properties and external estates and outgrowers. There were no FFB traders or indirectly resourced FFB received by Asia Palm Oil Mill. Therefore, this indicator is not applicable.</p>	Not Applicable
Principle 3: Optimise productivity, efficiency, positive impacts and resilience			
Criterion 3.1: There is an implemented management plan that aims to achieve long-term economic and financial viability.			

RSPO P&C Public Summary Report
Revision 15 (Nov 2023)

3.1.1	<p>(C) A business or management plan (minimum three years) is documented that includes, where applicable, a jointly developed business case for Scheme Smallholders.</p> <p>- Critical (Major) compliance -</p>	<p>Sighted in Melewar 2 Estate, Hwa Li 3 Estate (Sharikat Keratong Sdn, Bhd) and Asia Oil Palm 2 Estate, Business Management Plan established as the Summary of Oil Palm Expenditure for Estimate Year 2022/2023, 2023/2024, 2024/2025 & 2025/2026 which include the Cost of Upkeep and Cost of Collection (Mature Harvesting) with consideration of expected FFB produced and mill's OER and KER. No smallholder within Asia Production Unit (APU)</p> <p><u>Asia POM</u></p> <p>Sighted 3 Years Product Projection (2024-2027) established. Included:</p> <table><tr><td>Projected</td><td>2024</td><td>2025</td><td>2025</td></tr><tr><td>FFB (MT)</td><td>163140</td><td>158179</td><td>170000</td></tr><tr><td>OER (%)</td><td>19.87</td><td>19.86</td><td>19.91</td></tr><tr><td>KER (%)</td><td>5.22</td><td>5.45</td><td>4.74</td></tr><tr><td>Production Cost (RM/MT CPO)</td><td>741.44</td><td>999.57</td><td>856.88</td></tr><tr><td>Forecast Price (RM/MT CPO)</td><td>2250</td><td>2250</td><td>2250</td></tr><tr><td>Baseline OER (%)</td><td>20.5</td><td>20.5</td><td>20.5</td></tr><tr><td>Baseline KER (%)</td><td>5.5</td><td>5.5</td><td>5.5</td></tr><tr><td>Baseline Production Cost</td><td>570</td><td>570</td><td>570</td></tr></table>	Projected	2024	2025	2025	FFB (MT)	163140	158179	170000	OER (%)	19.87	19.86	19.91	KER (%)	5.22	5.45	4.74	Production Cost (RM/MT CPO)	741.44	999.57	856.88	Forecast Price (RM/MT CPO)	2250	2250	2250	Baseline OER (%)	20.5	20.5	20.5	Baseline KER (%)	5.5	5.5	5.5	Baseline Production Cost	570	570	570	Complied
Projected	2024	2025	2025																																				
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Baseline Production Cost	570	570	570																																				
3.1.2	<p>An annual replanting programme projected for a minimum of five years with yearly review, is available.</p> <p>- Minor compliance -</p>	<p>Annual Replanting Programme established for all estate as below for FY 2023-2027:</p> <table><tr><td rowspan="2">Estate</td><td colspan="5">Year Replanting (Ha)</td></tr><tr><td>2023</td><td>2024</td><td>2025</td><td>2026</td><td>2027</td></tr><tr><td>Melewar 2</td><td>237.23</td><td>201.85</td><td>172.09</td><td>149.85</td><td>207.42</td></tr></table>	Estate	Year Replanting (Ha)					2023	2024	2025	2026	2027	Melewar 2	237.23	201.85	172.09	149.85	207.42	Complied																			
Estate	Year Replanting (Ha)																																						
	2023	2024	2025	2026	2027																																		
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RSPO P&C Public Summary Report
Revision 15 (Nov 2023)

		Hwa Li 3	364.02	321.63	325.15	354.59	237.75	
		Asia Oil Palm 2	269.00	210.63	196.20	220.50	209.21	
3.1.3	The unit of certification holds management reviews at planned intervals appropriate to the scale and nature of the activities undertake. - Minor compliance -	APU Management Review Meeting 2023 was conducted on 03/08/2023 at Asia Palm Oil Mill Chaired by Lee Min Khin (Plantation Controller) and attended by Estate/Mill Managers, Internal Control Team (ICT) staff and Estate New Visiting Sr. Manager (Wong Mun Kai). Among discussed included results of internal audits, Outstanding previous meeting issues, results of external audit, process performance and product conformity, customer/stakeholders feedback, Changes that could affect the management system, complaints and grievances, Improvement , resources needed. Minutes prepared by Carls Ewis Julius (ICT) and approved by Lee Min Khin (Group Plantation Controller) on 08/09/2023. Asia POM Sighted Monthly Progress Report (October, September, August 2023)						Complied
Criterion 3.2: The unit of Certification regularly monitors and reviews their economic, social and environmental performance and develops and implements action plans that allow demonstrable Continuous improvement in key operations.								
3.2.1	(C) The action plan for continuous improvement is implemented, based on consideration of the main social and environmental impacts and opportunities of the unit of certification. - Critical (Major) compliance -	YKN Hwa Li 3 Estate J.C.Chang Group has developed a Continuous Improvement Plan for Estate (N/002-004/2019) Dated 13/08/2019 sighted which explained actions: Minimize Use of Pesticides <ul style="list-style-type: none">• Upgrade and intensify IPM Practices• Barn Owl Boxes						Complied

RSPO P&C Public Summary Report
Revision 15 (Nov 2023)

		<ul style="list-style-type: none"> • Introduce Barn Owl to Sabah Estate • Predator Host Plants <p>Weeding Regimes</p> <ul style="list-style-type: none"> • Moving Inter-rows with Rotor slasher • Discrete and Selective spraying practices • Use Quality Herbicides/Adjuvant • Uae FFB to circle mulch young replants <p>Environmental Impact</p> <ul style="list-style-type: none"> • Establishment of Riparian Buffer Zone • Plans for Biodiversity Conservation • Water Conservation and Soil Erosion control • Enhancing soil fertility through EFB compost application <p>Maximizing Recycling and Minimizing Waste or By-products generation</p> <ul style="list-style-type: none"> • Pollution preventions plan <p>Social Impact</p> <ul style="list-style-type: none"> • Guidelines to workers employment term and condition • Mechanism for communication and consultation • Assessment of OSH hazards and risks • CHRA Implementation • Monitoring workers medical condition • Living Environment of linesites and etc. <p>RSPO Improvement plan FY 2023/2024 established for the estate such as:</p> <ul style="list-style-type: none"> • Riparian Reserve-Tree planting and maintenance: July 2023-June 2024 (Status: In-progress) 	
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RSPO P&C Public Summary Report
Revision 15 (Nov 2023)

		<ul style="list-style-type: none"> • Planting Natural covers: July 2023-Jun 2024 (Status: In-progress) • Repair Terrace Platform/Bunds: July 2023-Jun 2024 (Status: In-progress) • Minimizing use of certain pesticides: July 2023-Jun 2024 (Status: In-progress) • Carry out regular training on awareness on open burning, rubbish segregation, riparian buffer zone etc: Jul 2023-Jun 2024 (Status: In-progress) • Social Impact (Various improvement initiatives recorded plan sighted). • Productive Commission: Jul 2023-Jun 2024 (Status: In-Progress). <p>Asia Oil Palm 2 Estate Sighted Sustainability Improvement Plan for Asia Palm Oil Estate 2 FY 2023/2024. July 2023-June 2023</p> <ul style="list-style-type: none"> • Riparian reserve-Tree planting and maintenance • Planting natural covers • Repair terrace platforms/bunds • Minimize use of certain pesticides • Social improvement programmes (accommodation, medical, electricity supply, water supply, PPE, Regular training and awareness, productive commission and etc. <p>All above status: in progress and to be completed on October 2024.</p>	
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RSPO P&C Public Summary Report
Revision 15 (Nov 2023)

3.2.2	<p>As part of the monitoring and continuous improvement process, annual reports are submitted to the RSPO Secretariat using the [RSPO metrics template].</p> <p>PROCEDURAL NOTE:</p> <p>The RSPO metrics template is awaiting decision/agreement by RSPO and the issue is still being discussed.</p> <p>Until such metrics is agreed and developed, companies will carry on with existing reporting e.g. PalmGHG, Annual Communication of Progress (ACOP) reporting, and information provided to Certification Body and feedback via RSPO Secretariat is required.</p> <p>- Minor Compliance -</p>	<p>RSPO metric template version 2.1 is used for the reporting of Asia Production Unit Unit's metrics (economic, social and environment). Data reporting period is January to December 2022 for (social and environment metrics) and economic metrics from November 2022 – October 2023 (counting back from audit month). Based on verification with input data, no discrepancies of data reported for the said period for all metrics.</p>	Complied
Criterion 3.3: Operating procedures are Appropriately documented, consistently implemented and monitored.			
3.3.1	<p>(C) Standard Operating Procedures (SOPs) for the unit of certification are in place.</p> <p>- Critical (Major) compliance -</p>	<p>Melewar 2 Estate, Hwa Li Estate Div.3 and Asia Oil Palm 2 Estate have adequate SOP documented. Sampled Estate SOP Manual/procedures category for the following operations among others categorized in:</p> <p>A: Oil Palm Nursery and Replanting B: Upkeep and Cultivation C: Soil, Water, Biodiversity, Conservation and Mgt D: FFB Harvesting and Despatching E: Legal Employment, Welfare, Communication and Consultation and others.</p> <p>Also available:</p> <ul style="list-style-type: none"> Guidelines on Estate Vehicle Maintenance (G/001-01/2018) Guidelines on Fertilizer Receipts, Management and Application (H/001- 03/2016) 	Complied

RSPO P&C Public Summary Report
Revision 15 (Nov 2023)

		<ul style="list-style-type: none"> • Buffalo Management (K/001-01/2008) • Guidelines on Integrated Pest and Disease Management of Oil Palm (L/001-06/2017) • Rat control and baiting (L/002-07/2016) <p><u>Asia POM</u></p> <ul style="list-style-type: none"> • Standard Operating Procedure were established and documented as found in comb binding). (Total 21 SOPs) • SOP Reception Station (Q/018-05/2019) Version 05, dated 02/05/2019 • SOP Grading Station (CCP/02-05/2019-A)M) dated 08/07/2019 • SOP Vertical Sterilizer Station (Q/039-04/2019) Version 4.0, dated 02/08/2019 • SOP Threshing Station (Q/020-04/2019), Version 4.0, dated 12/06/2019 • SOP Extraction Station (CCP/03-04/2019-AOM), dated 12/06/2019 • SOP Pressing Station (Q/021-03/2018) Version 3.0, dated 23/01/2018 • 15 others SOP and last in the list is SOP Pumping Air to tyre/tube. Version 1.0 dated 02/08/2022. 	
3.3.2	A mechanism to check consistent implementation of procedures is in place. - Minor Compliance -	Internal audits conducted by Internal Compliance Team (ICT) in all estates and Asia POM and estates as mechanism to check consistent implementation of procedures in place. Results of internal audit recorded 3 NCs which carried out on 3/8/2023. All NCs were closed within the timeline by the lead auditor from ICT. Additionally Official Visit Report by Sr. Visiting Manager conducted between 21-22/09/2023.	Complied

RSPO P&C Public Summary Report
Revision 15 (Nov 2023)

		While for Safety and health procedures and practices a monthly Workplace Inspection was conducted by Safety and Health Committee.	
3.3.3	Records of monitoring and any actions taken are maintained and available. - Minor Compliance -	<p>Melewar 2 Estate, Hwa Li 3 Estate and Asia Oil Palm 2 Estate has monthly developed and maintained Estate Performance Report. Sampled Month Of January, April and September 2023. Monitoring records on monthly performance and progress:</p> <ul style="list-style-type: none"> • Area Statement (Mature, Immature, Uncultivated area, Total hectarage) • Staff movement • Labor Statistic 2022/2023 • Accommodation for staff and workers (Buildings/housing) • Capital expenditures • General Charges (Staff, Labor lines, Upkeep premises, Office Expenses and etc) • Upkeep and cultivation cost • Progress of Fertilizer application • Compost Costing • EFB Semi -Decomposed • Weeding and Spraying Progress • Road works Expenses, Soils and water conservation • Pruning Progress • FFB, oil and kernel yield • Harvesting adequacy & rounds • FFY yield per Ha Comparison • Crop quality (OER & KER) and etc. 	Complied

RSPO P&C Public Summary Report
Revision 15 (Nov 2023)

		<u>Asia POM</u> Sighted Monthly Progress Report (October, September, August 2023) Data extracted from Lintramax covering monthly performance: <ul style="list-style-type: none"> • Mill production • Daily processing hour • Daily extraction rate • Revenue expenditure summary • General charges summary • General Overhead summary • Stock despatch position CPO • Stock despatch position PK • Despatch discrepancy • Capital Summary and other monitoring parameters. 	
Criterion 3.4: A comprehensive Social and Environmental Impact Assessment (SEIA) is undertaken prior to new plantings or operations, and a social and environmental management and monitoring plan is implemented and regularly updated in ongoing operations.			
3.4.1	(C) In new plantings or operations including mills, an independent SEIA, undertaken through a participatory methodology involving the affected stakeholders and including the impacts of any smallholder/out-grower scheme, is documented. - Critical (Major) compliance -	There is no new planting in any of the sampled estates. Nonetheless, the assessment of environmental impact of its existing activities and Management Plan is documented in the following documents. Refer Environmental and Social Improvement Plan Period Review: 18/08/2022 – 17/08/2024. Main topics discussed as below: <ol style="list-style-type: none"> 1. Soil – Steep slope, soil erosion, soil degradation, soil management, ultra basic soil 2. Water – Excessive used of water from upstream activity thus affecting downstream users, contamination of surface and ground water through run off soil, nutrient or chemicals, 	Complied

RSPO P&C Public Summary Report
Revision 15 (Nov 2023)

		<p>application field and leachate due to recycling, water wastage and increase of chemical usage, water shortage, Operational activities and water for household consumption.</p> <ol style="list-style-type: none"> 3. Energy – Renewable energy, non-renewable energy 4. Operational procedure – Land development, land preparation, Open Burning, Estate and Mill Operational requirement 5. Pollution – Sludge, oil spillage, leachate from Processing by product, leachate from by product application (Biomass recycling), Leachate from domestic waste, Lubricant and grease, Diesel spillage, Chemical spillage, Overflow / leakage of sewages 6. Emission – significant pollutant 7. Waste – Recycle waste, non-recycle waste, schedule waste. 8. Water course and wetland – Identification monitoring and management 9. HCV Assessment <p>For Replanting at State Sabah, they required to conduct EIA by 3rd parties.</p> <p>Melewar Estate 2 – Refer Environmental Impact Assessment (EIA) for Proposed Replanting of 1770 Ha Oil Palm at Melewar Estate 2 in the district of Kinabatangan, Sabah dated May 2018 with reference number NOBES/18/50. Assessment was conducted by North Borneo Environmental Services Sdn Bhd. Monitoring was made from Environmental Compliance Report for June 2023 (ECR 8). Assessment was conducted by North Borneo Environmental Services Sdn Bhd.</p>	
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RSPO P&C Public Summary Report
Revision 15 (Nov 2023)

		<p>Hwa Li 3 – Refer Environmental Impact Assessment (EIA) for Proposed Replanting of 3851.56 Ha Oil Palm at Hwa Li Estate in the district of Kinabatangan, Sabah dated June 2019 with reference number KEC-(EV)/18/19. Assessment was conducted by Kiwiheng Environmental Consultant Sdn Bhd. Monitoring was made from Environmental Compliance Report for September 2023 (H2-2/2023). Assessment was conducted by Kiwiheng Environmental Consultant Sdn Bhd.</p> <p>For Asia POM, Refer Environmental and Social Improvement Plan – Asia Palm Oil Mill date of review 28/07/2023. Main topics discussed as below:</p> <ol style="list-style-type: none"> 1. Soil – Soil erosion 2. Water – Waterways / water source, Operational activities and water for household consumption, wastewater, rainfall, Environmental issue and pollution 3. Energy – Renewable energy, non-renewable energy 4. Operational procedure – Open burning, Mill operational requirement. 5. Training – training 6. Pollution – Sludge & Oil Spillage, Hydro cyclone, Mill processing waste water POME, leachate from processing, leachate from product application, leachate from domestic waste, spillage of lubricant, grease, diesel spillage, chemical spillage, overflow / leakage of sewage, decanter & belt press cake, coiler ash & clinkers, Fibre, shell and noise 7. Emission – boiler, generator smoke, methane gaseous from effluent pond, significant pollutant 	
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RSPO P&C Public Summary Report
Revision 15 (Nov 2023)

		8. Waste – recycle waste, non-recycle waste, schedule waste	
3.4.2	For the unit of certification, a SEIA is available and social and environmental management and monitoring plans have been developed with participation of affected stakeholders. - Minor Compliance -	The continuous implementation of the improvement activities was checked during the field visit and documents review. The environmental management plan has been established to monitor the identified significant activities that give impacts to the environment. Assistant Manager of each estate/mill has been appointed the task of monitoring to ensure the plan is effectively implemented.	Complied
3.4.3	(C) The social and environmental management and monitoring plan is implemented, reviewed and updated regularly in a participatory way. - Critical (Major) compliance -	Refer Environmental and Social Improvement Plan Period Review: 18/08/2022 – 17/08/2024 for estates Environmental and Social Improvement Plan – Asia Palm Oil Mill date of review 28/07/2023 for Mill. Management Action Plans was being implemented and reviewed done in a participatory way as evidenced from minutes of meetings, discussions, written feedbacks/responses from internal and external stakeholders. Each Management Action Plan has identified the Environmental Aspects-Impacts, Action Plan undertaken (solution and method involved), Action Plan Review, Time frame, PIC and Further Action Required After Review. Based on house census record for 1st half of 2023, 3 persons (1 worker and 2 dependents) were recorded under house #A05. Only one (1) dependent has been legalized and obtained a valid dependent pass/stay permit and the spouse has yet to be legalized. Discrepancy of information was evident based on the interview with management team and the said worker against house census record to identify the actual total occupancy per house/dwelling. Reference document: Environmental and Social Improvement Plan for 2023-2025 date review: 17/8/2023	Non-compliance

RSPO P&C Public Summary Report
Revision 15 (Nov 2023)

		<p>Social aspect: Recruitment under dependent pass and stay permit</p> <p>Social impact: Delay/non-documented dependents affected the status of legalization.</p> <p>Thus, a major NC was raised.</p>	
Criterion 3.5: A system for managing human resources is in place.			
3.5.1	<p>Employment procedures for recruitment, selection, hiring, promotion, retirement and termination are documented and made available to the workers and their representatives where applicable.</p> <p>- Minor Compliance -</p>	<p>The procedure established as Guidelines on Procedure or System of Recruitment, Selection, Hiring, Promotion, Retirement and Termination; Doc. Ref. # E020-01/2019; Doc. Date: 12/8/2019. The procedure was briefed to all existing employees and new employees on periodical basis and made available to them upon requests.</p>	Complied
3.5.2	<p>Employment procedures are implemented, and records are maintained.</p> <p>- Minor Compliance -</p>	<p>Employment procedure implementation (induction training) can be seen via below induction and policy briefing session. A few new joiner records sampled:</p> <p><u>Melewar estate 2</u></p> <p>1) Date joined: 3/11/2023, general worker (Indonesian) male</p> <p>2) Date joined: 1/11/2023, general worker (Indonesian) female</p>	Complied
Criterion 3.6: An occupational health and safety (H&S) plan is documented, effectively communicated and implemented.			
3.6.1	<p>(C) All operations are risk assessed to identify H&S issues. Mitigation plans and procedures are documented and implemented.</p> <p>- Critical (Major) compliance -</p>	<p>Hirarc was reviewed on 01/09/2023. Involved Asst.Manager, Estate Dresser, CC, Field Conductors, Mondore Harvesters, Spraying Hang Head, Manuring Head and etc in Melewar Division 2.</p> <p>In Hwa Li 3 Estate, Hirarc was conducted on all operational area and activities in estate. It was last reviewed on 15/08/2023:</p>	Complied

RSPO P&C Public Summary Report
Revision 15 (Nov 2023)

		<p>Nursery, Palm census, Palm chipping and felling, Drain construction, maintenance and repair, Fogging, Loose fruit picking, Workshop, Hospital assistant and clinic and etc.</p> <p><u>Asia POM</u></p> <p>Guidelines on Hazard Assessment, Prevention and Control (Risk Management and Mitigation Plan) (U029-01/2019) dated 15/08/2019 was established and documented and available during audit. Identification and assessment process were defined, and hierarchy of risk control included. Para 6.0 Requirement to Review: will be done after last review was 3 years, changes to activities and process and directed by DG DOSH. Review related to accident occurred included.</p> <p>Hirarc reviewed on 09/01/2023 and next review on 09/01/2024. Approved by Stephene Lee Khing Wen (Manager/Engineer). As in Table of Contents, hazard identification, risk assessment covering operations such as FFB reception, Showel Operation, Grading, loading ramp, Sterilization, Threshing Station, Pressing Station, Empty Bunches Press, Depericarpers station, Clinic, Water Treatment Plant, Laboratory, Scheduled waste, Compost plant and total all 42 activities assessed.</p> <p>Sampled Process Kernel Plant</p> <p>Date reviewed: 09/01/2023 by Wahid Suddin (Supervisor)</p> <p>Accident in 2022:</p> <p>JKKP 6, accident dated 09/06/2022 Mohd Asrul Muis (Indonesia Empty Bunch Operator) Motorcycle accident travelling back home hit a dog. MC 106 days. Accident dated 10/06/2022 Ardi Abd Kadir (Mandore) Accident finger stucked between pully and belting (Fruits Elevator) MC 12 days. Accident on 20/01/2022 Mohd Nursham b. Erwan (nut Kernel Operator) Fall down while cleaning</p>	
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RSPO P&C Public Summary Report
Revision 15 (Nov 2023)

		<p>at kernel plant station and helmet off and head hit Dry Nut Chute. MC 3 Days. Included in Minutes of Meeting of SHC conducted on 07/02/2022.</p> <p>5 noise related cases as reported in JKPP 7 reported in 2022 statistics.</p> <p>Accident in 2023:</p> <p>Date accident 21/10/2023 Rusli b. Sakka. Boiler accident from clinker and dust drop while opening the door. Skin burnt. MC 17 days + 9 days + 12 days. Form JKPP 6 was sent on 23/10/2023. Hirarc was revised on 21/10/2023</p> <p>Asia Oil Palm 2 Estate</p> <p>Sighted Hazard Identification, Risk Assessment and Risk Control (Hirarc) Version 3 dated 21/09/2023. Summary List of Hirarc contained 45 activities and operation for oil palm cultivation identified such as:</p> <ul style="list-style-type: none"> 1. Nursery Operation 5. Road Construction/repair/maintenance 11 Selecting weeding 17 Manuring (Manual broadcasting) 21 Harvesting and pruning 23 Transporting workers 26 Workshop 35 Working at height 36 Grass cutting 40 Scheduled waste/waste store 45 Hospital Assistant/clinic staff 	
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RSPO P&C Public Summary Report
Revision 15 (Nov 2023)

3.6.2	<p>(C) The effectiveness of the H&S plan to address health and safety risks to people is monitored.</p> <p>- Critical (Major) compliance -</p>	<p>Sighted OSH Plan for Hwa Li 3 Estate last reviewed 15/08/2023. Among Action Plan for OSH included:</p> <ul style="list-style-type: none"> • Review OSH policy and release in January 2024 • Appointment of PIC for Legal changes • Safety and Health Committee appointment and selection • Hirarc to be review in two year time after September 2022. • Noise Risk Assessment was conducted and follow by audiometric test, training, signages and PPE. • Issuance of PPE suitable with risk and process for protection from risk of exposure. • Accident reporting and investigation. <p><u>Asia POM</u></p> <p>In house Safety and Health Improvement Plan, date review 26/06/2023. Among Action Plan for OSH included:</p> <ul style="list-style-type: none"> • Review OSH policy every 2 years • Appointment of PIC for Legal changes by January 2023 • Safety and Health Committee appointment and selection • Hirarc to be review in two year time after September 2022. • Noise Risk Assessment was conducted and follow by audiometric test, training, signages and PPE. • Issuance of PPE suitable with risk and process for protection from risk of exposure as Hirarc • Conduct audiometric test and training of noise • Monthly safety and health inspection • Accident reporting and investigation. 	Complied
Criterion 3.7: All staff, workers, Scheme Smallholders, out-growers, and contract workers are appropriately trained.			

