

**RSPO PRINCIPLE AND CRITERIA  
PUBLIC SUMMARY REPORT**

- ☐ Initial Assessment
- ☒ Annual Surveillance Assessment (3\_1)
- ☐ Recertification Assessment (Choose an item.)
- ☐ Extension of Scope

<b>Client Company Name / Parent Company:</b> <b>Johor Corporation</b>
Client Company / Parent Company Address: Level 11, Menara Komtar, Johor Bahru City Centre, 80000 Johor Bahru, Johor Darul Takzim, Malaysia
Certification Unit: <b>Johor Plantations Group Berhad - Sedenak Palm Oil Mill</b>  Location of Certification Unit: Lot 136, Mukim Sedenak, 81000 Kulai, Johor, Malaysia
Date of Final Report: 07/11/2024

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## Section 1: Scope of the Assessment

1. Company Details			
Parent Company	Johor Corporation		
RSPO Membership Number	1-0080-09-000-00	Membership Approval Date	15/06/2009
Address	Level 16, Menara Komtar, Johor Bahru City Centre, 80000 Johor Bahru, Johor Darul Takzim		
Palm Oil Mill / Group Manager / Estate (Certification Unit)	Johor Plantations Group Berhad ( <i>formerly known as Johor Plantations Group Berhad and Mahamurni Plantations Sdn Bhd</i> ) - Sedenak Palm Oil Mill		
Location / Address	Lot 136, Mukim Sedenak, 81000 Kulai, Johor, Malaysia		
Website	<a href="http://www.jcorp.com.my">http://www.jcorp.com.my</a>		
Management Representative	Wan Adlin Wan Mahmood	E-mail	<a href="mailto:wanadlin@johorplantations.com">wanadlin@johorplantations.com</a>
Telephone	+607 363 2000	Facsimile	07-8631084

2. Certification Information			
Certificate Number	RSPO 537873	Certificate Start Date	23/01/2024
Date of First Certification	23/01/2009	Certificate Expiry Date	22/01/2029
Scope of Certification	Production of Sustainable Crude Palm Oil (CPO) and Palm Kernel (PK)		
Visit Objectives	<ul style="list-style-type: none"> <li>• Determination of the conformity of the client's management system, or parts of it, with audit criteria.</li> <li>• Evaluation of the ability of the management system to ensure the client organization meets applicable statutory, regulatory and contractual requirements.</li> </ul>		
Assessment Cycle	<input type="checkbox"/> Pre Assessment (Choose an item.) <input type="checkbox"/> Initial Assessment <input checked="" type="checkbox"/> Annual Surveillance Assessment (ASA 3_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	90 Ton/ 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)

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3. Other Certifications			
Certificate Number	Standard(s)	Certificate Issued by	Expiry Date
MSPO 697948	MSPO 2530-3:2013 General Principles for Oil Palm Plantations and Organized Smallholders	BSI Services (Malaysia) Sdn. Bhd.	29/03/2029
MSPO 697947	MSPO 2530-4:2013 General Principles for Palm Oil Mills	BSI Services (Malaysia) Sdn. Bhd.	29/03/2029
BVC-MSPO/SC-0027	MSPO Supply Chain Certification Standard 2018	Bureau Veritas Certification	10/03/2025
A158820	MS 1500:2009	JAKIM	31/05/2025
EU-ISCC-Cert-DE119-60222022	ISCC EU	ASG Cert GmbH	04/05/2025
EU-PLUS-Cert-60222022	ISCC PLUS	ASG Cert GmbH	04/05/2025
O-238/24	ISO 45001:2018 - Occupational Health and Safety Management Systems (Sedenak Estate)	Niosh Certification Sdn Bhd	15/01/2027
O-237/24	ISO 45001:2018 - Occupational Health and Safety Management Systems (Sedenak POM)	Niosh Certification Sdn Bhd	02/01/2027
ABMS 00204	ISO 37001:2016	SIRIM QAS	03/06/2025

4. Location(s) of Mill & Supply Bases			
Name (Mill / Supply Base / Group Manager / Smallholders)	Location	GPS Coordinates	
		Latitude	Longitude
Sedenak Palm Oil Mill	Lot 136, Mukim Sedenak, 81000 Kulai, Johor, Malaysia	1° 43' 47.41" N	103° 32' 21.97" E
Sedenak Estate	Lot 136, Mukim Sedenak, 81000 Kulai, Johor, Malaysia	1° 42' 48.79" N	103° 31' 36.24" E
Kuala Kabong Estate	PTD 35021, HSD 71140, Mukim Bukit Batu, Daerah Kulai, Johor, Malaysia	1° 41' 20.10" N	103° 26' 00.87" 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
Sedenak Estate	2609.22	26.39	172.39	2808.00	93.01
Kuala Kabong Estate	1316.01	12.01	268.89	1596.91	82.41

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<b>Total</b>	<b>3925.23</b>	<b>38.4</b>	<b>441.28</b>	<b>4404.91</b>	<b>89.11</b>
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**Note:**

\*Sedenak Estate - Area planted reduced from 2611.71 to 2609.22 due to resurvey 23.6.2024

\*Kuala Kabong Estate – The total concession and planted area have changed due to development by Johorland for the development of Industrial Area. where the estate has stop the manuring activity since 2022. The estate is run at minimum maintenance prior from the takeover for the development. The Estate is currently on lease until 31/12/2024,

### 6. Plantings & Cycle

Estate / Smallholders	Age (Years) - ha				Mature	Immature
	0 - 3	4 - 14	15 - 25	>25		
Sedenak Estate	697.05	419.17	1493.00	0.00	1912.17	697.05
Kuala Kabong Estate	0	0	1316.01	0	1316.01	0
<b>Total (ha)</b>	<b>697.05</b>	<b>419.17</b>	<b>2809.01</b>	<b>0</b>	<b>3228.18</b>	<b>697.05</b>

**Note:** Only Mature area is considered as production area

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

Estate / Smallholders	Tonnage (MT) / year			
	Estimated last year (Jan 24 – Dec 24)	Actual (Sep 23 - Aug 24)		Forecast (Jan 25 – Dec 25)
		Previous license period (Sep 23 – Dec 23)	Current license period (Jan 24 – Aug 24)	
Sedenak Estate	41,570.00	16,944.50	28,041.70	42,308.00
Kuala Kabong Estate	21,892.00	7,165.82	10,441.37	20,803.00
<b>Total</b>	<b>63,462.00</b>	<b>62,593.39</b>		<b>63,111.00</b>

**Note:**

- Additional volume extension approved on 01/10/2024 with the extension of extra 45,000 mt of FFB, 2,250 mt of CSPK and additional 8,685 mt of CSPO. This is due to the extra FFB supplied to mill from other certified unit.
- The area is planned for development of high tech industrial area, where the estate has stop the fertiliser since 2022. The estate is run at minimum maintenance prior from the takeover for the development. Workers from Kuala Kabong Estate has been transferred to the sister estates among JPG

### 8. Summary of Certified Tonnage of FFB (from other certified unit(s))

Estate / Smallholders	Tonnage (MT) / year			
	Estimated last year (Jan 24 – Dec 24)	Actual (Sep 23 - Aug 24)		Forecast (Jan 25 – Dec 25)
		Previous license period (Sep 23 – Dec 23)	Current license period (Jan 24 – Aug 24)	
Siang Estate		13,891.22	4,114.29	
Basir Ismail Estate		5,230.85	0	

Sindora Estate		1,373.53	0	
Bt Layang		3,305.75	5,603.29	
REM Estate		628.45	65.39	
Tunjuk Laut Estate		421.75	0	
Sungai Papan Estate		7,166.09	0	
<b>Total</b>		<b>41,800.61</b>		<b>9,782.97</b>

9. Summary of Non-Certified Tonnage of FFB (outside supplier – excluded from certificate)				
Out growers / smallholders	Tonnage (MT) / year			
	Estimated last year (Jan 24 – Dec 24)	Actual (Sep 23 - Aug 24)		Forecast (Jan 25 – Dec 25)
		Previous license period (Sep 23 – Dec 23)	Current license period (Jan 24 – Aug 24)	
Asam Bubok	9,791.00	2737.96	6178.87	10,225.00
Kebun Sedenak	1,440.00	652.53	1227.91	1,585.00
Koperasi Pesara	3,370.00	1409.57	2772.09	3,681.00
Peladang Jb	4,200.00	1607.51	2003.24	4,133.00
Bukit Siput	7,200.00	4698.14	8585.33	7,266.00
Sedenak Bahru	5,173.00	1539.91	2588.86	4,993.00
Che Yu Trading	6,000.00	3197.63	546.14	5,104.00
Per. Sri Mahtai	720.00	204.06	411.85	726.00
Hong Hui	56,600.00	21106.1	48437.83	65,247.00
Choon Guan	21,400.00	8018.57	9329.33	22,495.00
Per. Sri Misan	38,250.00	12757.33	17009.83	39,750.00
Fong Tak	8,700.00	582.64	627.92	8,780.00
Keng Ann	9,600.00	3202.34	5309.9	9,054.00
Guan Leng	82,700.00	29381.84	52815.4	81,131.00
Peladang Kulai	2,100.00	448.29	985.29	2,031.00
Per. Md Sangidi	10,200.00	2957.93	3523.34	10,292.00
Az Iman	14,350.00	2728.82	5077.67	14,483.00
Hwa Lee Trading	6,670.00	0	0	5,591.00
Kcl Dagang	6,070.00	1236.1	2255.04	5,455.00
Boustead Eldred	0.00	0	0	0.00
Ladang Air Manis	16,467.00	5913.53	9976.64	16,869.00
Genting Kulai Besar (N)	0.00	152.14	0	0.00

Genting Kulai Besar	0.00	263.34	0	0.00
Genting Sri Gading	0.00	820.2	0	0.00
Genting Sungei Rakyat	0.00	518.99	0	0.00
Genting Sing Mah	0.00	102.65	0	0.00
Eng Leng Heng	5,980.00	0	0	2,876.00
Eng Huat Latex	0.00	105.07	192.35	79.00
Nirwana Ceria	5,830.00	737.19	493.31	5,884.00
Qi Hong Marketing	17,640.00	1026.52	17910.53	27,494.00
Haji Mansor	7,250.00	3618.45	4922.14	7,566.00
Sudiana Enterprise	0.00	0	1877.6	6,335.00
<b>Total</b>	<b>347,701.00</b>	<b>316,783.76</b>		<b>369,125.00</b>

<b>9A. Monthly Records of Certified and Uncertified FFB Received since the last audit</b>				
<b>No.</b>	<b>Month - Year</b>	<b>Volume of FFB from certified supply base (mt)</b>	<b>Volume of FFB from uncertified supply base (mt)</b>	<b>Total FFB/Month (mt)</b>
1	Sep-23	13,497.84	25,509.87	39,007.71
2	Oct-23	20,128.81	30,349.92	50,478.73
3	Nov-23	14,166.17	29,411.40	43,577.57
4	Dec-23	8,335.14	26,454.16	34,789.30
5	Jan-24	8,883.990	21,590.89	30,474.88
6	Feb-24	4,421.24	18,611.41	23,032.65
7	Mar-24	4,893.70	21,494.14	26,387.84
8	Apr-24	5,807.82	27,253.90	33,061.72
9	May-24	6,033.28	34,551.46	40,584.74
10	Jun-24	5,216.26	29,355.48	34,571.74
11	Jul-24	6,602.17	25,359.24	31,961.41
12	Aug-24	6,407.58	26,841.89	33,249.47
<b>TOTAL</b>		<b>104,394.00</b>	<b>316,783.76</b>	<b>421,177.76</b>

<b>10. Summary of Certified Tonnage (MT) (not applicable for ISS)</b>			
<b>Estimated last year (Jan 24 – Dec 24)</b>	<b>Actual (Sep 23 - Aug 24)</b>		<b>Forecast (Jan 25 – Dec 25)</b>
	<b>Previous license period (Sep 23 – Dec 23)</b>	<b>Current license period (Jan 24 – Aug 24)</b>	

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FFB	FFB		FFB
63,462.00 mt	56,127.96 mt	48,266.04 mt	63,111.00 mt
	<b>TOTAL</b>	104,394.00 mt	
<b>CPO (OER: 22.61 %)</b>	<b>CPO (OER: 19.08 %)</b>		<b>CPO (OER: 23.03 %)</b>
14,342.41 mt	10,846.02 mt	9,067.96 mt	14,536.00 mt
	<b>TOTAL</b>	19,913.98 mt	
<b>PK (KER: 6.79%)</b>	<b>PK (KER: 5.27 %)</b>		<b>PK (KER: 6.16 %)</b>
4,309.07 mt	3,006.07 mt	2,498.15 mt	3,886.00 mt
	<b>TOTAL</b>	5,504.22 mt	

Note: Additional volume extension approved on 01/10/2024 with the extension of extra 45,000 mt of FFB, 2,250 mt of CSPK and additional 8,685 mt of CSPO. This is due to the extra FFB supplied to mill from other certified unit.

10A. Monthly Records of Certified CPO & PK since the last audit			
No.	Month - Year	Certified CPO (MT)	Certified PK (MT)
1	Sep-23	2,592.23	715.97
2	Oct-23	3,926.72	1,076.50
3	Nov-23	2,743.43	759.53
4	Dec-23	1,583.64	454.08
5	Jan-24	1,636.07	447.96
6	Feb-24	880.03	253.20
7	Mar-24	950.02	268.96
8	Apr-24	1,105.08	313.40
9	May-24	1,098.51	307.05
10	Jun-24	922.25	236.18
11	Jul-24	1,251.25	325.18
12	Aug-24	1,224.75	346.22
<b>TOTAL</b>		<b>19,913.98</b>	<b>5,504.23</b>

11. Summary of Actual Volume sold					
Current License period (Jan 24 – Aug 24)					
	RSPO Certified	Other Schemes Certified		Conventional	Total
		ISCC	Others		
<b>CPO (MT)</b>	7,814.68	0.00	0.00	141.90	7,956.58
<b>PK (MT)</b>	2,005.78	0.00	0.00	383.51	2,389.29



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<b>Credits</b>	0.00	0.00	0.00	0.00	0.00
<b>Previous License period (Sep 23 – Dec23)</b>					
<b>CPO (MT)</b>	9,777.91	0	0	1,926.76	11,704.67
<b>PK (MT)</b>	1,497.90	0	0	1,418.20	2,916.10
<b>Credits</b>	0.00	0.00	0.00	0.00	0.00
<b>Note:</b> 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	A	CPOMB23009	502.58	3,503.68
2	B	CPOMB24022	4,607.37	
		CPOMB24019		
		CPOMB24013		
		CPOMB24012		
		CPOMB24012		
		CPOMB24009		
		CPOMB24009		
		CPOMB24006		
		CPOMB24002		
		CPOMB24002		
		CPOMB24006		
		CPOMB23016		
		CPOMB23014		
		CPOMB23008		
		CPOMB23006		
	CPOMB23003			
3	C	CPOMB23010	1,001.14	
4	D	CPOMB23013 CPOMB23012	1,604.32	
5	E	CPOMB24020 CPOMB24017 CPOMB24017 CPOMB24014 CPOMB24010 CPOMB24004 CPOMB24004 CPOMB24003	5,590.76	

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		CPOMB23015 CPOMB24003 CPOMB23015 CPOMB23015 CPOMB23011 CPOMB23005 CPOMB23004 CPOMB23007		
6	F	CPOMB24021 CPOMB24018 CPOMB24015 CPOMB24011 CPOMB24011 CPOMB24008 CPOMB24011 CPOMB24008 CPOMB24005 CPOMB24005 CPOMB24001 CPOMB24001 CPOMB-MP2251 CPOMB-MP2250 CPOMB-MP2249 CPOMB-MP2248	4,286.42	
<b>TOTAL</b>			<b>17,592.59</b>	<b>3,503.68</b>

11B. Records of certified CPO & PK Sold under other schemes since the last audit (if any)				
No.	Buyers Name	Scheme Name	Certified CPO Sold (MT)	Certified PK Sold (MT)
1	A	-	0.00	0.00
<b>TOTAL</b>			<b>0.00</b>	<b>0.00</b>

11C. Records of CPO & PK Sold as conventional since the last audit (if any)			
No.	Buyers Name	CPO Sold (MT)	PK Sold (MT)
1	A	2,068.66	1,801.71
<b>TOTAL</b>		<b>2,068.66</b>	<b>1,801.71</b>

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11D. Records of Certified CPO Sold under RSPO Credits since the last audit (if any)			
No.	Buyers Name	PalmTrace Trading License Number	RSPO Credits of Certified CPO Sold
1	N/A	N/A	N/A
<b>TOTAL</b>			<b>N/A</b>

12. Independent Smallholders Certified Tonnage (MT) / Volume									
	Estimated last year (Not Applicable)			Actual (Not Applicable)			Forecast (Not Applicable)		
Phase	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			N/A			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
<b>TOTAL</b>		<b>N/A</b>	<b>N/A</b>	<b>N/A</b>	<b>N/A</b>	<b>N/A</b>
<b>Note:</b> 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 (Not Applicable)							
Credits				N/A	N/A	N/A	N/A
Physical	N/A	N/A	N/A				
Previous License period (Not Applicable)							
Credits				N/A	N/A	N/A	N/A
Physical	N/A	N/A	N/A				

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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](mailto:Chaiyaporn.Seekao@bsigroup.com))

Website: [www.bsigroup.com](http://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 **23/09/2024 - 26/09/2024**. 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 **03/11/2024**. 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.

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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 (ASA3-1)	Year 3 (ASA3-2)	Year 4 (ASA3-3)	Year 5 (ASA3-4)
Sedenak Palm Oil Mill	✓	✓	✓	✓	✓
Sedenak Estate	✓	✓	✓	✓	✓
Kuala Kabong Estate	✓	✓	✓	✓	✓

**Tentative Date of Next Visit: September 22, 2025 - September 26, 2025**

**Total Number of Mandays: 9.5 mandays**

## 2.2 BSI Assessment Team

Name	Role	Competency
Ahmad Ruffi Bin Abu Talib Khan (ARK)	Team Leader	<p><b>Education:</b> Bachelor Degree In Mechanical Engineering from Universiti Teknologi MARA Shah Alam, graduated in 2015.</p> <p><b>Work Experience:</b> He started his career as Assistant Mill Manager, managing the day-to-day mill operations. In his five years' experience, he has experience handling the certification of ISO 9001, OHSAS 18001, ISO 14001 as well as Malaysia Sustainable Palm Oil (MSPO). He is a qualified Lead Auditor for MS 2530:2013 and has accumulated more than 300 audit days throughout his current career as the auditor for multiple disciplines covering all over Malaysia.</p> <p><b>Training attended:</b> He has completed CQI – IRCA approved ISO 9001, ISO 14001 and ISO 45001 Lead Auditor Course, MSPO 2530:2013 Lead Auditor Course, Endorsed RSPO Lead Auditor and RSPO SCC Auditor course.</p> <p><b>Language proficiency:</b> Fluent in in both verbal/written Bahasa Malaysia and English</p> <p><b>Aspect covered in this audit:</b></p> <p><input type="checkbox"/> Good Agriculture Practice <input type="checkbox"/> Health and Safety <input checked="" type="checkbox"/> Supply chain requirements</p> <p><input type="checkbox"/> Social <input checked="" type="checkbox"/> Environmental <input checked="" type="checkbox"/> Market Communication and claim requirements</p> <p><input type="checkbox"/> ISH context (ICS, internal audit, policy, business planning and trading system)</p>
Mohd. Razaleigh Mohamad (MRM)	Team Member	<p><b>Education:</b> Holds a Bachelor Degree in Plantation Management and Agrotechnology, University Technology Mara (UiTM).</p>

		<p><b>Work Experience:</b> He has 5 years' experience in Oil Palm Estate Management with Tradewinds Plantation Berhad. The last position held was Senior Assistant Manager. He has more than 4 years of experience in Third Party Certification Audit with Control Union (M) Sdn Bhd for RSPO P&amp;C, MSPO P&amp;C and GLOBALG.A.P. IFA Fruits and Vegetables. Qualified as RSPO Lead Auditor and approved to conduct Environmental and Social elements.</p> <p><b>Training attended:</b> He has completed ISO 9001-2015 Lead Auditor Course, ISO14001- 2015 Lead Auditor Course, ISO45001-2018 Lead Auditor Course, Endorsed RSPO P&amp;C Lead Auditor Course, Endorsed MSPO P&amp;C Lead Auditor Course, Social Accountability SA8000 Auditor Course, RSPO Independent Smallholder (IHS) Auditor Training and Endorsed RSPO Refresher Trainings (P&amp;C and SCCS).</p> <p><b>Language proficiency:</b> Fluent in English and Bahasa Malaysia</p> <p><b>Aspect covered in this audit:</b></p> <p><input 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>
Zulkifli Kamarol Zaman (ZKZ)	Team Member	<p><b>Education:</b> He graduated in Bachelor of Science (Agribusiness) from University Putra Malaysia (UPM) in 2008.</p> <p><b>Work Experience:</b> He has 10 years' experience in oil palm industry whereas he has been working at plantation company as Estate Assistant Manager prior to joining Certification Body as an Auditor. He is familiar with the estate's daily operation as well as the Best Management Practices for oil palm cultivation. Prior to joining BSI, he was the auditor for several certification bodies. He is involved in auditing MSPO OPMC, MSPO SCCS, RSPO P&amp;C, RSPO SCCS and PEFC CoC standard.</p> <p><b>Training attended:</b> He has completed ISO IMS 9001, 14001, 45001 Lead Auditor Course in April 2018, Endorsed MSPO OPMC Lead Auditor Course in April 2019, Endorsed MSPO SCCS Auditor Course in September 2019, Endorsed RSPO P&amp;C Lead Auditor Course in March 2020, Endorsed RSPO SCCS Lead Auditor Course in March 2020, PEFC Chain of Custody Training in December 2020, CQI IRCA ISO 9001:2015 Lead Auditor Course in October 2023, CQI IRCA ISO 45001:2018 Lead Auditor Course in November 2023, SA8000 Introduction &amp; Basic Auditor Training Course in November 2023 and CQI IRCA ISO 14001:2015 Lead Auditor Course in June 2024.</p> <p><b>Language proficiency:</b> He is fluent in English and Bahasa Malaysia.</p> <p><b>Aspect covered in this audit:</b></p> <p><input type="checkbox"/> Good Agriculture Practice <input type="checkbox"/> Health and Safety <input type="checkbox"/> Supply chain requirements</p> <p><input checked="" 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>