RSPO P&C Public Summary Report
Revision 15 (Nov 2023)

3.7.1	<p>(C) A documented programme that provides training is in place, which is accessible to all staff, workers, Scheme Smallholders and out-growers, taking into account gender-specific needs, and which covers applicable aspects of the RSPOP&C, in a form they understand, and which includes assessments of training.</p> <p>- Critical (Major) compliance -</p>	<p>Melewar 2 Estate, Hwa Li 3 Estate and Asia Oil Palm 2 Estate 2023 Annual Training Programme was established and documented on quarterly basis. Among topics of training included:</p> <ul style="list-style-type: none"> • Harvesting • Sprayer • Manurer • Driver and Loader • Ramp • Replanting • Noise Exposure Control • Scheduled Waste • Waste Management • First Aid and total is 33 training for <u>Asia POM</u> <p>Available Training Programme planned for year 2023 under category of process:</p> <ul style="list-style-type: none"> • Critical Control Point • Stations • Safety, ERP and Sustainability <p>NIOSH Programme-outsider</p>	Complied
3.7.2	<p>Records of training are maintained.</p> <p>- Minor Compliance -</p>	<p>Among training records report included as sighted and maintained:</p> <ul style="list-style-type: none"> • Driving and attendant conducted on 14/03/2023 and attended by 21 participant and test conduct after the training and all passed. • Training for planting crop cover and spraying of pesticides conducted on 12/04/2023 at PR22A (A8) attended by 7 workers. 	Complied

RSPO P&C Public Summary Report
Revision 15 (Nov 2023)

		<ul style="list-style-type: none"> Nursery training was conducted on 07/02/2023 at Nursery Area attended by 9 workers. Training for IPM was conducted on 15/05/2023 and attended by 26 workers. Training for Ramp, SOP Ramp, Working at High Area was conducted on 15/03/2023 and attended by 2 workers. Harvester Training was conducted on 10/01/2023 attended by 30 harvesters. FFB Traceability Training was conducted on 16/03/2023 and attended by 28 workers. <p><u>Asia POM</u> Training conducted: FFB Grading Training conducted on 17/01/2023 Sabah Labor Ordinance conducted on 01/03/2023 CepSWAM attended V. Shadeesh (Sr. Asst) and Semi bt. Tahlil Noise Conservation on 03/04/2023</p>	
3.7.3	<p>Appropriate training is provided for personnel carrying out the tasks critical to the effective implementation of the Supply Chain Certification Standard (SCCS). Training is specific and relevant to the task(s) performed.</p> <p>- Minor Compliance -</p>	<p>Supply Chain (SCCS) Training was conducted for all critical points identified in the Supply Chain Process as FY 2023. The critical points were weighbridge, grading, extraction, clarification, nut & kernel plant, laboratory, despatch, waste management and transporter. Sampled the training records as below:</p> <p>Mill Laboratory Training (Plan: June, Actual 19/06/2023) Grading Station (Plan: Feb, Actual 20/02/2023) Management and Documentation Training 03/01/2023 (Semi bt Tahlil) Security CPO & PK Despatch Training (Yunus Pamma) 25/07/2023 Extraction Training (Plan: April Actual 10/04/2023)</p>	Complied

RSPO P&C Public Summary Report
Revision 15 (Nov 2023)

Criterion 3.8: Supply chain requirement for mills (note: All supply chain requirements are considered as Critical (C) . However, it will not contribute to suspension if there is more than 5 non-compliance within a principle)			
3.8.1	Identity Preserved Module A mill is deemed to be Identity Preserved (IP) if the FFB processed by the mill are sourced from plantations/estates that are certified against the RSPO Principles and Criteria (RSPO P&C), or against the Group Certification scheme. Certification for CPO mills is necessary to verify the volumes and sources of certified FFB entering the mill, the implementation of any processing controls (for example, if physical separation is used), and volume sales of RSPO certified products. If a mill process certified and uncertified FFB without physically separating them, then only Mass Balance Module is applicable.	Asia POM is under mass balance module. Thus, this indicator is not applicable.	Not Applicable
3.8.2	Mass Balance Module A mill is deemed to be Mass Balance (MB) if the mill process FFB from both RSPO certified and uncertified plantations/estates. A mill may be taking delivery of FFB from uncertified growers, in addition to those from its own and 3rd party certified supply base. In that scenario, the mill can claim only the volume of oil palm products produced from processing of the certified FFB as MB.	Asia POM received and processed both RSPO certified and uncertified FFB from plantations/estates, outgrowers and FFB Traders and claim only the volume of oil palm products produced from processing of the certified FFB as MB certified.	Complied
3.8.3	The estimated tonnage of CPO and PK products that could potentially be produced by the certified mill shall be recorded by the certification body (CB) in the public summary of the P&C certification report. This figure represents the total volume of certified oil palm product (CPO and PK) that the certified mill is allowed to deliver in a year. The actual tonnage produced shall then be recorded in each subsequent annual surveillance report.	The estimated tonnage of CPO and PK products that could potentially be produced by the certified mill is recorded in this public summary report. The actual tonnage produced from last audit date is reported in the summary in Table 7 and Table 10.	Complied

RSPO P&C Public Summary Report
Revision 15 (Nov 2023)

3.8.4	<p>The mill shall also meet all registration and reporting requirements for the appropriate supply chain through the RSPO IT platform.</p>	<p>The registration of PalmTrace will be carried out by the Marketing Department in HQ. Company has registered in PalmTrace system as follows:</p> <table><tr><td>Member Name</td><td>J.C Chang Goldings Sdn Bhd / Asia Production Unit</td></tr><tr><td>Member ID</td><td>RSPO_PO1000000524</td></tr><tr><td>RSPO Membership Number</td><td>2-0029-06-000-00 (J.C. Chang Holdings Sdn. Bhd.)</td></tr><tr><td>Type of Business</td><td>Oil Mill</td></tr><tr><td>Licence Status</td><td>15/05/2023 – 30/01/2024</td></tr></table>	Member Name	J.C Chang Goldings Sdn Bhd / Asia Production Unit	Member ID	RSPO_PO1000000524	RSPO Membership Number	2-0029-06-000-00 (J.C. Chang Holdings Sdn. Bhd.)	Type of Business	Oil Mill	Licence Status	15/05/2023 – 30/01/2024	Complied
Member Name	J.C Chang Goldings Sdn Bhd / Asia Production Unit												
Member ID	RSPO_PO1000000524												
RSPO Membership Number	2-0029-06-000-00 (J.C. Chang Holdings Sdn. Bhd.)												
Type of Business	Oil Mill												
Licence Status	15/05/2023 – 30/01/2024												
3.8.5	<p>Documented procedures</p> <p>The mill shall have written procedures and/or work instructions or equivalent to ensure the implementation of all elements of the applicable supply chain model specified. This shall include at minimum the following:</p> <ul style="list-style-type: none">a) Complete and up to date procedures covering the implementation of all the elements of the supply chain model requirements.b) Complete and up to date records and reports that demonstrate compliance with the supply chain model requirements (including training records).c) Identification of the role of the person having overall responsibility for and authority over the implementation of these requirements and compliance with all applicable requirements. This person shall be able to demonstrate awareness of the mill’s procedures for the implementation of this standard.	<p>Documented Procedures were made available for verification and the requirements have been adhered to as follows:</p> <ul style="list-style-type: none">a) Refer Standard Operating Procedure for SCC Standard Mass Balance Calculation with reference number SC/MBC-09/2022-AOM dated 10/12/2022.b) Complete and up to date records and reports in relation to RSPO SCCS were maintained and available for verification. Among the records available were Mass Balance Sheet, Internal Audit Reports, and SCCS Training records.c) Mill have identified and appointed the Mill Manager as the PIC for RSPO Supply Chain Certification Standard requirements as Appointment letter dated 29/07/2022.d) Procedures for receiving and processing certified and non-certified FFBs were addressed in the Standard Operation	Complied										

RSPO P&C Public Summary Report
Revision 15 (Nov 2023)

	d) The mill shall have documented procedures for receiving and processing certified and non-certified FFBs including ensuring no contamination in the IP mill.	Procedure at Reception Station with document reference number CCP/01-06/2019-AOM dated 02/05/2019.	
3.8.6	<p>Internal Audit</p> <p>i) The mill shall have a written procedure to conduct annual internal audit to determine whether the mill:</p> <p>a. Conforms to the requirements in the RSPO Supply Chain Certification Standard and the RSPO Market Communications and Claims Documents.</p> <p>b. Effectively implements and maintains the standard requirements within its organisation.</p> <p>ii) Any non-conformities found as part of the internal audit shall be issued corrective action. The outcomes of the internal audits and all actions taken to correct non-conformities shall be subject to management review at least annually. The mill shall maintain the internal audit records and reports.</p>	<p>The procedure to conduct annual internal audit is addressed in the Audit Procedure & Management Review dated 01/12/2022 with reference number T/001-04/2022 titled: Guideline For Internal Auditing and Management Review Of the Sustainability And Supply Chain System.</p> <p>Refer latest SCCS Internal Audit dated 03/08/2023. Based on the internal audit report and checklist, the elements of RSPO supply chain were adequately covered including the RSPO Market Communications and Claims elements. There were 3 non-conformities raised from the internal audit. For non-conformity raised, corrective action has been established to rectify the lapse found. The status of the non-conformity shall also be discussed in the management review meeting. All corrective action has been implemented and non-conformities was closed.</p>	Complied
3.8.7	<p>Purchasing and Goods In</p> <p>i) The mill shall verify and document the tonnage and sources of certified and the tonnage of non-certified FFBs received.</p> <p>ii) The mill shall inform the CB immediately if there is a projected overproduction of certified tonnage.</p> <p>iii) The mill shall have a mechanism in place for handling non-conforming FFB and/or documents.</p>	<p>Asia POM maintain the daily records of all certified and uncertified FFB received and documented in daily processing records. The records include the FFB suppliers, weight, and vehicle transportation details. The mill has maintained records of FFB received such as Delivery Notes and Weighbridge operator. Sample of FFB delivery records:</p> <p>Incoming FFB</p> <p>Certified Supply Base</p> <p>Sample 1</p> <ul style="list-style-type: none"> Estate: Melewar Estate 	Complied

RSPO P&C Public Summary Report
Revision 15 (Nov 2023)

		<ul style="list-style-type: none">• Certified No: RSPO651278• Date: 30/06/2023• Ticket Number: FFB230100XXW• Vehicle Number: SD14XXK• Field / Block: P97• FFB Weight: 10.31 MT <p>Sample 2</p> <ul style="list-style-type: none">• Estate: Hwa Li Estate• Certified No: RSPO651278• Date: 30/06/2023• Ticket Number: FFB23010XXXW• Vehicle Number: SD85XXL• Field / Block: P97• FFB Weight: 8.91 MT <p>Non-Certified 3rd Party FFB</p> <ul style="list-style-type: none">• Company: Benar Waris Sdn Bhd• Estate: Benar Waris Sdn Bhd• Date: 28/06/2023• Ticket Number: FFB230100XXW• Vehicle Number: SWG12XX	
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RSPO P&C Public Summary Report
Revision 15 (Nov 2023)

		<ul style="list-style-type: none"> FFB Weight: 2.25 MT <p>Mechanism to handle non-conforming FFB and documents has been detailed up in the Mechanism For Handling Non-Conforming Oil Palm Product and/or Documents (SC/MEC-08/2022-AOM)</p>	
3.8.8	<p>Sales and Goods Out</p> <p>The supplying mill shall ensure that the following minimum information for RSPO certified products is made available in document form. The information shall be complete and can be presented either on a single document or across a range of documents issued for RSPO certified oil palm products (for example, delivery notes, shipping documents and specification documentation):</p> <ol style="list-style-type: none"> The name and address of the buyer; The name and address of the seller; The loading or shipment / delivery date; The date on which the documents were issued; RSPO certificate number; A description of the product, including the applicable supply chain model (Identity Preserved or Mass Balance or the approved abbreviations); The quantity of the products delivered; Any related transport documentation; A unique identification number. 	<p>Asia POM ensured the required information is available in document form. Outgoing records of CPO and PK were verified as below:</p> <p>CPO - MB</p> <ol style="list-style-type: none"> The name and address of the buyer; Buyer A The name and address of the seller; Asia POM The loading or shipment / delivery date; 21/01/2023 The date on which the documents were issued; 21/01/2023 RSPO Certificate Number: RSPO 651278 A description of the product: CPO/MB The quantity of the products delivered; 32.63 MT Any related transport documentation; STXXXXK A unique identification number: CPORS23XXXXXXX <p>PK - MB</p> <ol style="list-style-type: none"> The name and address of the buyer; Buyer A The name and address of the seller; Asia POM The loading or shipment / delivery date; 30/10/2023 The date on which the documents were issued; 30/10/2023 	Complied

RSPO P&C Public Summary Report
Revision 15 (Nov 2023)

		e) RSPO Certificate Number: RSPO 651278 f) A description of the product: PK/MB g) The quantity of the products delivered; 27.21 MT h) Any related transport documentation; STXXXX i) A unique identification number: PKRSXXXXXXX	
3.8.9	<p>Outsourcing Activities</p> <p>i) The mill shall not outsource its milling activities. In cases where he mill outsources activities to independent third parties (e.g. subcontractors for storage, transport or other outsourced activities), the mill holding the certificate shall ensure that the independent third party complies with relevant requirements of this RSPO Supply Chain Certification</p> <p>ii) The mill shall ensure the following:</p> <p>a) The mill has legal ownership of all input material to be included in outsourced processes</p> <p>b) The mill has an agreement or contract covering the outsourced process with each contractor through a signed and enforceable agreement with the contractor. The onus is on the mill to ensure that certification body (CB) has access to the outsourcing contractor or operation if an audit is deemed necessary.</p> <p>c) The mill has a documented control system with explicit procedures for the outsourced process which is communicated to the relevant contractor.</p> <p>d) The mill shall furthermore ensure (e.g. through contractual arrangements) that independent third parties engaged provide relevant access for duly accredited CBs to their respective</p>	<p>Asia POM has established Standard Operating Procedure related Outsourcing Activities. Refer Standard Operating Procedure for SCC Standard Mass Balance Calculation with reference number SC/MBC-09/2022-AOM dated 10/12/2022 Section 9.0.</p> <p>i. Stated in the SOP, A CPO mill and independent mill cannot outsource processing activities like refining or crushing.</p> <p>ii. Sighted the contract agreement between Asia POM and contractor;</p> <p>a) Asia POM has legal ownership of all input material to be included in the outsourced process. Refer listing of FFB Supplier Certified and Non-Certified. The contract agreement and details like MPOB licence were kept in the file.</p> <p>b) Refer Contract Agreement for Transportation Agreement CPO and PK between Asia Oil Palm Sdn Bhd and Pengangkutan DXXXXX TXXX Sdn. Bhd. – Agreement on the Transportation of Crude Palm Oil (CPO) and Palm Kernel (PK); Initial term: 3 years commencing from 01/07/2023.</p> <p>c) The mill trades CSPO and CSPK with its buyers among refineries and/or oleo-chemical plants. Based on</p>	Complied

RSPO P&C Public Summary Report
Revision 15 (Nov 2023)

	operations, systems, and all information, when this is announced in advance.	agreements, transporter has no ownership of transported products and owned by buyer. d) The contract agreements specified that all transporters are required to fulfil and comply with applicable legal requirements. Refer procedure stated on "The site has a transport agreement 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".	
3.8.10	The mill shall record the names and contact details of all contractors used for the physical handling of RSPO certified oil palm products.	Names and contact details of transporters used for the physical handling of RSPO certified oil palm products were recorded and registered in the mill supplier database system. The independent third parties involve in Mill operation is only transportation services for CPO and PK.	Complied
3.8.11	The mill shall inform its CB in advance prior to conduct of its next audit of the names and contact details of any new contractor used for the physical handling of RSPO certified oil palm products.	There is no new contractors used for the handling of certified CPO and PK. As per stated in the procedure Section 13.5 "The Mill shall inform in advance the outsourced contractors if audit is deemed necessary by Certification Bodies (CB) and ensure that the contractors engaged provide relevant access for the CBs to their respective operations, system, and any and all information, when this is announced in advance."	Complied
3.8.12	Record keeping i) The mill shall maintain accurate, complete, up-to-date and accessible records and reports covering all aspects of this RSPO Supply Chain Certification Standard requirements.	Record Keeping i) 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.	Complied

RSPO P&C Public Summary Report
Revision 15 (Nov 2023)

	<ul style="list-style-type: none"> ii) Retention times for all records and reports shall be a minimum of two (2) years and shall comply with relevant legal and regulatory requirements and be able to confirm the certified status of raw materials or products held in stock. iii) For Identity Preserved Module, the mill shall record and balance all receipts of RSPO certified FFB and deliveries of RSPO certified CPO and PK on a real-time basis. iv) For Mass Balance Module, the mill: <ul style="list-style-type: none"> a) Shall record and balance all receipts of RSPO certified FFB and deliveries of RSPO certified CPO and PK on a real-time basis and / or three-monthly basis. b) All volumes of certified CPO and PK that are delivered are deducted from the material accounting system according to conversion ratios stated by RSPO. c) The mill can only deliver Mass Balance sales from a positive stock. Positive stock can include product ordered for delivery within three (3) months. However, a mill is allowed to sell short (i.e. product can be sold before it is in stock). 	<ul style="list-style-type: none"> ii) The retention period for maintaining the traceability records is 7 years as stated in the Refer Standard Operating Procedure for SCC Standard Mass Balance Calculation with reference number SC/MBC-09/2022-AOM dated 10/12/2022 Section 5.0 iii) NA as the mill is using MB model. iv) For Mass Balance Module: <ul style="list-style-type: none"> a) All RSPO certified FFB and deliveries of RSPO certified CPO and PK on real time basis. Refer RSPO Mass Balance Sheet Record for Oil Mills FY 2022 and 2023. b) Verified from RSPO Mass Balance Sheet Record for Oil Mills FY 2022 and 2023, confirmed that all volumes of certified CPO and PK that area delivered are deducted from the material accounting system. For the period assessment, Certified CPO and certified PK was sold. As per section 5.3 and 5.4 stated 5.3 Document Person In charge shall record and balance all receipts of "Sustainable Certified Product" certified FFB and deliveries of certified CPO and PK on a three-monthly basis and/or update till yesterday production when permit able. c) 5.4 All volumes of palm oil that are delivered are deducted from the material accounting system according to the conversion ratio calculation as stated above. d) Based on mass balance sheet latest dated end of October 2023, no negative stock recorded. Refer section 5.5 stated 5.5 The mill can only deliver Mass Balance sales from a positive stock. Positive stock can include product ordered for delivery within three (3) months. 	
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RSPO P&C Public Summary Report
Revision 15 (Nov 2023)

3.8.13	<p>Extraction Rate</p> <p>The oil extraction rate (OER) and the kernel extraction rate (KER) shall be applied to provide a reliable estimate of the amount of certified CPO and PK from the associated inputs. Mill shall determine and set their own extraction rates based upon past experience, documented and applied it consistently.</p>	<p>Conversion factor of CPO and PK production is depending on the actual OER and KER. Verified OER and KER as below.</p> <table><tr><td>Month</td><td>OER</td><td>KER</td></tr><tr><td>Nov 2022 – Oct 2023</td><td>20.66</td><td>4.61</td></tr></table>	Month	OER	KER	Nov 2022 – Oct 2023	20.66	4.61	Complied
Month	OER	KER							
Nov 2022 – Oct 2023	20.66	4.61							
3.8.14	<p>Extraction rates shall be updated periodically to ensure accuracy against actual performance or industry average if appropriate.</p>	<p>Asia POM derives the extraction rates based on the actual extraction rate produced in the mill. Therefore, the accuracy is continuously maintained.</p>	Complied						
3.8.15	<p>Processing</p> <p>For Identity Preserved Module, the mill shall assure and verify through documented procedures and record keeping that the RSPO certified oil palm product is kept separated from non-certified oil palm products, including during transport and storage to strive for 100% separation.</p>	<p>NA as the mill is using MB module.</p>	Not Applicable						
3.8.16	<p>Registration of Transactions</p> <p>i) Shipping Announcement in the RSPO IT platform shall be carried out by the mills when RSPO certified products are sold as certified to refineries, crushers, and traders not more than three months after dispatch with the dispatch date being the Bill of Lading or the dispatch documentation date.</p> <p>ii) Remove: RSPO certified volumes sold under different scheme or as conventional, or in case of underproduction, loss or damage shall be removed in the RSPO IT platform.</p>	<p>Registration of transactions</p> <p>i) The registration of PalmTrace is carried out by the Asia POM person in charge. All transaction will be registered in the PalmTrace. Verified the registration of CPO Sale. For the period of Nov 2022 until Oct 2023, there were 7 announcements for CPO and 24 announcements for PK made. All dispatches announcement was made within 3 months after shipment.</p> <p>ii) RSPO Certified Volumes Sold under as different scheme or unconventional was not able to be confirmed its shipping announcement by the buyer. However, we have indicated this to the client and they have a system in place to remove the stocks at their respective time interval which was not at this particular audit. Refer correspondence email between</p>	Non-compliance						

RSPO P&C Public Summary Report
Revision 15 (Nov 2023)

		<p>Representative HQ with Global Trading Department dated 16/10/2023 titled "Palmtrace CSPO & CSPK Volume Removal for month of October and November 2023".</p> <p>Major NC</p> <p>RSPO certified volume sold under conventional was not removed in the RSPO IT Platform.</p> <p>Based on verification of Mass Balance Record 2022/2023 and CPO Delivery Record sighted availability RSPO Certified CPO sold as conventional=2,141.105 MT and RSPO Certified PK sold as conventional=90.231 MT in the period Nov 2022 until Dec 2022 (Previous Licence Periods). However, based on verification through RSPO IT Platform Palm Trace, there is no evidence of removal has been made for both transactions.</p>	
3.8.17	<p>Claims</p> <p>The mill shall only make claims regarding the production of RSPO certified oil that are in compliance with the RSPO Rules on Market Communications and Claims.</p>	<p>RSPO trademark was not used. Nonetheless, the facility is aware with the requirements of the RSPO Rules on Market Communications and Claims.</p>	Complied
General corporate communications			
4.1	<p>A corporate communication is one made by any RSPO member that highlights its RSPO membership and/or its commitment to the objectives and principles of RSPO. Corporate communication is a "non-product related" claim.</p>	<p>The Carotino / JC Chang Group website was reviewed and confirm that the communication made did not explicitly highlight its RSPO membership but had communicated its commitments towards production of sustainable palm oil. The communication did not imply any such that being an RSPO member means had certified to RSPO related certifications.</p>	Complied
4.2	<p>In corporate communications, a member is allowed to:</p> <p>A. display its RSPO membership status</p>	<p>The Carotino / JC Chang Group website was reviewed and confirm that the communication made did not explicitly highlight its RSPO</p>	Complied

RSPO P&C Public Summary Report

Revision 15 (Nov 2023)

	<p>B. display the RSPO web address (www.rspo.org)</p> <p>C. state that the member supports the work of RSPO</p> <p>D. state the member's history with regard to RSPO</p> <p>E. use the RSPO Trademark (as shown below) with a valid trademark licence number to promote its RSPO membership</p>	<p>membership but had communicated its commitments towards production of sustainable palm oil.</p> <p>The website had not displayed the RSPO website and had not display any RSPO Trademark.</p>	
4.3	Members are not allowed to use the RSPO corporate logo as shown below. This is for the sole use of the RSPO Secretariat.	<p>The Carotino / JC Chang Group website was reviewed and confirm that the communication made did not explicitly highlight its RSPO membership but had communicated its commitments towards production of sustainable palm oil.</p> <p>The website had not displayed the RSPO website and had not display any RSPO Trademark.</p>	Complied
4.4	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 palm oil products.	The communication did not imply any such that being an RSPO member means had certified to RSPO related certifications and selling of its oils are considered RSPO certified.	Complied
4.5	<p>Additionally, RSPO certified members are allowed to make statements that highlight their RSPO certification status and product-related claims in their corporate communication tools. Some permitted examples include:</p> <ul style="list-style-type: none"> • "We have been sourcing RSPO certified palm oil since (YEAR)." • "We have used (X) tonnes of RSPO certified palm oil for our products manufactured in the last year." • "We have been RSPO certified since (YEAR)." • "We have (X NUMBER OF PRODUCTS) produced using RSPO certified MB/SG palm oil." • "In (YEAR), our company sourced (X%) of palm oil derivative volumes that was used across our products manufactured as 	No evidence of RSPO corporate logo used by Asia POM and verified through document and site review (notice board, business card, shipping documentation, etc.	Complied

RSPO P&C Public Summary Report

Revision 15 (Nov 2023)

	<p>MB certified.”</p> <ul style="list-style-type: none"> • “Our company covered (X%) of palm oil derivative volumes used across all our products manufactured in (YEAR) with smallholder credits.” • “We are RSPO certified. Ask us for our RSPO certified products.” 		
4.6	<p>RSPO non-certified members are allowed to make product-related claims in their corporate communication tools by doing the following:</p> <p>A. Use the RSPO Trademark with a valid trademark licence number to promote its membership of RSPO. It is sufficient for non-certified members to indicate this only once in their communication.</p> <p>B. Claim statements are limited to the following examples:</p> <p>i. “The rate of RSPO-certified palm oil procurement was (X%). We aim to achieve (X%) sustainable procurement by fiscal year (YEAR).”</p> <p>ii. X% of palm oil sourced by our organisation are certified through the Roundtable on Sustainable Palm Oil (RSPO) supply chains as (a) Identity Preserved, (b) Segregated, (c) Mass Balance, or (d) Book and Claim.</p> <p>C. In cases wherein an organisation/member would like to indicate their commitment to sourcing RSPO certified volumes, the statement shall be accompanied with a disclaimer: “This reported figure is not audited through RSPO Certification”.</p>	<p>The Carotino / JC Chang Group website was reviewed and confirm that the communication made did not explicitly highlight its RSPO membership but had communicated its commitments towards production of sustainable palm oil.</p> <p>The website had not displayed the RSPO website and had not display any RSPO Trademark.</p>	Complied
Product-specific communications			
5.1 General			
5.1.1	<p>Product-specific communications refer to any public statement about an individual product that contains RSPO certified sustainable palm oil. These product-specific communications can be made on pack and/or off pack</p>	<p>The Carotino / JC Chang Group website was reviewed and confirm that the communication made did not explicitly highlight its RSPO membership but had communicated its commitments towards</p>	Complied

RSPO P&C Public Summary Report
Revision 15 (Nov 2023)

	such as shipping documents, advertisements, flyers, brochures, posters, displays, newsletters, websites, emails, letters, offerings, invoices, (annual) reports, or media interviews.	production of sustainable palm oil. The communication did not imply any such that being an RSPO member means had certified to RSPO related certifications.	
5.1.2	Product-specific communications are voluntary.	<p>The Carotino / JC Chang Group website was reviewed and confirm that the communication made did not explicitly highlight its RSPO membership but had communicated its commitments towards production of sustainable palm oil.</p> <p>The website had not displayed the RSPO website and had not display any RSPO Trademark.</p>	Complied
5.1.3	Wherever the RSPO Label is displayed for product-specific communications, the applicable trademark licence number must be shown immediately under or next to the RSPO Label or the statement itself.	<p>The Carotino / JC Chang Group website was reviewed and confirm that the communication made did not explicitly highlight its RSPO membership but had communicated its commitments towards production of sustainable palm oil.</p> <p>The website had not displayed the RSPO website and had not display any RSPO Trademark.</p>	Complied
5.1.4	Use of any other trademark or label to highlight the presence of RSPO certified sustainable palm oil products is an unauthorised product-specific communication.	<p>The Carotino / JC Chang Group website was reviewed and confirm that the communication made did not explicitly highlight its RSPO membership but had communicated its commitments towards production of sustainable palm oil.</p> <p>The website had not displayed the RSPO website and had not display any RSPO Trademark.</p>	Complied
5.1.5	If any organisation, which does not further modify end products or does not need to undergo Supply Chain Certification such as retailers, traders or distributors, enters into any agreement whereby the RSPO certified supplier labels products with the retailers/traders/distributors RSPO Trademark licence number, the following conditions shall be met as shown below	The Carotino / JC Chang Group website was reviewed and confirm that the communication made did not explicitly highlight its RSPO membership but had communicated its commitments towards production of sustainable palm oil.	Complied

RSPO P&C Public Summary Report

Revision 15 (Nov 2023)

	<ul style="list-style-type: none"> • RSPO members should be registered on the RSPO IT Platform and complete the information under 'description of products' field. • Both parties shall inform their certification body in writing about the agreement. • The RSPO certified supplier is responsible for ensuring that the buyer's RSPO Trademark licence number is used only on products that are supplied to that buyer. 	The website had not displayed the RSPO website and had not display any RSPO Trademark.	
5.1.6	Organisations that do not further modify end products or that do not need to undergo Supply Chain Certification such as retailers, traders, or distributors who intend to use the RSPO Label with their own RSPO Trademark licence number in any of their product-specific communications, can do so by undergoing a remote audit. A remote audit shall be conducted by an RSPO-accredited certification body (CB) prior to the use of the RSPO Label whereby the organisation will need to demonstrate that the use is in compliance with the rules contained within this document and that the claim itself can be supported through a certified supply chain	<p>The Carotino / JC Chang Group website was reviewed and confirm that the communication made did not explicitly highlight its RSPO membership but had communicated its commitments towards production of sustainable palm oil.</p> <p>The website had not displayed the RSPO website and had not display any RSPO Trademark.</p>	Complied
5.2 Off pack claims			
5.2.1	Off pack claims are product-specific communications regarding the certified sustainable palm oil contained within the product(s) made on any communication materials such as shipping documents, advertisements, flyers, brochures, posters, displays, newsletters, websites, emails, letters, offerings, invoices, (annual) reports, or media interviews. The RSPO Label should be used together with the valid trademark licence number wherever an off pack claim is made.	There is no off pack claim related with Asia POM since Mill only Produce CPO and PK raw product.	Complied
5.2.2	When confirming the sale of certified palm oil products, members must adhere to the requirements of the RSPO SCCS. This includes stating the	There is no off pack claim related with Asia POM since Mill only Produce CPO and PK raw product.	Complied

RSPO P&C Public Summary Report
Revision 15 (Nov 2023)

	supply chain model and certificate number under which the claim is being made.		
5.2.3	<p>Where a distributor or wholesaler takes title to products containing certified sustainable palm oil products, the requirements of the RSPO SCCS can follow either one of these two options:</p> <ul style="list-style-type: none"> • If the distributor or wholesaler holds only a distributor licence, it may only communicate RSPO certified palm oil 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 products have been made on behalf of the distributor or wholesaler, with specific evidence either through on pack claims or documentation. • If the distributor or wholesaler is supply chain certified, they should follow the requirements outlined in section 5.2.2. 	There is no off pack claim related with Asia POM since Mill only Produce CPO and PK raw product.	Complied
5.3 On pack claims			
5.3.1	Only RSPO members who have supply chain certification and members who have undergone remote audit as per 5.1.6 are allowed to make on pack claims about the certified sustainable palm oil contained within the product(s) as per Module A, B, C and E. RSPO members who have purchased RSPO Credits are entitled to claim their support for the production of certified sustainable palm oil as per Module D.	There is no on pack claim related with Asia POM since Mill only Produce CPO and PK raw product.	Complied
5.3.2	<p>In case of limited space, RSPO allows flexibility to use a one-line arrangement claim together with a valid trademark licence number for on pack communications as below without having to use any RSPO Label. The licence number has to measure at least 4pt (1.4mm) in size and the font must be Calibri. The following options shall be considered:</p> <p>A) For Identity Preserved (IP)/ Segregated (SG) Certified Products:</p>	There is no on pack claim related with Asia POM since Mill only Produce CPO and PK raw product.	Complied

RSPO P&C Public Summary Report
Revision 15 (Nov 2023)

	<ul style="list-style-type: none"> • RSPO IP/SG CERTIFIED* • Contains RSPO IP/SG palm oil* • Contains RSPO certified palm oil (IP/SG)* <p>*Add RSPO TM Licence Number below or next to the claim.</p>		
	<p>B) or Mass Balance (MB) Certified Products:</p> <ul style="list-style-type: none"> • RSPO MIXED* • Contributes to the production of RSPO certified palm oil* • Contains RSPO certified palm oil (MB)* <p>*Add RSPO TM Licence Number below or next to the claim.</p>	There is no on pack claim related with Asia POM since Mill only Produce CPO and PK raw product.	Complied
	<p>C) For Partially Certified Products:</p> <ul style="list-style-type: none"> • RSPO 50% MIXED* • Contains at least 50% RSPO certified palm oil* <p>*Add RSPO TM Licence Number below or next to the claim.</p>	There is no on pack claim related with Asia POM since Mill only Produce CPO and PK raw product.	Complied
	<p>D) For Products covered with Book and Claim (B&C):</p> <ul style="list-style-type: none"> • RSPO CREDITS* • Supports the production of RSPO certified palm oil* • Contains palm oil covered by the purchase of RSPO Credits* <p>*Add RSPO TM Licence Number below or next to the claim.</p>	There is no on pack claim related with Asia POM since Mill only Produce CPO and PK raw product.	Complied
5.3.3	On pack claims shall not include information about the claimant's RSPO membership status.	There is no on pack claim related with Asia POM since Mill only Produce CPO and PK raw product.	Complied

RSPO P&C Public Summary Report

Revision 15 (Nov 2023)

5.3.4	Members shall not communicate to consumers information about their suppliers' RSPO membership status.	There is no on pack claim related with Asia POM since Mill only Produce CPO and PK raw product.	Complied
5.3.5	Use of the RSPO Label is restricted to claims about RSPO certified sustainable palm oil contained in products and is not authorised for use in relation to any other ingredient.	There is no on pack claim related with Asia POM since Mill only Produce CPO and PK raw product.	Complied
5.3.6	All members making on pack claims are encouraged to submit the information and images of their end products that carry the RSPO Label via the MyRSPO portal.	There is no on pack claim related with Asia POM since Mill only Produce CPO and PK raw product.	Complied
MODULE B – MASS BALANCE SPECIFIC RULES (Delete Non Applicable Module)			
Mass Balance palm oil content			
	95% of the palm oil content must be RSPO MB-certified.	Oil palm content for CPO and PK is 100% RSPO MB certified. Non-certified FFB is come from external crop and since Asia POM is using Mass Balance module, the non-certified volume is covered in the Mass Balance sheet.	Complied
	If 100% of RSPO MB certified palm oil content cannot be sourced, a maximum of 5% volume from other non-certified sources is allowed and the reason for this must be fully justified. The volume of the non-certified palm oil content shall be covered by the purchase of RSPO Credits of equivalent volume.	Asia POM only applies MB model and the conventional CPO are downgraded from MB whenever demanded. Non-certified FFB is come from external crop and since Asia POM is using Mass Balance module, the non-certified volume is covered in the Mass Balance sheet.	Complied
Messaging			
	Messaging ALLOWED in storytelling in product-specific communications includes:	No RSPO label and storytelling in product-related communications used as CPO and PK is semi-finished product. No messaging involved since Asia POM is producing crude palm product and does not involve in any labelling of end product.	Complied

RSPO P&C Public Summary Report
Revision 15 (Nov 2023)

	<ul style="list-style-type: none"> • [Palm oil products]/[palm oil]/[palm kernel oil] from RSPO certified mills and plantations were mixed with non-certified palm oil products in the supply chain. • The volume of [palm oil 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. 		
Product-Specific Communications Labelling			
	<p>Members are allowed to use the RSPO Label in one of the following ways:</p> <ul style="list-style-type: none"> • The RSPO Label MUST contain the tag "MIXED". The tag "MIXED" designates palm oil 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". 	No RSPO label and storytelling in product-related communications used as CPO and PK is semi-finished product. No messaging involved since Asia POM is producing crude palm product and does not involve in any labelling of end product.	Complied
Principle 4: Respect community and human rights and deliver benefits			
Criterion 4.1: The unit of Certification respects human rights, which includes respecting the rights of Human Rights Defenders.			
4.1.1	(C) A policy to respect human rights, including prohibiting retaliation against Human Rights Defenders (HRD), is documented and communicated to all levels of the workforce, operations, FFB suppliers and local communities and prohibits intimidation and harassment by the unit of certification and contracted services, including contracted security forces.	Asia group estates subscribe to J.C Chang Group's Social & Human Rights Policy, which was established on 14 November 2019, signed by Plantation Director, Mr. Tee Swee Kee. This Policy was communicated to all level of workforce and other relevant stakeholders during due diligence process signing and stakeholders	Complied

RSPO P&C Public Summary Report
Revision 15 (Nov 2023)

	- Critical (Major) compliance -	meeting. Latest session with internal stakeholder (Melewar 2 Estate) was carried out on 3/10/23.	
4.1.2	The unit of certification does not instigate violence or use any form of harassment in their operations. - Minor compliance -	Based on the interview of internal stakeholders among workers as well relevant external stakeholders, the mill and estates within Asia Production Unit @ APU do not instigate violence or use any form of harassment in their operations.	Complied
Criterion 4.2: There is a mutually agreed and documented system for dealing with complaints and grievances, which is implemented and accepted by all affected parties			
4.2.1	(C) The mutually agreed system, open to all affected parties, resolves disputes in an effective, timely and appropriate manner, ensuring anonymity of complainants, HRD, community spokespersons and whistle-blowers, where requested, without risk of reprisal or intimidation and follows the RSPO policy on respect for HRD. - Critical (Major) compliance -	Based on the records of complaints and grievances no issue of whistle-blowing that requires anonymity of complainants and/or grievance parties. Interview conducted with internal stakeholders among workers and relevant external stakeholders also confirmed the information.	Complied
4.2.2	Procedures are in place to ensure that the system is understood by the affected parties, including by illiterate parties. - Minor compliance -	The consultation and communication procedure available for the JC Chang Group is the SOP on Mechanism for Communication and Consultation (Doc. Ref. No. E/004-08/2019) dated 12 August 2019. This procedure specifies the mechanism of communication and consultation with all its stakeholders. There are three methods of communication and consultations; i.e. via the Joint Consultative Meeting (for workers), verbal or written complaints and using the complaint box located outside the office of each unit (for all stakeholders including all employees, neighbouring estates, smallholders, NGOs, business associates, NGOs, etc). To ensure understanding by illiterate parties, the briefings were given verbally, and when necessary, translators from among the workers (usually a worker representatives) are sought to translate documents including procedures for dealing with complaints and	Complied

RSPO P&C Public Summary Report
Revision 15 (Nov 2023)

		grievances. For example, latest briefing on the procedures was done on 3/10/23 at Melewar Estate 2.	
4.2.3	The unit of certification keeps parties to a grievance informed of its progress, including against agreed timeframe and the outcome is available and communicated to relevant stakeholders. - Minor compliance -	APU maintain their Complaints and Grievance books. Document review with no latest complaint or grievance lodged by internal and external stakeholders. Last recorded complaint lodged was received on 23/10/2019. APU maintain the logbook to record internal complaints which more to housing defects and maintenance due to worker complaints. The rectification towards the complaints being verified is responded within 10 days as per procedure.	Complied
4.2.4	The conflict resolution mechanism includes the option of access to independent legal and technical advice, the ability for complainants to choose individuals or groups to support them and/or act as observers, as well as the option of a third-party mediator. - Minor compliance -	JC Chang Group established SOP on Mechanisms for Complaints and Grievances Doc. No.: E/001-07/2019 dated 12/08/2019 contains a provision that parties have the option of referring the unresolved complaint / grievance to an independent arbitrator, and the option to access to technical and legal advice, and the ability for complainants to choose individuals or groups to support them and/or act as observers, as well as a third-party mediator.	Complied
Criterion 4.3: The unit of Certification contributes to local sustainable development as agreed by local communities.			
4.3.1	Contributions to community development that are based on the results of consultation with local communities are demonstrated. - Minor compliance -	JC Chang Group contributions to local sustainable development with consultation with local communities and discuss the issues includes social and/or environmental benefits. Based on the interview of internal stakeholders among workers and relevant external stakeholders, contributions to community development are demonstrated. Among CSR activities in 2023: - Donation to SMK Paris 3 and middle school	Complied
Criterion 4.4: Use of the land for oil palm does not diminish the legal, customary or user rights of other users without their free, prior and informed consent.			

RSPO P&C Public Summary Report
Revision 15 (Nov 2023)

4.4.1	<p>(C) Documents showing legal ownership or lease, or authorised use of customary land authorised by customary landowners through a Free, Prior and Informed Consent (FPIC) process. Documents Related to the history of land tenure and the actual legal or customary use of the land are available.</p> <p>- Critical (Major) compliance -</p>	<p>Documents showing legal ownership or lease available as summarized below:</p> <table border="1"> <thead> <tr> <th>Estate</th><th>Lot No/Hectare</th><th>Lease period</th><th>Authorised used of land</th></tr> </thead> <tbody> <tr> <td>Melewar Estate 2</td><td>1 land title under country lease (CL) 095311201</td><td>01/01/1979 – 31/12/2077</td><td>Cultivation of oil palm, Cocoa and/or Agricultural crop of economic value</td></tr> <tr> <td>Hwa Li Estate Div.3</td><td>4 land titles under country lease (CL) i)CL095324600, 101.1 ha ii)CL095326104, 10.01 ha iii)CL95324502, 4,047 ha iv)CL095327138, 230.6 ha</td><td>i)1/1/1995 - 31/12/2093 ii)1/1/1996 - 31/12/2094 iii) 1/1/1994 - 31/12/2092 iv)1/1/1999 – 31/12/2097</td><td>i-iii) For cultivation of an agricultural crop of economic value iv) For cultivation of oil palm</td></tr> <tr> <td>Asia Oil Palm 2 Estate</td><td>CL095317383</td><td>i)1/01/1990 – 31/12/2088</td><td>Cocoa and/or Agricultural crop of economic value</td></tr> </tbody> </table>	Estate	Lot No/Hectare	Lease period	Authorised used of land	Melewar Estate 2	1 land title under country lease (CL) 095311201	01/01/1979 – 31/12/2077	Cultivation of oil palm, Cocoa and/or Agricultural crop of economic value	Hwa Li Estate Div.3	4 land titles under country lease (CL) i)CL095324600, 101.1 ha ii)CL095326104, 10.01 ha iii)CL95324502, 4,047 ha iv)CL095327138, 230.6 ha	i)1/1/1995 - 31/12/2093 ii)1/1/1996 - 31/12/2094 iii) 1/1/1994 - 31/12/2092 iv)1/1/1999 – 31/12/2097	i-iii) For cultivation of an agricultural crop of economic value iv) For cultivation of oil palm	Asia Oil Palm 2 Estate	CL095317383	i)1/01/1990 – 31/12/2088	Cocoa and/or Agricultural crop of economic value	Complied
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Asia Oil Palm 2 Estate	CL095317383	i)1/01/1990 – 31/12/2088	Cocoa and/or Agricultural crop of economic value																
4.4.2	Copies of documents evidencing agreement-making processes and negotiated agreements detailing the FPIC process are available and include:	No land dispute within APU. Relevant stakeholders interview carried out with neighbouring has confirmed no FPIC process at all visited estates. Thus, this requirement is not applicable.	Not Applicable																

RSPO P&C Public Summary Report
Revision 15 (Nov 2023)

4.4.2a	Evidence that a plan has been developed through consultation and discussion in good faith with all affected groups in the communities, with particular assurance that vulnerable, minorities' and gender groups are consulted, and that information has been provided to all affected groups, including information on the steps that are taken to involve them in decision making. - Minor compliance -	No land dispute within APU. Relevant stakeholders interview carried out with neighbouring has confirmed no FPIC process at all visited estates. Thus, this requirement is not applicable.	Not Applicable
4.4.2b	Evidence that the unit of certification has respected communities' decisions to give or withhold their consent to the operation at the time that these decisions were taken. - Minor compliance -	No land dispute within APU. Relevant stakeholders interview carried out with neighbouring has confirmed no FPIC process at all visited estates. Thus, this requirement is not applicable.	Not Applicable
4.4.2c	Evidence that the legal, economic, environmental and social implications of permitting operations on their land have been understood and accepted by affected communities, including the implications for the legal status of their land at the expiry of the unit of certification's title, concession or lease on the land. - Minor compliance -	No land dispute within APU. Relevant stakeholders interview carried out with neighbouring has confirmed no FPIC process at all visited estates. Thus, this requirement is not applicable.	Not Applicable
4.4.3	(C) Maps of an appropriate scale showing the extent of recognised legal, customary or user rights are developed through participatory mapping involving affected parties (including neighbouring communities where applicable, and relevant authorities). - Critical (Major) compliance -	No land dispute within APU. Relevant stakeholders interview carried out with neighbouring has confirmed no FPIC process at all visited estates. Thus, this requirement is not applicable.	Not Applicable
4.4.4	All relevant information is available in appropriate forms and languages, including assessments of impacts, proposed benefit sharing, and legal arrangements.	No land dispute within APU. Relevant stakeholders interview carried out with neighbouring has confirmed no FPIC process at all visited estates. Thus, this requirement is not applicable.	Not Applicable

RSPO P&C Public Summary Report
Revision 15 (Nov 2023)

	- Minor compliance -		
4.4.5	<p>(C) Evidence is available to show that communities are represented through institutions or representatives of their own choosing, including by legal counsel if they so choose.</p> <p>- Critical (Major) compliance -</p>	No land dispute within APU. Relevant stakeholders interview carried out with neighbouring has confirmed no FPIC process at all visited estates. Thus, this requirement is not applicable.	Not Applicable
4.4.6	<p>There is evidence that implementation of agreements negotiated through FPIC is annually reviewed in consultation with affected parties.</p> <p>- Minor compliance -</p>	No land dispute within APU. Relevant stakeholders interview carried out with neighbouring has confirmed no FPIC process at all visited estates. Thus, this requirement is not applicable.	Not Applicable
Criterion 4.5: No new plantings are established on local peoples' land where it can be demonstrated that there are legal, customary or user rights, without their FPIC. This is dealt with through a documented system that enables these and other stakeholders to express their views through their own representative institutions.			
4.5.1	<p>(C) Documents showing identification and assessment of demonstrable legal, customary and user rights are available.</p> <p>- Critical (Major) compliance -</p>	Evidence of rightful and legal land ownership are as per Indicator 4.4.1 above. No other legal, customary or user rights is available.	Complied
4.5.2	<p>(C) FPIC is obtained for all oil palm development through a comprehensive process, including in particular, full respect for their legal and customary rights to the territories, lands and resources via local communities' own representative institutions, with all the relevant information and documents made available, with option of resourced access to independent advice through a documented, long-term and two-way process of consultation and negotiation.</p> <p>- Critical (Major) compliance -</p>	There is no new planting within Asia Production Unit and therefore, this Indicator is not applicable.	Not Applicable
4.5.3	Evidence is available that affected local peoples understand they have the right to say 'no' to operations planned on their lands before and during initial discussions, during the stage of information gathering and associated consultations, during negotiations, and up until an agreement	There is no new planting within Asia Production Unit and therefore, this Indicator is not applicable.	Not Applicable

RSPO P&C Public Summary Report
Revision 15 (Nov 2023)

	with the unit of certification is signed and ratified by these local peoples. Negotiated agreements are non-coercive and entered into voluntarily and carried out prior to new operations. - Minor compliance -		
4.5.4	To ensure local food and water security, as part of the FPIC process, participatory SEIA and participatory land-use planning with local peoples, the full range of food and water provisioning options are considered. There is transparency of the land allocation process. - Minor compliance -	There is no new planting within Asia Production Unit and therefore, this Indicator is not applicable.	Not Applicable
4.5.5	Evidence is available that the affected communities and rights holders have had the option to access to information and advice that is independent of the project proponent, concerning the legal, economic, environmental and social implications of the proposed operations on their lands. - Minor compliance -	There is no new planting within Asia Production Unit and therefore, this Indicator is not applicable.	Not Applicable
4.5.6	Evidence is available that the communities (or their representatives) gave consent to the initial planning phases of the operations prior to the issuance of a new concession or land title to the operator. - Minor compliance -	There is no new planting within Asia Production Unit and therefore, this Indicator is not applicable.	Not Applicable
4.5.7	New lands are not acquired for plantations and mills after 15 November 2018 as a result of recent (2005 or later) expropriations without consent under the right of eminent domain of the federal and state land acquisition legislations. - Minor compliance -	There is no new planting within Asia Production Unit and therefore, this Indicator is not applicable.	Not Applicable

RSPO P&C Public Summary Report
Revision 15 (Nov 2023)