**Accompanying Persons:**

Name	Role
N/A	N/A

### 2.3 Assessment Plan

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

Date	Time	Subjects	ARK	MRM	ZKZ
Sunday, 22/09/2024	PM	Audit team travel to Johor Bahru, Johor, Malaysia	✓	✓	✓
Monday, 23/09/2024  Day 1  <b>Sedenak Estate</b>	9:00 AM – 9:30 AM	Opening meeting @ <b>Sedenak Estate</b> <ul style="list-style-type: none"> <li>Opening presentation by audit team leader</li> <li>Confirmation of assessment scope and finalize audit plan</li> </ul>	✓	✓	✓
	9:30 AM – 12:30 PM	<b>Sedenak Estate</b> 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, workers housing, clinic, landfill, etc.	✓	✓	✓
	10:30 AM – 12:30 PM	Meeting with stakeholders (Government, village representatives, smallholders, employee union representatives, vendor etc.)	–	✓	✓
	12:30 PM – 1:30 PM	Lunch Break	✓	✓	✓
	1:30 PM – 4:30 PM	Document Assessment P1 – P7: General Documentation e.g. Legal, Manual and Procedure, production & monitoring records, IPM, HCV records, SEIA documents & records, OSH records, assessment on pay documents, records of communication with stakeholder/workers representatives, new planting, CIP and implementation & etc.)	✓	✓	✓
	4:30 PM – 5:00 PM	<ul style="list-style-type: none"> <li>Auditors' discussion</li> <li>Day 1 Interim Closing Briefing</li> </ul>	✓	✓	✓
Tuesday, 24/09/2024  Day 2  <b>Sedenak Palm Oil Mill</b>	9:00 AM – 12:30 PM	<b>Sedenak Palm Oil Mill</b> Mill visit: FFB receiving, warehouse, workshop, wastes management & Landfill, Effluent Ponds, OSH & ERP, Environment issues, POME application, water treatment. Laboratory, weighbridge and palm product storage area, staff, workers and contractor interview, housing and facility inspection, clinic, lab, weighbridge, and palm product storage area etc.	✓	✓	✓
	10:30 AM – 12:30 PM	Meeting with stakeholders (Government, village representatives, smallholders, employee union representatives, vendor etc.)	–	✓	✓
	12:30 PM – 1:30 PM	Lunch Break	✓	✓	✓



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Date	Time	Subjects	ARK	MRM	ZKZ
	1:30 PM – 4:30 PM	Document Assessment P1 – P7: SOPs, assessment on management plans, SEIA documents, GHG records, wage records, employee data, training records, legal permits, mill inspection and internal monitoring records, CIP & implementation	✓	✓	✓
	4:30 PM – 5:00 PM	<ul style="list-style-type: none"> <li>Auditors' discussion</li> <li>Day 2 Interim Closing Briefing</li> </ul>	✓	✓	✓
Wednesday, 25/09/2024  Day 3  <b>Kuala Kabong Estate</b>	9:00 AM – 12:30 PM	<b>Kuala Kabong Estate</b> 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, workers housing, clinic, landfill, etc.	✓	✓	✓
	10:30 AM – 12:30 PM	Meeting with stakeholders (Government, village representatives, smallholders, employee union representatives, vendor etc.)	–	✓	✓
	12:30 PM – 1:30 PM	Lunch Break	✓	✓	✓
	1:30 PM – 4:30 PM	Document Assessment P1 – P7: General Documentation e.g. Legal, Manual and Procedure, production & monitoring records, IPM, HCV records, SEIA documents & records, OSH records, assessment on pay documents, records of communication with stakeholder/workers representatives, new planting, CIP and implementation & etc.)	✓	✓	✓
	4:30 PM – 5:00 PM	<ul style="list-style-type: none"> <li>Auditors' discussion</li> <li>Day 3 Interim Closing Briefing</li> </ul>	✓	✓	✓
Thursday, 26/09/2024  Day 4  <b>Sedenak Palm Oil Mill</b>	9:00 AM – 11:30 PM	<b>Sedenak Palm Oil Mill</b> Mill visit: FFB receiving, warehouse, workshop, wastes management & Landfill, Effluent Ponds, OSH & ERP, Environment issues, POME application, water treatment. Laboratory, weighbridge and palm product storage area, staff, workers and contractor interview, housing and facility inspection, clinic, lab, weighbridge, and palm product storage area, etc.	✓	–	–
	11:30 AM – 12:00 PM	Closing Meeting Preparation	✓	–	–
	12:30 PM – 1:00 PM	Closing Meeting	✓	–	–

### Major NC Closure Audit Plan

Date	Time	Subjects	ARK
Saturday 02/11/2024	PM	Audit team travel to Johor Bahru	✓
Sunday, 03/11/2024	1:00 PM – 1:30 PM	Opening meeting • Opening presentation by audit team leader • Confirmation of assessment scope and finalize audit plan	✓
	1:30 PM – 4:30 PM	Verification on Major NC closure evidence. Document review, site observation, workers/stakeholder interview (individual and group session) for:  1. 2553353-202409-M1 2. 2553353-202409-M2	✓
	4:30 PM	Closing Meeting	-

## 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?	Yes, 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	Yes, all the estates and mills certified within 5 years after obtaining RSPO membership. The Indonesian units, PT RAJ & PT TPR were disposed on 6th July 2023.	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.	No. There have not been any new acquisitions.	Complied

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Any deviations from the maximum periods requires approval by the RSPO Secretariat.	No. There have no any deviations from the maximum periods requires approval by the RSPO Secretariat.	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 has no any changes to the time-bound plan since the last audit.	Complied
Have there been any isolated lapses in implementation of the plan? If yes a <b>Minor</b> non-compliance shall be raised	No. There is no isolated lapse in Time Bound Plan	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 <b>Major</b> non-compliance shall be raised	There is no any fundamental failure to proceed with implementation of the plan	Complied
<b>Un-Certified Units or Holdings</b>		
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.	No uncertified units of holdings under Johor Plantations Group Berhad. Thus, this requirement is not applicable.	Not Applicable
Any new plantings since January 1 <sup>st</sup> 2010 shall comply with the RSPO New Plantings Procedure.	No uncertified units of holdings under Johor Plantations Group Berhad. Thus, this requirement is not applicable.	Not Applicable
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. <i>Note:</i>	No uncertified units of holdings under Johor Plantations Group Berhad. Thus, this requirement is not applicable.	Not Applicable
Any Labor disputes are being resolved through a mutually agreed process, in accordance with RSPO P&C criterion 4.2	No uncertified units of holdings under Johor Plantations Group Berhad. Thus, this requirement is not applicable.	Not Applicable
Any Legal non- compliance is being addressed through measures consistent with the requirements of RSPO P&C criteria 2.1	No uncertified units of holdings under Johor Plantations Group Berhad. Thus, this requirement is not applicable.	Not Applicable
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.	No uncertified units of holdings under Johor Plantations Group Berhad. Thus, this requirement is not applicable.	Not Applicable
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 uncertified units of holdings under Johor Plantations Group Berhad. Thus, this requirement is not applicable.	Not Applicable

Have there been any stakeholder (including NGO) consultation conducted?	No uncertified units of holdings under Johor Plantations Group Berhad. Thus, this requirement is not applicable.	Not Applicable
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### 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

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#### Approved Time Bound Plan

Name of the Unit of Certification (UoC)	Country	Name of the Mills and Supply Bases	Total Managed Area (Ha)	Certification Status (Certified / Not certified)	Plan Year for Certification	Actual Certification Year	Date of Last TBP Verified and Approved by CB	REVISION OF THE TBP (Only applicable when revision is made)			
								Any revision from the last approved TBP? (Yes / No)	New Proposed Year for Certification	Justification of changes for each UoC	Date of approval from RSPO
<i>Sedenak Palm Oil Mill</i>	<i>Malaysia</i>	<i>Sedenak Estate</i>	2808	Certified	Nil	2009	20-Apr-22	No	Nil	We completed the disposal of our Indonesia operation in August 2023	Nil
		<i>Kuala Kabong Estate</i>	1718	Certified	Nil	2009	20-Apr-22	No	Nil	We completed the disposal of our Indonesia operation in August 2023	Nil
<i>Sindora Palm Oil Mill</i>	<i>Malaysia</i>	<i>Sindora Estate</i>	3,919.06	Certified	Nil	2009	20-Apr-22	No	Nil	We completed the disposal of our Indonesia operation in August 2023	Nil
		<i>Basir Ismail Estate</i>	3594.4	Certified	Nil	2009	20-Apr-22	No	Nil	We completed the disposal of our Indonesia operation in August 2023	Nil
		<i>REM Estate</i>	2898.9	Certified	Nil	2009	20-Apr-22	No	Nil	We completed the disposal of our Indonesia operation in August 2023	Nil
		<i>Sungai Papan Estate</i>	2,995.85	Certified	Nil	2009	20-Apr-22	No	Nil	We completed the disposal of our Indonesia operation in August 2023	Nil
<i>Tereh Palm Oil Mill</i>	<i>Malaysia</i>	<i>Tereh Utara Estate</i>	3087.4	Certified	Nil	2009	20-Apr-22	No	Nil	We completed the disposal of our Indonesia operation in August 2023	Nil

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		<i>Tereh Selatan Estate</i>	2707.2	Certified	Nil	2009	20-Apr-22	No	Nil	We completed the disposal of our Indonesia operation in August 2023	Nil
		<i>Selai Estate</i>	3535.1	Certified	Nil	2009	20-Apr-22	No	Nil	We completed the disposal of our Indonesia operation in August 2023	Nil
		<i>Mutiara Estate</i>	3695.1	Certified	Nil	2009	20-Apr-22	No	Nil	We completed the disposal of our Indonesia operation in August 2023	Nil
		<i>Sungai Tawing Estate</i>	2225.8	Certified	Nil	2009	20-Apr-22	No	Nil	We completed the disposal of our Indonesia operation in August 2023	Nil
		<i>Wawasan Estate</i>	362.30	Certified	Nil	2009	20-Apr-22	No	Nil	We completed the disposal of our Indonesia operation in August 2023	Nil
		<i>Felda Paloh Estate</i>	1331.8	Certified	Nil	2009	20-Apr-22	No	Nil	We completed the disposal of our Indonesia operation in August 2023	Nil
		<i>Rengam Estate</i>	2418.2	Certified	Nil	2009	20-Apr-22	No	Nil	We completed the disposal of our Indonesia operation in August 2023	Nil
<i>Palong Palm Oil Mill</i>	<i>Malaysia</i>	<i>Palong Estate</i>	3701.9	Certified	Nil	2009	20-Apr-22	No	Nil	We completed the disposal of our Indonesia operation in August 2023	Nil
		<i>Mungka Estate</i>	2898.3	Certified	Nil	2009	20-Apr-22	No	Nil	We completed the disposal of our Indonesia operation in August 2023	Nil
		<i>UMAC Estate</i>	1616.3	Certified	Nil	2009	20-Apr-22	No	Nil	We completed the disposal of our Indonesia operation in August 2023	Nil
		<i>Labis Bahru Estate</i>	2108.2	Certified	Nil	2009	20-Apr-22	No	Nil	We completed the disposal of our Indonesia operation in August 2023	Nil
<i>Pasir Panjang Palm Oil Mill</i>	<i>Malaysia</i>	<i>Pasir Panjang Estate</i>	4013.6	Certified	Nil	2009	20-Apr-22	No	Nil	We completed the disposal of our Indonesia operation in August 2023	Nil
		<i>Tunjuk Laut Estate</i>	2867.8	Certified	Nil	2009	20-Apr-22	No	Nil	We completed the disposal of our Indonesia operation in August 2023	Nil

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		Siang Estate	3443.1	Certified	Nil	2009	20-Apr-22	No	Nil	We completed the disposal of our Indonesia operation in August 2023	Nil
		Bukit Kelompok Estate	2613.8	Certified	Nil	2009	20-Apr-22	No	Nil	We completed the disposal of our Indonesia operation in August 2023	Nil
		Pasir Logok Estate	2097.7	Certified	Nil	2009	20-Apr-22	No	Nil	We completed the disposal of our Indonesia operation in August 2023	Nil
Bukit Layang Estate	Malaysia	Bukit Layang Estate	397.76	Certified	Nil	12-Jul	20-Apr-22	No	Nil	We completed the disposal of our Indonesia operation in August 2023	Nil

### 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 two (2) Critical; zero (0) Minor nonconformities and two (2) Opportunity For Improvement raised. The Johor Plantations Group Berhad - Sedenak Palm Oil Mill Certification unit submitted Corrective Action Plans for the nonconformity. Corrective action plans with respect to the nonconformity was reviewed by the BSI audit team and accepted.

The implementation of the corrective action plans to address the minor nonconformity will be followed up during the next surveillance assessment. The implementation of the Corrective Actions for the 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			
<b>NCR Ref #</b>	2553353-202409-M1	<b>Issued Date</b>	26/09/2024
<b>Due Date</b>	25/12/2024	<b>Closure Date</b>	03/11/2024
<b>Indicator &amp; Category (Critical / Minor)</b>	6.2.4 (C) – Critical		
<b>Statement of Nonconformity:</b>	The condition of the surrounding linesite area is unsatisfactory.		
<b>Requirement Reference:</b>	<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.</p> <p>National laws, or in their absence the ILO Guidance on 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 (5 years) is allowed to upgrade the infrastructure.</p>		
<b>Objective Evidence:</b>	<p>Section 23 (1) of Employees' Minimum Standards of Housing, Accommodations and Amenities Act 1990 (Act 446) stated: It shall be the duty of the employer of a place of employment where employees and their dependants are provided with housing accommodation to ensure that—</p> <p>(a) the area surrounding the employees' housing is kept clear of undergrowth and maintained in a clean and sanitary condition;</p> <p>(b) the perimeter drains around each dwelling or block of dwellings including all outlet drains are kept in a good state of repair and clear of refuse or undergrowth to permit free flow of water;</p> <p>(c) all refuse in the housing site is collected daily and disposed of satisfactorily; and</p> <p>(d) all communal latrines and bathrooms are kept in a clean, sanitary and working condition.</p> <p>However, during site visit to the mill linesite area, it was observed that there were damaged drains and undergrowth behind houses No. M113 and M114. Further verification made to linesite inspection record, the criteria for 'kebersihan luar rumah, kawasan sekeliling, and longkang,' conducted on 12/09/2024, showed good remarks, which do not reflect the actual conditions observed onsite.</p>		



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<b>Corrections:</b>	The mill has repaired the damaged drain on October 2024, and the surrounding areas have been cleared to unblock the drain
<b>Root Cause Analysis:</b>	<ol style="list-style-type: none"> <li>1) The linesite inspection was not conducted thoroughly during the site visit.</li> <li>2) There is an inadequate understanding of the linesite inspection records justification and site visit assessments.</li> </ol>
<b>Corrective Actions:</b>	<ol style="list-style-type: none"> <li>1) The mill will update the inspection records to ensure that the Borang Aduan Kerosakan Rumah includes observations on the condition of the drains.</li> <li>2) An awareness training session will be conducted for HA personnel to ensure they correctly identify issues related to cleanliness, drainage, and sanitary conditions, focusing on improving the effectiveness of linesite inspection recordings.</li> <li>3) The monthly report will be verified by a supervisor and should include photos of the conditions observed during the inspection.</li> </ol>
<b>Assessment Conclusion:</b>	<p>The management conducted the repair work on the damaged drain accordingly, with the surrounding areas has been cleared from the refused that blocked the drains.</p> <p>The training to the HA on the requirements of linesite inspection accordance to the Act 446 has been conducted on 07/10/2024. Verified the training records, photo of the training and training evaluations conducted by the management. Interview with HA found the process of the housing inspection will be conducted as per requirements stated in Act 446, and understanding of process is good.</p> <p>The records of the housing inspection was verified accordingly with the record of inspection is available for review. Thus, the Major NC was closed effectively on 03/11/2024.</p>

Non-conformity			
<b>NCR Ref #</b>	2553353-202409-M2	<b>Issued Date</b>	26/09/2024
<b>Due Date</b>	25/12/2024	<b>Closure Date</b>	03/11/2024
<b>Indicator &amp; Category (Critical / Minor)</b>	3.8.16 – Critical		
<b>Statement of Nonconformity:</b>	The process of removal of the downgraded CPO in the RSPO IT Platform is not available.		
<b>Requirement Reference:</b>	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.		
<b>Objective Evidence:</b>	Verification made to the mass balance sheet and records of the production of CPO and PK as well as sales records of both products. In the previous license period (Jan 2023 - Dec 2023) found that there 2360.51 mt of CPO and 942.35 mt PK were downgraded as conventional. However, there is no evidence of removal is made in the RSPO IT Platform.		

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<b>Corrections:</b>	<ol style="list-style-type: none"> <li>1) Mill will provide the mass balance of CSPO and CSPK productions on a monthly basis to Commercial &amp; Trading for balance checking and removal from the RSPO IT Platform.</li> <li>2) The Commercial &amp; Trading Department will monitor the CSPO-MB and CSPK-MB sold together with the stock balance for the RSPO Palm Trace announcement or removal.</li> </ol>
<b>Root Cause Analysis:</b>	Lack of understanding in managing the removal process of the downgraded CPO in the RSPO IT Platform.
<b>Corrective Actions:</b>	<ol style="list-style-type: none"> <li>1) The CSPO-MB and CSPK-MB stocks will be monitored before the end of the accounting period i.e. 31st December, each year.</li> <li>2) The respective person in charge to attend a new RSPO platform training.</li> </ol>
<b>Assessment Conclusion:</b>	<p>Verification of the mass balance sheet is available and updated accordingly. The Mill has submitted the Mass Balance sheet to the marketing department for review. Records of removal has been conducted. Verified the transaction record with the number ST-TR-cd95f0ff-ac06, ST-TR-2fef91b2-dcd5, ST-TR-3e8fdb03-f2b8, ST-TR-03bdba49-0103 were conducted on 29/10/2024 for the removal of certified PK stock.</p> <p>The training on PRISMA System was attended by the Commercial and Trading Department on 22/10/2024. The Major NC was effectively closed on 03/11/2024.</p>

<b>Opportunity for Improvements</b>	
<b>OFI #</b>	<b>Description</b>
<b>OFI 1</b>	<b>2553353-202409-I1</b> <u>Indicator 7.2.1</u> Chemical stock management can be further improved by identifying obsolete, expired and off spec chemical.
<b>OFI 2</b>	<b>2553353-202409-I2</b> <u>Indicator 3.6.1</u> Communication of audiometric test results can be further improved by ensuring that the communication is effective and understandable by the workers.

<b>Positive Findings</b>	
<b>PF #</b>	<b>Description</b>
<b>PF 1</b>	Good cooperation from top management to the workers in preparation and continuous implementation in sustainability
<b>PF 2</b>	The areas are well maintained and clean, as well as good understanding of RSPO among the workers.