4.5.8	<p>(C) New lands are not acquired in areas inhabited by communities in voluntary isolation.</p> <p>- Critical (Major) compliance -</p>	There is no new planting within Asia Production Unit and therefore, this Indicator is not applicable.	Not Applicable
<p>Criterion 4.6: Any negotiations Concerning compensation for loss of legal, customary or user rights are dealt with through a documented system that enables indigenous peoples, local communities and other stakeholders to express their views through their own representative institutions.</p>			
4.6.1	<p>(C) A mutually agreed procedure for identifying legal, customary or user rights, and a procedure for identifying people entitled to compensation, is in place.</p> <p>- Critical (Major) compliance -</p>	<p>JC Chang Group established SOP of Identifying Legal and Customary Rights and Identifying People Entitled to Compensation with doc. No.: E/002- 03/2015) dated 08/09/2015.</p> <p>JC Chang Group established FPIC Procedure with doc. No.: E/004-07/2015 dated 08/09/2015</p> <p>JC Chang Group established Resolution and Compensation Procedure with doc. No.: E/002-02/2012 dated 11/09/2012.</p>	Complied
4.6.2	<p>(C) A mutually agreed procedure for calculating and distributing fair compensation (monetary or otherwise) is established and implemented, monitored and evaluated in a participatory way, and corrective actions taken as a result of this evaluation.</p> <p>- Critical (Major) compliance -</p>	<p>JC Chang Group established SOP of Identifying Legal and Customary Rights and Identifying People Entitled to Compensation with doc. No.: E/002- 03/2015) dated 08/09/2015.</p> <p>JC Chang Group established FPIC Procedure with doc. No.: E/004-07/2015 dated 08/09/2015</p> <p>JC Chang Group established Resolution and Compensation Procedure with doc. No.: E/002-02/2012 dated 11/09/2012.</p>	Complied
4.6.3	<p>Evidence is available that equal opportunities are provided to both men and women to hold land titles for scheme small holdings.</p> <p>- Minor compliance -</p>	Document review and onsite interviews with local communities informed there is no evidence of any land dispute. Therefore, this Indicator is not applicable.	Not Applicable

RSPO P&C Public Summary Report
Revision 15 (Nov 2023)

4.6.4	<p>The process and outcomes of any negotiated agreements, compensation and payments are documented, with evidence of the participation of affected parties, and made publicly available to them.</p> <p>- Minor compliance -</p>	<p>Document review and onsite interviews with local communities informed there is no evidence of any land dispute. Therefore, this Indicator is not applicable.</p>	Not Applicable
<p>Criterion 4.7: Where it can be demonstrated that local peoples have legal, customary or user rights, they are compensated for any agreed land acquisitions and relinquishment of rights, subject to their FPIC and negotiated agreements.</p>			
4.7.1	<p>(C) A mutually agreed procedure for identifying people entitled to compensation is in place.</p> <p>- Critical (Major) compliance -</p>	<p>JC Chang Group established SOP of Identifying Legal and Customary Rights and Identifying People Entitled to Compensation with doc. No.: E/002- 03/2015) dated 08/09/2015.</p> <p>JC Chang Group established FPIC Procedure with doc. No.: E/004-07/2015 dated 08/09/2015</p> <p>JC Chang Group established Resolution and Compensation Procedure with doc. No.: E/002-02/2012 dated 11/09/2012..</p>	Complied
4.7.2	<p>(C) A mutually agreed procedure for calculating and distributing fair and gender-equal compensation (monetary or otherwise) is established and implemented, monitored and evaluated in a participatory way, and corrective actions taken as a result of this evaluation.</p> <p>- Critical (Major) compliance -</p>	<p>JC Chang Group established SOP of Identifying Legal and Customary Rights and Identifying People Entitled to Compensation with doc. No.: E/002- 03/2015) dated 08/09/2015.</p> <p>JC Chang Group established FPIC Procedure with doc. No.: E/004-07/2015 dated 08/09/2015</p> <p>JC Chang Group established Resolution and Compensation Procedure with doc. No.: E/002-02/2012 dated 11/09/2012.</p> <p>Document review and onsite interviews with local communities informed there is no evidence of any land dispute. Therefore no evaluation done as there is no evidence of any local people having legal, customary or user rights.</p>	Complied

RSPO P&C Public Summary Report
Revision 15 (Nov 2023)

4.7.3	Communities that have lost access and rights to land for plantation expansion are given opportunities including employment and supply contracts to benefit from plantation development. - Minor compliance -	Document review and onsite interviews with local communities informed there is no evidence of any land dispute. Therefore, this Indicator is not applicable.	Not Applicable
Criterion 4.8: The right to use the land is demonstrated and is not legitimately contested by local people who can demonstrate that they have legal, customary, or user rights.			
4.8.1	Where there are or have been disputes, proof of legal acquisition of title and evidence that mutually agreed compensation has been made to all people who held legal, customary, or user rights at the time of acquisition is available and provided to parties to a dispute, and that any compensation was accepted following a documented process of FPIC. - Minor compliance -	Document review and onsite interviews with local communities informed there is no evidence of any land dispute. Therefore, this Indicator is not applicable.	Not Applicable
4.8.2	(C) Land conflict is not present in the area of the unit of certification. Where land conflict exists, acceptable conflict resolution processes (see Criteria 4.2 and 4.6) are implemented and accepted by the parties involved. In the case of newly acquired plantations, the unit of certification addresses any unresolved conflict through appropriate conflict resolution mechanisms. - Critical (Major) compliance -	Document review and onsite interviews with local communities informed there is no evidence of any land dispute. Therefore, this Indicator is not applicable.	Not Applicable
4.8.3	Where there is evidence of acquisition through dispossession or forced abandonment of customary and user rights prior to the current operations and there remain parties with demonstrable customary and land use rights, these claims will be settled using the relevant requirements (Indicators 4.4.2, 4.4.3 and 4.4.4) - Minor compliance -	Document review and onsite interviews with local communities informed there is no evidence of any acquisition through dispossession or forced abandonment of customary and user rights prior to the current operations. Therefore, this Indicator is not applicable.	Not Applicable

RSPO P&C Public Summary Report
Revision 15 (Nov 2023)

4.8.4	For any conflict or dispute over the land, the extent of the disputed area is mapped out in a participatory way with involvement of affected parties (including neighbouring communities where applicable). - Minor compliance -	Document review and onsite interviews with local communities informed there is no evidence of any land dispute. Therefore, this Indicator is not applicable.	Not Applicable
Principle 5: Support smallholder inclusion			
Criterion 5.1: The unit of certification deals fairly and transparently with all smallholders (Independent and Scheme) and other local businesses.			
5.1.1	Current and previous period prices paid for FFB are publicly available and accessible by smallholders. - Minor compliance -	No Inclusion of Smallholder in Asia Palm Oil Mill as it does not receive FFB from smallholders. All FFB suppliers are from own estates within J.C Chang Group. Therefore, this indicator is not applicable.	Not Applicable
5.1.2	(C) Evidence is available that the unit of certification explains the FFB pricing to smallholders on request from individual smallholders (at least once a year or upon request). - Critical (Major) compliance -	No Inclusion of Smallholder in Asia Palm Oil Mill as it does not receive FFB from smallholders. All FFB suppliers are from own estates within J.C Chang Group. Therefore, this indicator is not applicable.	Not Applicable
5.1.3	(C) Fair pricing, calculated as a portion of the international CPO price less costs is provided to smallholders in the supply base and documented. - Critical (Major) compliance -	No Inclusion of Smallholder in Asia Palm Oil Mill as it does not receive FFB from smallholders. All FFB suppliers are from own estates within J.C Chang Group. Therefore, this indicator is not applicable.	Not Applicable
5.1.4	(C) Evidence is available that all parties, including women and independent representative organisations assisting smallholders where requested, are involved in decision-making processes and understand the contracts. These include those involving finance, loans/credits, and repayments through FFB price reductions for replanting and or other support mechanisms where applicable. - Critical (Major) compliance -	No Inclusion of Smallholder in Asia Palm Oil Mill as it does not receive FFB from smallholders. All FFB suppliers are from own estates within J.C Chang Group. Therefore, this indicator is not applicable.	Not Applicable

RSPO P&C Public Summary Report
Revision 15 (Nov 2023)

5.1.5	Contracts are fair, legal and transparent and have an agreed timeframe. - Minor compliance -	No Inclusion of Smallholder in Asia Palm Oil Mill as it does not receive FFB from smallholders. All FFB suppliers are from own estates within J.C Chang Group. Therefore, this indicator is not applicable.	Not Applicable
5.1.6	(C) Agreed payments are made in a timely manner and receipts specifying price, weight, deductions and amount paid are given. - Critical (Major) compliance -	No Inclusion of Smallholder in Asia Palm Oil Mill as it does not receive FFB from smallholders. All FFB suppliers are from own estates within J.C Chang Group. Therefore, this indicator is not applicable.	Not Applicable
5.1.7	Weighbridges used for determining payment to smallholders are verified by an independent third party on a regular basis (this can be government). - Minor compliance -	No Inclusion of Smallholder in Asia Palm Oil Mill as it does not receive FFB from smallholders. All FFB suppliers are from own estates within J.C Chang Group. Therefore, this indicator is not applicable.	Not Applicable
5.1.8	The unit of certification supports Independent Smallholders with certification, where applicable, ensuring mutual agreements between the unit of certification and the smallholders on who runs the internal control system (ICS), who holds the certificates, and who holds and sells the certified material. - Minor compliance -	No Inclusion of Smallholder in Asia Palm Oil Mill as it does not receive FFB from smallholders. All FFB suppliers are from own estates within J.C Chang Group. Therefore, this indicator is not applicable.	Not Applicable
5.1.9	(C) The unit of certification has a grievance mechanism for smallholders and all grievances raised are dealt with in a timely manner. - Critical (Major) compliance -	No Inclusion of Smallholder in Asia Palm Oil Mill as it does not receive FFB from smallholders. All FFB suppliers are from own estates within J.C Chang Group. Therefore, this indicator is not applicable.	Not Applicable
Criterion 5.2: The unit of certification supports improved livelihoods of smallholders and their inclusion in sustainable palm oil value chains.			
5.2.1	The Company consults with interested smallholders (irrespective of type) within the Unit of Certification, including women or other partners in their	No Inclusion of Smallholder in Asia Palm Oil Mill as it does not receive FFB from smallholders. All FFB suppliers are from own	Not Applicable

RSPO P&C Public Summary Report
Revision 15 (Nov 2023)

	supply base, to assess their needs for support to improve their livelihoods and their interest in RSPO certification. - Minor compliance -	estates within J.C Chang Group. Therefore, this indicator is not applicable. Stakeholder consultation was conducted accordingly.	
5.2.2	The unit of certification develops and implements smallholder support programme to improve smallholder livelihood and build their capacity to enhance productivity, quality, organisational and managerial competencies, and specific elements of RSPO certification (including the RSPO Independent Smallholder Standard or RISS). - Minor compliance -	No Inclusion of Smallholder in Asia Palm Oil Mill as it does not receive FFB from smallholders. All FFB suppliers are from own estates within J.C Chang Group. Therefore, this indicator is not applicable.	Not Applicable
5.2.3	Where applicable, the unit of certification provides support to smallholders to promote legality of FFB production. - Minor compliance -	No Inclusion of Smallholder in Asia Palm Oil Mill as it does not receive FFB from smallholders. All FFB suppliers are from own estates within J.C Chang Group. Therefore, this indicator is not applicable.	Not Applicable
5.2.4	(C) Evidence exists that the unit of certification trains Scheme Smallholders on pesticide handling. - Critical (Major) compliance -	No Inclusion of Smallholder in Asia Palm Oil Mill as it does not receive FFB from smallholders. All FFB suppliers are from own estates within J.C Chang Group. Therefore, this indicator is not applicable.	Not Applicable
5.2.5	The unit of certification regularly reviews and publicly reports on the progress of the Smallholder support programme. - Minor compliance -	No Inclusion of Smallholder in Asia Palm Oil Mill as it does not receive FFB from smallholders. All FFB suppliers are from own estates within J.C Chang Group. Therefore, this indicator is not applicable.	Not Applicable
Principle 6: Respect workers' rights and conditions			
Criterion 6.1: Any form of discrimination is prohibited.			
6.1.1	(C) A publicly available non-discrimination and equal opportunity policy is implemented in such a way to prevent discrimination based on ethnic	An Equal Opportunities Policy dated 12 th August 2019 was established and signed by Plantation Director, Mr. Tee Swee Kee.	Complied

RSPO P&C Public Summary Report
Revision 15 (Nov 2023)

	origin, caste, national origin, religion, disability, gender, sexual orientation, gender identity, union membership, political affiliation or age. - Critical (Major) compliance -	The Policy is available in both Malay and English languages. The policy prevent discrimination based on ethnic origin, caste, national origin, religion, disability, gender, sexual orientation, gender identity, union membership, political affiliation or age. Latest policy briefing was carried out on 2 nd October 2023 at Hwa Li 3 Estate.	
6.1.2	(C) Evidence is provided that workers and groups including local communities, women, and migrant workers have not been discriminated against including charging of recruitment fees for foreign workers. - Critical (Major) compliance -	Records of employments and interview conducted on-site with sampled internal and external stakeholders confirmed that the workers and groups including local communities, women, and migrant workers have not been discriminated against. Recruitment process detailed out under, Guidelines on Terms & Conditions of Employment for Sabah Estate's Workers, doc. ref. no. E/009-07/2020 dated 9/4/2020.	Complied
6.1.3	The unit of certification demonstrates that recruitment selection, hiring, access to training and promotion are based on skills, capabilities, qualities and medical fitness necessary for the jobs available. - Minor compliance -	JC Chang's mill and estates have implemented its recruitment based on the company's Guidelines on Procedure of Recruitment, Selection, Hiring, Promotion, Retirement and Termination; Doc. Ref. # E020- 01/2019; Doc. Date: 12/08/2019. Sighted sample advertisements and records of new employee's recruitments as well as promotion of exiting employees confirmed that it was based on skills, capabilities, qualities and medical fitness necessary.	Complied
6.1.4	Pregnancy testing is not conducted as a discriminatory measure and is only permissible when it is legally mandated. Alternative equivalent employment is offered for pregnant women. - Minor compliance -	Pregnancy test was carried out on monthly basis as CHRA recommendation as to initiate medical removal protection (MRP) if there is any pregnant or breast-feeding women work in chemically exposed environment. Monthly urine pregnancy test (UPT) carried out for sprayer, manurer and storekeeper in the estate. Results of monthly UPT available for verification.	Complied
6.1.5	(C) A gender committee is in place specifically to raise awareness, identify and address issues of concern, as well as opportunities and improvements for women.	In place at JC Chang Group Estates and its supply base gender committee which is a women employee outreach programme endorsed and funded by the Company. Its members comprise female employees and wives of workers. The committee promotes	Complied

RSPO P&C Public Summary Report
Revision 15 (Nov 2023)

	<div>- Critical (Major) compliance -</div>	<div>gender equality and empower women’s knowledge and skills. Meeting frequency is twice per year as practiced.</div> <div>Based on minutes sighted, committee members were briefed on sexual harassment, domestic violence, how to make complaints if there was a case, reproductive rights, the new census for new mothers, and briefings on Company policies.</div> <div>Date of meeting carried out in 2023 summarized as per below:</div> <table><tr><td>Estate</td><td>Date of meeting</td><td>Remarks</td></tr><tr><td>Melewar 2</td><td>17/2/2023, 2/08/2023</td><td>No reported sexual harassment and domestic violence case.</td></tr><tr><td>AOP 2</td><td>7/1/23, 7/7/23</td><td>No reported sexual harassment and domestic violence case.</td></tr></table>	Estate	Date of meeting	Remarks	Melewar 2	17/2/2023, 2/08/2023	No reported sexual harassment and domestic violence case.	AOP 2	7/1/23, 7/7/23	No reported sexual harassment and domestic violence case.	
Estate	Date of meeting	Remarks										
Melewar 2	17/2/2023, 2/08/2023	No reported sexual harassment and domestic violence case.										
AOP 2	7/1/23, 7/7/23	No reported sexual harassment and domestic violence case.										
6.1.6	<div>There is evidence of equal pay for the same work scope.</div> <div>- Minor compliance -</div>	<div>Same salary offered to workers for the same work scope. For mill operator, daily rated workers received RM57.70. For estate, the given rate is RM57.70 based on the latest Minimum Wages Order 2022 effective from 1/5/2022.</div>	Complied									
Criterion 6.2: Pay and conditions for staff and workers and for contract workers always meet at least legal or industry minimum standards and are sufficient to provide decent living wages (DLW).												
6.2.1	<div>(C) Applicable labour laws, union and/or other collective agreements and documentation of pay and conditions are available to the workers in national languages (English or Bahasa Malaysia) and explained to them in language they understand.</div> <div>- Critical (Major) compliance -</div>	<div>All employees have signed employment contracts (for foreigners), and employment letters (for locals) Each document is dated and contains provisions related to duration of contract, job scope, place of work, roles and responsibilities of employers and employees, wages, allowances, working hours, mutual termination notice, holidays, paid annual leave, medical leave, other benefits, deductions, etc. These documents were prepared in Bahasa</div>	Complied									

RSPO P&C Public Summary Report
Revision 15 (Nov 2023)

		Malaysia, a language which is understood by all workers from Malaysia, Indonesia and Philippines. Any changes to the provisions of the contract e.g. change in minimum wages, are inserted in another mutually agreed document i.e. Details of Changes on Terms and Conditions of Employment dated 9/4/2020 which in accordance with Guidelines On Term and Conditions of Employment For Sabah Estate's Workers, E/009-07/2020.	
6.2.2	<p>(C) Employment contracts and related documents detailing payments and conditions of employment (e.g. regular working hours, deductions, overtime, sick leave, holiday entitlement, maternity leave, reasons for dismissal, period of notice, etc. in compliance with national legal requirements) and payroll documents give accurate information on compensation for all work performed. This includes a form of record for work done by family members.</p> <p>- Critical (Major) compliance -</p>	<p>Details of payments and conditions of employment are stated and documented in the employment contracts given to all workers. The contract contains terms related to duration, hours of work, overtime, annual/medical leave, public holiday, mutual termination, salary deductions, maternity entitlement, etc. The terms are in compliance with the Sabah Labour Ordinance.</p> <p>Working hours is 8 hours. From Monday to Saturday. Total monthly working hours is 208 hours. The overtime maximum is 104 hours according to the Sabah Labour Ordinance 2005. Verified the payslips, the payment and calculation of over time well distributed.</p> <p>The overtime rate after 8 hours daily rated is: upkeeping</p> <ul style="list-style-type: none"> - Mon - Sat – daily rated / 8 hours x 1.5 - Sunday - daily rated / 8 hours x 2.0 - Public holiday – daily rated / 8 hours x 3.0 <p>The overtime rate after 8 hours piece rated is: harvesters</p> <ul style="list-style-type: none"> - Mon - Sat – flat rate - Sunday – flat rate x 2.0 - Public holiday – flat rate x 3.0 <p>Number of samples (workers) taken are determined based on the formula of $\sqrt{n} \times 0.8$ (n= total number of workers). Employment</p>	Complied

RSPO P&C Public Summary Report
Revision 15 (Nov 2023)

		<p>contracts and payslips of the following workers were sighted during the audit:</p> <p>i) Hwa Li 3 Estate 2 (15 workers sampled from 324workers)</p> <p>ii) Melewar 2 Div Estate (10 workers sampled from 155 workers)</p> <p>iii) Asia POM (9 workers sampled from 105 workers)</p> <p>3 different production trends (October 2023 [peak], June 2023 [normal], April 2023 [low]) were selected. From the above selected sample workers, minimum wages of RM1,500 per month or RM57.70 per day based on Minimum Wages Order 2022 has been met.</p>	
6.2.3	<p>(C) There is evidence of legal compliance for regular working hours, deductions, overtime, sickness, holiday entitlement, maternity leave, reasons for dismissal, period of notice and other legal labour requirements.</p> <p>- Critical (Major) compliance -</p>	<p>JC Chang Group established employment contracts signed with the workers include regular working hours, statutory deductions, duration of employment, wages payable, working hours, medical benefits including medical leave entitlement, annual leave entitlement, mutual termination of service, etc. Document review on medical certificates is given a paid medical leave, entitled to annual leave. Female employees are entitled to 2 months paid maternity leave. Crosscheck between the employment contracts, payslip, checkroll book, punch cards and onsite interviews with workers themselves confirmed the implementation as per requirement apply as stated in the Sabah Labour Ordinance. There is no evidence of termination, and so compliance with reasons for dismissal and period of notice could not be verified during this audit. Salary deductions are made for statutory deductions such as SOCSO, EPF, and EIS</p>	Complied
6.2.4	<p>(C) The unit of certification provides adequate housing, sanitation facilities, water supplies, medical, educational and welfare amenities to national standards or above, where no such public facilities are available or accessible. National laws, or in their absence the ILO Guidance on</p>	<p>JC Chang's group estates and mill provides adequate housing, sanitation facilities, water supplies, medical, educational and welfare amenities to workers in the plantation. Regular inspection for labour line was carried out by MA/EHA on weekly basis. House</p>	Complied

RSPO P&C Public Summary Report

Revision 15 (Nov 2023)

	<p>Workers' Housing Recommendation No. 115, are used. In the case of acquisitions of non-certified units, a plan is developed detailing the upgrade of infrastructure. A reasonable time (5years) is allowed to upgrade the infrastructure.</p> <p>- Critical (Major) compliance -</p>	<p>defect issue and cleanliness standard will be reported in the inspection checklist for further rectification by the management.</p> <p>For example, at Melewar 2 estate, the latest inspection was carried out on 11/11/23, 18/11/23, 24/11/23 and 1/12/23. From the report, the was no major issue recorded and demonstrated with actual condition during site visit.</p>															
6.2.5	<p>The unit of certification makes efforts to improve workers' access to adequate, sufficient and affordable food.</p> <p>- Minor compliance -</p>	<p>JC Chang Group estates and mill ensure that workers access to adequate, sufficient and affordable food improves from time to time. As to ensure goods price is affordable, monthly price monitoring was done by each operating unit.</p>	Complied														
6.2.6	<p>A DLW is paid to all workers, including piece rate/quotas, for whom the calculation is based on achievable quotas during regular work hours.</p> <p>PROCEDURAL NOTE:</p> <p>STATEMENT FROM THE RSPO STANDARDS STANDING COMMITTEE REGARDING INDICATOR 6.2.6 ON DECENT LIVING WAGE</p> <p>With reference to procedural note of indicator 6.2.6, the RSPO has published a guidance on the DLW calculation in June 2019. The RSPO Secretariat will endeavour to carry out DLW country benchmarks for palm oil producing countries in which RSPO members operate and for which no Global Living Wage Coalition (GLWC) benchmarks exist (As of September 2019, GLWC has developed national benchmarks in Bangladesh, Belize, Brazil, China, Colombia, Costa Rica, Dominican Republic, Ecuador, Ethiopia, Ghana, Guatemala, India, Kenya, Malawi, Mexico, Nicaragua, Pakistan, South Africa, Sri Lanka, Uganda and Vietnam These benchmarks are developed based on banana, coffee, floriculture, textile, manufacturing, seafood processing and tea industry. The RSPO is in the process of commissioning benchmarks for Malaysia and Indonesia for the palm oil sector and will develop methods to calculate and/or define DLW applicability for all palm oil producing countries in which RSPO members operate).</p> <p><i>Where a GLWC living wage standard (benchmark), or one that fulfils the basic requirements of the RSPO-endorsed living wage methodology, has been established in the country or region of operation, the same should be used as benchmarks.</i></p>	<p>SOP Living wages (LW) has been established and documented in the document title "Implementation plan for living wage (LW)" document number E/027-02/2023 and 07/11/2023. The assessment has been done through data collection from financial year 20/21 until financial year 22/23. Information that has been collected is average wages received for all operating units located Pahang and Sabah states (Mill and Estate) and benefits in kinds that has been provided by the operating. Comparison has been made based on the LW benchmark calculation that has been extracted from report of household expenditure survey 2016, Annex 3, overview of LW for Malaysia from RSPO Guidance for implementing a living wage. Details of calculation as per below</p> <table><tr><th rowspan="2"></th><th colspan="2">Pahang</th><th colspan="2">Sabah</th></tr><tr><th>Mill</th><th>Estate</th><th>Mill</th><th>Estate</th></tr><tr><td>Actual average salary (RM)</td><td>1,635.32</td><td>1,519.85</td><td>2,077.20</td><td>1,338.64</td></tr></table>		Pahang		Sabah		Mill	Estate	Mill	Estate	Actual average salary (RM)	1,635.32	1,519.85	2,077.20	1,338.64	Complied
	Pahang			Sabah													
	Mill	Estate	Mill	Estate													
Actual average salary (RM)	1,635.32	1,519.85	2,077.20	1,338.64													

RSPO P&C Public Summary Report

Revision 15 (Nov 2023)

	<p>In the absence of such benchmarks, the RSPO will collaborate with the GLWC and/or local experts on developing oil palm industry benchmarks (Benchmark in this context may include other approaches and/or methods to calculate the applicability of DLW in the country or region in accordance to the RSPO endorsed method for determining a DLW. Local applicability for benchmarks is important and it may differ based on the needs of each locality or country). These benchmarks will be developed in collaboration and consultation with relevant stakeholders such as palm oil industry members, workers' union, authorities and/or relevant organisations.</p> <p><i>For countries where no living wage standard is established, until such time that an RSPO endorsed benchmark for the country is in place, national minimum wages shall be paid to all workers. In addition to the payment of minimum wages, the Unit of Certification (UoC) shall conduct an assessment of the prevailing wages and in-kind benefits provided to workers in the Unit of Certification aligned with the RSPO Guidance for Implementing a Decent Living Wage (RSPO Guidance for Implementing a Decent Living Wage). The RSPO will also develop further guidance and tools to calculate DLW in line with the RSPO endorsed methodology which may include independent studies by local experts in their respective region or country).</i></p> <p>Once these benchmarks are available, this procedural note is no longer applicable. UoC shall have an implementation plan towards the payment of a DLW with specific targets, and a phased implementation process including:</p> <ul style="list-style-type: none">• Updated assessment on prevailing wages and in-kind benefits• There is annual progress on the implementation of living wages• Where a minimum wage, based on equivalent of baskets of goods, is stipulated in Collective Bargaining Agreements (CBAs), this should be used as the foundation for the gradual implementation of the living wage payment• The UoC may choose to implement the living wage payment in a specific section as a pilot project; the pilot will then be evaluated and adapted before eventual scale up of the living wage implementation. <p>- Minor compliance -</p>	<table><tr><td>In kind benefits</td><td>214.43</td><td>310.60</td><td>679.97</td><td>299.71</td></tr><tr><td>Prevailing wages (RM)</td><td>1,840.01</td><td>1,849.93</td><td>3,251.30</td><td>1,945.11</td></tr><tr><td>Benchmark (RM)</td><td>1,492.73</td><td></td><td></td><td>1,137.91</td></tr><tr><td>GAP</td><td>(347.28)</td><td></td><td></td><td>(807.20)</td></tr></table>	In kind benefits	214.43	310.60	679.97	299.71	Prevailing wages (RM)	1,840.01	1,849.93	3,251.30	1,945.11	Benchmark (RM)	1,492.73			1,137.91	GAP	(347.28)			(807.20)	
In kind benefits	214.43	310.60	679.97	299.71																			
Prevailing wages (RM)	1,840.01	1,849.93	3,251.30	1,945.11																			
Benchmark (RM)	1,492.73			1,137.91																			
GAP	(347.28)			(807.20)																			
6.2.7	Permanent, full-time employment including contractors' workers and contracted workers is used for all core work performed by the unit of certification. Casual, temporary and day labour is limited to jobs that are temporary or seasonal	Employment contracts detailing payments and conditions of employment available to the permanent workers employed as per samples sighted in indicator 6.2.2 above. No casual, temporary and day labour employed within all operating units within APU.	Complied																				

RSPO P&C Public Summary Report

Revision 15 (Nov 2023)

	- Minor compliance -		
Criterion 6.3: The unit of Certification respects the rights of all personnel to form and join trade unions of their choice and to bargain collectively. Where the right to freedom of association and collective bargaining are restricted under law, the employer facilitates parallel means of independent and free association and bargaining for all such personnel.			
6.3.1	<p>(C) A published statement recognising freedom of association and right to collective bargaining in national languages (English and/or Bahasa Malaysia) is available and is explained to all workers, in language that they understand, and is demonstrably implemented.</p> <p>- Critical (Major) compliance -</p>	All the Estates subscribe to JC Chang's Group Social & Human Rights Policy dated 14 th November 2019 and Tee Swee Kee (Plantation Director). This Policy respects the rights to associate and join unions and is displayed on the main notice boards located at pertinent area with estate's office compound. For example, policy briefing was carried out on 2/10/23 at Hwa Li 3 Estate.	Complied
6.3.2	<p>Minutes of meetings between the unit of certification with trade unions or workers representatives, who are freely elected, are documented in national languages (English and/or Bahasa Malaysia) and made available upon request.</p> <p>- Minor compliance -</p>	Minutes of meetings between the unit of certification with trade unions or workers representatives or Joint Consultative Council @ JCC meeting was carried out every quarter. Minute of meetings documented and made available for verification at visited operating units. At Melewar 2 Estate, meeting for FY2023 was carried out on 31/3/23, 6/7/23 and 27/9/23. Based on the latest minute of meeting, previous pending issue reported and has been resolved accordingly. Interview carried out the JCC committee member has confirmed the minute and issues discussed.	Complied
6.3.3	<p>Management does not interfere with the formation or operation of registered unions/ labour organisations or associations, or other freely elected representatives for all workers including migrant and contract workers.</p> <p>- Minor compliance -</p>	<p>JCC appointment is via employee nomination/election. Evidence was made available to show that the workers' representatives have been freely chosen by the workers themselves via an election process and they represent their respective nationalities as follow.</p> <ol style="list-style-type: none"> Asia Oil Palm Estate 2 records showed that the election was held on 14/04/2021 and there has no change of member. Asia Palm Oil Mill records showed that the election was held on 09/09/2022. 	Complied

RSPO P&C Public Summary Report
Revision 15 (Nov 2023)

		<p>3. Hwa Li Estate 3 records showed that the election was held on 05/08/2022.</p> <p>4. Melewar Estate 2 records showed that election held on 09/05/2022.</p> <p>List of newly appointed members was distributed made available for verification. There is no involvement of management in the formation or operation of registered unions/ labour organisations or associations observed. Evidence of freely elected process was evident.</p>	
Criterion 6.4: Children are not employed or exploited.			
6.4.1	<p>A formal policy for the protection of children, including prohibition of child labour and remediation is in place, and included into service contracts and supplier agreements.</p> <p>- Minor compliance -</p>	JC Chang's Group has established Child Protection Policy dated 20 th February 2020 where they are not engaged in or support the use of Child Labour for both check roll and contractor/vendor/supplier. Remediation plan is in place and will provide adequate support to enable children of its employees to attend and remain in school until no longer a child. This was verified during field observations and review of check roll list. The minimum age of workers to recruit is 18 years old. This requirement is also included in all agreements with its contractors via sustainability compliance clause, E023-01/2019.	Complied
6.4.2	<p>(C) There is evidence that minimum age requirements are met. Personnel files show that all workers are above the national minimum age or above company policy minimum age, whichever is higher. There is a documented age screening verification procedure.</p> <p>- Critical (Major) compliance -</p>	Documentary evidence is available that minimum age requirements are met. This is based on workers' check roll list and copies of their passport/NRIC details. Based on workers' NRIC and passports, all workers were at least 18 years old when employed.	Complied
6.4.3	<p>(C) Young persons may be employed only for non- hazardous work, with protective restrictions in place for that work.</p>	Based on site observation at work area (field/workstation), no young person employed for non- hazardous work.	Complied

RSPO P&C Public Summary Report
Revision 15 (Nov 2023)

	- Critical (Major) compliance -		
6.4.4	<p>The unit of certification demonstrates communication about its 'no child labour' policy and the negative effects of child labour, and promotes child protection to supervisors and other key staff, smallholders, FFB suppliers and communities where workers live.</p> <p>- Minor compliance -</p>	Meeting with internal and external stakeholders confirmed that the information on no child labour policy and the negative effects of child labour were provided in appropriate languages and accessible to them. The latest briefing was carried out on 12/07/23 at Hwa Li 3 estate.	Complied
Criterion 6.5: There is no harassment or abuse in the workplace, and reproductive rights are protected.			
6.5.1	<p>(C) A policy to prevent sexual and all other forms of harassment and violence is implemented and communicated to all levels of the workforce.</p> <p>- Critical (Major) compliance -</p>	JC Chang's Group Estates subscribed to the Company's Sexual Harassment Policy signed on 1 July 2012 by Plantation Director, Mr. Tee Swee Kee. This Policy is being continuously communicated to all levels of workforce via Gender Committee Meetings and during morning musters. At Asia POM, awareness on the Policy was given on 5/9/23. Based on interview with a group of gender committee at respective operating units, it was evident that they were understood the policy statement with the intent to prevent sexual and all other forms of harassment and violence.	Complied
6.5.2	<p>(C) A policy to protect the reproductive rights of all, especially of women, is implemented and communicated to all levels of the workforce.</p> <p>- Critical (Major) compliance -</p>	JC Chang's Group Estates subscribed to the Company's Policy of Reproductive Rights (Doc. No. E/015/-02/2015) dated 5 November 2015 as well as the Social & Human Rights Policy dated 14 November 2019. This Policy respects and protects employees' reproductive rights. This Policy is continuously communicated to all levels of workforce as evidenced from briefings during morning muster at Asia POM on 5/9/23	Complied
6.5.3	Management has assessed the needs of new mothers, in consultation with the new mothers, and actions are taken to address the needs that have been identified.	New mothers need assessment discussed in the gender committee meeting. Result of discussion and assessment results recorded in the minutes of meeting as reported under indicator 6.1.5.	Complied

RSPO P&C Public Summary Report
Revision 15 (Nov 2023)

	- Minor compliance -											
6.5.4	A grievance mechanism, which respects anonymity and protects complainants where requested, is established, implemented and communicated to all levels of the workforce. - Minor compliance -	On-site interview carried out with internal stakeholders (workers representatives, gender representatives) have confirmed that the information on grievance mechanism, which respects anonymity and protects complainants where requested, is established and communicated to them. No reported/written grievance issues that requires the implementation of the mechanism occurs in all operating units within APU since the last review period.	Complied									
Criterion 6.6: No forms of forced or trafficked labour are used.												
6.6.1	<p>(C) All workers have entered into employment voluntarily and the following are prohibited:</p> <ul style="list-style-type: none">Retention of identity documents or passports (except for administration purposes including legalisation and renewal processes)Charging the workers for recruitment fees.Contract substitutionInvoluntary overtimeLack of freedom of workers to resignPenalty for termination of employmentDebt bondageWithholding of wages <p>- Critical (Major) compliance -</p>	<p>JC Chang’s Group Estates are able to demonstrate that all workers have entered into employment voluntarily.</p> <p>Passports:</p> <p>Workers are given the option of either keeping their own passports, or to keep their passports at the management office for safety reasons. Sighted during the audit, letters from workers confirming their preference to keep their passports at the office for safety reasons. Among those sighted were letters from the following workers:</p> <table><tr><th>Estate</th><th>Worker No/ID</th><th>Country of origin</th></tr><tr><td>Melewar 2</td><td>C83#&%^&</td><td>Indonesia</td></tr><tr><td>Hwa Li 3</td><td>C73#\$%&&</td><td>Indonesia</td></tr></table> <p>Recruitment fees:</p> <p>No recruitment fees are imposed on any of the foreign workers.</p> <p>Number of samples (workers) taken are determined based on the formula of $\sqrt{n} \times 0.8$ (n= total number of workers). Employment</p>	Estate	Worker No/ID	Country of origin	Melewar 2	C83#&%^&	Indonesia	Hwa Li 3	C73#\$%&&	Indonesia	Complied
Estate	Worker No/ID	Country of origin										
Melewar 2	C83#&%^&	Indonesia										
Hwa Li 3	C73#\$%&&	Indonesia										

RSPO P&C Public Summary Report
Revision 15 (Nov 2023)

		<p>contracts and payslips of the following workers were sighted during the audit:</p> <ul style="list-style-type: none">) Hwa Li 3 Estate 2 (15 workers sampled from 324workers) ii) Melewar 2 Div Estate (10 workers sampled from 155 workers) iii) Asia POM (9 workers sampled from 105 workers) <p>Based on the above samples, no evidence of recruitment fees charged to workers.</p> <p>Contract substitution:</p> <p>No contract substitution as the workers entered the employment voluntarily. No intermediate agency used for recruitment and employment opportunities are normally based on recommendation from friends and family members who has worked with the company before.</p> <p>Number of samples (workers) taken are determined based on the formula of $\sqrt{n} \times 0.8$ (n = total number of workers). Employment contracts of the following workers were sighted during the audit:</p> <ul style="list-style-type: none">) Hwa Li 3 Estate 2 (15 workers sampled from 324workers) ii) Melewar 2 Div Estate (10 workers sampled from 155 workers) iii) Asia POM (9 workers sampled from 105 workers) <p>Based on the above samples and interview with group of workers, no evidence of contract substitution observed.</p> <p>Involuntary overtime:</p> <p>No involuntary overtime practice by the company.</p>	
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RSPO P&C Public Summary Report
Revision 15 (Nov 2023)

		<p>Lack of freedom of workers to resign & penalty for termination of employment:</p> <p>Clause 16 of employment contracts allow for early termination of contract by giving of 28 days' notice (worked less than 2 years), 42 days' notice (worked for more than 2 years but less than 5 years) and 56 days' notice (worked for more than 5 years). Contract has mentioned that no penalty to be payable if there is no breach of contract and notice period occurred.</p> <p>Debt bondage & withholding of wages:</p> <p>Based on payslips sighted and interview with workers, there was no evidence of any debt bondage and withholding of wages. .</p>	
6.6.2	<p>(C) Where temporary or migrant workers are employed, a specific labour policy and/or procedures are established and implemented.</p> <p>- Critical (Major) compliance -</p>	<p>A Guidelines on Workers Employment for Casual and Temporary Employee have been established. Refer to document, ref. no. E/021-01/2018 dated 15/11/18. The guidelines have included the commitment to ensure;</p> <ul style="list-style-type: none"> - Prohibit the use of illegal temporary or migrant workers. Legalization must be initiated without undue delay and completed with 6 months. - workers' entitlement to housing and basic amenities which are at par with statutory requirements - free of discrimination, coercion or violence - no form of any contract substitution is not allowed - minimum wages to be provided as per requirement <p>Based on pay slips, employment contracts, check roll reviewed, the estates are able to demonstrate the implementation of this Policy.</p>	Complied
<p>Criterion 6.7: The unit of certification ensures that the working environment under its control is safe and without undue risk to health.</p>			

RSPO P&C Public Summary Report

Revision 15 (Nov 2023)

6.7.1	<p>(C) The responsible person(s) for H&S is identified. There are records of regular meetings between the responsible person(s) and workers. Concerns of all parties about health, safety and welfare are discussed at these meetings, and any issues raised are recorded.</p> <p>- Critical (Major) compliance -</p>	<p>Safety and Health Committee in Melewar Division 2 Estate was established as sighted Organization Chart for Melewar 2 Estate. Chairman is Dulmi Mullar (Estate Manager), Secretary is Abdul Hasim Kamaruddin and 11 employer representatives and 11 employees representatives. Minutes of meeting conducted on 27/-9/2023, 30/06/2023, 31/03/2023 and 03/01/2022. Meeting was discussing OSH related issues as verified.</p> <p>Asia POM</p> <p>Available SHC Organization Chart 2023 where Chairman is Stephen Lee Khing Wen (Mill Manager), Secretary id Samsi Laipan (Asst Manager), 15 employers representatives and 15 employees representatives. Chairman was appointed by Plantation Director as Appointment Letter dated 29/07/2021 and other members Appointment Letter dated 25/07/2023. Meeting of SHC was regularly conducted as minuted on 09/01/2024 (Next), 01/02/2023, 13/10/2023, 07/08/2023, 25/07/2023, 15/05/2023, 01/02/2023,</p>	Complied
6.7.2	<p>Accident and emergency procedures are in place and instructions are clearly understood by all workers. Accident procedures are available in national languages (English and/or Bahasa Malaysia) and explained in the language understandable to the workforce. Assigned operatives trained in first aid are present in both field and other operations, and first aid equipment is available at worksites. Records of all accidents are kept and periodically reviewed.</p> <p>- Minor compliance -</p>	<p>In Melewar Division 2 Estate, sighted Occupational Accident Monthly Record (Jan-Nov 2023). So far no accident reported in 2023. Document prepared by Nurfazerah W (HA) and approved by Dulmi Mullar (Estate Manager).</p> <p>Available a list of holder or keeper of First Aid Boxes for Melewar 2 Estate. A total of 23 boxes stated in the list. Monthly inspection was conducted by Estate Hospital Assistant (EHA) as records sampled. A total of 19 items inspected on monthly basis.</p> <p>A Guidelines on First Aid in Workplace (M/025-003/2023) Dated 23/10/2023.</p> <p><u>Hwa Li 3 Estate</u></p>	Complied

RSPO P&C Public Summary Report
Revision 15 (Nov 2023)

		<p>Training by CERT Academy Sdn. Bhd. on 10& 11 /09/2023 attended by Albario Valentine, Irma Saripuddin, Sri Sukanti Suharmaji, Mohd Azhari Abdul Kamar and total 26 workers.</p> <p>Adequate action as result of accident involving Mohd Nursyam on 20/01/2022. Briefing was conducted on 31/01/2022 and helmet with better strap provided.</p> <p><u>Asia Oil Palm 2 Estate</u></p> <p>Sighted a list of First Aid Box holders Year 2023. Total 21 units of boxes in the list and mostly Type B Box.</p>	
6.7.3	<p>(C) Workers use appropriate personal protective equipment (PPE), which is provided free of charge to all workers at the place of work to cover all potentially hazardous operations, such as pesticide application, machine operations, land preparation, and harvesting. Sanitation facilities for those applying pesticides are available, so that workers can change out of PPE, wash and put on their personal clothing.</p> <p>- Critical (Major) compliance -</p>	<p>In Melewar 2 Estate, as site visit conducted sighted PPE issued and use by:</p> <p>Block 95C3 Sprayers: Safety Helmet, safety boots, apron, rubber gloves, safety glass and cartridge mask.</p> <p>Block 95C13 Harvester: Safety Helmet, safety glass, safety boots and cotton gloves.</p> <p>Block 95D3 Manurer: Safety Helmet, safety boots, apron, rubber gloves, safety glass and cartridge mask.</p> <p>In Asia Oil Palm 2 Estate</p> <p>Sampled among harvesters found PPE such as Safety Helmet, Gloves and safety boots provided and wears by them. While sampling among Sprayers found PPE such as Safety helmet, apron, cartridge face mask, goggles, rubber gloves and yellow boots provided and wears by them. While tractor driver (Sprayer Group) found having additional ear plugs due to noise exposure. Sighted records of purchase of Safety Helmets (Proguard Yellow 20 units and Blue 10 units) purchased from KM Enterprise as invoice no INV021685 dated 06/11/2023.</p>	Complied

RSPO P&C Public Summary Report
Revision 15 (Nov 2023)

6.7.4	<p>All workers are provided with medical care and covered by accident insurance. Costs incurred from work- related incidents leading to injury or sickness are covered in accordance with Malaysian law.</p> <p>- Minor compliance -</p>	<p>In Hwa Li Estate a SOCSO contribution was made on monthly basis for coverage of accident and occupational insurance for local and foreign workers,</p> <p>January 2023: 293 workers (RM 6681.00)</p> <p>March 2023: 293 workers (RM 6352.30)</p> <p>Jun 2023: 346 workers (RM 7520.60).</p> <p><u>Asia POM</u></p> <p>SOCSO Contribution was made on monthly basis and sighted Form 8A for month of September 2023: 132 workers (RM 5363.90), June 2023: 150 workers (RM 5400.60), January 2023: 143 workers (RM 7112.00). Sample accident cases in 2022 involving</p> <p><u>Asia Oil Palm 2 Estate</u></p> <p>Monthly contribution sighted in Form 8A SOCSO as below:</p> <p>July 2023: 224 workers (RM 4773.70)</p> <p>May 2023: 222 workers (RM 5054.10)</p> <p>February 2023: 197 workers (RM 4324.50)</p>	Complied
6.7.5	<p>Occupational injuries are recorded using Lost Time Accident (LTA) metrics.</p> <p>- Minor compliance -</p>	<p>Records on Lost Time Accident (LTA) are maintained and presented during the meetings. Accident records were updated and available for verification. In year 2023, no accident was reported in Melewar 2 Estate. Form JKPP 8 was submitted to DOSH on 03/01/2023 and no loss time accident reported.</p> <p>In Hwa Li 3 Estate a Form JKPP 8 was submitted to DOSH on 09/01/2023, where no accident or occupational poisoning cases in year 2022 statistic.</p>	Complied
Principle 7: Protect, conserve and enhance ecosystems and the environment			

RSPO P&C Public Summary Report
Revision 15 (Nov 2023)

Criterion 7.1: Pests, diseases, weeds and invasive introduced species are effectively managed using appropriate Integrated Pest Management (IPM) techniques.			
7.1.1	<p>(C) IPM plans are implemented and monitored to ensure effective pest control.</p> <p>- Critical (Major) compliance -</p>	<p>Melewar 2 Estate, Hwa Li 3 Estate, Asia Oil Palm 2 Estate found having IPM Plan that included:</p> <ul style="list-style-type: none"> • RATS: Discourage killing and hunting of snake, leopard cats or other Rats predator. Method: Put up signage prohibited of hunting. • Leave eating caterpillar: To avoid prophylactic spraying or spray of beneficial plant (cassia cobanensis, tunerra subulate) Method: Application of pesticides or herbicides should be done accordingly and no spraying to be carried out if still manageable. • Rhinoceros Beetle: EFB or compost apply thinly in the field to avoid breeding sites of rhinoceros beetle. Method: Application of EFB & compost were carried out as per SOP and evenly distributed and applied thinly in the field as soil conditioner and also mulching at replanting areas. • Ganoderma: To carry out census to assess the severity of the outbreak Method: Ganoderma census was carried out every year. 	Complied
7.1.2	<p>Species referenced in the Global Invasive Species Database and CABI.org are not to be used in managed areas, unless plans to prevent and monitor their spread are implemented.</p> <p>- Minor compliance -</p>	<p>None of the species referenced in the Global Invasive Species Database and CABI.org were used in the management of IPM in the estates visited. In JC Chang Group estates, 3 common plant species were used for IPM such as Tunera subulata, Cassia cobanensis, and Antigonal leptopus.</p>	Complied
7.1.3	<p>There is no use of fire for pest control unless in exceptional circumstances such as plantation sanitation, i.e. where no other effective methods exist, and with prior approval of government authorities.</p>	<p>Evidence and records of fire usage for pest control at all estate visited. Asia Production Unit has committed to Zero Burning compliance as spelt out in the JC Chang Group Environmental Policy dated 01/01/2008.</p>	Complied

RSPO P&C Public Summary Report
Revision 15 (Nov 2023)

	- Minor compliance -																											
Criterion 7.2: Pesticides are used in ways that do not endanger health of workers, families, communities or the environment.																												
7.2.1	(C) Justification of all pesticides used is demonstrated. Selective products and application methods that are specific to the target pest, weed or disease are prioritised. - Critical (Major) compliance -	J.C.Chang Group has established a documents guidance for pesticides use as below: • Justification for Pesticide Usage under IPM (Insecticide, Fungicide and Rodenticide) (B/008-14/2016) Justifications for pesticide usage under IPM (B/009- 10/2015)	Complied																									
7.2.2	(C) Records of pesticides use (including active ingredients used and their LD50, area treated, amount of active ingredients applied per ha and number of applications) are provided. - Critical (Major) compliance -	Sighted a record of pesticide usage was available including active ingredient used and area treated, amount of active ingredient applied per Ha and number of applicants, documented in Monitoring of Pesticide Usage – Units Per Ha, Tonne FFB And Per Tonne Oil in Melewar 2 Estate and Asia Oil Palm Estate for FY 2023. While in Hwa Li 3 Estate Pesticides Monitoring FY 2022/2023 as below: <table><tr><td>Pesticides</td><td>a.i</td><td>a.i %</td><td>Total i.a Used</td><td>a.i Used per Ha</td></tr><tr><td>Nufarm Glyphosate</td><td>Glyphosate Isopropylammonium</td><td>41</td><td>237 lit</td><td>0.005</td></tr><tr><td>SENTRY</td><td>Glyphosate Isopropylammonium</td><td>41</td><td>2,405.47 lit</td><td>0.051</td></tr><tr><td>Ally 20DF</td><td>Metsulfuron Methyl</td><td>20</td><td>70.81 Kg</td><td>0.001</td></tr><tr><td>Miracle S240</td><td>Polyether Modified Trisiloxane</td><td>75</td><td>103.35 Lit</td><td>0.002</td></tr></table>	Pesticides	a.i	a.i %	Total i.a Used	a.i Used per Ha	Nufarm Glyphosate	Glyphosate Isopropylammonium	41	237 lit	0.005	SENTRY	Glyphosate Isopropylammonium	41	2,405.47 lit	0.051	Ally 20DF	Metsulfuron Methyl	20	70.81 Kg	0.001	Miracle S240	Polyether Modified Trisiloxane	75	103.35 Lit	0.002	Complied
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RSPO P&C Public Summary Report
Revision 15 (Nov 2023)