## 3.3.1 Status of Nonconformities Previously Identified and Opportunity for Improvement

Previous Audit Critical (Major) Non-conformity			
NCR Ref #	2398967-202309-M1	Issued Date	27/09/2023
Due Date	26/12/2023	Closure Date	25/12/2023
Indicator & Category (Critical / Minor)	2.3.2 – Critical		
Statement of Nonconformity:	Johor Plantations Group Berhad (JPB) or previously known as KMB unable to fulfil the requirement has not registered their case to RSPO by 15 November 2022.		
Requirement Reference:	<p>i) 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; • Information on geo-location of FFB origins</p> <ul style="list-style-type: none"> <li>• Evidence of the ownership status or the right/claim to the land, or valid use of land by the grower/smallholder</li> <li>• One or more supporting documents for claims</li> <li>• Valid MPOB license</li> </ul> <p>ii) Interim Measure For Fulfilment Of Indicator 2.3.2 Of The 2018 RSPO Principles &amp; Criteria — On Legality Of Indirect FFB Supplies All RSPO certified companies who were unable to fulfil the requirement by November 2021 must register their case with the RSPO Certification Unit by sending an email to certification@rspo.org by 31 March 2022.</p> <p>For the NIs, the deadline to register the case is the same for the transition period (e.g., for the Malaysia NI, the deadline to register is 15 November 2022).</p>		
Objective Evidence:	As of 27/9/2023, Johor Plantations Group Berhad (JPB) or previously known as KMB has not registered the case to RSPO due to unfulfillment the evidence as listed in Indicator 2.3.1.		
Corrections:	Johor Plantations Group Berhad (JPB) has submitted the appeal via email for registering the case with RSPO, as specified requirement in indicator 2.3.2. We are notifying RSPO that we are unable to meet the requirement outlined in Indicator 2.3.1		
Root Cause Analysis:	Inadequate monitoring of information or notifications from RSPO on registered case to RSPO by 15 November 2022.		
Corrective Actions:	<p>Johor Plantations Group Berhad (JPB) has appointed a Person in Charge (PIC) to monitor and retrieve all pertinent information from the RSPO website by quarterly.</p> <p>Major NC close out verification:</p> <p>i) JPB has submitted an appeal for non-submission of case register to RSPO on 27/9/2023 and requesting for further extension to RSPO certification helpdesk on 12/12/23. The next revision of the P&amp;C was not able to be endorsed and adopted at 20th General Assembly November 2023.</p> <p>ii) Appointment of PIC, executive of certification management and administration for any RSPO announcement inquiries, refer to appointment letter ref: SID/SD/ADMIN/080/23 dated 30/11/2023 was sighted. Any updates pertaining to RSPO announcement will be presented during monthly sustainability meeting</p>		

## RSPO P&amp;C Public Summary Report

Revision 15 (Nov 2023)

Assessment Conclusion:	Implemented actions were verified found to be sufficient to close the major NC on 25/12/2023. Continuous implementation will be further verified in the next assessment.																																																																																																																		
Effectiveness Closure (for previous audit closed Critical NC):	The management has appointed Ms Fatin Amira Binti Ramli for the PIC in handling the RSPO Announcement Enquiries dated 30/11/2023 with Reference Num: SID/SD/ADMIN/080/23.																																																																																																																		
	The management has started to engage with OCP Supplier on 19/12/2023 regarding the FFB Sales and Purchase contract renewal as well as the traceability requirement, and on 18/09/2024, during the stakeholder meeting.																																																																																																																		
	Sample taken on the FFB Dealer for Fong Tak Development Sdn Bhd (FFB Dealer) with MPOB License No: 505079315000 , AZ Iman Resources Sdn Bhd MPOB License No: 610583015000 , Perniagaan Md Sangiri with MPOB License No: 506462015000 is as following.																																																																																																																		
	<table><tr><td>No</td><td>MPOB License</td><td>Latitude</td><td>Longitude</td><td>Hectarage (ha)</td><td>Lot No</td></tr><tr><td colspan="6">Fong Tak Development Sdn Bhd</td></tr><tr><td>1</td><td>465622-701000</td><td>1 48'30.336"N</td><td>103 15'12.316"E</td><td>2.23</td><td>PTD 3781</td></tr><tr><td>2</td><td>413159-101000</td><td>1 45'35.294"N</td><td>103 24'53.553"E</td><td>1.59</td><td>LOT 2522</td></tr><tr><td>3</td><td>415067-601000</td><td>1 51'43.471"N</td><td>103 19'13.116"E</td><td>15.39</td><td>PTD 3020</td></tr><tr><td>4</td><td>529295-101000</td><td>1 48'23.201"N</td><td>103 18'51.890"E</td><td>2.02</td><td>PTD 4451</td></tr><tr><td>5</td><td>441441-001000</td><td>1 45'11.399"N</td><td>103 23'17.268"E</td><td>0.96</td><td>PTD 9354</td></tr><tr><td colspan="6">AZ Iman Resources Sdn Bhd</td></tr><tr><td>1</td><td>315499101000</td><td>103 29'48.518 E</td><td>1 50'03.434 N</td><td>2.03</td><td>Layang Layang, Johor</td></tr><tr><td>2</td><td>302817101000</td><td>103 29'28.206</td><td>E1 48 30.750 N</td><td>4.8.7</td><td>Lot 1997</td></tr><tr><td>3</td><td>754982001008</td><td>103 30'07.829 E</td><td>1 49'15.221 N</td><td>0.8</td><td>Kluang, Johor</td></tr><tr><td>4</td><td>755116001008</td><td>103 29'38.537 E</td><td>1 49'38.058 N</td><td>2.43</td><td>Kluang, Johor</td></tr><tr><td>5</td><td>754223001008</td><td>103 30'21.370 E</td><td>1 49'54.058 N</td><td>2.02</td><td>No 154</td></tr><tr><td colspan="6">Perniagaan Md Sangiri</td></tr><tr><td>1</td><td>746259001008</td><td>1°50'48.643 N</td><td>103°24'59.193 E</td><td>1.21</td><td>LO1306</td></tr><tr><td>2</td><td>746251001008</td><td>1°50'49.090 N</td><td>103°25'22.194 E</td><td>0.71</td><td>LO963</td></tr><tr><td>3</td><td>746253001008</td><td>1°49'59.600 N</td><td>103°25'16.844 E</td><td>1.62</td><td>OTD2447</td></tr><tr><td>4</td><td>746246001008</td><td>1°50'51.647 N</td><td>103°25'10.880 E</td><td>0.50</td><td>1286</td></tr><tr><td>5</td><td>746247001008</td><td>1°50'16.396 N</td><td>103°24'05.699 E</td><td>1.79</td><td>1453</td></tr></table>	No	MPOB License	Latitude	Longitude	Hectarage (ha)	Lot No	Fong Tak Development Sdn Bhd						1	465622-701000	1 48'30.336"N	103 15'12.316"E	2.23	PTD 3781	2	413159-101000	1 45'35.294"N	103 24'53.553"E	1.59	LOT 2522	3	415067-601000	1 51'43.471"N	103 19'13.116"E	15.39	PTD 3020	4	529295-101000	1 48'23.201"N	103 18'51.890"E	2.02	PTD 4451	5	441441-001000	1 45'11.399"N	103 23'17.268"E	0.96	PTD 9354	AZ Iman Resources Sdn Bhd						1	315499101000	103 29'48.518 E	1 50'03.434 N	2.03	Layang Layang, Johor	2	302817101000	103 29'28.206	E1 48 30.750 N	4.8.7	Lot 1997	3	754982001008	103 30'07.829 E	1 49'15.221 N	0.8	Kluang, Johor	4	755116001008	103 29'38.537 E	1 49'38.058 N	2.43	Kluang, Johor	5	754223001008	103 30'21.370 E	1 49'54.058 N	2.02	No 154	Perniagaan Md Sangiri						1	746259001008	1°50'48.643 N	103°24'59.193 E	1.21	LO1306	2	746251001008	1°50'49.090 N	103°25'22.194 E	0.71	LO963	3	746253001008	1°49'59.600 N	103°25'16.844 E	1.62	OTD2447	4	746246001008	1°50'51.647 N	103°25'10.880 E	0.50	1286	5	746247001008	1°50'16.396 N	103°24'05.699 E	1.79	1453
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<b>Previous Audit Critical (Major) Non-conformity</b>			
<b>NCR Ref #</b>	2398967-202309-M2	<b>Issued Date</b>	27/09/2023
<b>Due Date</b>	26/12/2023	<b>Closure Date</b>	25/12/2023
<b>Indicator &amp; Category (Critical / Minor)</b>	3.6.2 – Critical		
<b>Statement of Nonconformity:</b>	The risk assessment process in identifying the H&S issues and the implementation of management plan was not effectively monitored.		
<b>Requirement Reference:</b>	The effectiveness of the H&S plan to address health and safety risks to people is monitored.		
<b>Objective Evidence:</b>	<p>i) The workplace inspection checklist verified at Kuala Kabong Estate and Sedenak Estate found that the station checked as the following:</p> <ol style="list-style-type: none"> <li>1. Chemical Store</li> <li>2. Schedule Waste Store</li> <li>3. Fertilizer Store</li> <li>4. Workshop</li> <li>5. Linesite</li> <li>6. Lubricant / Fuel Store</li> <li>7. Clinic / Medical Waste</li> <li>8. Chemical Mixing Area</li> <li>9. General Store</li> </ol> <p>However, there is no inspection conducted on the workplace of the production site at both estate.</p> <p>ii) Medical Surveillance Programme 2023 for Kuala Kabong and Sedenak Estate were not carried out as per established H&amp;S plan at respective estates.</p>		
<b>Corrections:</b>	<p>i. A warning letter had been issues by Estate management.</p> <p>ii. The person in charge is necessary to inspect on a weekly basis through a checklist inspection and be monitored by a supervisor.</p> <p>iii) The Medical Surveillance was conducted on 1st August 2023 for Sedenak Estate and on 2nd August 2023 for Kuala Kabong Estate.</p>		
<b>Root Cause Analysis:</b>	<p>i. Inadequate awareness on requirements to inspect the production site at Kuala Kabong Estate and Sedenak Estate.</p> <p>i) Lack of monitoring in conducting medical surveillance as per established OSH management plan.</p>		
<b>Corrective Actions:</b>	<p>i. Inspection will be carried out on weekly basis.</p> <p>ii. The penalty will be imposed to worker who failed to comply with safety and health requirement based on OSH requirement during production site inspection.</p> <p>iii. The briefing on the safety and health in workplace to the workers will be conducted during morning assembly and will be recorded accordingly.</p>		

	<p>iv. The estate will conduct a comprehensive review of the OSH plan, ensuring its alignment with current regulatory requirements and best practices.</p> <p>v. The estate will implement supplementary training and awareness programs for individuals responsible for medical surveillance, emphasizing the importance of adhering to the H&amp;S plan and the repercussions of non-compliance.</p> <p>vi. The estate will prominently display the deadline for medical surveillance assessments on the noticeboard.</p> <p>Major NC close out visit:</p> <p>i) Weekly inspection was carried out by the appointed PIC and was briefed during morning muster on 1/10/23. Records of weekly inspection for October, November and December 2023 were verified for total of 9 workstation. Interview with the appointed PIC has confirmed on the understanding of workplace inspection process</p> <p>ii) Medical surveillance was carried by OHD under KPJ Hospital, ref: HQ/15/DOC/00/437 on 12/9/23 for Kuala Kabong Estate. At Sedenak Estate, medical surveillance was carried out on 1/8/2023 by the same OHD/medical practitioner.</p> <p>iii) Review of OSH plan and workplace inspection results presented in the quarterly OSH committee meeting. Latest Q4 meeting minutes for Sedenak and Kuala Kabong Estate was made available for verification.</p> <p>iv) Latest updated OSH plan has included compliance monitoring programme i.e. medical surveillance, audiometric etc displayed via estate's license and permit dashboard.</p>
<b>Assessment Conclusion:</b>	Implemented actions were verified found to be sufficient to close the major NC on 25/12/2023. Continuous implementation will be further verified in the next assessment
<b>Effectiveness Closure (for previous audit closed Critical NC):</b>	<ol style="list-style-type: none"> <li>1. It has been verified that workplace inspection has been included the production area for both operating units. Sample has been taken for harvesting, spraying, fertilizers application activities which has been done on weekly basis. Sample has been taken for month March'24 and June'24</li> <li>2. Medical surveillance has been done for all operating units and has been verified for year 2024. Details as per below:</li> </ol> <p><u>Sedenak Estate</u> Medical surveillance conducted by Dr Aidilnurul Fareena binti Ishak, Occupational Health Doctor on 03/07/2024 and there is no abnormal results due to occupational cause.</p> <p><u>Sedenak POM</u> Medical surveillance has been done 03/07/2024 for 48 workers. 16 workers have been identified with abnormalities with non-occupational cause.</p> <p><u>Kuala Kabong Estate</u> Medical surveillance for year 2024 conducted on 04/07/2024 with total 16 workers and all has been declared fit for works.</p>

Previous Audit Minor Non-conformity			
<b>NCR Ref #</b>	2398967-202309-N1	<b>Issued Date</b>	27/09/2023
<b>Due Date</b>	Next Assessment Visit	<b>Closure Date</b>	26/09/2024

<b>Indicator &amp; Category (Critical / Minor)</b>	3.4.2 – Minor
<b>Statement of Nonconformity:</b>	Social management and monitoring plan has not been developed with participation of affected stakeholders.
<b>Requirement Reference:</b>	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.
<b>Objective Evidence:</b>	Kuala Kabong Estate has been inviting food, clothing and raw material vendors inside their premise on twice a month basis to sell their goods to the workers. However, the management plan has yet to be established based on the potential risks such as legality and health requirements of the vendors, training needs related to company's policy, complaint/grievance procedure, safety hazards, and vaccination requirement for food preparation, to name a few.
<b>Corrections:</b>	i. Kuala Kabong Estate will conduct a meeting with vendors on 10/10/2023 to brief the company's policy, procedures & other related matters.
<b>Root Cause Analysis:</b>	Inadequate communication of estate regulations, policies, and procedures to stakeholders.
<b>Corrective Actions:</b>	i. Kuala Kabong Estate will add new vendors to the stakeholders list, requiring them to submit relevant documents such as business licenses and food handling certificates (typhoid). ii. The estate will conduct a Social Impact Assessment (SIA) and involve vendors in the assessment process. iii. The estate will revise and update the SIA report.
<b>Assessment Conclusion:</b>	<p>Verification is made through the following documents:</p> <ol style="list-style-type: none"> <li>Updated stakeholder list, dated August 2024</li> <li>Social Impact Assessment and Social Management Plan (Document No.: JPG/PRO/SID/SD/SMS/6.9-F1; Issue No.: 00; Revision No.: 00; Effective Date: 21/09/2024) conducted by Sustainability Department</li> </ol> <p>Based on the above documents, all relevant stakeholders were listed in the stakeholder list, and the management plan demonstrated that all affected stakeholders were involved. This was further confirmed by interviews with sampled of workers and stakeholders, indicating that the operating unit has identified and assessed all vendors within the estate premises.</p> <p>Further verification of the documentation review, found that relevant documents from vendors, such as business licenses and food handling certificates, were maintained by estate management.</p> <p>With this evidence, the implementation of the corrective action was found to be effective, and the minor non-conformity was closed on 26/09/2024.</p>

Previous Audit Minor Non-conformity			
<b>NCR Ref #</b>	2398967-202309-N2	<b>Issued Date</b>	27/09/2023
<b>Due Date</b>	Next Assessment Visit	<b>Closure Date</b>	26/09/2024
<b>Indicator &amp; Category (Critical / Minor)</b>	6.2.7 – Minor		



<b>Statement of Nonconformity:</b>	Temporary labour is used to perform core work i.e., harvesting.
<b>Requirement Reference:</b>	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.
<b>Objective Evidence:</b>	Kuala Kabong Estate has engaged a contractor (Binatab Sdn Bhd) to provide workers to do harvesting task for the period from 01/06/2023 to 31/07/2023. Based on the contract agreement between Binatab and their workers dated 01/06/2023, the term of employment is classified as temporary since it was stated that under Clause 4 that the period of employment is "one year".
<b>Corrections:</b>	i. The contract agreement has been revised as per requirement.
<b>Root Cause Analysis:</b>	Inadequate monitoring the employment contract on Permanent, full-time employment including contractors' workers and contracted workers is used for all core work performed by the unit of certification.
<b>Corrective Actions:</b>	i. The contractor has informed the workers about the terms of their employment. ii. The contractor is required to submit the relevant documents to the estate for record-keeping.
<b>Assessment Conclusion:</b>	During this assessment, it was found that all sampled workers under contractor employment contracts had terms of permanent employment, as stated in the contract clauses. The contractor briefed the workers on the terms of employment, which was verified during interviews conducted in the harvesting area managed by the contractor. Relevant documents, such as payslips, SOCSO 8A forms, a list of workers, and copies of passports and permits, were provided during the audit, and were kept by the estate.  Based on this evidence, it indicates that the implementation aligns with the corrective actions. Therefore, this minor non-conformity was satisfactorily closed on 26/09/2024.

Previous Audit Opportunity for Improvement	
OFI#	Description
OFI 1	<b>OFI Statement:</b> N/A  <b>Verification / Follow-up actions:</b> N/A

### 3.3.2 Summary of the Nonconformities and Status

CAR Ref.	Category (Critical / Minor)	P&C Indicator	Issued Date	Status & Date (Closure)
2253186-202209-M1	Critical	6.7.3	29/09/2022	Closed out on 01/12/2022
2253186-202209-N1	Minor	7.3.2	29/09/2022	Closed out on 27/09/2023
2398967-202309-M1	Critical	2.3.2	27/09/2023	Closed out on 25/12/2023



2398967-202309-M2	Critical	3.6.2	27/09/2023	Closed out on 25/12/2023
2398967-202309-N1	Minor	3.4.2	27/09/2023	Closed out on 26/09/2024
2398967-202309-N2	Minor	6.2.7	27/09/2023	Closed out on 26/09/2024
2553353-202409-M1	Critical	6.2.4 (C)	26/09/2024	Closed out on 03/11/2024
2553353-202409-M2	Critical	3.8.16	26/09/2024	Closed out on 03/11/2024

### 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 Johor Plantations Group Berhad - Sedenak Palm Oil Mill Certification Unit's environmental and social performance, legal and any known dispute issues.

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

Structured worker interviews with male and female workers and staff were held in private at the workplace. 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	Semai Setia Transport	Face to face
Contractor	SBK Logistics Sdn Bhd	Face to face
Contractor	Binatab Sdn Bhd	Face to face
Contractor	LCT Tan & Son Enterprise	Face to face
Contractor	Perusahaan Megah Jaya Enterprise	Face to face
FFB Supplier	Hong Hui Trading	Face to face
FFB Supplier	AZ Iman	Face to face
FFB Supplier	Kebun Sedenak	Face to face
Internal	Union Representatives	Face to face
Internal	Mill and Estate Workers (Local and Foreign Workers)	Face to face
Internal	Gender Committee Representatives	Face to face
Local Communities	Jawatankuasa Pembangunan dan Keselamatan Kampung (JPKK) Kg. Melayu Sedenak	Face to face

## RSPO P&C Public Summary Report

### Revision 15 (Nov 2023)

Local Communities	Penghulu Mukim Sedenak, Kulai	Face to face
Local Communities	Tabika KEMAS Ladang Sedenak	Face to face
Government Department	SJK(T) Ladang Sedenak	Face to face

Stakeholders comment	
<b>1</b>	<p><b>Feedbacks:</b> Contractor (Semai Setia Transport and SBK Logistics Sdn Bhd)</p> <p>CPO transporters (from Sedenak Palm Oil Mill to refineries) confirmed they have signed respective contracts with Johor Plantations Group Berhad (JPG) and confirmed their understanding of the salient points in the contracts. Payment terms are clear, terms of contract are fair, and all payments are received within 45 days of original invoice and this has been stipulated in the contract agreement. They are invited to attend stakeholder meetings and duly briefed on JPG policies and grievance procedures. Aware of policies related to anti-bribery, no child labour, no forced and trafficked labour. Good business relationship between the contractor and mill within the JPG.</p> <p><b>Audit Team verification and response:</b></p> <p>Sighted the contracts entered into with the CPO transporters, which are valid and still current. Also sighted payment vouchers which showed payments made in timely manner as stated by the transporters. No further issue.</p>
<b>2</b>	<p><b>Feedbacks:</b> Contractor (Binatab Sdn Bhd, LCT Tan &amp; Son Enterprise and Perusahaan Megah Jaya Enterprise)</p> <p>The manpower contractor supplying harvesters to Kuala Kabong Estate and Sedenak Estate has been providing manpower to the estates for many years, maintaining a strong relationship with the company as they also supply labor to other JPG estates. They provide work tools and PPE to the harvesters, such as harvesting poles, sickles, and, for newly arrived workers, essentials like mattresses, cooking gas, rice, cooking stoves, etc. So far, there have been no issues with freedom of movement, as the workers retain their individual immigration cards and passports. The contractor signs employment contracts with their workers, and copies of monthly pay slips for each worker are submitted to the respective estate to ensure compliance with the Employment Act, SOCSO Act, EIS, Minimum Wages Order, and other legal requirements.</p> <p>The contractor is invited to attend stakeholder meetings and is briefed on JPG policies and grievance procedures. They are aware of policies related to anti-bribery, no child labor, and the prohibition of forced or trafficked labor. There is a good business relationship between the contractor and the estates within JPG.</p> <p>They confirmed that they have signed an agreement with the company before providing services, and the terms and conditions, including compliance with legal and RSPO requirements, were clearly communicated. They also confirmed that they do not employ child labor and are aware of the complaint procedures. Payments from the company have been made in a timely manner.</p> <p><b>Audit Team verification and response:</b></p> <p>Reviewed and verified the contracts signed between company and contractor, and between contractor and its workers. Also reviewed were the payslips for contractors' workers. It was verified that the salary payments and employment contract are in accordance with the Employment Act, SOCSO Act, EIS, Minimum Wages Order.</p>
<b>3</b>	<p><b>Feedbacks:</b> Government Department (SJKT Ladang Sedenak)</p> <p>The representatives informed that the management from the estates and mill are very attentive and supportive. The management will assist whenever they requested for any assistance from the management.</p>