		<table><tr><td>GARLON 250EC</td><td>Triclopyr-Butoxyethyl Ester</td><td>32.1</td><td>27.29 Lit</td><td>0.0006</td></tr><tr><td>Storm</td><td>Flocoimafen</td><td>0.005</td><td>0.25 Kg</td><td>0.00001</td></tr><tr><td>Antrocol 70WP</td><td>Propineb</td><td>70</td><td>11.90 Kg</td><td>0.0000</td></tr><tr><td>Cypermethrin</td><td>Cypermethrin</td><td>5.5</td><td>0.50 Lit</td><td>0.0000</td></tr><tr><td>DECIS 250</td><td>Deltamethrin</td><td>2.85</td><td>0.23 Lit</td><td>0.0000</td></tr></table>	GARLON 250EC	Triclopyr-Butoxyethyl Ester	32.1	27.29 Lit	0.0006	Storm	Flocoimafen	0.005	0.25 Kg	0.00001	Antrocol 70WP	Propineb	70	11.90 Kg	0.0000	Cypermethrin	Cypermethrin	5.5	0.50 Lit	0.0000	DECIS 250	Deltamethrin	2.85	0.23 Lit	0.0000	
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7.2.3	<p>(C) Any use of pesticides is minimised as part of a plan, eliminated where possible, in accordance with IPM plans.</p> <p>- Critical (Major) compliance -</p>	<p><u>Asia Oil Palm 2 Estate</u></p> <p>IPM Plan established and documented as part of Environmental and Social Improvement Interim Plan-Sabah for all estates (Melewar 2 Estate, Hwa Li 3 Estate and Asia Oil Palm Estate Division2. Pesticides used monitored on monthly and annual basis with data recorded and available to monitor trends. The trends currently increase due to additional of mature palm fields, hence the chemicals usage and pesticides, insecticides and rodenticides on FY2022/2023. Sighted during the site visit at all the estates, the establishment of beneficial plants along the estate roads and immature areas as well as barn owl boxes placed at strategic areas. No prophylactic use of pesticides Paraquat and Monocrotophos was eliminated. Currently paraquat was eliminated.</p>	Complied																									
7.2.4	<p>There is no prophylactic use of pesticides, unless in exceptional circumstances, as identified in national best practice guidelines.</p> <p>- Minor compliance -</p>	<p>As sampled in visited estates, no prophylactic use of pesticides in operation.</p>	Complied																									

RSPO P&C Public Summary Report
Revision 15 (Nov 2023)

7.2.5	<p>Pesticides that are categorised as World Health Organisation Class 1A or 1B, or that are listed by the Stockholm or Rotterdam Conventions, and paraquat, are not used, unless in exceptional circumstances, as validated by a due diligence process, or when authorised by government authorities for pest outbreaks.</p> <p>The due diligence refers to:</p> <ul style="list-style-type: none"> a) Judgment of the threat and verify why this is a major threat b) Why there is no other alternative which can be used c) Which process was applied to verify why there is no other less hazardous alternative d) What is the process to limit the negative impacts of the application e) Estimation of the timescale of the application and steps taken to limit application to the specific outbreak. <p>- Minor compliance -</p>	<p>Store Clerk maintained a stock card and Chemical Register for storage of pesticides and chemicals. Any introductions of new chemicals in the operations will be updated accordingly. As verified, the register showed that only class III & IV pesticides were used at the mill and estates. No prophylactic use of pesticides Paraquat and Monocrotophos was eliminated. In its place, less hazardous alternatives such as Glyphosate and Acephate was used instead.</p>	Complied
7.2.6	<p>(C) Pesticides are only handled, used or applied by persons who have completed the necessary training and are always applied in accordance with the product label. All precautions attached to the products are properly observed, applied, and understood by workers (see Criteria 3.6). Personnel applying pesticides must show evidence of regular updates on the knowledge about the activity they carry out.</p> <p>- Critical (Major) compliance -</p>	<p>Melewar 2 Estate as sampled among Sprayers, found all were trained and applied all precautions necessary for activity perform at Block 95C3. Riparian protection, triple rinse requirements, requirement of PPE, bathing and washing PPE after work and bathing found understood by them.</p> <p>In Hwa Li 3 Estate, Spraying and Introduction to SDS, Spraying Pump & Nozzle & Portable Emergency Wash Training was conducted on 07/02/2023 at field PM97B02. Attended by 7 Sprayers.</p> <p>Asia Oil Palm 2 Estate as sampled in the field during site visit and sampling among sprayers found a signage of "Kawasan Sudah</p>	Complied

RSPO P&C Public Summary Report
Revision 15 (Nov 2023)

		DIracun, Dilarang masuk” found posted. All precaution were taken by sprayer and understood. PPE used and adequately.	
7.2.7	<p>(C) Storage of all pesticides is in accordance with recognised best practices.</p> <p>- Critical (Major) compliance -</p>	In Melewar 2 Estate, Hwa Li 3 Estate and Asia Oil Palm Estate Division 3, sighted and observed during visit at Chemical Store found pictogram were posted at entrance, warning sign on chemical hazardous to health. SOP entering chemical store, PPE and First Aid Boxes in standby condition. Emergency shower and eye wash ready for emergency use and spill kit, containment use to prevent spillages. SDS were maintained and kept (reviewed within 5 years).	Complied
7.2.8	<p>All pesticide containers are triple rinsed and punctured before being disposed of and/or handled responsibly if used for other purposes.</p> <p>- Minor compliance -</p>	<p>Excess chemical containers that were not used for premixing have been triple rinsed and punctured was categorized under scheduled waste and disposed through waste contractors. The visited estates use the empty chemical containers as premix containers to transport chemical premix to the field for chemical spraying operations. The accumulated chemical containers are then disposed through licensed waste collector. Verified the records of disposal as below:</p> <p><u>Melewar Estate 2</u></p> <p>Disposal through LD Recycle Enterprise dated 03/11/2023 with reference number ME2/H110/2022/2023/18/DM/nm.</p> <p><u>Hwa Li 3</u></p> <p>Disposal through LD Recycle Enterprise dated 02/12/2023 with reference number HLE3/HO/MAIN(122/12/)/2023.</p> <p><u>Asia Oil Palm Estate 2</u></p> <p>Disposal through LD Recycle Enterprise dated 29/11/2023 with reference number PTC23000019W.</p>	Complied

RSPO P&C Public Summary Report
Revision 15 (Nov 2023)

7.2.9	<p>(C) Aerial spraying of pesticides is prohibited, unless in exceptional circumstances where no other viable alternatives are available. This requires prior government authority approval. All relevant information is provided to affected local communities at least 48 hours prior to application of aerial spraying.</p> <p>- Critical (Major) compliance -</p>	During interview with sprayers in all estate and observed, no aerial spraying for pesticide were practices.	Complied
7.2.10	<p>(C) Specific annual medical surveillance for pesticide operators, and documented action to treat related health conditions, is demonstrated.</p> <p>- Critical (Major) compliance -</p>	<p>Newly revised CHRA was conducted on 20/07/2023-23/07/2023 by Safetech Solution, Sabah as letter dated 30/11/2023. In 2023 Medical Surveillance was conducted on 04/08/2023 by Klinik Mabello and total of 41 workers sent and result Fit to Work. No medical removal recommended.</p> <p><u>Hwa Li Estate Division 3</u></p> <p>Medical Surveillance was conducted on 03/08/2023 by Klinik Mabello (Paris) Sdn. Bhd involving 80 workers and all Fit to Work. No worker required medical removal. Some have non-occupational related condition and need further medical attention.</p> <p>Asia Oil Palm 2 Estate has conducted Medical Surveillance for 38 workers (Sprayers, Mandore, Welder, Tractor Driver, Weeder, Manurer, Storekeeper). Sent on 16/03/2023 at Klinik Marbello (Paris) Sdn Bhd.</p>	Complied
7.2.11	<p>(C) No work with pesticides is undertaken by persons under the age of 18, pregnant or breastfeeding women or other people that have medical restrictions and they are offered alternative equivalent work.</p> <p>- Critical (Major) compliance -</p>	J.C Chang Group has established a Guidelines on Weeding Regime and Practices (B/004-02/2019) Subject: Weeding Regime & Practices (12/08/2019) mentioned: No work with pesticides is undertaken by persons under the age of 18 years old, pregnant or breastfeeding women or other people that have medical restrictions should be offered alternative equivalent work, Sighted during interview with sprayers in all estates, this issue was implemented accordingly.	Complied

Criterion 7.3: Waste is reduced, recycled, reused and disposed of in an environmentally and socially responsible manner.			
7.3.1	<p>A waste management plan which includes reduction, recycling, reusing, and disposal based on toxicity and hazardous characteristics, is documented and implemented.</p> <p>- Minor compliance -</p>	<p>Waste Management Plan has been established for sampled estates as per Guidelines on Waste Management Plan, F/001-04/2015 dated 23/07/2015. Identification of waste was conducted as per Guidelines Wastes and waste products identification and disposal plan for estates. F/007-05/2016 dated 18/08/2016.</p> <p>Waste management plan was established and incorporated under Environmental and Social Improvement Plan for Estates, Period Reviewed: 10/08/2022 – 17/08/2024. The plan was discussed were:</p> <p>Recycle waste.</p> <ul style="list-style-type: none"> • Waste segregation was practiced and recorded. • Recycle waste were disposed to licence contractor and documented. • Training was carried out to the person involved and was documented for reference. <p>Non-recycle waste.</p> <ul style="list-style-type: none"> • The non-recyclable waste was buried at the designated pit and was documented for reference. • Landfill was identified and marked. Location more than 500 metres from housing complex and water ways. <p>Schedule waste</p> <ul style="list-style-type: none"> • Schedule waste disposal were done through licenced contractor should be continued. • Record of disposal should be kept accordingly and updated when necessary. 	Complied

RSPO P&C Public Summary Report
Revision 15 (Nov 2023)

7.3.2	<p>Proper disposal of waste material, according to procedures that are fully understood by workers and managers, is demonstrated.</p> <p>- Minor compliance -</p>	<p>Procedure of Schedule waste management has been established. Refer Guidelines Wastes and waste products identification and disposal plan for estates and mill. F/007-05/2016 dated 18/08/2016.</p> <p>Labelling of Schedule Waste and Storage was addressed in the Guidelines Schedule Waste Storage & Labelling, F/014-02/2016 dated 01/06/2016. Other than that, refer Guidelines On Scheduled Wastes Labelling, Storage and Documentation, F/014-04/2017 dated 07/01/2017.</p> <p>Awareness training on Schedule waste has been conducted as per date below:</p> <p>Melewar Estate 2: 21/04/2023</p> <p>Hwa Li 3: 15/09/2023</p> <p>Asia Oil Palm Estate 2: 14/08/2023</p> <p>Asia POM: 24/07/2023</p> <p>Generally, the workers have demonstrated good understanding in proper disposal of wastes.</p> <p>Record of Inventory of Schedule Waste and Disposal Record as per details below:</p> <p>Melewar Estate 2</p> <p><u>Inventory</u></p> <ul style="list-style-type: none"> File reference Number: JAS.STW.600-3/4/28 Date Reporting: 28/11/2023 Waste Generated: SW110, SW305, SW409, SW410. <p><u>Disposal</u></p>	Complied
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RSPO P&C Public Summary Report
Revision 15 (Nov 2023)

		<p>Sample 1</p> <ul style="list-style-type: none"> Disposal consignment note: 2023092911TCG6XO Date Disposal: 29/09/2023 SW305: Used lubricant Oil: 0.352 MT by Lagenda Bumimas Sdn Bhd <p>Sample 2</p> <ul style="list-style-type: none"> Disposal consignment note: 2023092911E4KMQS Date Disposal: 29/09/2023 SW409 – Contaminated PPE With Chemical: 0.004 MT by Lagenda Bumimas Sdn Bhd <p>Hwa Li 3</p> <p><u>Inventory</u></p> <ul style="list-style-type: none"> File reference Number: JAS.SSK.600-3/4/308 Date Reporting: 29/11/2023 Waste Generated: SW109, SW305, SW409, SW410. <p><u>Disposal</u></p> <p>Sample 1</p> <ul style="list-style-type: none"> Disposal consignment note: 2023092217OCKZ0 Date Disposal: 22/09/2023 SW306: Used Hydraulic Oil: 0.8300 MT by Lagenda Bumimas Sdn Bhd <p>Sample 2</p>	
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RSPO P&C Public Summary Report
Revision 15 (Nov 2023)

		<ul style="list-style-type: none"> Disposal consignment note: JASSHQ600338 Date Disposal: 30/11/2023 SW404: Clinical waste: 0.025 MT by Sedafiat Sdn Bhd <p>Asia POM</p> <p><u>Inventory</u></p> <ul style="list-style-type: none"> File reference Number: JAS.SSK.600-3/1/54 Date Reporting: 29/11/2023 Waste Generated: SW102, SW109, SW305, SW409, SW410, SW429. <p><u>Disposal</u></p> <p>Sample 1</p> <ul style="list-style-type: none"> Disposal consignment note: 2023082217XSMLVD Date Disposal: 19/08/2023 SW102: Used Battery: 0.2010 MT by Lagenda Bumimas Sdn Bhd <p>Sample 2</p> <ul style="list-style-type: none"> Disposal consignment note: 202308221614IWGA Date Disposal: 19/08/2023 SW109: Used Battery: 0.009 MT by Lagenda Bumimas Sdn Bhd <p>Asia Oil Palm Estate 2</p> <p><u>Inventory</u></p> <ul style="list-style-type: none"> File reference Number: JAS.SSK.600-3/4/285 	
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RSPO P&C Public Summary Report
Revision 15 (Nov 2023)

		<ul style="list-style-type: none">• Date Reporting: 30/11/2023• Waste Generated: SW305, SW306, SW409, SW410. <p><u>Disposal</u></p> <p>Sample 1</p> <ul style="list-style-type: none">• Disposal consignment note: 20231011178VMI9S• Date Disposal: 10/10/2023• SW410: Used Filter Oil: 0.3640 MT by Lagenda Bumimas Sdn Bhd													
7.3.3	The unit of certification does not use open fire for waste disposal. - Minor compliance -	<p>No open burning (Including domestic wastes) is allowed under group policy. Landfill was the method used by the estates for domestic waste disposal. Refer Guidelines on Garbage Disposal, F/006-06/2016 dated 21/12/2016. Fire was not use and sightings at field and line site confirm no burnt marks sighted. Sample of landfill were observed and found in order.</p> <table><tr><td>Estate</td><td>Block No</td><td>Date Open</td></tr><tr><td>Melewar Estate 2</td><td>95D1</td><td>10/11/2023</td></tr><tr><td>Hwa Li 3</td><td>PM97A6</td><td>18/11/2023</td></tr><tr><td>Asia Oil Palm Estate 2</td><td>PM94E15</td><td>03/12/2023</td></tr></table>	Estate	Block No	Date Open	Melewar Estate 2	95D1	10/11/2023	Hwa Li 3	PM97A6	18/11/2023	Asia Oil Palm Estate 2	PM94E15	03/12/2023	Complied
Estate	Block No	Date Open													
Melewar Estate 2	95D1	10/11/2023													
Hwa Li 3	PM97A6	18/11/2023													
Asia Oil Palm Estate 2	PM94E15	03/12/2023													
Criterion 7.4: Practices maintain soil fertility at, or where possible improve soil fertility to, a level that ensures optimal and sustained yield.															
7.4.1	Good agriculture practices, as contained in SOPs, are followed to manage soil fertility to optimise yield and minimise environmental impacts.	The assessed estates continued to use the Asia / Melewar established SOP as below:	Complied												

RSPO P&C Public Summary Report
Revision 15 (Nov 2023)

	- Minor compliance -	<p>i) Methods of nutrient assessment for oil palm fertilizer recommendation - B/016-01/2014</p> <p>ii) Guidelines for Compost Application - B/028-01/2017</p> <p>iii) Guidelines for Semi-Decomposed EFB Application - B/030-01/2019</p> <p>iv) SOP-Soil and water conservation - C/002-01/2008)</p> <p>Soil analysis and foliar analysis are monitored on yearly basis by Agronomist. The recommendations for improvements are given to maintain the sustainable practices. They include use of chemical fertilizers, EFB and decanter cake. The visited estates operate in accordance with the Agriculture Manual and standard operating procedures. The practices are consistently monitored by estate operation management and Plantation Controller.</p>	
7.4.2	<p>Periodic tissue and soil sampling is carried out by Companies to monitor and manage changes in soil fertility and plant health.</p> <p>- Minor compliance -</p>	<p>Foliar and soil sampling was carried out by Applied Agricultural Resources Sdn Bhd prior to the fertilizer recommendation for the next financial year. Leaf and soil nutrient analysis are commonly used in the diagnosis of fertilizer requirements in oil palms. The frequency for leaf sampling and soil sampling must be conduct for every year. Reviewed the sampling records as follows:</p> <p>Melewar Estate 2</p> <ul style="list-style-type: none"> • Soil analysis was conducted on 24/03/2023 with report reference R23/3/326 by KDC Laboratory. • Foliar analysis was conducted on 18/03/2023 with report reference R23/3/284 by KDC Laboratory. <p>Hwa Li 3</p>	Complied

RSPO P&C Public Summary Report
Revision 15 (Nov 2023)

		<ul style="list-style-type: none">• Soil analysis was conducted on 07/04/2023 with report reference R23/3/331 by KDC Laboratory.• Foliar analysis was conducted on 06/04/2023 with report reference R23/4/63 by KDC Laboratory. Asia Oil Palm Estate 2 <ul style="list-style-type: none">• Soil analysis was conducted on 03/04/2023 with report reference R23/3/325 by KDC Laboratory.• Foliar analysis was conducted on 27/03/2023 with report reference R23/3/291 by KDC Laboratory.																
7.4.3	<p>A nutrient recycling strategy is in place, which includes the recycling of Empty Fruit Bunches (EFB), Palm Oil Mill Effluent (POME), palm residues and optimal use of inorganic fertilisers.</p> <p>- Minor compliance -</p>	<p>Refer Guidelines on Disposal off EFB To Fields, File reference F/003-01/2009 dated 20/04/2009 (EFB Application 30-40MT/Ha). The application in the field was based on Agronomist Recommendation. Refer data EFB, Semi Decomposed EFB as below:</p> <p>Hwa Li 3</p> <table><tr><th>Month</th><th>MT, applied</th><th>Ha Coverage</th></tr><tr><td>July 2023</td><td>45.57</td><td>1.82</td></tr><tr><td>Aug 2023</td><td>139.14</td><td>5.57</td></tr><tr><td>Sept 2023</td><td>187.80</td><td>7.51</td></tr><tr><td>Oct 2023</td><td>10.69</td><td>0.43</td></tr></table>	Month	MT, applied	Ha Coverage	July 2023	45.57	1.82	Aug 2023	139.14	5.57	Sept 2023	187.80	7.51	Oct 2023	10.69	0.43	Complied
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Oct 2023	10.69	0.43																
7.4.4	<p>Records of fertiliser inputs are maintained.</p> <p>- Minor compliance -</p>	<p>The fertiliser application was conducted as per recommendation by agronomist base on foliar and soil sampling conducted. Refer record of Manuring Programme and Application record. The fertiliser application records were available at the estate visited for review.</p>	Complied															

RSPO P&C Public Summary Report
Revision 15 (Nov 2023)

		The estate reported the fertiliser application to the Progress Report on monthly basis.																												
Criterion 7.5: Practices minimise and control erosion and degradation of soils.																														
7.5.1	<p>(C) Maps identifying marginal and fragile soils, including steep terrain, are available.</p> <p>- Critical (Major) compliance -</p>	<p>Maps identifying marginal and fragile soil was available. Social & Environmental Impact Assessment including a Preliminary Management review for JC Chang Group’s Asia and Melewar Production Units, Sabah Malaysia dated 13/07/2011. Assessment was conducted by Wild Asia (Malaysia). There is no marginal and fragile soil as per confirmation with Group Senior Agronomist.</p> <p>Melewar Estate 2</p> <table><tr><td>Soil series</td><td>Hectarage, Ha</td><td>Percentage, %</td></tr><tr><td>Lungmanis</td><td>1108.82</td><td>54.80</td></tr><tr><td>Kertam</td><td>530.13</td><td>26.20</td></tr><tr><td>Bidu Bidu</td><td>192.63</td><td>9.52</td></tr><tr><td>Rumidi</td><td>143.66</td><td>7.10</td></tr><tr><td>Sapi</td><td>2023.40</td><td>2.38</td></tr></table> <p>Hwa Li 3</p> <table><tr><td>Soil series</td><td>Hectarage, Ha</td><td>Percentage, %</td></tr><tr><td>Kinabatangan</td><td>1127.49</td><td>26.30</td></tr><tr><td>Sapi</td><td>79.31</td><td>1.85</td></tr></table>	Soil series	Hectarage, Ha	Percentage, %	Lungmanis	1108.82	54.80	Kertam	530.13	26.20	Bidu Bidu	192.63	9.52	Rumidi	143.66	7.10	Sapi	2023.40	2.38	Soil series	Hectarage, Ha	Percentage, %	Kinabatangan	1127.49	26.30	Sapi	79.31	1.85	Complied
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RSPO P&C Public Summary Report
Revision 15 (Nov 2023)

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7.5.2	<p>No replanting on steep slopes (above 25 degrees) unless approved by state governments. In case of replanting is permitted, no replanting in contiguous area of steep terrain (greater than 25 degrees) larger than 25 Ha within the Unit of Certification.</p> <p>- Minor compliance -</p>	<p>There is no extensive replanting conducted on steep slopes. Verified through site visit and interview. Refer Social & Environmental Impact Assessment including a Preliminary Management review for JC Chang Group’s Asia and Melewar Production Units, Sabah Malaysia dated 13/07/2011. Assessment was conducted by Wild Asia (Malaysia). Stated in Environmental and Social Improvement Plan dated 17/08/2023, Section Steep Slope: “Identify and map out steep slope >25°, If >25°, will not be planted”.</p> <p>Record verification as per below:</p> <table><tr><td>Estate</td><td>Degree</td><td>Percentage, %</td></tr><tr><td></td><td>Swamps</td><td>1.50</td></tr></table>	Estate	Degree	Percentage, %		Swamps	1.50	Complied																					
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RSPO P&C Public Summary Report
Revision 15 (Nov 2023)

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7.5.3	There is no new planting of oil palm on steep terrain. - Minor compliance -	There is no new planting of oil palm conducted on steep terrain. Verified through site visit and interview at estates visited.	Complied																																	
Criterion 7.6: Soil surveys and topographic information are used for site planning in the establishment of new plantings, and the results are incorporated into plans and operations.																																				