	<p>They have good relationship with the management. They also informed that no child labour was observed in the estates. The management consistently contributes to school activities, offering both monetary and non-monetary support. The teachers mentions that the estates operations do not disrupt learning or activity in the school.</p>
	<p><b>Audit Team verification and response:</b></p> <p>Verified the contribution record and found no other issue.</p>
4	<p><b>Feedbacks:</b> Local Communities (Jawatankuasa Pembangunan dan Keselamatan Kampung (JPKK) Kg. Melayu Sedenak and Penghulu Mukim Sedenak, Kulai)</p> <p>They informed that there was no land dispute issue reported. Clear demarcation of boundary was available such as the boundary was separated by the railway track. No encroachment by estates under JPG. The company also provide job opportunity to the local communities. They also mention that has been invited to attend stakeholder meeting and briefed on the complaint procedure and company's policies. Good cooperation given by estate management team. Contribution not only monetary but also manpower and machinery were given if there is any assistance required. Its commendable that the management continually engages with the community through consultation processes. So far, there have been no unresolved issues with the management or estate activities that could potentially have a negative impact.</p>
	<p><b>Audit Team verification and response:</b></p> <p>No further issues were found. Verification was made through the minutes of stakeholder meetings and the enquiry register book.</p>
5	<p><b>Feedbacks:</b> Local Communities (Tabika KEMAS Ladang Sedenak)</p> <p>She mentioned that the estate management is very attentive and supportive. Grass cutting is provided once a month at the kindergarten, and if the kindergarten requires any assistance, such as for repairs or other needs, they can contact the estate management for help. She is always invited to attend the annual stakeholder meetings organized by the management. There are no obstacles for the kindergarten to approach management with complaints, suggestions, or requests for assistance. She also mentioned that no child labor has been observed in the estates, and estate activities do not disrupt learning at the kindergarten. The attendance of students from the estates has been very encouraging.</p>
	<p><b>Audit Team verification and response:</b></p> <p>No further issues were found. Verification was made through the minutes of stakeholder meetings and the enquiry register book.</p>
6	<p><b>Feedbacks:</b> FFB Supplier (Hong Hui Trading, AZ Iman and Kebun Sedenak)</p> <p>The FFB Suppliers stated that the mill has provided training pertaining to FFB quality and grading. They further indicated their comprehension of the price mechanism and the factors that contribute to price reduction or penalties as stipulated in the contract agreement. This factors were briefed to them and mutually agreed upon before signing the final contract They mentioned that there is no issue on price fluctuation as FFB price is basically derived from the government authority (i.e. MPOB) which depends on the current market price. Penalties will be imposed if they do not comply with the FFB quality standard set by government authority, such as despatching unripe bunches. They also informed that penalties imposed do not involve monetary fines or deduction from weight; they only need to bring back the substandard low quality of FFB and they have no issue with this practice as it was mutually agreed upon when signing the contract agreement. Timely payments were also observed. In addition, they are cognizant of their ability to lodge complaints with the mill management at any time. It is worth noting that they maintain a positive and amicable relationship with the mill management.</p>
	<p><b>Audit Team verification and response:</b></p> <p>Verification was made through FFB contract agreement record of payments to the FFB supplier. No further issue was found.</p>

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7	<p><b>Feedbacks:</b> Union Representatives</p> <p>They informed that they were elected by the workers freely. They informed that there are no outstanding issues with the estate and mill management. Regular meetings between the management and NUPW committee are conducted to address any matter arising from the workers. If there is any issue, they will discuss with management and action will be taken to resolve the issue. The workers were paid according to Minimum Wage Order 2022. There is no discrimination happened in the operating units as the management treated everyone the same.</p> <p><b>Audit Team verification and response:</b></p> <p>Reviewed the meeting minutes found issues reported were incorporated into action plan. Verified the payslips found the sampled workers were paid as per legal requirements.</p>
8	<p><b>Feedbacks:</b> Mill and Estate Workers – (Local and Foreign Workers)</p> <p>Regular training on company's SOP, policies, safety and health, environmental and social aspects were conducted by the estate and mill. Employment contract and payslip were provided, and the salaries deposited into workers bank account. Wages are paid according to Minimum Wages Order 2022. PPE is provided at no cost and can be replaced by making a request to the estate management. Overtime was offered voluntarily basis. Foreign workers retain possession of their passports. Workers are aware of the complaint and grievance channels available to them. The management has been very accommodative to the workers in term of welfare. For the new workers, they are provided with a mattress, bed, pillow, RM50 pocket money, essential food supplies worth RM100, and a personal locker. The house is also equipped with a meat safe, and the bathroom floor has been upgraded with mosaic tiles.</p> <p><b>Audit Team verification and response:</b></p> <p>The management has conducted the appropriate training and understanding of workers toward the RSPO is good. No further issue</p>
9	<p><b>Feedbacks:</b> Gender Committee Representatives – Women Onwards WOW</p> <p>They informed that no sexual harassment and violence cases reported since the last audit. Female workers understand the function of Gender Committee and aware the complaint mechanism if there are any issues occurred. They were treated equally without any discrimination by the management. The committee is tasked with planning annual activities for female workers to ensure a conducive living environment in the estate and during this activities they also can also know each other better, making easier to share any problems or thoughts. The management has also been very supportive with the programmes in term of financial, facilities and other resources. They were briefed on the new mother's requirements for specific needs and consultation have been conducted by the management. The management has consulted the new mothers on their needs. The management respects the reproductive rights of workers, allowing them to return home for breastfeeding during working hours or attend monthly antenatal checkups without any salary deductions.</p> <p><b>Audit Team verification and response:</b></p> <p>Reviewed and verified the new mothers' assessment forms, Gender Committee meeting minutes, and the enquiry register book. No issues were found.</p>

#### 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
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Based on comprehensive desktop studies, documentation reviews, and records reviews, there is no evidence of land ownership by other users, or any customary rights associated with the land currently under oil palm operations. The Unit of Certification is in its third generation of planting, with the current landowner holding the property for over 25

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years. A review of the complaint and grievance records during audits confirms that there have been no issues related to land conflict involving this Unit of Certification. Furthermore, interview records from previous and current assessments, including those with local communities, as maintained by BSI MY, indicate that there are no ongoing or historical conflicts related to the land in question.

As a precaution, the CB maintains a mechanism to identify and consult any interested parties should any claims or rights be identified in the future. This includes keeping track of all consultations conducted during the certification cycle to ensure comprehensive coverage.



**Previous land owner / user comment****Feedbacks:** N/A**Audit Team verification and response:** N/A

Sedenak Certification Unit has completed its 2nd cycle of replanting. Therefore, this is no longer applicable.

**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 Johor Plantations Group Berhad - Sedenak Palm Oil Mill has complied with the Malaysia National Interpretation 2019 of the RSPO P&amp;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 Johor Plantations Group Berhad - Sedenak Palm Oil Mill is remain certified.</p>	
<b>Report prepared by</b>	<b>Acceptance of Assessment Conclusion</b>
<b>Name: AHMAD RUFİ BIN ABU TALİB KHAN</b>	<b>Name: RASHİD BASİRAN</b>
<b>Company Name: BSI SERVICES MALAYSIA SDN BHD</b>	<b>Company Name: JOHOR PLANTATIONS GROUP BERHAD</b>
<b>Title: CLIENT MANAGER</b>	<b>Title: HEAD OF SUSTAINABILITY DEPARTMENT</b>
<b>Signature:</b> 	<b>Signature:</b> <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> 
<b>Date: 04/11/2024</b>	<b>Date: 05/11/2024</b>

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**Appendix A: Summary of Findings**

Criterion / Indicator		Assessment Findings	Compliance
<b>Principle 1: Behave ethically and transparently</b>			
<b>Criterion 1.1:</b> 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	<p><b>(C)</b> Documents that are specified in the RSPO P&amp;C are made available to the public.</p> <p>- Critical (Major) compliance -</p>	<p>The documents specified in the RSPO P&amp;C were made available on-site upon request at all the operating units visited. Management documents related to sustainability, including land titles, OSH plans, EIA and SIA reports, HCV reports, complaint and grievance records, company procedures, summary reports, policies, and continual improvement plans, were accessible upon request during the audit. In addition, the company's policies and guidelines and sustainability report are publicly available on its website (<a href="https://johorplantations.com/corporate-governance/">https://johorplantations.com/corporate-governance/</a>) and (<a href="https://johorplantations.com/reports-presentations/">https://johorplantations.com/reports-presentations/</a>) which was confirmed to be accessible to the public.</p> <p>Johor Plantations Group Berhad (JPG) has developed procedure entitled Sustainability Management System (Document No.: JPG/PRO/SID/SD/SMS; Issue No.: 00; Revision No.: 00; Effective Date: 14/11/2023) as a Sustainability Procedure to provide guidance in executing the best practices for certification maintenance at all operating unit of JPG. Section 6.1 of this procedure, titled "Transparency," details the documents that are prepared and made publicly available. These documents include, but are not limited to are such as:</p> <ul style="list-style-type: none"> <li>• Land title/user rights</li> <li>• Occupational Safety and Health Plan</li> </ul>	Complied

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		<ul style="list-style-type: none"> <li>Plans and impact assessment relating to environmental and social impacts</li> <li>HCV documentation</li> <li>Pollution prevention and reduction plans</li> <li>Details of complaint and grievances</li> <li>Continuous improvement plan</li> <li>Public summary of certification assessment reports</li> <li>Company policies</li> <li>Summary report of contribution to community development</li> <li>Procedures for negotiation and compensation</li> <li>HCS documentation</li> <li>Report on the progress of smallholder support programme</li> </ul> <p>At each operating unit visited, the above documents were available upon request. The operating units are required to provide adequate information when requested by stakeholders regarding sustainability, social, and legal issues, where appropriate. The Person in Charge (PIC) of each unit maintains a register of documents and information provided to stakeholders, recording all document requests in the Enquiry Register. Other than that, policy and procedure were found displayed at appropriate place such as office notice board, workstation, and worker quarters.</p> <p>Stakeholders were briefed on the procedure for requesting publicly available documents during a stakeholder meeting held on 18/09/2024 at The Legends Golf and Country Resort, as verified in the minutes of the stakeholder meeting entitled "Mesyuarat dan Sesi Taklimat Bersama Pihak-Pihak Berkepentingan Komplek Sedenak (Northern Region)." This meeting involved stakeholders from Sedenak POM, Sedenak Estate, and Kuala Kabong Estate.</p>	
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1.1.2	<p>Information is provided in appropriate languages and accessible to relevant stakeholders.</p> <p>- Minor compliance -</p>	<p>Information is available in appropriate languages and accessible to relevant stakeholders (including internal and external stakeholder), provided through stakeholder meeting and various meeting such as gender meeting, workers meeting, OSH meeting latest conducted at each specific operating unit. Complaint and grievance procedure, policies and RSPO requirements were discussed in the meeting with internal and external stakeholders. Any concern or complaints can also be forwarded during the meeting. This also has been verified through interview with sampled stakeholders conducted during the audit.</p> <p>The meeting was given in by representatives from Integrity and Compliance Unit and Sustainability and Innovation Department in Malay language which is understand by the relevant stakeholder. This has been verified through interview with sampled stakeholder conducted during the audit. Furthermore, information (in both English and Malay) is displayed in strategic areas within the estate and mill compounds. Latest stakeholder meeting was conducted on 18/09/2024 at The Legends Golf and Country Resort, as verified in the minutes of the stakeholder meeting entitled "Mesyuarat dan Sesi Taklimat Bersama Pihak-Pihak Berkepentingan Komplek Sedenak (Northern Region)." This meeting involved stakeholders from Sedenak POM, Sedenak Estate, and Kuala Kabong Estate. This meeting attended by 102 personnel consists of government agencies, internal stakeholder, contractor and supplier, and local communities.</p>	Complied
1.1.3	<p><b>(C)</b> Records of requests for information and responses are maintained.</p> <p>- Critical (Major) compliance -</p>	<p>All operating unit visited were able to demonstrate that records of requests for information and responses were maintained. As specified in the procedure entitled Sustainability Management System (Document No.: JPG/PRO/SID/SD/SMS; Issue No.: 00; Revision No.: 00; Effective Date: 14/11/2023), Section 6.1, titled</p>	Complied

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		<p>"Transparency," provides guidance on managing responses to stakeholder information requests. All requests from stakeholders are recorded in the Enquiry Register book. The mechanism of request can be through meeting, phone/email/fax and letter/memo/notice. Reviewed the Enquiry Register, it was noted that all the requests were related to requests for assistance or donations. It was verified that the management of the respective units visited responded to all requests and inquiries in a timely manner. There have been no requests for information specified in the RSPO P&amp;C from any stakeholders since the last assessment. This was further confirmed through interviews with sampled stakeholders during the audit.</p> <p>Example of record request and response were verified as follows:</p> <p><u>Sedenak Estate</u></p> <ol style="list-style-type: none"> <li>1. Request for repair at Tabika KEMAS Ladang Sedenak, as per letter dated 17/06/2024 [TBK/KUL/J4AP007(4)] and responded by the management on 21/06/2024.</li> <li>2. Request for grass cutting at Sekolah Agama Sedenak, as per letter dated 20/06/2024 [reference: BKS SASD/01015(06)] and responded by the management on 28/06/2024.</li> </ol> <p><u>Sedenak POM</u></p> <ol style="list-style-type: none"> <li>1. A request for any form of contribution in conjunction with the 22nd Annual Sports Tournament of SJK(T) Ladang Sedenak, as per the letter dated 20/07/2024, was responded to by the management on 12/08/2024.</li> <li>2. Request related to compliance from governments authorities such as Department Safety and Health (DOSH) and Department of Environment (DOE) were recorded in the DOSH logbook and</li> </ol>	
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		<p>DOE visit report, respectively. It was verified that the management have responded in a constructive and timely manner where evidence of response being provided.</p> <p><u>Kuala Kabong Estate</u></p> <p>Request for any form of contribution for the SK LKTP Bukit Batu Rugby Excellence Program, as per the letter dated 25/08/2024. Evidence of the estate management's response to the request on 15/09/2024 was provided through a letter.</p>	
1.1.4	<p><b>(C)</b> Consultation and communication procedures are documented, disclosed, implemented, made available, and explained to all relevant stakeholders by nominated representative.</p> <p>- Critical (Major) compliance -</p>	<p>Johor Plantations Group Berhad (JPG) has developed procedure entitled Sustainability Management System (Document No.: JPG/PRO/SID/SD/SMS; Issue No.: 00; Revision No.: 00; Effective Date: 14/11/2023) as a Sustainability Procedure to provide guidance in executing the best practices for certification maintenance at all operating unit of JPG. Section 6.2 of this procedure, titled "Consultation Communication," stated to ensure the company has an open and transparent communication methods with local communities and other internal &amp; external stakeholders. The procedure specifies that communication is divided into two categories: internal and external. The modes of communication include email, face-to-face meetings, inspections, intranet (website), meetings with staff and/or worker representatives, memos, messaging applications or global texts, campaigns, muster sessions, notice boards and posters, and suggestion boxes.</p> <p>All the above procedure has been communicated to the relevant stakeholder at operating unit visited during stakeholder meeting. Latest stakeholder consultation meeting was conducted on 18/09/2024 at The Legends Golf and Country Resort, as verified in the minutes of the stakeholder meeting entitled "Mesyuarat dan Sesi Taklimat Bersama Pihak-Pihak Berkepentingan Komplek Sedenak (Northern Region)." attended by government authorities, local</p>	Complied

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		<p>communities, neighbouring estates and village, and contractor. It was confirmed during the interview with the sampled stakeholders and workers that they have been explained the gist and essence of the above SOP and procedure. This procedure was also implemented as can be seen during the stakeholder meeting where questions asked by stakeholders were duly answered.</p> <p>Assistant Manager of Sedenak Estate, Chief Clerk of Kuala Kabong Estate and Assistant Manager of Sedenak POM has been appointed as Social Person in Charge by the Senior Manager/ Manager and appointment letter dated 07/03/2024, 01/08/2024, and 08/04/2024 was sighted respectively.</p>	
1.1.5	<p>There is a current list of contact and details of stakeholders and their nominated representatives.</p> <p>- Minor compliance -</p>	<p>Current stakeholder lists for Sedenak Estate (updated on 04/03/2024), Sedenak POM (updated in August 2024) and Kuala Kabong Estate (updated on 10/09/2024) were sighted and reviewed. This list contains relevant stakeholders and details of their nominated representatives including contact number and address. These stakeholders include suppliers, contractors, service providers, transporters, list of CPO and PKO buyers, government agencies such as Department of Safety and Health, SOCSO Labour Department, Indonesian Consulate, nearby schools, neighbouring plantations, local communities, etc.</p>	Complied
<b>Criterion 1.2:</b> The unit of certification commits to ethical conduct in all business operations and transactions.			
1.2.1	<p>A policy for ethical conduct is in place and implemented in all business operations and transactions, including recruitment and contracts.</p> <p>- Minor compliance -</p>	<p>A policy for ethical conduct has been documented in following policy:</p> <p>1. Anti-Bribery and Anti-Corruption Policy (Document No.: JPG/ABAC/GOV/IAID/003; Issue No.: 00; Revision No.: 00; Effective Date: 28/05/2023) signed by Chairman of the company. The purpose of the policy is:</p>	Complied

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		<ul style="list-style-type: none"><li>- To ensure that JPG conducts its business activities with honesty, accountability, and transparency by prohibiting all forms of bribery and corruption, whether committed by employees, agents, or any third party acting on JPG's behalf.</li><li>- To ensure that JPG complies with the Malaysian Anti-Corruption Commission Act 2009 and any other relevant anti-bribery and corruption laws while ensuring that the company's operations and relationships are conducted with the highest ethical standards.</li></ul> <p>2. Conflict of Interest Policy (Document No.: JPB/POL/HCD/OHR/03; Issue No.: 00; Revision No.: 00; Effective Date: 01/07/2023), signed by Chairman of the company where this policy is a written document that expresses JPG commitment to comply with the provisions of the Malaysian Anti-Corruption Commission Act 2009 (MAAC Act). This policy also outlines procedure for the management of conflict of interest in JPG to prevent any bribery, fraud and abuse of power.</p> <p>3. Gift and Entertainment Policy (Document No.: JPG/GE/GOV/IAID/005; Issue No.: 00; Revision No.: 00; Effective Date: 28/05/2023), signed by Chairman of the company. The purpose of this policy is as follow:</p> <ul style="list-style-type: none"><li>- To provide guideline for employees in accepting or providing gifts or entertainment before, during, or after fulfilling their responsibilities on official matters.</li><li>- To help employees make the right decisions when accepting or providing gifts pr entertainment.</li></ul>	
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		<ul style="list-style-type: none"><li>- To avoid accusations from any party that the gifts or entertainment received or provided is a bribe that could jeopardize JPG's image and reputation.</li></ul> <p>In addition to the above policy, JPG has also addressed its ethical conduct policy through the Code of Business Ethics (COBE) and Vendor Code of Business Ethics (VCOBE) which is to be implemented across all business operations and transactions, including recruitment and contracts. This document is publicly available on the company's website. The SCOC outlines principles and standards relating to sustainability, business ethics and integrity, safety, health and the environment, and labor, among other areas. Any supplier or contractor wishing to enter into a business partnership with JPG must commit to and apply the principles and standards outlined in the COBE and VCOBE.</p> <p>Sections 7.1 to 7.13 of the VCOBE state that ethical and management practices should align with standards of ethical behavior, including compliance with all applicable anti-bribery and corruption laws, such as the Malaysian Anti-Corruption Commission Act 2009. The VCOBE also prohibits any involvement in money laundering, either directly or indirectly, the use of illegal or unethical methods, and requires avoiding conflicts of interest. While section 8 of the COBE also states the same commitment and management practices as stated in VCOBE.</p> <p>JPG enforces the implementation of the VCOBE and COBE by requiring all contractors and vendors to sign the document before commencing their work. Review of sample contract agreement with contractor and recruitment agents found that there is a clause specifying that the contractor and vendors shall adhere with the Malaysian Anti-Corruption Commission Act 2009 and company's business ethics. Interview with sampled contractors conducted during the audit indicate that they are understand the gist and</p>	
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		<p>essence of the company's business ethic and policy as well. Copies of the signed VCOBE and COBE are maintained by all operating units visited and are available for verification.</p> <p>For recruitment agents, evidence for Vendor Integrity Pledges (VIP) where stated commitment to promote values of integrity, transparency, accountability and good corporate governance and comply with all applicable laws, rules and regulations relating to anti-bribery, fraud and corruption.</p> <p>During stakeholder consultations held with auditors, the transporters, contractors and service providers also confirmed their awareness, compliance and implementation of the ethical policy, VCOBE and COBE.</p>	
1.2.2	<p>A system is in place to monitor compliance and the implementation of the policy and overall ethical business practice.</p> <p>- Minor compliance -</p>	<p>Sedenak Complex consists of Sedenak POM, Sedenak Estate and Kuala Kabong Estate has a system is in place to monitor compliance and the implementation of the policy and overall ethical business practice. The monitoring mechanism includes annual Internal Audits by HQ Sustainability Department team in the mill and estates. Apart from that, Anti-Bribery Management System (ABMS) Internal Audit, Financial Internal Audit from internal audit department and Third-Party Financial Audit are among the methods to ensure whether the management is monitoring the compliance and implementation of the policy of the counterparties.</p> <p>In addition, all levels of employees have signed conflict of interest forms and integrity pledges. These documents, among other things, state a commitment to not being involved in or committing acts of corruption, and to immediately report any attempts at bribery or corruption by any party. Sample individual files of workers were reviewed and verified during the audit of all operating units visited.</p>	Complied

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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	<b>(C)</b> The Unit of Certification complies with legal requirements - Critical (Major) compliance -	<p>It has been verified that all operating units complied with the Malaysia legal requirement. This has been verified based on the document review, interview with the management and stakeholders and site visits. Details of permit and licenses that has been reviewed by the auditor.</p> <p><u>Sedenak Estate</u></p> <ol style="list-style-type: none"> <li>1. Diesel and petrol storage permit No; PBKB/2024/B/J-00671 expired on 22/06/2027</li> <li>2. Air compressor permit No; PMT-JH-117887 expired on 11/01/2025</li> <li>3. MPOB licences; nursery licences No; 620248011000 expired on 30/04/2025</li> <li>4. MPOB license referred to 501224702000 valid from 06/04/2023 until 31/10/2024 for 2,808 ha.</li> <li>5. Water abstraction licences under Enakmen Air (Johor) 1921 licences number 07/A/KJ/118 with limit 700m3 per day expired on 31/12/2024.</li> </ol> <p><u>Sedenak POM</u></p> <ol style="list-style-type: none"> <li>1. MPOB licences reference 500058304000 expired on 31/12/2024.</li> <li>2. Diesel purchase and storage license permit number PBKB/2024/B/J-000035 expired on 15/01/2026</li> </ol>	Complied



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		<p>3. Water abstraction licences number 08/A/KJ/051 expired on 31/12/2024 with maximum abstraction limit 2000m3 per day.</p> <p>4. DOE License @ Compliance Schedule no. 004532, validity 01/07/2024 to 30/06/2025 for processing capacity of 90 mt/hr. BOD<sub>3</sub> limit is 2500 mg/l and method of discharge is land application.</p> <p><u>Kuala Kabong Estate</u></p> <p>1. MPOB license referred to 621380002000 valid from 01/11/2023 until 31/10/2024 for 1,718.32 ha.</p> <p>2. Diesel Permit ref: KPDNHEP.J. JB(PGK)5/2/1552(PD)(B), permit no.: PBKB/2023/B/J-000405), diesel quantity: 8000 litre, petrol quantity: 400 litre valid until 31/08/2025.</p>	
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>The Sedenak POM certification unit continues to implement and maintain its documented system for identifying, accessing, tracking updates, and monitoring compliance with legal requirements applicable to its operations. Each operating unit, including the mill and estate, maintains its own Legal Requirements Register (LRR), which is periodically evaluated for compliance, primarily through internal audits. Key registered laws include the Environmental Quality Act (EQA), Occupational Safety and Health Act (OSHA), Factory and Machinery Act, Employment Act, Workers' Minimum Standards of Housing and Amenities Act, and the Minimum Wages Order 2020, among others. Legal provisions related to the COVID-19 pandemic, such as the Prevention and Control of Infectious Diseases (Measures Within Infected Local Areas) Regulation 2020, have also been identified. The tracking system for regulatory changes is managed by the head office, sustainability team, and online resources, with updates communicated from the head office.</p>	Complied

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		Kulim (Malaysia) Berhad has a centralized system for monitoring changes in legislation.	
2.1.3	Legal or authorised boundaries are clearly demarcated and visibly maintained, and there is no planting beyond these legal or authorised boundaries. - Minor compliance -	<p>Whenever the land boundaries are adjacent with third party (smallholders, villages, other oil palm companies, etc.) the normal practice of Johor Plantations Group to indicate the legal boundaries are through construction of trenches. This was confirmed through the field visit. Apart from that, erection of concrete slab with GPS coordinate/peg no. along the boundaries was also commonly practiced and clearly visible.</p> <p>Sedenak Estate – trenches and markers available along the boundary with smallholders at both sample visited (P01/06 and P00/01)</p> <p>Kuala Kabong Estate – trenches and markers available along the boundary with smallholder at field P02/04.</p> <p>Sedenak POM – The management has fenced the boundary of the mill. The mill is located in Sedenak Estate.</p>	Complied
<b>Criterion 2.2:</b> 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 -	<p>Each operating unit visited maintains its own stakeholder list, which includes a comprehensive record of contracted parties. These stakeholder lists were updated as follows:</p> <ul style="list-style-type: none"> <li>• Sedenak Estate; List of stakeholder updated on 04/03/2024.</li> <li>• Sedenak POM; List of stakeholder updated in August 2024</li> <li>• Kuala Kabong Estate; List of Stakeholder updated on 10/09/2024.</li> </ul> <p>Information such as names and addresses of the contractors, as well as the contact person for each contractor. The lists were made available for verification at all the sampled units.</p>	Complied

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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>Samples of contracts for all operating unit visited were verified to contain clauses on meeting applicable legal requirements. Section 16 and 17 of the contract agreement which has been signed by the contractor stated that the contractor shall comply in all respects with the relevant laws, regulations and procedure. This is also stated in the Code of Business Ethics (COBE) and Vendor Code of Business Ethics (VCOBE) which is signed by the contractor before work commence. While for FFB supplier, the clause on meeting applicable legal requirements were stated in clause 14 of the contract agreement with FFB supplier entitled 'Letter Offer to Purchase Fresh Fruit Bunches (FFB)'. Example of verified contract agreements are as follows:</p> <p><u>Sedenak Estate:</u></p> <ul style="list-style-type: none"> <li>• LCT Tan &amp; Son Enterprise (Harvesting of Fresh Fruit Bunches in fields P00 and P01); Contract period: 01/08/2024 to 31/12/2024.</li> </ul> <p><u>Sedenak POM:</u></p> <ul style="list-style-type: none"> <li>• SBK Logistics Sdn Bhd (CPO Transportation from Mills to Refineries); Contract period: 01/07/2024 to 31/12/2024.</li> <li>• Semai Setia Transport (CPO Transportation from Mills to Refineries); Contract period: 01/07/2024 to 31/12/2024.</li> <li>• Kebun Sedenak Sdn Berhad (FFB Supplier); Contract Period: 01/01/2024 to 31/12/2024</li> <li>• Hong Hui Trading (FFB Supplier); Contract Period: 01/01/2024 to 31/12/2024</li> <li>• AZ Iman Enterprise (FFB Supplier); Contract Period:</li> </ul>	Complied
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		<p>01/01/2024 to 31/12/2024</p> <p><u>Kuala Kabong Estate:</u></p> <ul style="list-style-type: none"> <li>• Binatab Sdn Bhd (Harvesting of Fresh Fruit Bunches at P99); Contract period: 01/02/2024 to 31/12/2024.</li> <li>• Perusahaan Megah Jaya Enterprise (Harvesting of Fresh Fruit Bunches at P00. P01 and P02); Contract period: 01/02/2024 to 31/12/2024.</li> <li>• Binatab Sdn Bhd (Harvesting of Fresh Fruit Bunches in fields P99); Contract period: 01/02/2024 to 31/12/2024.</li> <li>• Sukatno Bin Wagiman (Eatery Shop); Tenancy agreement: 01/04/2024 to 31/03/2025</li> <li>• Hafeeza Enterprise (Sundry Shop); Contract period: 01/04/2024 to 31/03/2025.</li> </ul> <p>Evidence of legal due diligence was also available for the above-mentioned contractors. This includes verifying dates of contractor workers salary payment, employment contracts, SOCSO and EPF contribution, workers' payslip, typhoid vaccination certificate and food handler training certificate. Interviewed with the sampled contractors conducted during the audit indicate that they are aware of the terms and conditions outlined in the agreement. At the HQ level, Contractor Registration Form is used as a method of the due diligence. The form among others includes the declaration of the contractor on their company including history of work, board of directors, company background, machinery, previous major contracts and company registration numbers. Same practice also being implemented to the recruitment agents. All contractors and recruitment agents also are required to fill Conflict of Interest,</p>	
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		Bankruptcy and Criminal Records – Vendor Declaration (Document No.: JPG/VMU/COI/B/CR-A).	
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>It was verified that all contracts agreement as mentioned in indicator 2.2.2, include clauses or elements for disallowing child, forced and trafficked labour which is clearly stated in the Vendor Code of Business Ethics (VCOBE) under Section 5.8. This clauses state that the contractor or vendors shall not employ anyone under the age of 18 or the applicable minimum legal age in the country they operate as the JPG's seeks to promote the well-being of children and safeguard them from any form of maltreatment or exploitation.</p> <p>Review the contractor documents such as workers' payslip, employment contract, SOCSO 8A form and EPF contribution form found that there is no young person were employed by the contractors. This was also verified during site visit and interview with sampled contractors during the audit.</p>	Complied
<b>Criterion 2.3:</b> All FFB supplies from outside the unit of certification are from legal sources.			
2.3.1	<p><b>(C)</b> For all directly sourced FFB, the mill requires:</p> <ul style="list-style-type: none"> <li>• Information on geo-location of FFB origins</li> <li>• Evidence of the ownership status or the right/claim to the land, or valid use of land by the grower/smallholder</li> <li>• One or more supporting documents for claims</li> <li>• Valid MPOB license</li> </ul> <p>- Critical (Major) compliance -</p>	<p>FFB Supplier List 2024 incorporated the details of information on geo-location of FFB origins, Evidence of the ownership status to the land or valid use of land by the grower/smallholder, Supporting documents (Agreement) for claims and Valid MPOB license.</p> <p>The mill has 2 estates supplying Certified FFB within the certification scope. The mill also receives non-certified FFB from 32 outside FFB Suppliers (FFB traders)</p> <p>The mill has compiled the evidence for all its suppliers on the information on geo-location of FFB origins, 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 and valid MPOB license.</p>	Complied

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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>Sample taken on the FFB Dealer for Fong Tak Development Sdn Bhd (FFB Dealer) with MPOB License No: 505079315000 , AZ Iman Resources Sdn Bhd MPOB License No: 610583015000 , Perniagaan Md Sangiri with MPOB License No: 506462015000 is as following.</p> <table><tr><th>N o</th><th>MPOB License</th><th>Latitude</th><th>Longitude</th><th>Hectarag e (ha)</th><th>Lot No</th></tr><tr><td colspan="6">Fong Tak Development Sdn Bhd</td></tr><tr><td>1</td><td>465622-701000</td><td>1 48'30.336"N</td><td>103 15'12.316"E</td><td>2.23</td><td>PTD 3781</td></tr><tr><td>2</td><td>413159-101000</td><td>1 45'35.294"N</td><td>103 24'53.553"E</td><td>1.59</td><td>LOT 2522</td></tr><tr><td>3</td><td>415067-601000</td><td>1 51'43.471"N</td><td>103 19'13.116"E</td><td>15.39</td><td>PTD 3020</td></tr><tr><td>4</td><td>529295-101000</td><td>1 48'23.201"N</td><td>103 18'51.890"E</td><td>2.02</td><td>PTD 4451</td></tr><tr><td>5</td><td>441441-001000</td><td>1 45'11.399"N</td><td>103 23'17.268"E</td><td>0.96</td><td>PTD 9354</td></tr><tr><td colspan="6">AZ Iman Resources Sdn Bhd</td></tr><tr><td>1</td><td>315499101000</td><td>103 29'48.518 E</td><td>1 50'03.434 N</td><td>2.03</td><td>Layang Layang, Johor</td></tr><tr><td>2</td><td>302817101000</td><td>103 29'28.206</td><td>E1 30.750 N 48</td><td>4.8.7</td><td>Lot 1997</td></tr><tr><td>3</td><td>754982001008</td><td>103 30'07.829 E</td><td>1 49'15.221 N</td><td>0.8</td><td>Kluang, Johor</td></tr><tr><td>4</td><td>755116001008</td><td>103 29'38.537 E</td><td>1 49'38.058 N</td><td>2.43</td><td>Kluang, Johor</td></tr></table>	N o	MPOB License	Latitude	Longitude	Hectarag e (ha)	Lot No	Fong Tak Development Sdn Bhd						1	465622-701000	1 48'30.336"N	103 15'12.316"E	2.23	PTD 3781	2	413159-101000	1 45'35.294"N	103 24'53.553"E	1.59	LOT 2522	3	415067-601000	1 51'43.471"N	103 19'13.116"E	15.39	PTD 3020	4	529295-101000	1 48'23.201"N	103 18'51.890"E	2.02	PTD 4451	5	441441-001000	1 45'11.399"N	103 23'17.268"E	0.96	PTD 9354	AZ Iman Resources Sdn Bhd						1	315499101000	103 29'48.518 E	1 50'03.434 N	2.03	Layang Layang, Johor	2	302817101000	103 29'28.206	E1 30.750 N 48	4.8.7	Lot 1997	3	754982001008	103 30'07.829 E	1 49'15.221 N	0.8	Kluang, Johor	4	755116001008	103 29'38.537 E	1 49'38.058 N	2.43	Kluang, Johor	Complied
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		5	754223001008	103 30'21.370 E	1 49'54.058 N	2.02	No 154	
		Perniagaan Md Sangiri						
		1	746259001008	1°50'48.643 N	103°24'59.1 93 E	1.21	LO 1306	
		2	746251001008	1°50'49.090 N	103°25'22.1 94 E	0.71	LO 963	
		3	746253001008	1°49'59.600 N	103°25'16.8 44 E	1.62	OTD 2447	
		4	746246001008	1°50'51.647 N	103°25'10.8 80 E	0.50	1286	
		5	746247001008	1°50'16.396 N	103°24'05.6 99 E	1.79	1453	
<b>Principle 3: Optimise productivity, efficiency, positive impacts and resilience</b>								
<b>Criterion 3.1:</b> There is an implemented management plan that aims to achieve long-term economic and financial viability.								
3.1.1	<b>(C)</b> A business or management plan (minimum three years) is documented that includes, where applicable, a jointly developed business case for Scheme Smallholders. - Critical (Major) compliance -	JPB Sedenak management unit has established and implemented its commitment to long-term sustainability and continuous improvement through a capital expenditure program. An annual business plan, including a five-year projection (2023-2028), has been prepared to guide future planning. Key components of the business plan include:  i) FFB processing and OER/KER extraction rates ii) Revenue (from sales of CPO, PK, shell, fiber, and other income) iii) Production costs (general expenses, production, maintenance, depreciation) iv) FFB purchasing and forwarding						Complied

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		v) General expenditure vi) Capital budget (CAPEX).													
3.1.2	An annual replanting programme projected for a minimum of five years with yearly review, is available. - Minor compliance -	Replanting program has been established for both estates. Details as per below;  <u>Sedenak Estate</u> <table><tr><td>Year</td><td>Hectare (Ha)</td></tr><tr><td>2025</td><td>336.10</td></tr><tr><td>2026</td><td>94.25</td></tr><tr><td>2027</td><td>-</td></tr><tr><td>2028</td><td>-</td></tr><tr><td>2029</td><td>181.45</td></tr></table> <u>Kuala Kabong Estate</u> There is no replanting has been programme for Kuala Kabong Estate since the estate has been included in the development plan for housing and industrial area.	Year	Hectare (Ha)	2025	336.10	2026	94.25	2027	-	2028	-	2029	181.45	Complied
Year	Hectare (Ha)														
2025	336.10														
2026	94.25														
2027	-														
2028	-														
2029	181.45														
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 -	Management review meeting has been conducted on 08/09/2024 at Kuala Kabong Estate. They were chaired by the respective operating unit’s managers and attended by key personnel. Among the agenda discussed were: – Follow-up action from previous management review – Process conformance & product conformity. – Customer feedback – Internal audit – External audit	Complied												



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		<ul style="list-style-type: none"> <li>Changes that could affect management system.</li> <li>Recommendation for improvement</li> <li>Complaints and grievances</li> <li>Other matters</li> </ul>	
<b>Criterion 3.2:</b> 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	<b>(C)</b> 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 -	Action plan for continuous improvement implemented by individual operating unit within the certification unit and annually reviewed. The plans were developed based on consideration of the social impacts, which in general includes welfare of employees, and relationship between the relevant stakeholders. Based on interview, records review and site visit, the implementation of all the plans were observed to be on track within the set timeframe.	Complied
3.2.2	As part of the monitoring and continuous improvement process, annual reports are submitted to the RSPO Secretariat using the [RSPO metrics template].  <b>PROCEDURAL NOTE:</b> The RSPO metrics template is awaiting decision/agreement by RSPO and the issue is still being discussed. 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. - Minor Compliance -	RSPO metric template version 2.1 is used for the reporting of Sedenak POM certification unit's metrics (economic, social and environment). Data reporting period is January to December 2023 for (social and environment metrics) and economic metrics from September 2023 – August 2024 (counting back from audit month). Based on verification with input data, no discrepancies of data reported in the metrics for the period under review for all the operating units	Complied
<b>Criterion 3.3:</b> Operating procedures are Appropriately documented, consistently implemented and monitored.			
3.3.1	<b>(C)</b> Standard Operating Procedures (SOPs) for the unit of certification are in place. - Critical (Major) compliance -	For Palm Oil Mill, there is no changes compare to last year where operations are guided by the following documents: <ul style="list-style-type: none"> <li>Quality Manual (SDPOM/QM) document no SDPOM/QM.4.0</li> <li>Standards Operating Procedure (SDPOM/SOP)</li> </ul>	Complied

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		R&D and Agricultural Manual has been established which covers all the operation in the estate such as land preparation, planting/replanting, field maintenance, infrastructure development & maintenance, harvesting & evacuation, integrated pest management, and pest & diseases. There are 19 SOPs and 18 WI's covering all aspects of oil palm management including composting site operation.	
3.3.2	A mechanism to check consistent implementation of procedures is in place. - Minor Compliance -	In addition to routine daily supervision, the sampled management units have established mechanisms to monitor the implementation of their procedures. These include internal audits, inspections by the Mill and Estate Inspectorates, and workplace inspections by the Safety Officer. Verification reports from these visits were made available at all the sampled operating units.	Complied
3.3.3	Records of monitoring and any actions taken are maintained and available. - Minor Compliance -	The operating units maintain all the records of monitoring and actions taken for all issues raised during the visit. Sample has been taken for workplace inspection records, corrective action plan for internal audit, corrective action for agronomist visits.	Complied
<b>Criterion 3.4:</b> 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	<b>(C)</b> 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 was no new planting or new operation reported in the estate. As for the current operations, the social impacts were updated annually and registered in the Evaluation of Impact Significant. It was last updated on 27/08/2024 and the evaluation was based on three criteria which are likelihood, consequences and frequency. The impact assessment was conducted on for all activities which include harvesting, manuring, workshop, waste, chemical application and peat management.	Complied

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		<p>There is no new planting nor expending the existing ones conducted by each operating unit visited under Sedenak Complex as of the date of the audit. This is verified through the following document/facts:</p> <p>a) Hectare statement compared to the previous year.</p> <p>b) Interviews with the management</p> <p>No additional methods have been implemented or introduced in the operations of the mill and estate, which could potentially result in altered impacts on the social aspects. The social impacts arising from the mill and estate operations have remained consistent since last assessment.</p> <p>Nevertheless, each operating unit has its own Social Impact Assessments (SIA) done which have been prepared internally by the Company's Sustainable Department team. Latest of Social Impact Assessment was conducted on 21/09/2024 for estate and mill under Sedenak Complex. The social impacts were updated annually and registered in the Evaluation of Impact Significant. The social impact register is developed based on the scoring of frequency, consequence and likelihood. Social Management Plan will be developed after the social impact register established.</p> <p>Management plan has been established by each operating units and has been verified by the audit team. There is evidence that the management plan has been developed in participatory ways with the stakeholders. This has been verified during stakeholder consultation conducted with several stakeholder during the audit.</p>	
3.4.2	<p>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.</p> <p>- Minor Compliance -</p>	<p>The Social &amp; Environment Management Plan for the year 2024 has been made available to the Certification Unit (CU). This comprehensive plan encompasses various elements, including objectives, categories, actions, frequencies, responsible individuals, and monitoring periods. Furthermore, any identified</p>	Complied

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		<p>issues and their corresponding mitigation plans have been consolidated within the Social Management Plan and Environment Risk Assessment for the year 2024.</p> <p>Social Impact Assessment (SIA) as well as the Social Management Plans for the Sedenak POM and its supply base are available. For existing operation, the social impact management plans were developed and updated periodically by each visited operating units. The SIA has been prepared with participation of affected stakeholders via interviews and feedback received, including from NUPW and WOW meetings. A Social Management Plan for 2024 has been developed by each operating unit, which includes a list of impact issues, suggestions for social improvements, an action plan, persons responsible, and monitoring. Among management plans are as follow:</p> <p><u>Sedenak POM</u></p> <ul style="list-style-type: none"> <li>• Issue: Lorry often drives at high speeds when passing through intersections in the village after despatch FFB to the mill.  Management Plan: The management of the mill and estate gives regular reminders to all contractor drivers regarding this matter. Discussions with JKR Kulai include a proposal to create yellow markings to slow down vehicles.</li> </ul> <p><u>Kuala Kabong Estate</u></p> <ul style="list-style-type: none"> <li>• Issue: Periodic explanations regarding whistle-blowing procedures need to be provided to all workers.  Management Plan: The company, through the Human Resources Department and the Sustainability Department, will conduct regular JPG engagement sessions with all employees to raise awareness about the importance of making</li> </ul>	
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		<p>complaints, the process to lodge complaints, types of complaints, and employees' rights to make complaints.</p> <p><u>Sedenak Estate</u></p> <ul style="list-style-type: none"> <li>Issue: Some workers have limited exposure to union membership.</li> </ul> <p>Management Plan: Regular detailed explanations will be provided to workers about the benefits and importance of joining the labor union.</p>	
3.4.3	<p><b>(C)</b> The social and environmental management and monitoring plan is implemented, reviewed and updated regularly in a participatory way.</p> <p>- Critical (Major) compliance -</p>	<p>The operating units have established the Environmental Management Plan base on the Environmental Risk Assessment conducted. Sample of the implementation of the management plan as follows:</p> <p><u>Sedenak Palm Oil Mill</u></p> <ol style="list-style-type: none"> <li>1. The mill to monitor POME treatment system to make sure the effluent operation BOD is within the limit</li> <li>2. Mill to conduct the periodically tank and machine inspection and conduct the ERP training on oil spillage. The records of training is available for ERP conducted at mill.</li> <li>3. To ensure effluent bund is in good conditions. Which mill conducted the monitoring of the furrow system and interview with the operator verified that the work are conducted. Site verification regarding the structure of bund, found that the area is well maintained.</li> </ol> <p><u>Sedenak Estate</u></p> <ol style="list-style-type: none"> <li>1. To monitor the signs of erosion, siltation and road maintenance program</li> <li>2. Conduct monitoring on migratory bird species</li> </ol>	Complied