RSPO P&C Public Summary Report
Revision 15 (Nov 2023)

7.6.1	<p>(C) To demonstrate the long-term suitability of land for palm oil cultivation, soil maps or soil surveys identifying marginal and fragile soils, including steep terrain, are taken into account in plans and operations.</p> <p>- Critical (Major) compliance -</p>	There is no new planting at audited estates. Hence, the indicators 7.6.1, 7.6.2 and 7.6.3 are not applicable. Further, based on the soil maps presented and field visit verification, there was no fragile soil or marginal soil existence at the estates assessed. Soil series and topography map available for estate sampled.	Not Applicable
7.6.2	<p>Extensive planting on marginal and fragile soils, is avoided, or, if necessary, done in accordance with the soil management plan for best practices.</p> <p>- Minor compliance -</p>	There is no new planting at audited estates. Hence, the indicators 7.6.1, 7.6.2 and 7.6.3 are not applicable. Further, based on the soil maps presented and field visit verification, there was no fragile soil or marginal soil existence at the estates assessed. Soil series and topography map available for estate sampled.	Not Applicable
7.6.3	<p>Soil surveys and topographic information guide the planning of drainage and irrigation systems, roads and other infrastructure.</p> <p>- Minor compliance -</p>	Soil surveys as per 7.5.1 and topographic information as per 7.5.2 was act as guide for planning of drainage and irrigation systems, roads and other infrastructure. Verification was made during interview with management team.	Not Applicable
Criterion 7.7: No new planting on peat, regardless of depth after 15 November 2018 and all peatlands are managed responsibly.			
7.7.1	<p>(C) There is no new planting on peat regardless of depth after 15 November 2018 in existing and new development areas.</p> <p>- Critical (Major) compliance -</p>	Not applicable as there was neither new planting nor presence of peat soil.	Not Applicable
7.7.2	<p>Areas of peat within the managed areas are inventoried, documented and reported (effective from 15 November 2018) to RSPO Secretariat.</p> <p>PROCEDURAL NOTE:</p> <p>Maps and other documentation of peat soils are provided, prepared and shared in line with RSPO Peatland Working Group (PLWG) audit guidance (see Procedural Note for 7.7.5 below).</p>	Not applicable as there was neither new planting nor presence of peat soil.	Not Applicable

RSPO P&C Public Summary Report
Revision 15 (Nov 2023)

	- Minor compliance -		
7.7.3	(C) Subsidence of peat is monitored, documented and minimised. - Critical (Major) compliance -	Not applicable as there was neither new planting nor presence of peat soil.	Not Applicable
7.7.4	(C) A documented water and ground cover management programme is in place. - Critical (Major) compliance -	Not applicable as there was neither new planting nor presence of peat soil.	Not Applicable
7.7.5	(C) For plantations planted on peat, drainability assessments are conducted following the RSPO Drainability Assessment Procedure, or other RSPO recognised methods, at least five years prior to replanting. The assessment result is used to set the timeframe for future replanting, as well as for phasing out of oil palm cultivation at least 40 years, or two cycles, whichever is greater, before reaching the natural gravity drainability limit for peat. When oil palm is phased out, it is replaced with crops suitable for a higher water table (paludiculture) or rehabilitated with natural vegetation. This is subject to transitional (5 years: 2019 to 2024) arrangement stated in the Drainability Assessment Procedure. Within 12 months initial implementation period, company could submit other alternate methodologies to be considered by RSPO for recognition. - Critical (Major) compliance -	Not applicable as there was neither new planting nor presence of peat soil.	Not Applicable
7.7.6	(C) All existing plantings on peat are managed according to the 'RSPO Manual on Best Management Practices (BMPs) for existing oil palm cultivation on peat', version 2 (2019) and associated audit guidance. - Critical (Major) compliance -	Not applicable as there was neither new planting nor presence of peat soil.	Not Applicable

RSPO P&C Public Summary Report
Revision 15 (Nov 2023)

7.7.7	<p>(C) All areas of unplanted and set-aside peatlands in the managed area (regardless of depth) are protected as “peatland conservation areas”; new drainage, road building and power lines by the unit of certification on peat soils is prohibited; peatlands are managed in accordance with the ‘RSPO BMPs for Management and Rehabilitation of Natural Vegetation Associated with Oil Palm Cultivation on Peat’, version 2 (2019) and associated audit guidance.</p> <p>- Critical (Major) compliance -</p>	Not applicable as there was neither new planting nor presence of peat soil.	Not Applicable
Criterion 7.8: Practices maintain the quality and availability of surface and groundwater.			
7.8.1	<p>A water management plan is in place and implemented to promote more efficient use and continued availability of water sources and to avoid negative impacts on other users in the catchment. The plan addresses the following:</p> <p>a) The unit of certification does not restrict access to clean water or contribute to pollution of water used by communities.</p> <p>b) Workers have adequate access to clean water.</p> <p>- Minor compliance -</p>	<p>Water management plan was established and incorporated under Environmental and Social Improvement Plan for Estates, Period Reviewed: 10/08/2022 – 17/08/2024. Among the plan were:</p> <p>Water was / water source</p> <ol style="list-style-type: none"> 1. All waterways was identified and marked in the estate map. All record was documented 2. No construction of bund, weirs or damn 3. Water sampling was carried out as per SOP <p>Water wastage and increase of chemical usage</p> <ol style="list-style-type: none"> 1. Water meter was installed at water treatment plant 2. Daily recording was practice and verified by staff and AM 3. Baseline for 3-month consumption as a reference and monitoring monthly usage. <p>Water shortage</p> <ol style="list-style-type: none"> 1. An additional water tank were purchased to harvest rain water. 	Complied

RSPO P&C Public Summary Report
Revision 15 (Nov 2023)

		<p>2. Domestic water sample sent to lab for testing at least once a year.</p> <p>3. Periodically, maintenance was carried out as per schedule.</p> <p>Wastewater for operation activities</p> <p>1. Premixing chemicals are done at designated area covered with bund and spillage kit area provided.</p> <p>2. Chemical surplus from field area return to store, documented and labelled for safe keeping.</p> <p>Rainfall</p> <p>1. Rain fall daily recorded and summary was done at the end of the month complete with graph.</p> <p>Water management plan has included the availability of water sources and to avoid negative impacts on other users in the catchment. No restriction of access to clean water or contribute to pollution of water used by communities. Access to clean water is adequately provided to workers for household consumption.</p> <p>Water quality analysis has been conducted at estates and mill. Site visit all sampling points were maintained and completed with proper signage. Water sampling report as below:</p> <p><u>Melewar Estate 2</u></p> <ul style="list-style-type: none"> • River water analysis was conducted on 15/04/2023 with report reference number R23/4/330 by KDC Laboratory. Result showed within the parameter. • Domestic water analysis was conducted on 29/07/2023 with report reference W230710/01 by DYNAKEY Laboratories Sdn Bhd. Result showed within the parameter. 	
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RSPO P&C Public Summary Report
Revision 15 (Nov 2023)

		<p><u>Hwa Li 3</u></p> <ul style="list-style-type: none"> River water analysis was conducted on 03/10/2023 with report reference number R23/10/11 by KDC Laboratory. Result showed within the parameter. Domestic water analysis was conducted on 13/10/2023 with report reference W231003/02 by DYNAKEY Laboratories Sdn Bhd. Result showed within the parameter. <p><u>Asia POM</u></p> <ul style="list-style-type: none"> River water analysis was conducted on 14/04/2023 with report reference number R23/4/172 by KDC Laboratory. Result showed within the parameter. Domestic water analysis was conducted on 08/05/2023 with report reference W230408/01B by DYNAKEY Laboratories Sdn Bhd. Result showed within the parameter. Final Discharge water analysis was conducted on 07/11/2023 with report reference W231108/07A-07C by DYNAKEY Laboratories Sdn Bhd. Result showed within the parameter. <p><u>Asia Oil Palm Estate 2</u></p> <ul style="list-style-type: none"> River water analysis was conducted on 14/04/2023 with report reference number R23/4/172 by KDC Laboratory. Result showed within the parameter. Domestic water usage under Asia Pom Management. 	
7.8.2	(C) Water courses and wetlands are protected, including maintaining and restoring appropriate riparian and other buffer zones in line with 'RSPO Manual on BMPs for the management and rehabilitation of riparian reserves' (April 2017) or applicable National legislation or specific	Based on site visit at the workers quarters, clean water was adequately provided. The water for domestic used was provided by Treated water. From the verification water management plan, the	Complied

RSPO P&C Public Summary Report
Revision 15 (Nov 2023)

	<p>environmental permit. Smallholders may replant existing planted areas provided there is no evidence of environmental deterioration having occurred during the previous cycle.</p> <p>- Critical (Major) compliance -</p>	<p>management will monitor the water quality from water sampling test that has been conducted.</p> <p>Buffer zone monitoring report was conducted:</p> <p>Melewar Estate 2: 23/09/2023</p> <p>Hwa Li 3: 20/11/2023</p> <p>Asia Oil Palm Estate 2: 03/12/2023</p>																									
7.8.3	<p>Mill effluent is treated to be in compliance with national regulations. Discharge quality of mill effluent, especially Biochemical Oxygen Demand (BOD), is regularly monitored.</p> <p>- Minor compliance -</p>	<p>Mill effluent is treated through biological anaerobic treatment. Regular monitoring was conducted as per requirement. Monthly and quarterly reports were submitted to DOE accordingly. Reviewed the Quarterly Return Form to DOE as follows:</p> <table><tr><th>Report Date</th><th>Quarter/Week</th><th>BOD (Limit=20 mg/L)</th></tr><tr><td rowspan="3">11/07/2023</td><td>1stweek/1stmonth</td><td>5.60</td></tr><tr><td>5thweek/2ndMonth</td><td>5.10</td></tr><tr><td>9thweek/3rdMonth</td><td>5.90</td></tr><tr><td rowspan="3">06/04/2023</td><td>1stweek/1stmonth</td><td>6.00</td></tr><tr><td>5thweek/2ndMonth</td><td>3.20</td></tr><tr><td>9thweek/3rdMonth</td><td>3.60</td></tr><tr><td rowspan="3">04/10/2023</td><td>1stweek/1stmonth</td><td>4.80</td></tr><tr><td>5thweek/2ndMonth</td><td>9.10</td></tr><tr><td>9thweek/3rdMonth</td><td>4.80</td></tr></table>	Report Date	Quarter/Week	BOD (Limit=20 mg/L)	11/07/2023	1 st week/1 st month	5.60	5 th week/2 nd Month	5.10	9 th week/3 rd Month	5.90	06/04/2023	1 st week/1 st month	6.00	5 th week/2 nd Month	3.20	9 th week/3 rd Month	3.60	04/10/2023	1 st week/1 st month	4.80	5 th week/2 nd Month	9.10	9 th week/3 rd Month	4.80	Complied
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RSPO P&C Public Summary Report
Revision 15 (Nov 2023)

		Asia POM discharge POME through Land Application after treated as per "Jadual Pematuhan" No:003557. Signage on "Takat Pelepasan" was maintained at Mill has conducted water sampling at final discharge. Refer Report W231108/07A-07C by DYNAKEY Laboratories Sdn Bhd. Result showed within the parameter.										
7.8.4	Mill water use per tonne of FFB is monitored and recorded. - Minor compliance -	<p>Mill has maintained monitoring of water usage for processing FFB which are recorded monthly. Water for processing is abstracted from water catchment by using pump. The trend of water usage is tandem with volume of FFB process. Refer Water Usage Record Asia POM. Average data as below:</p> <table><tr><td>Period July - June</td><td>FFB Processed, MT</td><td>Water/FFB (mt/m³)</td></tr><tr><td>2021/2022</td><td>176,261.24</td><td>1.48</td></tr><tr><td>2022/2023</td><td>179,076.84</td><td>1.70</td></tr></table> <p>Baseline was set on 1.45. High consumption of water/FFB (mt/m³) is due to high crop proceed by mill.</p>	Period July - June	FFB Processed, MT	Water/FFB (mt/m ³)	2021/2022	176,261.24	1.48	2022/2023	179,076.84	1.70	Complied
Period July - June	FFB Processed, MT	Water/FFB (mt/m ³)										
2021/2022	176,261.24	1.48										
2022/2023	179,076.84	1.70										
Criterion 7.9: Efficiency of fossil fuel use and the use of renewable energy is optimised												
7.9.1	A plan for efficiency of the use of fossil fuels and to optimise renewable energy is implemented, monitored and documented. - Minor compliance -	<p>Management Plan for efficiency of the use of fossil fuels and to optimise renewable energy is implemented, monitored and documented in Environmental and Social Improvement Plan for Estates, Period Reviewed: 10/08/2022 – 17/08/2024. Among plan related to energy was:</p> <ol style="list-style-type: none">1. Identified the strategic location for fixing the solar system2. Daily running hours and fuel consumption are properly recorded and monitored by management.	Complied									

RSPO P&C Public Summary Report
Revision 15 (Nov 2023)

		<p>3. Monthly services were carried out as per schedule and documented</p> <p>4. 3 years fuel consumption was use a baseline for monitoring purpose. All data are documented for reference.</p> <p>The diesel utilisation for the estates is provided in the below table for period July 2022 - June 2023.</p> <table border="1"> <thead> <tr> <th>Estate / Mill</th><th>Diesel, (L)</th><th>FFB/CPO, (MT)</th><th>Diesel / FFB/CPO (MT)</th></tr> </thead> <tbody> <tr> <td>Melewar Estate 2</td><td>298,578.00</td><td>24,103.68</td><td>10.56</td></tr> <tr> <td>Hwa Li 3</td><td>566,780.00</td><td>52,158.70</td><td>11.00</td></tr> <tr> <td>Asia Oil Palm Estate 2</td><td>253,706.66</td><td>16,634.51</td><td>5.78</td></tr> <tr> <td>Asia POM</td><td>191,372.00</td><td>26,762.73</td><td>5.23</td></tr> </tbody> </table> <p>Monitoring of Fuel usage lire per MT FFB was monitored with Baseline in the budget.</p>	Estate / Mill	Diesel, (L)	FFB/CPO, (MT)	Diesel / FFB/CPO (MT)	Melewar Estate 2	298,578.00	24,103.68	10.56	Hwa Li 3	566,780.00	52,158.70	11.00	Asia Oil Palm Estate 2	253,706.66	16,634.51	5.78	Asia POM	191,372.00	26,762.73	5.23	
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Asia POM	191,372.00	26,762.73	5.23																				
Criterion 7.10: Plans to reduce pollution and emissions, including greenhouse gases (GHG), are developed, implemented and monitored and new developments are designed to minimise GHG emissions.																							
7.10.1	<p>(C) GHG emissions are identified and assessed for the unit of certification. Plans to reduce or minimise them are implemented, monitored through the Palm GHG calculator and publicly reported.</p> <p>- Critical (Major) compliance -</p>	<p>Both the mill and the estates had identified emission of greenhouse gas (GHG) from their operations such as emission from their farm tractor and gen set operation. The management from both estate and mill had planned to reduce emission by daily inspection and monitoring for their farm tractor and gen set to prevent any leakage and problem that could adversely impact the environment.</p>	Complied																				

RSPO P&C Public Summary Report
Revision 15 (Nov 2023)

		<p>Fuel Consumption, POME and reported in the Palm GHG Summary Report. The consumption of fertilisers and diesel were verified through Estates:</p> <ul style="list-style-type: none"> • FFB record book • Stock book • Monthly stock issue • Stock requisition note Mill • Mill Month End Production Report • Monthly production report • Flowmeter & running hours record book • Effluent analysis report Based on the verification of records; all the sampled issuance was traceable 	
7.10.2	<p>(C) Starting 2014, the carbon stock of the proposed development area and major potential sources of emissions that may result directly from the development are estimated and a plan to minimise them prepared and implemented (following the RSPO GHG Assessment Procedure for New Development).</p> <p>- Critical (Major) compliance -</p>	Not applicable since no new development by the certification unit	Not Applicable
7.10.3	<p>(C) Other significant pollutants are identified and plans to reduce or minimise them implemented and monitored.</p> <p>- Critical (Major) compliance -</p>	<p>Management Plan for pollution is implemented, monitored and documented in Environmental and Social Improvement Plan for Estates, Period Reviewed: 10/08/2022 – 17/08/2024. Among plan related to pollution was:</p> <p>Sludge & Oil Spillage</p> <p>1. Raised bunds should be repaired wherever necessary.</p>	Complied

RSPO P&C Public Summary Report
Revision 15 (Nov 2023)

		<ol style="list-style-type: none"> 2. Inspection must be carried out to ensure that trap is properly maintained and cleaned. 3. Any damages structures or machineries leakages should be attended with timely manner wherever possible <p>Leachate from processing by product</p> <ol style="list-style-type: none"> 1. Application of compost and EFB was carried out according to the estate guideline to minimize pollution 2. River water sample was sent to accredited laboratory to duct if any sign of pollution. 3. River water sample was sent to accredited laboratory to check if any sign of pollution. <p>Leachate from domestic waste</p> <ol style="list-style-type: none"> 1. Waste collector and all workers are brief about waste management. 2. All waste collection and disposal are recorded and was documented. 3. Training was carried out to the workers involved was documented for reference. <p>Diesel spillage</p> <ol style="list-style-type: none"> 1. Perimeter of the store were bunded 10% extra to avoid of chemical spillage to the ground. 2. Every vehicles and workshop are provided with spillage tray to prevent spillage on the ground 3. Spill kit are available at the workshop, working site and storage areas 	
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RSPO P&C Public Summary Report
Revision 15 (Nov 2023)

		<p>Chemical spillage</p> <ol style="list-style-type: none"> 1. Spill kit to be readily available at the storage area for spillage containment. 2. Perimeter of the store were bunded 10% extra to avoid of chemical spillage to the ground. 3. Training should be provided to person in charge on method of handling chemical spillage <p>Overflow / Leakage of sewages</p> <ol style="list-style-type: none"> 1. Septic tank was inspected. Any blockage or overflow are repaired and documented. <p>For Air Pollution Control System, management use Electrostatic Precipitator (ESP) for monitoring. Continuous Emissions Monitoring System (CEMS) which link to the DOE on real time base were monitored.</p> <p>Sighted Online Environmental Reporting (OER) has been submitted to DOE on quarterly basis. The result within parameter as per Jadual Pematuhan JAS.SHQ.600-3/1/052 Licence No: 003557.</p> <p>Environmental audit by 3rd party has been conducted annually by Assessor with reference number JOLL/ECA/2023-036 dated 12/06/2023 by R&K Consultancy.</p> <p>Latest DOE visit was sighted on 07/09/2023. Sighted reports details and the response by the management for issue that has been raised.</p>	
Criterion 7.11: Fire is not used for preparing land and is prevented in the managed area			
7.11.1	(C) Land for new planting or replanting is not prepared by burning.	Commitment towards new planting or replanting is not prepared by burning were stated in the Policy On Replanting For The Group. As	Complied

	- Critical (Major) compliance -	<p>per statement in the policy "All old palms standing in the field will be felled, chipped, stalked and decomposed in the field naturally without using fire as our Group prohibited the form of replanting by using fire as part of field preparation".</p> <p>Verification through site visit at replanting area in the sample estate confirmed that land preparation for replanting was not prepared by burning.</p>	
7.11.2	<p>The unit of certification establishes fire prevention and control measures for the areas directly managed by the unit of certification.</p> <p>- Minor compliance -</p>	<p>Estates have established fire prevention and control measures in areas directly managed by them. Procedure related was established. Refer Guidelines On Fire Prevention, Control (Fire Extinguisher Selection, Placement, Use, Maintenance, Inspection, Records, Fire Drill) and Stakeholder Engagement dated 18/10/2019 with document reference M/017-02/2019.</p> <p>Water bowser, firewater pump and fire squad were sighted available. On top of that, Estates already established ERP team and will perform Estate Patrol. The record of the patrolling was sighted. The patrolling is conducted daily by watchman according to the patrolling schedule and also be conducted by Staff and Mandore during daily operation.</p>	Complied
7.11.3	<p>The unit of certification engages with adjacent stakeholders on fire prevention and control measures.</p> <p>- Minor compliance -</p>	<p>The certification units have engaged with adjacent stakeholders on fire prevention and control measures. Estates has conducted visit to neighbouring stakeholders by Assistant Manager to communicate on fire prevention. Procedure related was established. Refer Guidelines On Fire Prevention, Control (Fire Extinguisher Selection, Placement, Use, Maintenance, Inspection, Records, Fire Drill) and Stakeholder Engagement dated 18/10/2019 with document reference M/017-02/2019.</p> <p>Melewar Estate 2</p>	Non-compliance

RSPO P&C Public Summary Report
Revision 15 (Nov 2023)

		<ol style="list-style-type: none"> 1. Refer Section Engagement to Stakeholder for Fire Prevention and Control Measures. Sample of communication with Lam Soon Plantation Sdn Bhd dated 19/08/2023. 2. Refer Section Engagement to Stakeholder for Fire Prevention and Control Measures. Sample of communication with KJS Resources Sdn Bhd dated 19/08/2023. <p><u>Hwa Li 3</u></p> <ol style="list-style-type: none"> 1. Refer Section Engagement to Stakeholder for Fire Prevention and Control Measures. Sample of communication with Morisem 2 Estate dated 13/09/2022. 2. Refer Section Engagement to Stakeholder for Fire Prevention and Control Measures. Sample of communication with Genting Bahagia Estate dated 13/09/2022. <p><u>Asia Oil Palm Estate 2</u></p> <ol style="list-style-type: none"> 1. Refer Section Engagement to Stakeholder for Fire Prevention and Control Measures. Sample of communication with Lam soon Plantations Sdn Bhd dated 20/09/2023. 2. Refer Section Engagement to Stakeholder for Fire Prevention and Control Measures. Sample of communication with Genting Bahagia Estate dated 20/09/2023. <p>Minor NC</p> <p>Engagement on fire prevention between estates and adjacent stakeholders was not fully executed as per procedure established.</p> <p>Based on Stakeholder Meeting Minutes of Meeting dated 20/09/2023 Asia Production Unit, sample verified at Hwa Li 3, the communication on fire prevention was done (Discussion on Drain Field Barrier for Fire Prevention) however it was not according with</p>	
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RSPO P&C Public Summary Report
Revision 15 (Nov 2023)

		the procedure which stated: Procedure dated 18/10/2019 Section Engagement of Stakeholder for Fire Prevention and Control Measures dated 18/10/2019 "This exercise should be performed only to those stakeholders where their property is adjacent to our property and with risk of fire encountered. During the stakeholder consultation, the management should discuss issue such as: Risk of fire encounter, method of fire prevention and control and type of engagement request and agreed by stakeholder. The record of consultation and evidence of implementation should be properly documented and file accordingly."	
Criterion 7.12: Land clearing does not cause deforestation or damage any area required to protect or enhance High Conservation Values (HCVs) or High Carbon Stock (HCS) forest. HCVs and HCS forests in the managed area are identified and protected or enhanced.			
7.12.1	<p>(C) Land clearing since November 2005 has not damaged primary forest or any area required to protect or enhance HCVs. Land clearing since 15 November 2018 has not damaged HCVs or HCS forests.</p> <p>A historic Land Use Change Analysis (LUCA) is conducted prior to any new land clearing, in accordance with the RSPO LUCA guidance document.</p> <p>- Critical (Major) compliance -</p>	Refer Social & Environmental Impact Assessment including a Preliminary Management review for JC Chang Group's Asia and Melewar Production Units, Sabah Malaysia dated 13/07/2011. Assessment was conducted by Wild Asia (Malaysia). Refer Section High Conservation Values Assessment. There was no HCV area identified within property of Melewar Estate 2 Div 2, Hwa Li 3 and Asia Oil Palm Estate 2. There is no land clearing in the certification units.	Complied
7.12.2	<p>(C) HCVs, HCS forests and other conservation areas are identified as follows:</p> <p>a) For existing plantations with an HCV assessment conducted by an RSPO-approved assessor and no new land clearing after 15 November 2018, the current HCV assessment of those plantations remains valid.</p> <p>b) Any new land clearing (in existing plantations or new plantings) after 15 November 2018 is preceded by an HCV-HCS assessment, using the HCSA Toolkit and the HCV-HCSA Assessment Manual. This will include</p>	Refer Social & Environmental Impact Assessment including a Preliminary Management review for JC Chang Group's Asia and Melewar Production Units, Sabah Malaysia dated 13/07/2011. Assessment was conducted by Wild Asia (Malaysia). Refer Section High Conservation Values Assessment. There was no HCV area identified within property of Melewar Estate 2 Div 2, Hwa Li 3 and Asia Oil Palm Estate 2.	Complied

RSPO P&C Public Summary Report
Revision 15 (Nov 2023)

<p>stakeholder consultation and take into account wider landscape-level considerations.</p> <p>PROCEDURAL NOTE:</p> <p>Requirement is further clarified under the Interpretation of Indicator 7.12.2 and Annex 5 (approved by BOG on 12 June 2019).</p> <p>- Critical (Major) compliance -</p>	HCV Management and monitoring plan has been established in the HCV assessment. Refer Management Plan and Propose Action Plan			
	Concern	Objective	Action Plan	
	Building conservation plan	Secure the long-term sustainability plan for allowing on continuous implementation and improvement.	Determine objective of the conservation plan. Establish a monitoring protocol to ensure the plan will be implemented, monitored, reviewed and improved.	
	Identify all natural areas	Identify whom or what areas have an impact on conservation programme	Identification and demarcation. Obtain Written confirmation from Land Survey Department.	
	Implementation (Education and awareness)	Building alliances and strengthening the protection for all conservation areas	Map the conservation areas if any, Put signboard at strategic location, communicate conservation programme.	