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		<p>3. To brief workers on RTE Species sighted.</p> <p><u>Kuala Kabong Estate</u></p> <ol style="list-style-type: none"> <li>1. Awareness of electricity consumption and reducing the electricity campaign. To reduce the electricity waste.</li> <li>2. To follow the peat and water management for optimum peat management.</li> <li>3. PCD to be inspected and maintain.</li> </ol> <p>Management plan was review and updated regularly in a participatory way based on feedback and issues collected during various of meeting such as stakeholder meeting, union meeting, and gender meeting as well as feedback from internal and external parties. Social Impact Assessment Plan for year 2024 has been developed by each operating unit which consists of list of issues, sources of issues, action plan, status, person in charge and date of commenced. Verification during the audit found that there is evidence that all issues that has been highlighted in the social impact assessment and management plan that has been established has been implemented based on document review. It has been further confirmed through interview with sampled stakeholders that there are no repeating same issues for issues that has been highlighted in the assessment.</p>	
<b>Criterion 3.5:</b> 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>Johor Plantations Group Berhad (JPG) has documented its employment procedures in two key documents, Recruitment of Local Workers for Operating Units (Document No.: JPG/PRO/SID/SD/SMS; Issue No.: 00; Revision No.: 00; Effective Date: 14/11/2023) and Ethical Recruitment Migrant Workers (Document No.: JPB/PRO/OPERATIONS/PLANTATION/01; Issue</p>	Complied

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		<p>No.: 00; Revision No.: 00; Effective Date: 05/07/2023). The purpose of this documents is to explain recruitment processes for both local and foreign workers including pre and post recruitment. Among other aspects, the procedure has outlined the selection, hiring, promotion, retirement, and termination of workers.</p> <p>As specified in the Ethical Recruitment Migrant Workers Procedure, JPG conduct selection and recruitment of migrant workers directly in the respective countries of origin. The recruitment of foreign workers will be carried out by the Foreign Workers Unit (FWU). FWU is responsible for conducting a briefing to potential workers on the job. The FWU team shall conduct a personal one-on-one interview that include evaluation of the person ability to work in palm oil. The FWU team also will check the age of candidate by requesting official identity documents. Upon completion of the interview, workers shall also be asked if they have encountered any unethical practice, deceptive processes, or intimidation from any party. The verification process shall be documented and acknowledged by workers. If any unethical behaviour is found, a remedial process will be initiated.</p> <p>Section 5 (ii) of the procedure also mentions where there is a requirement to use services of recruitment agencies in the origin country, JPG shall enter into a definitive agreement with the recruitment agencies. This is to ensure the process managed by recruitment agencies adheres to ethical and transparent standards required by JPG. Other part mentions in the procedure are no charging of recruitment fees and related costs, clear and transparent terms and conditions of employment, no withholding of passports or personal documents, no discrimination and grievance channel. The Appendix A in the procedure has summarizes the process flow of migrant workers recruitment from start of the recruitment process to the end.</p>	
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		<p>While for hiring local workers, Section 5 of the Recruitment of Local Workers for Operating Units states that operating unit need to identify vacant positions in operations and request for necessary approvals to recruit new workers. Interested applicants are required to fill out an Application Form or 'Borang Permohonan Kerja'. Either Assistant Manager and/or the respective Supervisor/Field Conductor will interview shortlisted candidates. Interview will be conducted at operating unit office. Before interview, the candidate is subject to age screening through observation of their identity card. The age requirement to be allowed working is 18 to 60 years only. During interview, the Assistant Manager is to brief the applicant the job, tasks, and expectations, in a language that they understand. The candidates will be informed of the interview results, subject to the successful completion of medical screening by the Estate Hospital Assistant/Medical Assistant. They will be notified of the reporting date after obtaining the medical results. Prior commencing work, workers will receive the following:</p> <ul style="list-style-type: none"> <li>- Employment contract terms and conditions</li> <li>- Briefing on their duty</li> <li>- Induction on job requirement, rules and regulations and other pertinent information on the employment</li> <li>- Training</li> </ul>	
3.5.2	<p>Employment procedures are implemented, and records are maintained.</p> <p>- Minor Compliance -</p>	<p>Based on interview with sampled workers and relevant stakeholder and documentation review, it was found that employment procedures as mentioned in indicator 3.5.1 were implemented and all the records are adequately maintained. Induction process is mandatory to be carried out by operating units to ensure company's rules and regulations were socialized and acknowledged by the workers.</p>	Complied



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		<p>Induction briefing, fill out application form, medical checkup, interview session, briefing on salary, employment terms and conditions, as well as information about grievance channel were conducted as per required in the procedures established. This was confirmed during interview with sampled workers comprising both of foreign workers from different origin countries and local workers. During the audit, stakeholder consultation was conducted with several neighbouring operating unit and local community. It was noted that job vacancies, if any, will verbally communicated through the existing employees.</p> <p>At the operating units, application forms, medical check-up report, copy of identification documents and employment contract for newly recruited employees were made available for verification. These are among the pre-requisites outlined in the recruitment procedure.</p>	
<b>Criterion 3.6:</b> An occupational health and safety (H&S) plan is documented, effectively communicated and implemented.			
3.6.1	<p><b>(C)</b> All operations are risk assessed to identify H&amp;S issues. Mitigation plans and procedures are documented and implemented.</p> <p>- Critical (Major) compliance -</p>	<p>HIRARC (Hazard Identification, Risk Assessment, and Risk Control) was systematically applied across all operations in the mill and estates to identify potential hazards, assess risks, and recommend control measures. HIRARC assessments were conducted for a range of activities, including Fresh Fruit Bunch (FFB) harvesting, Pest and Disease Control (P&amp;D), landfill operations, manuring, and spraying. These assessments complied with legal requirements, and the resulting recommendations were implemented as detailed below:</p> <p><u>Sedenak Estate</u></p> <ol style="list-style-type: none"> <li>1. Chemical Health Risk Assessment was conducted to assess the use of hazardous chemicals in the estate. The CHRA Assessment was conducted on 19/04/2023 by TSM</li> </ol>	OFI

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		<p>Training a consultancy services. The CHRA Report (HQ/16/ASS/00/35-2023-20) was available for verification.</p> <p>2. Noise risk assessment conducted on 28/12/2021 report no HQ/18/PEB/00/00014-2021-023 for field grass cutter, workshop foreman and field tractor driver. Noise risk assessment conducted on 22/05/2023 report number HQ/18/PEB/00/00014-2023/007 for field mist blower and field fogging and on 03 and 05/03/2024 report number HQ/23/PEB/00/00082-2024/013 for Roto Slasher, spreader, JCB and Mechanical Buffalo.</p> <p><u>Sedenak POM</u></p> <p>1. Chemical health risk assessment conducted on 18/04/2023 by TSM training and consultancy services report reference number HQ/16/ASS/00/35</p> <p>2. Noise Risk Assessment conducted on 17/10/2023 done by TSM training and consultancy services report number HQ/18/PEB/00/00018-2023/74</p> <p><u>Kuala Kabong Estate</u></p> <p>1. Chemical hazard risk assessment (CHRA) has been conducted on 15/06/2023 reference HQ/16/ASS/00/35 done by TSM Training and consultancy services.</p> <p>2. Noise risk assessment report has been conducted by JPG Terrasolutions Sdn Bhd report reference number HQ/23/PEB/00/00082-2024-014 dated 05/03/2024.</p>	
3.6.2	<p><b>(C)</b> The effectiveness of the H&amp;S plan to address health and safety risks to people is monitored.</p> <p>- Critical (Major) compliance -</p>	<p>Each Operating Unit's Annual Health and Safety (H&amp;S) plan is largely implemented through the 2023 Annual Training Program to address identified health and safety risks. The focus is on promoting safe work practices by providing:</p>	Complied

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		<ol style="list-style-type: none"> <li>1. The necessary knowledge and skills to perform tasks safely and prevent the creation of hazards that may endanger themselves or others.</li> <li>2. Awareness and understanding of workplace hazards, including how to identify, report, and control them.</li> <li>3. Specialized training for tasks involving unique hazards.</li> </ol> <p>In addition to formal classroom training, other methods such as on-the-job training and worksite demonstrations are used to effectively communicate safety concepts, ensure understanding of hazards and controls, and promote good work practices.</p> <p>The safety performance of each Operating Unit is monitored through:</p> <ol style="list-style-type: none"> <li>1. Internal audits conducted by the Johor Plantation Berhad Head Office Sustainability Palm Oil Department;</li> <li>2. Workplace inspections by the site OSH Committee;</li> <li>3. Direct supervision and rounds by the Assistant Manager;</li> <li>4. Safety occurrence reporting;</li> <li>5. Health and medical surveillance;</li> <li>6. Chemical exposure monitoring.</li> </ol> <p>Monitoring results are discussed in meetings and communicated to employees, with corrective actions taken where necessary. Health</p>	
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		<p>and safety compliance monitoring is carried out at the respective estates, as outlined below:</p> <p><u>Sedenak Estate</u></p> <ol style="list-style-type: none"><li>1. Audiometric test conducted on 21/09/2023 report number R2023/09/LDSedenak by Dr. Rozana binti Hisham for 9 workers and 5 workers has been identified with hearing loss and for year 2024, audiometric test has been done on 18/09/2024 for 9 workers and the results is still pending.</li><li>2. Medical surveillance conducted by Dr Aidilnurul Fareena binti Ishak, Occupational Health Doctor on 03/07/2024 and there is no abnormal results due to occupational cause.</li></ol> <p><u>Sedenak POM</u></p> <ol style="list-style-type: none"><li>1. Audiometric test has been done on 04/07/2024 with report reference UNI-AUD-MSX/OHD/03/082024 for 61 employees with total 23 hearing impairment. Recommendation to do retest for hearing impairment and has been conducted on 19/07/2024 and the results still pending.</li><li>2. Medical surveillance has been done 03/07/2024 for 48 workers. 16 workers have been identified with abnormalities with non-occupational cause.</li></ol> <p><u>Kuala Kabong Estate</u></p> <ol style="list-style-type: none"><li>1. Medical surveillance for year 2024 conducted on 04/07/2024 with total 16 workers and all has been declared fit for works.</li></ol>	
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		2. Audiometric test has been conducted on 18/09/2024 by Terrasolutions Sdn Bhd.	
<b>Criterion 3.7:</b> All staff, workers, Scheme Smallholders, out-growers, and contract workers are appropriately trained.			
3.7.1	<p><b>(C)</b> 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&amp;C, in a form they understand, and which includes assessments of training.</p> <p>- Critical (Major) compliance -</p>	The annual training program has been established, encompassing all aspects of RSPO elements. In addition, it includes topics such as estate operating procedures, performance parameters, vehicle maintenance, and more. The program also identifies specific employee groups targeted for training in particular subjects. It is designed to address the needs of both the estates and the mill within the certification unit (CU).	Complied
3.7.2	<p>Records of training are maintained.</p> <p>- Minor Compliance -</p>	<p>Records of training has been maintained and verified. Sample as per below:</p> <p><u>Sedenak Estate</u></p> <ol style="list-style-type: none"> <li>1. Chemical handling- 01/02/2024</li> <li>2. Triple rinsing- 25/04/2024</li> <li>3. Rat baiting- 16/05/2024</li> <li>4. IPM- 01/02/2024</li> </ol> <p><u>Sedenak POM</u></p> <ol style="list-style-type: none"> <li>1. Grievance procedure training – 02/06/2024</li> <li>2. RSPO and MSPO training- 30/07/2024</li> <li>3. Safe work procedure for boiler operations- 12/02/2024</li> <li>4. Safe work procedure for loading ramp and sterilizer- 12/02/2024</li> </ol> <p><u>Kuala Kabong Estate</u></p> <ol style="list-style-type: none"> <li>1. Anti Bribery Policy- 23/01/2024</li> </ol>	Complied

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		2. HCV Biodiversity- 18/04/2024 3. Chemical handling – 24/07/2024 4. Fire drill – 19/02/2024. 5. Rat baiting training- 04/03/2024	
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>Training conducted from time to time to all personnel critical in SCCS effective implementation. Latest training was conducted by HQ sustainability department personnel, attended by mill manager, assistant mill manager, lab supervisor, lab despatch operator, weighbridge clerk and auxiliary police. Latest training was conducted on 24/01/2024</p>	Complied
<b>Criterion 3.8:</b> Supply chain requirement for mills (note: All supply chain requirements are considered as <b>Critical (C)</b> . However, it will not contribute to suspension if there is more than 5 non-compliance within a principle)			
3.8.1	<p><b>Identity Preserved Module</b></p> <p>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&amp;C), or against the Group Certification scheme.</p> <p>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.</p>	<p>Johor Plantations Group Berhad (JPB) are in the midst of updating its documented information related to traceability and supply chain procedures to reflect its change of name.</p> <p>As per SOP established, under section 4. Definition, Identity Preserved (IP) defined as FFB used by the mill sourced from plantations/ estates that are certified against the RSPO Principle and Criteria (RSPO P&amp;C), and /or against the Group Certification scheme.</p> <p>Sedenak POM received FFB from both certified and uncertified source using Mass Balance Module. Thus, the criteria is not applicable.</p>	Not Applicable
3.8.2	<p><b>Mass Balance Module</b></p> <p>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</p>	<p>Johor Plantations Group Berhad (JPB) are in the midst of updating its documented information related to traceability and supply chain procedures to reflect its change of name.</p> <p>As per SOP established, under section 4. Definition, Mass Balance (MB) – FFB used by the mill may be from uncertified growers, in</p>	Complied

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	only the volume of oil palm products produced from processing of the certified FFB as MB.	addition to those from its own group of company and third-party certified supply base. Only the volume of oil palm products produced from processing of the certified FFB claimed as MB.  Sedenak POM received FFB from both certified and uncertified source using Mass Balance Module. During the P&C assessment, the audit team verified the volumes and sources of certified FFB entering the mill, the implementation of processing controls and volume sales of RSPO certified products.									
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 10.	Complied								
3.8.4	The mill shall also meet all registration and reporting requirements for the appropriate supply chain through the RSPO IT platform.	<div>The registration of PalmTrace will be carried out by the Marketing Department in HQ. Company has registered in PalmTrace system as follows:</div> <table><tr><td>Member name</td><td>Johor Plantations Group Berhad-Sedenak Palm Oil Mill</td></tr><tr><td>Palm Trace ID</td><td>RSPO_PO1000000019</td></tr><tr><td>Membership No</td><td>1-0080-09-000-00</td></tr><tr><td>Type of business</td><td>Oil mill</td></tr></table>	Member name	Johor Plantations Group Berhad-Sedenak Palm Oil Mill	Palm Trace ID	RSPO_PO1000000019	Membership No	1-0080-09-000-00	Type of business	Oil mill	Complied
Member name	Johor Plantations Group Berhad-Sedenak Palm Oil Mill										
Palm Trace ID	RSPO_PO1000000019										
Membership No	1-0080-09-000-00										
Type of business	Oil mill										

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3.8.5	<p><b>Documented procedures</b></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"> <li>a) Complete and up to date procedures covering the implementation of all the elements of the supply chain model requirements.</li> <li>b) Complete and up to date records and reports that demonstrate compliance with the supply chain model requirements (including training records).</li> <li>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.</li> <li>d) The mill shall have documented procedures for receiving and processing certified and non-certified FFBs including ensuring no contamination in the IP mill.</li> </ul>	<p>Johor Plantations Group (JPG) are in the midst of updating its documented information related to traceability and supply chain procedures to reflect its change of name.</p> <ul style="list-style-type: none"> <li>a) As of the date of on-site assessment, the documented procedures for supply chain still based on existing as following: <ul style="list-style-type: none"> <li>- JPG Sustainable Management System Doc. Doc No: JPG/PRO/SID/SD/SMS, Effective Date: 14/11/2023.</li> <li>- Operational Procedure title: CSPO &amp; CSPK Supply Chain; Rev. # 02; Procedure # MKTG 04; Date: January 2021</li> </ul> </li> <li>b) Sedenak POM maintained the records and reports on the implementation of supply chain model requirements as per procedure Doc. Title: JPG Sustainable Management System Doc - Traceability. Doc No: JPG/PRO/SID/SD/SMS, Effective Date: 14/11/2023. stated that records shall be kept for seven years. Among records maintained in the supply chain implementation including the following: <ul style="list-style-type: none"> <li>- Training records</li> <li>- Internal audit report</li> <li>- Invoice and contracts</li> <li>- Weighbridge tickets</li> <li>- Daily production reports</li> <li>- Sustainable product monthly movements summary report (mass balance sheet)</li> </ul> </li> <li>c) Sighted the letter of appointment made to each operating unit to be the PIC for sustainability and certification program. The email dated 09/05/2024 is verified. Sedenak POM Senior Manager has been appointed to be the PIC in the mill including the traceability and supply chain requirement.</li> </ul>	Complied
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		d) The documented procedure # SQD/SMS/2.1 Traceability clause 6.4 Procedure Reception of FFB specifies procedures for receiving and processing certified and non-certified FFBs including ensuring no contamination in the IP mill. However, Sedenak POM certified as MB.	
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>Johor Plantations Group Berhad (JPB) are in the midst of updating its documented information related to traceability and supply chain procedures to reflect its change of name.</p> <p>i) As of the date of on-site assessment, the documented procedures for supply chain based JPG Sustainable Management System Doc. Doc No: JPG/PRO/SID/SD/SMS, Effective Date: 14/11/2023.</p> <p>a. The procedure with aim to ensure the implementation of Sustainable Management System including RSPO SCCS in line with the defined policies, procedures and requirements in the RSPO Supply Chain Certification Standard and the RSPO Market Communications and Claims Documents.</p> <p>b. Sedenak POM implemented and maintained the standard requirements internal audit conducted once a year with latest done on 11/07/2024.</p> <p>Based on the records of latest internal audit conducted on 11/07/2024 documented as Internal Audit Report; Doc. # JPB/PRO/SID/SD/SMS/6.7-FS; Issue # 0; Rev. # 0; Effective date: 2023; no non-conformity raised by the internal auditors. The internal audit report maintained together with records of internal audit plan, attendance list and internal audit checklists.</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>Purchasing and Goods In documents maintained as per sample Certified FFB received verified as following:</p>	Complied

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	<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>	<ul style="list-style-type: none"> <li>- FFB Receive Ticket # 483838; Date: 24/09/2024; Supplier: Kuala Kabong Estate; Field: P99, P00, P01, P02; DO # 40229; Nett weight: 27,850 kg; Cert. # RSPO 537873 – Certified FFB</li> <li>- FFB Receive Ticket # 483550 ; Date: 17/09/2024; Supplier: Keng Ann Rubber Sdn Bhd; Field: 2008; DO # nil; Nett weight: 45,540 kg; - Non Certified FFB</li> <li>i) The mill weighbridge clerk verified all incoming documents prior to receiving and this has been approved by the assistant mill manager</li> <li>ii) Based on the production records, no overproduction of certified tonnage as to date.</li> </ul> <p>The mill has a mechanism in place for handling non-conforming FFB and/or documents as specified in the procedure Doc. Title: JPG Sustainable Management System Doc - Traceability. Doc No: JPG/PRO/SID/SD/SMS, Effective Date: 14/11/2023</p>	
3.8.8	<p><b>Sales and Goods Out</b></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"> <li>a) The name and address of the buyer;</li> <li>b) The name and address of the seller;</li> <li>c) The loading or shipment / delivery date;</li> <li>d) The date on which the documents were issued;</li> <li>e) RSPO certificate number;</li> </ol>	<p>Sales and Goods Out documents maintained as per sample verified as following:</p> <p>Certified CPO:</p> <ul style="list-style-type: none"> <li>- Buyer: EVYAP Sabun Malaysia Sdn Bhd</li> <li>- Seller: Johor Plantations Group Berhad, Sedenak Palm Oil Mill, KB 721, 80990 Johor Bahru, Johor</li> <li>- Despatch Ticket # C37448; Date: 25/09/2024</li> <li>- RSPO Cert. # RSPO 537873</li> <li>- Product: CSPO MB</li> <li>- Nett weight: 40,150 kg</li> <li>- Vehicle # WGB7374</li> </ul>	Complied

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	<p>f) A description of the product, including the applicable supply chain model (Identity Preserved or Mass Balance or the approved abbreviations);</p> <p>g) The quantity of the products delivered;</p> <p>h) Any related transport documentation;</p> <p>i) A unique identification number.</p>	<p>Non - Certified CPO:</p> <ul style="list-style-type: none"> <li>- Buyer: KL-Kepong Edible Oils Sdn Bhd</li> <li>- Seller: Johor Plantations Group Berhad, Sedenak Palm Oil Mill, KB 721, 80990 Johor Bahru, Johor</li> <li>- Despatch Ticket # C37449; Date: 25/09/2024</li> <li>- Product: CPO</li> <li>- Nett weight: 35,050 kg</li> <li>- Vehicle #AFB1335</li> </ul> <p>Certified PK:</p> <ul style="list-style-type: none"> <li>- Buyer: PGEO Edible Oils Sdn. Bhd</li> <li>- Seller: Johor Plantations Group Berhad, Sedenak Palm Oil Mill, KB 721, 80990 Johor Bahru, Johor</li> <li>- Despatch Ticket # K10723; Date: 25/09/2023</li> <li>- RSPO Cert. # RSPO 537873</li> <li>- Product: CSPK MB</li> <li>- Nett weight: 26,050 kg</li> <li>- Vehicle # DBQ3222</li> </ul> <p>Non - Certified PK:</p> <ul style="list-style-type: none"> <li>- Buyer: Sehcom Industries Sdn Bhd</li> <li>- Seller: Johor Plantations Group Berhad, Sedenak Palm Oil Mill, KB 721, 80990 Johor Bahru, Johor</li> <li>- Despatch Ticket # K10722; Date: 25/09/2024</li> <li>- Product: PK</li> <li>- Nett weight: 39,250 kg</li> </ul>	
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		- Vehicle # JVQ8232	
3.8.9	<p><b>Outsourcing Activities</b></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 operations, systems, and all information, when this is announced in advance.</p>	<p>No processing outsource activity by Sedenak POM except for transportation as per Memorandum of Agreement (MOU) as following:</p> <ul style="list-style-type: none"> <li>- Renewal of Contract: Transport of Crude Palm Oil (CPO) from Johor Plantations Group Berhad Group Mills to Various Refineries; Contract # JPGB/CTD/88/20/2024 (NFH); Renewal period: 01/07/2024 to 31/12/2024; Transporter: Mirzafiz Sdn. Bhd.</li> <li>- Renewal of Contract: Transport of Crude Palm Oil (CPO) from Johor Plantations Group Berhad Group Mills to Various Refineries; Contract # JPGB/CTD/85/20/2024 (NFH); Renewal period: 01/07/2024 to 31/12/2024; Transporter: Teo Tuan Kwee Sdn. Bhd.</li> <li>- Renewal of Contract: Transport of Crude Palm Oil (CPO) from Johor Plantations Group Berhad Group Mills to Various Refineries; Contract # JPGB/CTD/84/20/2024 (NFH); Renewal period: 01/07/2024 to 31/12/2024; Transporter: Yewtan Enterprise.</li> </ul> <p>The agreement specified that -</p> <ul style="list-style-type: none"> <li>- The mill has legal ownership of all CPO transported until it reaches customer.</li> <li>- The explicit procedure specified is Doc. Title: JPG Sustainable Management System Doc - Traceability. Doc No: JPG/PRO/SID/SD/SMS, Effective Date: 14/11/2023</li> </ul> <p>Transporters agreed to provide relevant access for duly accredited CBs to their respective operations, systems, and all information with signing on the contract by both parties.</p>	Complied

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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.	The list of outsourced contractors was sighted, "list of stakeholders" to include the transport contractor for CPO. 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.	No new contractor used for the processing or physical handling of RSPO certified oil palm products transportation.	Complied
3.8.12	<p>Record keeping</p> <p>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.</p> <p>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.</p> <p>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.</p> <p>iv) For Mass Balance Module, the mill:</p> <p>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.</p> <p>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.</p> <p>c) The mill can only deliver Mass Balance sales from a positive stock. Positive stock can include product ordered for delivery within three</p>	<p>Accurate, complete, up-to-date and accessible records and reports covering all aspects of this RSPO Supply Chain Certification Standard requirements available for verification. As spelt out in its supply chain procedure, records are to be maintained minimum of two years for sample records as per following:</p> <ul style="list-style-type: none"> <li>- Mass Balancing Records (Sustainable Product Monthly Movements Summary Report) for Sedenak Palm Oil Mill</li> <li>- Daily Production Summary Report</li> <li>- Monthly Production Summary Report</li> </ul> <p>a. Based on mass balance sheet latest dated end of August 2024, no negative stock recorded.</p>	Complied

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	(3) months. However, a mill is allowed to sell short (i.e. product can be sold before it is in stock.		
3.8.13	<p><b>Extraction Rate</b></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>The oil extraction rate (OER) and the kernel extraction rate (KER) for Sedenak POM is determined and set their own extraction rates based upon past experience, documented and applied consistently. The management has recorded the extraction in monthly progress report and in mass balance sheet. Both records were found to be tallied.</p>	Complied
3.8.14	<p>Extraction rates shall be updated periodically to ensure accuracy against actual performance or industry average if appropriate.</p>	<p>Extraction rates are calculated daily through measurement in production and storage tanks for CPO and bunkers for PK. This daily extraction aggregated monthly and annually for monitoring and reporting. As of August, the 2024 year to-date OER: 18.73% and KER: 5.16%. the figure was taken from monthly progress report latest for the month of August 2024.</p>	Complied
3.8.15	<p><b>Processing</b></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>Not applicable for mass balance module.</p>	Not Applicable
3.8.16	<p><b>Registration of Transactions</b></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>i) Shipping Announcement in the RSPO IT platform carried out by the mills when RSPO certified products are sold as certified to refineries, crushers, and traders within three months after dispatch with the dispatch date being the Bill of Lading or the dispatch documentation date. Sighted sample of Shipping Announcement made as following:</p> <ul style="list-style-type: none"> <li>- Product name: CSPO; SC Model: MB; Volume: 504.46 MT; Transaction ID: TR-f8106260-d60f; Creation date: 7/9/2023; Confirmation date: 07/09/2023</li> </ul>	Non-compliance

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		<ul style="list-style-type: none"> <li>- Product name: CSPK; SC Model: MB; Volume: 300 MT; Transaction ID: TR-9abc7434-d7de; Creation date: 15/9/2023; Confirmation date: 19/09/2023</li> <li>ii) Verification made to the mass balance sheet and records of the production of CPO and PK as well as sales records of both products. In the previous license period found that there 2,360.51 mt of CPO and 942.35 mt PK were downgraded as conventional. However, there is no removal was made in the RSPO IT Platform, The Non Compliance is raised.</li> </ul>	
3.8.17	<p><b>Claims</b></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>	No claim made for certified CSPO and CSPK where are required to follow RSPO rules on market communication and claim except the offpack claim made through sale documents.	Complied
<b>General corporate communications</b>			
4.1	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>Sedenak POM has not made any off-product claims, a fact verified through document and site reviews, including examinations of the notice board, business cards, shipping documentation, procurement/purchasing documents, and promotional materials, among others.</p> <p>Johor Corporation has obtained the RSPO Trademark License with the License Number: 1-0080-100-01 dated 12/12/2023, the license is valid until 11/12/2025. Term and Condition is as per RSPO Rules On Market Communication &amp; Claims.</p>	Complied
4.2	<p>In corporate communications, a member is allowed to:</p> <ul style="list-style-type: none"> <li>A. display its RSPO membership status</li> <li>B. display the RSPO web address (www.rspo.org)</li> <li>C. state that the member supports the work of RSPO</li> <li>D. state the member's history with regard to RSPO</li> </ul>	On the parent company's website, it is explicitly mentioned that they are a member of RSPO and are dedicated to adopting RSPO standards.	Complied

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	E. use the RSPO Trademark (as shown below) with a valid trademark licence number to promote its RSPO membership		
4.3	Members are <b>not allowed</b> to use the RSPO corporate logo as shown below. This is for the sole use of the RSPO Secretariat.	Based on site visit and documentation review, verified that RSPO corporate logo is not use by the UoC.	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.	Sedenak Palm Oil Mill does not make any statement that may lead to believe that RSPO memberships by itself implies the selling of RSPO certified oil palm product.	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"> <li>• "We have been sourcing RSPO certified palm oil since (YEAR)."</li> <li>• "We have used (X) tonnes of RSPO certified palm oil for our products manufactured in the last year."</li> <li>• "We have been RSPO certified since (YEAR)."</li> <li>• "We have (X NUMBER OF PRODUCTS) produced using RSPO certified MB/SG palm oil."</li> <li>• "In (YEAR), our company sourced (X%) of palm oil derivative volumes that was used across our products manufactured as MB certified."</li> <li>• "Our company covered (X%) of palm oil derivative volumes used across all our products manufactured in (YEAR) with smallholder credits."</li> <li>• "We are RSPO certified. Ask us for our RSPO certified products."</li> </ul>	<p>On the parent company's website, it is explicitly mentioned that they are a member of RSPO and are dedicated to adopting RSPO standards.</p> <p>Not applicable as no off-product claim made by the mill as to date.</p>	Not Applicable
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>	Sedenak Palm Oil Mill is a RSPO certified unit and Johor Plantations Group Berhad (Johor Corporation) is a certified member. Therefore, this indicator is not applicable.	Not Applicable



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	<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>		
<b>Product-specific communications</b>			
<b>5.1 General</b>			
5.1.1	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 such as shipping documents, advertisements, flyers, brochures, posters, displays, newsletters, websites, emails, letters, offerings, invoices, (annual) reports, or media interviews.	Not applicable as no packings required for the mill products as deliveries made in bulk via tanker for CPO and cargo lorry for PK. Delivery documents specified only RSPO module i.e. CPO IP and PK IP.	Not Applicable
5.1.2	Product-specific communications are voluntary.	<p>No Product-specific communications are being made by the UoC.</p> <p>Not applicable as no packings required for the mill products as deliveries made in bulk via tanker for CPO and cargo lorry for PK. Delivery documents specified only RSPO module i.e. CPO IP and PK IP.</p>	Not Applicable
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.	No RSPO Label used.	Not Applicable

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		Not applicable as no packings required for the mill products as deliveries made in bulk via tanker for CPO and cargo lorry for PK. Delivery documents specified only RSPO module i.e. CPO IP and PK IP.	
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>No other trademark or label use to highlight.</p> <p>Not applicable as no packings required for the mill products as deliveries made in bulk via tanker for CPO and cargo lorry for PK. Delivery documents specified only RSPO module i.e. CPO IP and PK IP.</p>	Not Applicable
5.1.5	<p>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</p> <ul style="list-style-type: none"> <li>• RSPO members should be registered on the RSPO IT Platform and complete the information under 'description of products' field.</li> <li>• Both parties shall inform their certification body in writing about the agreement.</li> <li>• 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.</li> </ul>	<p>No on products claims made.</p> <p>Not applicable as no packings required for the mill products as deliveries made in bulk via tanker for CPO and cargo lorry for PK. Delivery documents specified only RSPO module i.e. CPO IP and PK IP.</p>	Not Applicable
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	<p>Only produce CPO and PK, no further modify end products.</p> <p>Not applicable as no packings required for the mill products as deliveries made in bulk via tanker for CPO and cargo lorry for PK. Delivery documents specified only RSPO module i.e. CPO IP and PK IP.</p>	Not Applicable

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	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		
<b>5.2 Off pack claims</b>			
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.	<p>Product specific communications made off pack such as shipping documents. Sighted shipping documents of below transaction:</p> <p>Certified CPO:</p> <ul style="list-style-type: none"> <li>- Buyer: EVYAP Sabun Malaysia Sdn Bhd</li> <li>- Seller: Johor Plantations Group Berhad, Sedenak Palm Oil Mill, KB 721, 80990 Johor Bahru, Johor</li> <li>- Despatch Ticket # C37448; Date: 25/09/2024</li> <li>- RSPO Cert. # RSPO 537873</li> <li>- Product: CSPO MB</li> <li>- Nett weight: 40,150 kg</li> <li>- Vehicle # WGB7374</li> </ul> <p>Certified PK:</p> <ul style="list-style-type: none"> <li>- Buyer: PGEO Edible Oils Sdn. Bhd</li> <li>- Seller: Johor Plantations Group Berhad, Sedenak Palm Oil Mill, KB 721, 80990 Johor Bahru, Johor</li> <li>- Despatch Ticket # K10723; Date: 25/09/2023</li> <li>- RSPO Cert. # RSPO 537873</li> <li>- Product: CSPK MB</li> <li>- Nett weight: 26,050 kg</li> <li>- Vehicle # DBQ3222</li> </ul> <p>There was no logo being used in the shipping documents.</p>	Complied

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5.2.2	<p>When confirming the sale of certified palm oil products, members must adhere to the requirements of the RSPO SCCS. This includes stating the supply chain model and certificate number under which the claim is being made.</p>	<p>Product specific communications made off pack such as shipping documents. Sighted shipping documents of below transaction:</p> <p>Certified CPO:</p> <ul style="list-style-type: none"> <li>- Buyer: EVYAP Sabun Malaysia Sdn Bhd</li> <li>- Seller: Johor Plantations Group Berhad, Sedenak Palm Oil Mill, KB 721, 80990 Johor Bahru, Johor</li> <li>- Despatch Ticket # C37448; Date: 25/09/2024</li> <li>- RSPO Cert. # RSPO 537873</li> <li>- Product: CSPO MB</li> <li>- Nett weight: 40,150 kg</li> <li>- Vehicle # WGB7374</li> </ul> <p>Certified PK:</p> <ul style="list-style-type: none"> <li>- Buyer: PGEO Edible Oils Sdn. Bhd</li> <li>- Seller: Johor Plantations Group Berhad, Sedenak Palm Oil Mill, KB 721, 80990 Johor Bahru, Johor</li> <li>- Despatch Ticket # K10723; Date: 25/09/2023</li> <li>- RSPO Cert. # RSPO 537873</li> <li>- Product: CSPK MB</li> <li>- Nett weight: 26,050 kg</li> <li>- Vehicle # DBQ3222</li> </ul>	Complied
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"> <li>• If the distributor or wholesaler holds only a distributor licence, it may only communicate RSPO certified palm oil products by linking the product</li> </ul>	Not distributor or wholesaler. Therefore, it is not applicable.	Not Applicable

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	<p>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.</p> <ul style="list-style-type: none"> <li>• If the distributor or wholesaler is supply chain certified, they should follow the requirements outlined in section 5.2.2.</li> </ul>		
<b>5.3 On pack claims</b>			
5.3.1	<p>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.</p>	<p>No on-pack claims.</p> <p>Not applicable as no packings required for the mill products as deliveries made in bulk via tanker for CPO and cargo lorry for PK. Delivery documents specified only RSPO module i.e. CPO MB and PK MB.</p>	Not Applicable
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> <ul style="list-style-type: none"> <li>• RSPO IP/SG CERTIFIED*</li> <li>• Contains RSPO IP/SG palm oil*</li> <li>• Contains RSPO certified palm oil (IP/SG)*</li> </ul> <p>*Add RSPO TM Licence Number below or next to the claim.</p>	<p>No on-pack claims.</p> <p>Not applicable as no packings required for the mill products as deliveries made in bulk via tanker for CPO and cargo lorry for PK. Delivery documents specified only RSPO module i.e. CPO MB and PK MB.</p>	Not Applicable
	<p>B) or Mass Balance (MB) Certified Products:</p> <ul style="list-style-type: none"> <li>• RSPO MIXED*</li> <li>• Contributes to the production of RSPO certified palm oil*</li> <li>• Contains RSPO certified palm oil (MB)*</li> </ul>	<p>No on-pack claims.</p>	Not Applicable

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	*Add RSPO TM Licence Number below or next to the claim.	Not applicable as no packings required for the mill products as deliveries made in bulk via tanker for CPO and cargo lorry for PK. Delivery documents specified only RSPO module i.e. CPO MB and PK MB.	
	C) For Partially Certified Products: <ul style="list-style-type: none"> <li>• RSPO 50% MIXED*</li> <li>• Contains at least 50% RSPO certified palm oil*</li> </ul> *Add RSPO TM Licence Number below or next to the claim.	No on-pack claims.  Not applicable as no packings required for the mill products as deliveries made in bulk via tanker for CPO and cargo lorry for PK. Delivery documents specified only RSPO module i.e. CPO MB and PK MB.	Not Applicable
	D) For Products covered with Book and Claim (B&C): <ul style="list-style-type: none"> <li>• RSPO CREDITS*</li> <li>• Supports the production of RSPO certified palm oil*</li> <li>• Contains palm oil covered by the purchase of RSPO Credits*</li> </ul> *Add RSPO TM Licence Number below or next to the claim.	No on-pack claims.  Not applicable as no packings required for the mill products as deliveries made in bulk via tanker for CPO and cargo lorry for PK. Delivery documents specified only RSPO module i.e. CPO MB and PK MB.	Not Applicable
5.3.3	On pack claims shall not include information about the claimant's RSPO membership status.	No on-pack claims.  Not applicable as no packings required for the mill products as deliveries made in bulk via tanker for CPO and cargo lorry for PK. Delivery documents specified only RSPO module i.e. CPO MB and PK MB.	Not Applicable
5.3.4	Members shall not communicate to consumers information about their suppliers' RSPO membership status.	No on-pack claims.  Not applicable as no packings required for the mill products as deliveries made in bulk via tanker for CPO and cargo lorry for PK.	Not Applicable

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		Delivery documents specified only RSPO module i.e. CPO MB and PK MB.	
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.	<p>No on-pack claims.</p> <p>Not applicable as no packings required for the mill products as deliveries made in bulk via tanker for CPO and cargo lorry for PK. Delivery documents specified only RSPO module i.e. CPO MB and PK MB.</p>	Not Applicable
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.	<p>No on-pack claims.</p> <p>Not applicable as no packings required for the mill products as deliveries made in bulk via tanker for CPO and cargo lorry for PK. Delivery documents specified only RSPO module i.e. CPO MB and PK MB.</p>	Not Applicable
<b>MODULE B – MASS BALANCE SPECIFIC RULES</b>			
<b>Mass Balance palm oil content</b>			
	95% of the palm oil content must be RSPO MB-certified.	Oil palm content is 100% CPO and claim as RSPO-MB certified.	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.	Oil palm content is 100% CPO and claim as RSPO-MB certified.	Complied
<b>Messaging</b>			
	Messaging ALLOWED in storytelling in product-specific communications includes:	Sedenak POM is producing crude palm product and does not involve in any labelling of end product.	Complied

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	<ul style="list-style-type: none"> <li>[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.</li> <li>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.</li> </ul>		
<b>Product-Specific Communications Labelling</b>			
	<p>Members are allowed to use the RSPO Label in one of the following ways:</p> <ul style="list-style-type: none"> <li>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.</li> <li>The RSPO Label can also include the statement: "[The palm oil contained in this product] contributes to the production of certified sustainable palm oil".</li> </ul>	No RSPO label and storytelling in product-related communications used as CPO and PK is semi-finished product. No messaging involved since Sedenak POM is producing crude palm product and does not involve in any labelling of end product.	Complied
<b>Principle 4: Respect community and human rights and deliver benefits</b>			
<b>Criterion 4.1:</b> The unit of Certification respects human rights, which includes respecting the rights of Human Rights Defenders.			
4.1.1	<p><b>(C)</b> 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.</p> <p>- Critical (Major) compliance -</p>	Johor Plantations Group Berhad (JPG) has established Sustainability Policy (Document No.: JPG/POL/SID/SD/001; Issue No.: 00; Revision No.: 00; Effective Date: 01/07/2023) signed by Chairman of the company. In section 6.9 of the policy states the company's commitment to respect, support and protect international human rights against violence, threats, and all forms of retaliation and contribute to the effective elimination of all forms of violations of human rights and fundamental freedoms of individual people which include Human Rights Defenders, whistleblowers, complainants, and community spokesperson.	Complied



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		<p>This policy was communicated to all levels of workforce during muster call. Further verification indicates that the policy briefing has been conducted on yearly basis for new and existing workers as evident in the training record and annual training plan at all operating unit visited. For contractor and their workers, Sustainability Policy has been communicated during induction session with the contractor and workers of contractor as evident in the training record. In addition to this, JPG has established Vendor Code of Business Ethics (VCOBE) which under section 5.9 where mentioned the commitment of the contractor to respect and protect the human rights. JPG has imposed the implementation of the VCOBE to all its contractors and vendors by signing the VCOBE document prior to commence the work. Copies of the signed VCOBE were kept by all the operating units visited and made available for verification.</p> <p>While for other stakeholders, communication of the Sustainability Policy was conducted during stakeholder meeting on 18/09/2024 at The Legends Golf and Country Resort, as verified in the minutes of the stakeholder meeting entitled "Mesyuarat dan Sesi Taklimat Bersama Pihak-Pihak Berkepentingan Komplek Sedenak (Northern Region)." This meeting involved stakeholders from Sedenak POM, Sedenak Estate, and Kuala Kabong Estate. This meeting attended by 102 personnel consists of government agencies, internal stakeholder, contractor and supplier, and local communities.</p> <p>Feedback received from stakeholders' consultation conducted during the audit with sampled workers and several external stakeholders found, there is no issue raised related to the human right at each operating unit. During the interview with some of the workers (both local and migrant), they mentioned that they were aware of such policy and commitments by company even though</p>	
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		they are not able to remember it word by word but is reflected in their working environment.	
4.1.2	<p>The unit of certification does not instigate violence or use any form of harassment in their operations.</p> <p>- Minor compliance -</p>	<p>As reflect earlier in indicator 4.1.1, JPG prohibits any form of harassment by established the Sustainability Policy and communicated the policy to the internal and external stakeholder.</p> <p>No evidence found during the audit that the certification unit has instigate violence or use any form of harassment, including the use of mercenaries and paramilitaries in their operations.</p> <p>Based on the interview with the sampled workers, all operating unit is against any form of violence and prohibit such act from taking place in the certification unit. Any occurrence of violence and harassment from any level of employees including management will be reported and will not be tolerated.</p> <p>Furthermore, the sampled workers interviewed confirmed that no occurrence of harassment or violence has occurred that has come to their knowledge. No harsh or insulting words are in used for giving orders to do the operation tasks, have been reported by workers. Most of the workers gave feedback that they are comfortable working at operating unit under Sedenak Complex which consists of Sedenak Estate, Sedenak POM and Kuala Kabong Estate.</p>	Complied
<b>Criterion 4.2:</b> There is a mutually agreed and documented system for dealing with complaints and grievances, which is implemented and accepted by all affected parties			