RSPO P&C Public Summary Report
Revision 15 (Nov 2023)

7.12.3	Indicator is not applicable in Malaysia context	Not Applicable			Not Applicable									
7.12.4	<p>(C) Where HCVs, HCS forests after 15 November 2018, peatland and other conservation areas have been identified, they are protected and/or enhanced. An integrated management plan to protect and/or enhance HCVs, HCS forests, peatland and other conservation areas is developed, implemented and adapted where necessary, and contains monitoring requirements. The integrated management plan is reviewed at least once every five years. The integrated management plan is developed in consultation with relevant stakeholders and includes the directly managed area and any relevant wider landscape level considerations (where these are identified).</p> <p>- Critical (Major) compliance -</p>	<p>The audit findings have confirmed that there is no new HCVs, HCS forests peatland and other conservation areas been identified after 15 Nov 2018 in sample estates.</p> <p>HCV Management and monitoring plan has been established in the HCV assessment. Refer Management Plan and Propose Action Plan</p> <table><tr><th>Concern</th><th>Objective</th><th>Action Plan</th></tr><tr><td>Building conservation plan</td><td>Secure the long term sustainability plan for allowing on continuous implementation and improvement.</td><td>Determine objective of the conservation plan. Establish a monitoring protocol to ensure the plan will be implemented, monitored, reviewed and improved.</td></tr><tr><td>Identify all natural areas</td><td>Identify whom or what areas have an impact on conservation programme</td><td>Identification and demarcation. Obtain Written confirmation from Land Survey Department.</td></tr></table>			Concern	Objective	Action Plan	Building conservation plan	Secure the long term sustainability plan for allowing on continuous implementation and improvement.	Determine objective of the conservation plan. Establish a monitoring protocol to ensure the plan will be implemented, monitored, reviewed and improved.	Identify all natural areas	Identify whom or what areas have an impact on conservation programme	Identification and demarcation. Obtain Written confirmation from Land Survey Department.	Complied
Concern	Objective	Action Plan												
Building conservation plan	Secure the long term sustainability plan for allowing on continuous implementation and improvement.	Determine objective of the conservation plan. Establish a monitoring protocol to ensure the plan will be implemented, monitored, reviewed and improved.												
Identify all natural areas	Identify whom or what areas have an impact on conservation programme	Identification and demarcation. Obtain Written confirmation from Land Survey Department.												

RSPO P&C Public Summary Report
Revision 15 (Nov 2023)

		<p>Implementation (Education and awareness)</p> <p>Building alliances and strengthening the protection for all conservation areas</p> <p>Map the conservation areas if any, Put signboard at strategic location, communicate conservation programme.</p>	
		<p>HCV Monitoring was conducted by the management unit as below:</p> <p>Melewar Estate 2: 05/07/2023</p> <p>Hwa Li 3: 20/11/2023</p> <p>Asia Oil Palm Estate 2: 03/12/2023</p> <p>Awareness training has been conducted. Based on site verification found the boundary of HCV area equipped with the awareness signage. Further verification through interview with workers found they have good awareness on it. Training record as below:</p> <p>Melewar Estate 2: 28/08/2023</p> <p>Hwa Li 3: 04/11/2023</p> <p>Asia Oil Palm Estate 2: 05/04/2023</p>	
7.12.5	<p>Where rights of local communities have been identified in HCV areas, HCS forest after 15 November 2018, peat land and other conservation areas, there is no reduction of these rights without evidence of a negotiated agreement, obtained through FPIC, encouraging their involvement in the maintenance and management of these conservation areas.</p> <p>- Minor compliance -</p>	<p>The audit findings have confirmed that there is no new HCVs, HCS forests peatland and other conservation areas been identified after 15 Nov 2018 in sample estates. Verified that there is no issue on land right that involved the local communities in sample estates.</p>	Complied

RSPO P&C Public Summary Report
Revision 15 (Nov 2023)

7.12.6	<p>All rare, threatened or endangered (RTE) species are protected, whether or not they are identified in an HCV assessment. A programme to regularly educate the workforce about the status of RTE species is in place. Appropriate disciplinary measures are taken and documented in accordance with company rules and national law if any individual working for the company is found to capture, harm, collect, trade, possess or kill these species.</p> <p>- Minor compliance -</p>	<p>Refer Social & Environmental Impact Assessment including a Preliminary Management review for JC Chang Group's Asia and Melewar Production Units, Sabah Malaysia dated 13/07/2011. Assessment was conducted by Wild Asia (Malaysia). Refer Section High Conservation Values Assessment. There was no HCV area identified within property of Melewar Estate 2 Div 2, Hwa Li 3 and Asia Oil Palm Estate 2.</p> <p>The HCV Assessment report indicated that there is no threatened or endangered (RTE) species, or HCVs, are present or are affected by plantation or mill operations.</p> <p>Despite the slope of the area, this forest is classed as a "production forest" since it has been mined and no wildlife is reported sighted. Stated in the estate's management plan, among the protection measures established were create Biodiversity awareness, through regular training to workforce, put up warning signage at strategic boundary line "No Hunting, No Fishing, No Trapping or Collecting of Wild Species" and regular monitoring of animal sightings.</p> <p>Awareness training had been conducted on and regular reminders were normally given to all workforce during muster call. Records of training were well maintained by the operating units. Animal sighting record as below:</p> <p>Melewar Estate 2: 12/07/2023</p> <p>Hwa Li 3: 10/11/2023</p> <p>Asia Oil Palm Estate 2: 30/11/2023</p>	Complied
7.12.7	<p>The status of HCVs, HCS forests after 15 November 2018, other natural ecosystems, peatland conservation areas and RTE species is monitored. Outcomes of this monitoring are fed back into the management plan.</p>	<p>The audit findings have confirmed that there is no new HCVs, HCS forests peatland and other conservation areas been identified after 15 Nov 2018 in the sample estates. Conservation area like buffer zone and steep was maintained by the certification units. Monitoring</p>	Complied

RSPO P&C Public Summary Report
Revision 15 (Nov 2023)

	- Minor compliance -	of these areas are made through the daily field supervision by the field staff and executives.	
7.12.8	(C) Where there has been land clearing without prior HCV assessment since November 2005, or without prior HCV-HCSA assessment since 15 November 2018, the Remediation and Compensation Procedure (RaCP) applies. - Critical (Major) compliance -	The audit findings have confirmed that there is no new HCVs, HCS forests peatland and other conservation areas been identified after 15 Nov 2018 in sampled estates. Verified that there is no land clearing in the sample estates and Remediation and Compensation was not applicable.	Complied

RSPO P&C Public Summary Report

Revision 15 (Nov 2023)

Appendix B: GHG Reporting Executive Summary

The GHG emissions that were produced in **2022** for **Asia POM** and supply base was calculated using the PalmGHG Calculator version 4.0.1. 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 **2022** for **Asia POM** and supply base are as following:

Emission per product	tCO ₂ e/tProduct	Extraction	%
CPO	0.95	OER	20.53
PKO	0.00	KER	4.43

Production	t/yr	Land Use	Ha
FFB Process	179,076.84	OP Planted Area	18,155.91
CPO Produced	36,762.732	OP Planted on peat	109.40
PKO Produced	7,633.69	Conservation (forested)	0.00
		Conservation (non-forested)	516.13
		Total	18,781.44

**Total FFB processed inclusive of diversion form other J.C Chang Holdings Sdn Bhd group estate under Melewar Certification Unit.*

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	34,208.10	0.30	15,681.83	0.37	0.00	0.00	49,889.93	-
CO ₂ Emission from fertilizer	7,415.49	0.06	2,493.05	0.06	0.00	0.00	9,908.53	-
NO ₂ Emission	5,049.43	0.04	1,579.70	0.04	0.00	0.00	6,629.13	-
Fuel Consumption	2,320.90	0.02	509.65	0.01	0.00	0.00	2,830.55	-
Peat Oxidation	0.00	0.00	5901.26	0.14	0.00	0.00	5,901.26	-
Sink								
Crop Sequestration	-26,377.56	-0.23	-14,864.30	-0.35	0.00	0.00	-41241.86	-
Conservation Sequestration	0.00	0.00	0.00	0.00	0.00	0.00	0.00	-
Total	22,616.35	0.20	12,110.26	0.29	2641.82	0.00	37368.43	-

RSPO P&C Public Summary Report

Revision 15 (Nov 2023)

**Note: Includes both estates and smallholders*

Summary of Mill Emission and Credit

	tCO ₂ e	tCO ₂ e/tFFB
Emission		
POME	5,192.01	0.03
Fuel Consumption	245.49	0.00
Grid Electricity Utilization	0.00	0.00
Credit		
Export of Grid Electricity	0.00	0.00
Sales of PKS	-526.02	0.00
Sales of EFB	0.00	0.00
Total	4,911.48	0.03

Summary of Kernel Crusher Emission and Credit (if applicable)

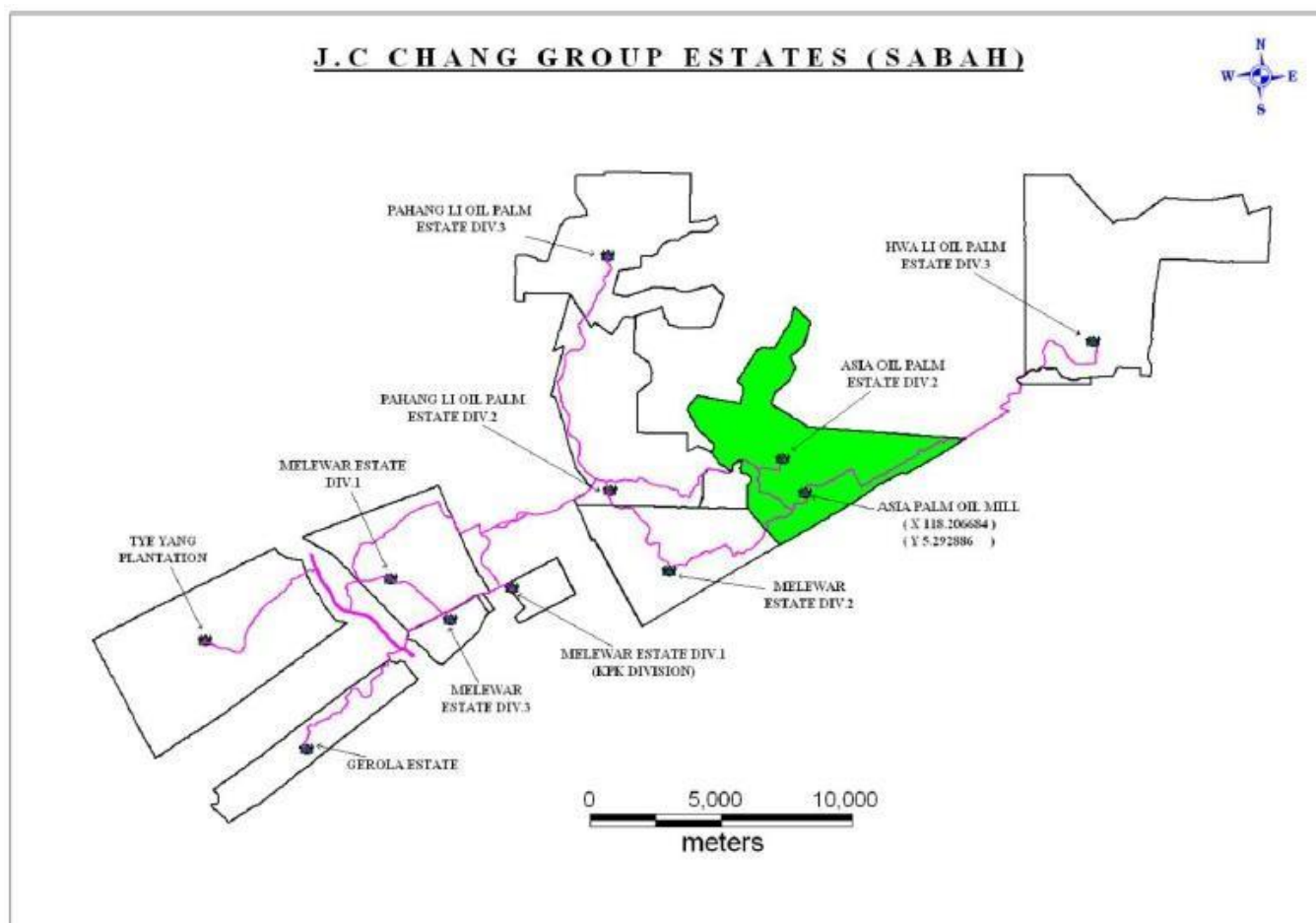
Emissions	tCO ₂ e
PK from own mill	0.00
PK from other source	0.00
Fuel Consumptions	0.00
Total Crusher emissions	0.00

*This mill has no kernel crusher operation.

Palm Oil Mill Effluent (POME) Treatment:	
Divert to Compost (%)	0.00
Divert to anaerobic diversion (%)	100

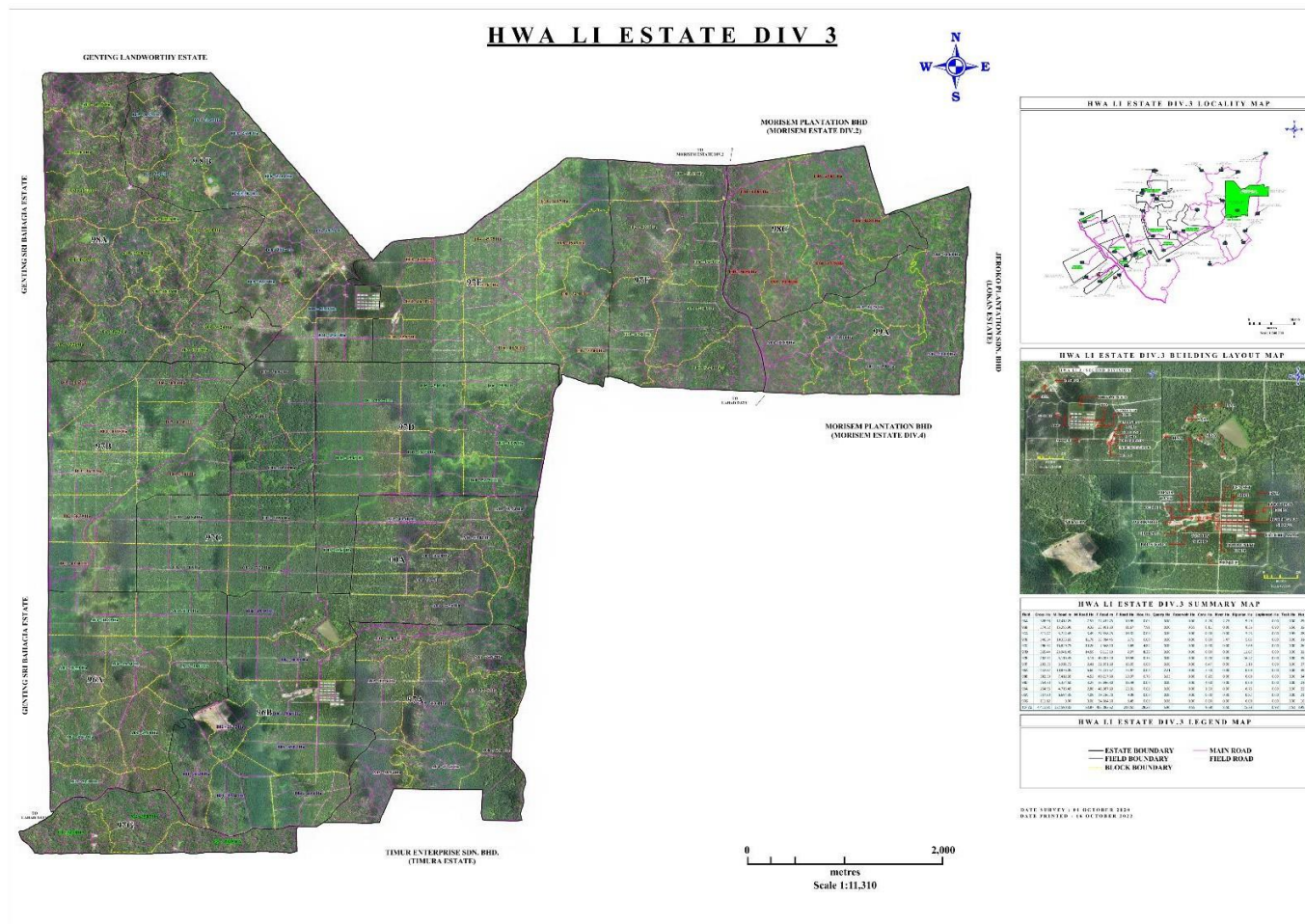
POME Diverted to Anaerobic Digestion:	
Divert to anaerobic pond (%)	0.00
Divert to methane captured (flaring) (%)	0.00
Divert to methane captured (energy generation) (%)	100

Appendix C: Location Map of Certification Unit and Supply bases



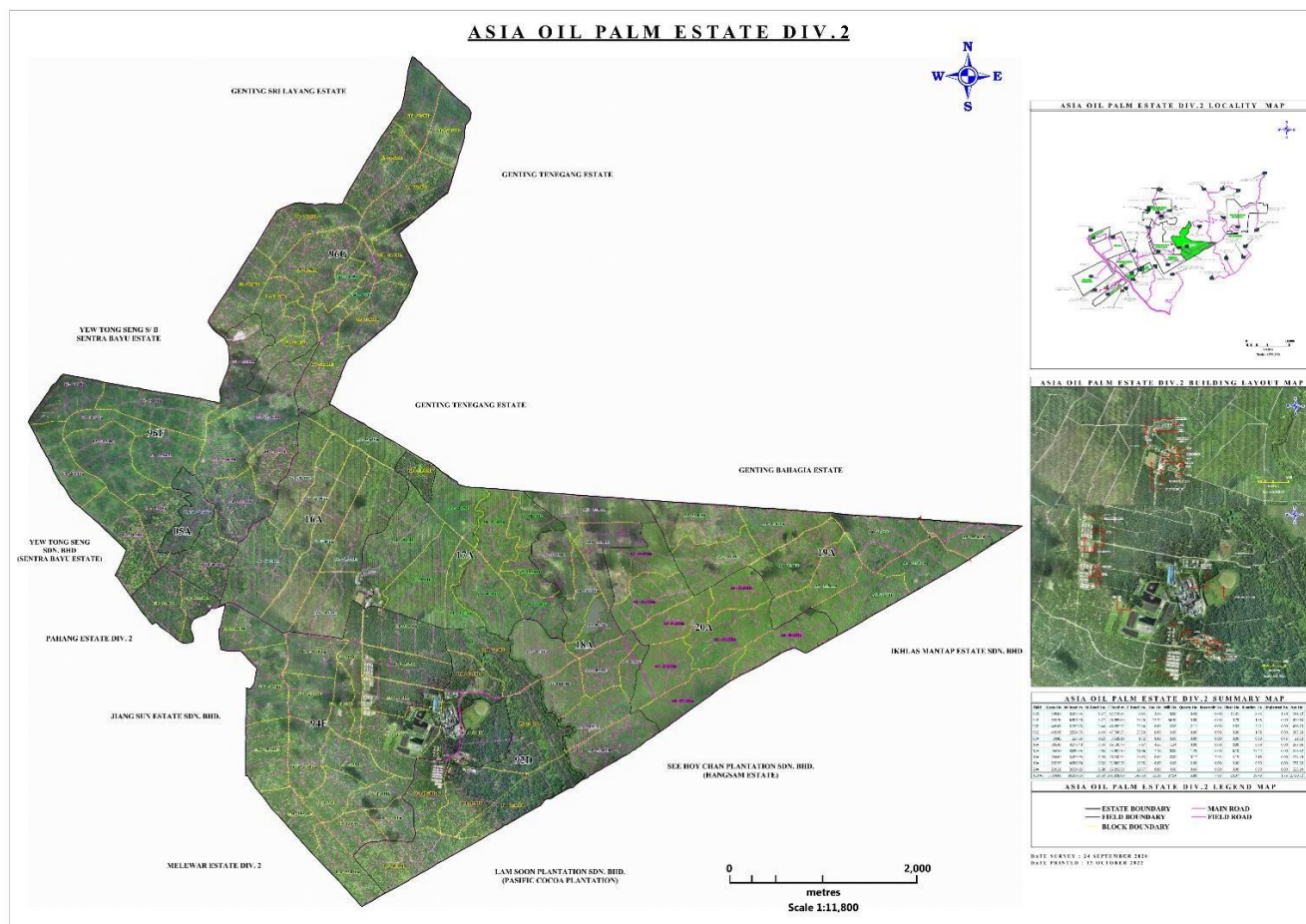
RSPO P&C Public Summary Report
Revision 15 (Nov 2023)

Appendix D: Estate Field Map



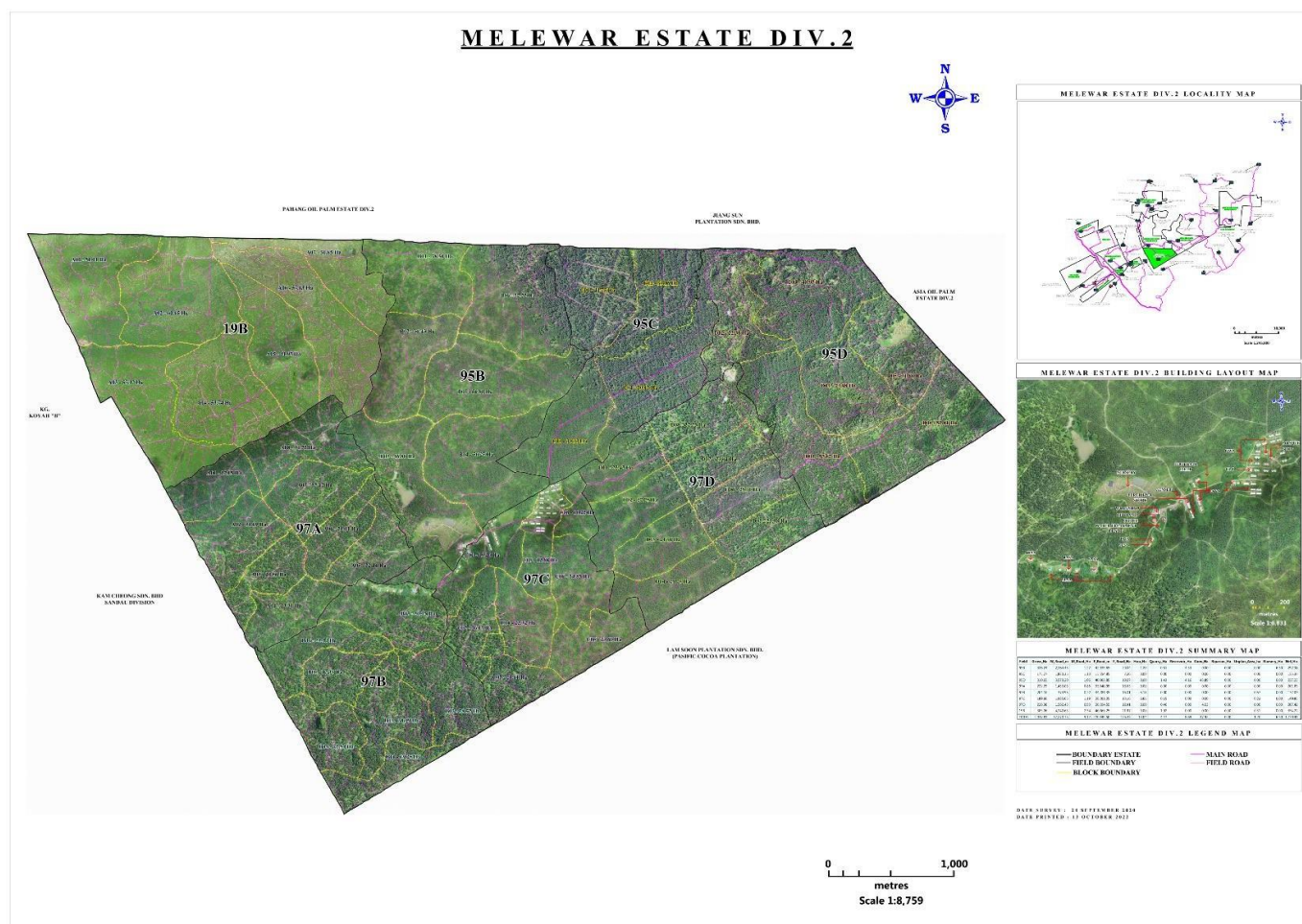
RSPO P&C Public Summary Report

Revision 15 (Nov 2023)



RSPO P&C Public Summary Report

Revision 15 (Nov 2023)



Appendix E: List of Smallholder Registered and/or sampled

Sampling Group	Current Certification	Scope Extension	Other:
Risk Factor Applied	N/A	N/A	N/A
Justification of Risk Factor Applied			
Number of samples			
Remarks			

[illegible]

Note: * are smallholders sampled in this audit.

RSPO P&C Public Summary Report

Revision 15 (Nov 2023)

Appendix F: 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
ISS	Independent Smallholder Standard
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