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4.2.1	<p><b>(C)</b> 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.</p> <p>- Critical (Major) compliance -</p>	<p>Procedure for complaint and grievance is documented in the procedure entitled Grievance (Doc. No.: SQD/SMS/4.1; Date: 01/08/2020). The purpose of this SOP is to set out the procedures for dealing with complaints and grievances that is agreeable to all sides and accepted by all stakeholders. This procedure applies to all affected parties including internal and external parties. Procedural steps outlines in the procedure are as follows:</p> <table><tr><th>Steps in Grievance Procedure</th><th>Employees</th><th>Others (e.g., vendors/suppliers/contractors, etc.)</th></tr><tr><td>Step 1</td><td>Employee refers grievance to this/her immediate executive/supervisor.</td><td>Complainant refers grievances to his/her executive.</td></tr><tr><td>Step 2</td><td>If the matter is not resolved within 10 working days following representations made under STEP 1, the employee shall bring the matter to the attention of this to Department General Manager/Manager/Assistant or Executive in Charge</td><td>If the complainant fails to obtain satisfaction within 7 working days of invoking STEP 1, he/she may refer grievances in writing to his/her Head of Department.</td></tr></table>	Steps in Grievance Procedure	Employees	Others (e.g., vendors/suppliers/contractors, etc.)	Step 1	Employee refers grievance to this/her immediate executive/supervisor.	Complainant refers grievances to his/her executive.	Step 2	If the matter is not resolved within 10 working days following representations made under STEP 1, the employee shall bring the matter to the attention of this to Department General Manager/Manager/Assistant or Executive in Charge	If the complainant fails to obtain satisfaction within 7 working days of invoking STEP 1, he/she may refer grievances in writing to his/her Head of Department.	Complied
Steps in Grievance Procedure	Employees	Others (e.g., vendors/suppliers/contractors, etc.)										
Step 1	Employee refers grievance to this/her immediate executive/supervisor.	Complainant refers grievances to his/her executive.										
Step 2	If the matter is not resolved within 10 working days following representations made under STEP 1, the employee shall bring the matter to the attention of this to Department General Manager/Manager/Assistant or Executive in Charge	If the complainant fails to obtain satisfaction within 7 working days of invoking STEP 1, he/she may refer grievances in writing to his/her Head of Department.										

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		Step 3	If the matter is still not resolved after 7 working days at STEP 2, the employee shall raise the grievance to his Division/Department Director.	If the complainant fails to obtain satisfaction within 5 working days, he/she may refer grievances in writing to his/her Division/Department Director.	
		Step 4	<p>If the matter is still not resolved after 3 working days at STEP 3, the Human Resources &amp; Administration Department will prepare a full report and submit to Managing Director within 6 working days.</p> <p>The Managing Director decision is final unless there are arrangement for independent conciliation or arbitration.</p>	<p>If the complainant fails to obtain satisfaction within 3 working days, he/she may refer grievances in writing to his/her Human Resources &amp; Administration Department.</p> <p>The Human Resources Department will submit full report to Managing Director within 6 working days.</p> <p>The Managing Director decision is final unless there are arrangement for independent conciliation or arbitration.</p>	

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		<p>In addition, section 5.8 of the procedure states that anonymous and complainants will be respected and protected if requested, it will be established, implemented and communicated to all levels of the workforce. Complaint/grievance procedure for workers is refers to the service contract agreement between the Malayan Agricultural Producers Association (MAPA) and the National Union of Plantation Workers (NUPW). In the first step, workers should submit their complaints to the supervisor within 4 days. If there is no settlement within 5 days, an official letter must be submitted to the Manager. If the issue is still unresolved after 7 days, a discussion between the Manager and the employee should take place. If there is still no solution, the matter can be referred to the Department of Industrial Relations or the Department of Manpower.</p> <p>It was observed that for the complaints against the top management of the estate/mill or complaint from internal and external parties, such process shall be covered within the Whistle-Blowing Policy (Document No.: JPG/ABAC/GOV/IAID/007; Issue No.: 00; Revision No.: 00; Effective Date: 28/05/2023). Also observed that the procedure outlines the means for handling the complaints and the means to protect the complainant upon complaining against the certain entity of the management. System for addressing the grievances raised by the workers are through complaint box, grievance/complaint/enquiry register book, worker's representative, whistle-blowing E-form (<a href="https://johorplantations.com/whistleblowing">https://johorplantations.com/whistleblowing</a>) and whistle-blowing email (<a href="mailto:whistleblowing@johorplantations.com">whistleblowing@johorplantations.com</a>). Alternatively, there are other channel to raise the grievance by write a report or telephone or personally meet Head of Integrity Unit.</p> <p>Interview with sampled workers has confirmed that the workers has been communicated with the above procedures.</p>	
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4.2.2	<p>Procedures are in place to ensure that the system is understood by the affected parties, including by illiterate parties.</p> <p>- Minor compliance -</p>	<p>The procedure as mentioned in the indicator 4.2.1 has been briefed and trained to staff and the workers. The same procedure has been briefed to the newly employed workers during induction course. Evidence of the training and briefing conducted are made available for verification during the audit. In addition, the procedure is communicated to workers during muster call or before the start of work.</p> <p>Furthermore, the level of the understanding for the workers on the policy and procedure relating to protection of whistle-blowers and complainant is sufficient whereby the workers are able to properly demonstrate the procedure as verified during interview with sampled workers consists of Malaysian, Indonesian and Bangladeshi workers. For illiterate workers, workers representatives from Indonesia, Bangladesh, and Malaysia will help to explain the procedures. This was confirmed during interviews, where workers stated that their representatives assist them with any issues they face. They mentioned that they were aware of the grievance procedure established by company even though they are not able to remember it word by word, but the management always remind about it during morning muster and other training or meeting.</p> <p>While for stakeholders, communication of the complaint and grievance mechanism was conducted during stakeholder meeting on 18/09/2024 at The Legends Golf and Country Resort, as verified in the minutes of the stakeholder meeting entitled "Mesyuarat dan Sesi Taklimat Bersama Pihak-Pihak Berkepentingan Komplek Sedenak (Northern Region)." This meeting involved stakeholders from Sedenak POM, Sedenak Estate, and Kuala Kabong Estate. This meeting attended by 102 personnel consists of government agencies, internal stakeholder, contractor and supplier, and local communities. It was found that they can demonstrates their</p>	Complied
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		understanding on the complaint mechanism in the procedure as verified during stakeholder consultation.	
4.2.3	<p>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.</p> <p>- Minor compliance -</p>	<p>All progress, timeframe and outcome of complaint and grievance were informed to the complainant as verified in the complaint book and enquiry register book. Record of complaint have been maintained since 2019 for each operating unit visited. Resolution of complaint has been resolved immediately after the complaint received. Acknowledgement from complainant in the complaint book and enquiry register book indicates that the complaint has been satisfactorily resolved. This has been verified during interview session with sampled workers under Sedenak Complex which consists of Sedenak Estate, Sedenak POM and Kuala Kabong Estate. Observed that major complaint is on damage at workers housing.</p>	Complied
4.2.4	<p>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.</p> <p>- Minor compliance -</p>	<p>Reflecting to finding in indicators above, the management unit did recognize rights for the complainants to access independent legal and technical advice. Based on the interview with the workers, there are aware they may independent legal and technical advice from third party mediator such as embassy, labour department and other government agencies. For example, during the interviews, migrant workers mentioned that they also have the option to report their issues to their respective embassies if the problems cannot be resolved by JPG. This also clearly mention in the procedure entitled Grievance (Document No.: SQD/SMS/4.1; Date: 01/08/2020). Section 5.5 of the procedure mentions that consideration will be given to involve independent legal, technical advice and third party's mediator, such as disinterested community group, NGO's or government (or a combination of these) to support complainants and/or act as observer.</p>	Complied

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<b>Criterion 4.3:</b> The unit of Certification contributes to local sustainable development as agreed by local communities.			
4.3.1	<p>Contributions to community development that are based on the results of consultation with local communities are demonstrated.</p> <p>- Minor compliance -</p>	<p>Operating unit under Sedenak Complex has committed to contribute to local development in consultation with the local communities. Verification made during the audit showed that contribution to local communities' development is conducted on a case by case and that this is done following the stakeholder meeting of which the matters of the needs is brought up by the stakeholders. Following to such request, further clarification and details of the request is sought and subject to management approval. For any request that has been approved, the stakeholders are then be informed and that the contribution is executed accordingly.</p> <p>Based on records and stakeholder consultation conducted during the audit, the audit team has verified the contribution to community development made by operating unit visited under Sedenak Complex. For example, as below:</p> <ul style="list-style-type: none"> <li>• Repair work for Tabika KEMAS Ladang Sedenak, as requested by the kindergarten on 17/06/2024 and 20/05/2024.</li> <li>• Grass cutting services at Sekolah Agama Sedenak, as requested in a letter dated 20/06/2024.</li> <li>• Contribution of a wheelchair to the workers, as requested in a letter dated 02/06/2024.</li> <li>• Providing traffic control assistance for the SK Sedenak Merentas Desa event on 21/04/2024.</li> <li>• Monetary contribution to orphans at Sekolah Kebangsaan LKTP Bukit Batu, as requested in a letter dated 18/03/2024.</li> <li>• Monetary contribution for the Majlis Apresiasi Kecemerlangan Murid Tahun 6 Sesi 2023/2024 on 03/02/2024.</li> </ul>	Complied
<b>Criterion 4.4:</b> 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.			



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4.4.1	<p><b>(C)</b> 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>It was found that oil palm activities by the mill and estates do not diminish the land use rights of other users. There is no evidence found through open-source platform (e.g.: website, news, report, etc.) that land conflict was arise.</p> <p>Copies of land titles were available during the audit. Evidence of legal ownership, history of land tenure and the actual legal use of the land has been verified during the audit as follow:</p> <p><u>Sedenak POM</u></p> <p>The mill has been established within the Sedenak Estate under Johor Plantations Group Berhad approximately area 7.71 Ha. Copy of land titles where the mill is located were available as follow:</p> <ul style="list-style-type: none"> <li>• Title No.: 237961</li> <li>• District: Kulaijaya</li> <li>• Mukim: Mukim Sedenak</li> <li>• Lot No.: Lot 136</li> </ul> <p><u>Sedenak Estate</u></p> <p>The estate holds a total of 10 land titles as per samples sighted as following:</p> <ul style="list-style-type: none"> <li>• Land title # 236656; Lot # Lot 1387; District: Kulai; Subdistrict: Mukim Sedenak; Area: 558.0606 ha.</li> <li>• Land title # 237392; Lot # Lot 964; District: Kulai; Subdistrict: Mukim Sedenak; Area: 21.4357 ha.</li> <li>• Land title # 236660; Lot # Lot 1389; District: Kulai; Subdistrict: Mukim Sedenak; Area: 63.8644 ha.</li> </ul>	Complied
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		<ul style="list-style-type: none"> <li>Land title # 238346; Lot # Lot 1000; District: Kulai; Subdistrict: Mukim Bukit Batu; Area: 6.2549 ha.</li> </ul> <p><u>Kuala Kabong Estate</u> The estate holds a land title as below: Land title #No. H.S.(D): 71140; Np. PT # PTD 35021; District: Kulai; Subdistrict: Mukim Bukit Batu; Area: 1,718.2174 ha</p>	
4.4.2	Copies of documents evidencing agreement-making processes and negotiated agreements detailing the FPIC process are available and include:	<p>As reflected earlier in indicator 4.4.1, all operating unit visited has documents indicates the legal ownership and lease land which clearly indicates that the approved usage of the land is for oil palm plantation activities.</p> <p>Further verification during interview with sampled stakeholders confirms that there are no land dispute issues. Therefore, there was no documents evidence of any negotiated agreements detailing FPIC process.</p>	Complied
4.4.2a	<p>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.</p> <p>- Minor compliance -</p>	<p>As reflected earlier in indicator 4.4.1, all operating unit visited has documents indicates the legal ownership and lease land which clearly indicates that the approved usage of the land is for oil palm plantation activities.</p> <p>Further verification during interview with sampled stakeholders confirms that there are no land dispute issues. Therefore, there was no documents evidence of any negotiated agreements detailing FPIC process.</p>	Complied
4.4.2b	<p>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.</p> <p>- Minor compliance -</p>	<p>As reflected earlier in indicator 4.4.1, all operating unit visited has documents indicates the legal ownership and lease land which clearly indicates that the approved usage of the land is for oil palm plantation activities.</p>	Complied

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		Further verification during interview with sampled stakeholders confirms that there are no land dispute issues. Therefore, there was no documents evidence of any negotiated agreements detailing FPIC process.	
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 -	As reflected earlier in indicator 4.4.1, all operating unit visited has documents indicates the legal ownership and lease land which clearly indicates that the approved usage of the land is for oil palm plantation activities.  Further verification during interview with stakeholders which consists of local communities and neighbouring estates confirms that there are no land dispute issues. Therefore, there was no documents evidence of any negotiated agreements detailing FPIC process.	Complied
4.4.3	<b>(C)</b> 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 -	As reflected earlier in indicator 4.4.1, all operating unit visited has documents indicates the legal ownership and lease land which clearly indicates that the approved usage of the land is for oil palm plantation activities.  Further verification during interview with sampled stakeholders confirms that there are no land dispute issues. Therefore, there was no documents evidence of any negotiated agreements detailing FPIC process.	Complied
4.4.4	All relevant information is available in appropriate forms and languages, including assessments of impacts, proposed benefit sharing, and legal arrangements. - Minor compliance -	As reflected earlier in indicator 4.4.1, all operating unit visited has documents indicates the legal ownership and lease land which clearly indicates that the approved usage of the land is for oil palm plantation activities.  Further verification during interview with sampled stakeholders confirms that there are no land dispute issues. Therefore, there was no documents evidence of any negotiated agreements detailing FPIC process.	Complied

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4.4.5	<p><b>(C)</b> 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>	<p>As reflected earlier in indicator 4.4.1, all operating unit visited has documents indicates the legal ownership and lease land which clearly indicates that the approved usage of the land is for oil palm plantation activities.</p> <p>Further verification during interview with sampled stakeholders confirms that there are no land dispute issues. Therefore, there was no documents evidence of any negotiated agreements detailing FPIC process.</p>	Complied
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>	<p>As reflected earlier in indicator 4.4.1, all operating unit visited has documents indicates the legal ownership and lease land which clearly indicates that the approved usage of the land is for oil palm plantation activities.</p> <p>Further verification during interview with sampled stakeholders confirms that there are no land dispute issues. Therefore, there was no documents evidence of any negotiated agreements detailing FPIC process.</p>	Complied
<p><b>Criterion 4.5:</b> 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.</p>			
4.5.1	<p><b>(C)</b> Documents showing identification and assessment of demonstrable legal, customary and user rights are available.</p> <p>- Critical (Major) compliance -</p>	<p>It was found that oil palm activities by the mill and estates do not diminish the land use rights of other users. There is no evidence found through open-source platform (e.g.: website, news, report, etc.) that land conflict was arise.</p> <p>Copies of land titles were available during the audit. Evidence of legal ownership, history of land tenure and the actual legal use of the land has been verified during the audit as follow:</p> <p><u>Sedenak POM</u></p>	Complied

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		<p>The mill has been established within the Sedenak Estate under Johor Plantations Group Berhad approximately area 7.71 Ha. Copy of land titles where the mill is located were available as follow:</p> <ul style="list-style-type: none"> <li>• Title No.: 237961</li> <li>• District: Kulaijaya</li> <li>• Mukim: Mukim Sedenak</li> <li>• Lot No.: Lot 136</li> </ul> <p><u>Sedenak Estate</u></p> <p>The estate holds a total of 10 land titles as per samples sighted as following:</p> <ul style="list-style-type: none"> <li>• Land title # 236656; Lot # Lot 1387; District: Kulai; Subdistrict: Mukim Sedenak; Area: 558.0606 ha.</li> <li>• Land title # 237392; Lot # Lot 964; District: Kulai; Subdistrict: Mukim Sedenak; Area: 21.4357 ha.</li> <li>• Land title # 236660; Lot # Lot 1389; District: Kulai; Subdistrict: Mukim Sedenak; Area: 63.8644 ha.</li> <li>• Land title # 238346; Lot # Lot 1000; District: Kulai; Subdistrict: Mukim Bukit Batu; Area: 6.2549 ha.</li> </ul> <p><u>Kuala Kabong Estate</u></p> <p>The estate holds a land title as below:</p> <p>Land title #No. H.S.(D): 71140; Np. PT # PTD 35021; District: Kulai; Subdistrict: Mukim Bukit Batu; Area: 1,718.2174 ha</p> <p>No new planting and acquisition on the new land is planned and occurred in the operating unit visited. This has been verified through</p>	
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		document review, field visit and interview with sampled stakeholders during the audit.	
4.5.2	<p><b>(C)</b> 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>	No new planting and acquisition on the new land is planned and occurred in the operating unit visited. This has been verified through document review, field visit and interview with sampled stakeholders during the audit.	Complied
4.5.3	<p>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 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.</p> <p>- Minor compliance -</p>	No new planting and acquisition on the new land is planned and occurred in the operating unit visited. This has been verified through document review, field visit and interview with sampled stakeholders during the audit.	Complied
4.5.4	<p>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.</p> <p>- Minor compliance -</p>	No new planting and acquisition on the new land is planned and occurred in the operating unit visited. This has been verified through document review, field visit and interview with sampled stakeholders during the audit.	Complied
4.5.5	<p>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.</p>	No new planting and acquisition on the new land is planned and occurred in the operating unit visited. This has been verified through document review, field visit and interview with sampled stakeholders during the audit.	Complied

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	- Minor compliance -		
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 -	No new planting and acquisition on the new land is planned and occurred in the operating unit visited. This has been verified through document review, field visit and interview with sampled stakeholders during the audit.	Complied
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 -	No new planting and acquisition on the new land is planned and occurred in the operating unit visited. This has been verified through document review, field visit and interview with sampled stakeholders during the audit.	Complied
4.5.8	<b>(C)</b> New lands are not acquired in areas inhabited by communities in voluntary isolation. - Critical (Major) compliance -	No new planting and acquisition on the new land is planned and occurred in the operating unit visited. This has been verified through document review, field visit and interview with sampled stakeholders during the audit.	Complied
<b>Criterion 4.6:</b> Any negotiations Concerning compensation for loss of legal, customary or user rights are dealt with through a documented system that enables indigenous peoples, local communities and other stakeholders to express their views through their own representative institutions.			
4.6.1	<b>(C)</b> A mutually agreed procedure for identifying legal, customary or user rights, and a procedure for identifying people entitled to compensation, is in place. - Critical (Major) compliance -	Johor Plantations Group Berhad (JPG) has established procedure entitled Land Encroachment (Doc. No.: KMB.PMD/MP/05; Issue No.: 0; Rev No.: 4; Date: 09/06/2020). The procedure among others, outlines the following steps in handling properties encroachment cases: <ul style="list-style-type: none"> <li>• Estate land encroachment case</li> <li>• Confirmation of case</li> <li>• Identify potential local communities or their representatives</li> <li>• Management recommendation</li> <li>• Notification and evidence</li> <li>• Surrender</li> </ul>	Complied

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		In addition, the procedure also mentions a proposal for compensation calculation (based on the situation and management approval). A land encroachment flowchart is available in the procedure to simplify the steps for handling land disputes and negotiations. There is no new planting and acquisition on the new land planned or currently in progress, made by operating units visited for the coming future project. This has been verified through document review, field visit and interview with sampled stakeholders during the audit.	
4.6.2	<p><b>(C)</b> 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>Johor Plantations Group Berhad (JPG) has established procedure entitled Land Encroachment (Doc. No.: KMB.PMD/MP/05; Issue No.: 0; Rev No.: 4; Date: 09/06/2020). The procedure among others, outlines the following steps in handling properties encroachment cases:</p> <ul style="list-style-type: none"> <li>• Estate land encroachment case</li> <li>• Confirmation of case</li> <li>• Identify potential local communities or their representatives</li> <li>• Management recommendation</li> <li>• Notification and evidence</li> <li>• Surrender</li> </ul> <p>In addition, the procedure also mentions a proposal for compensation calculation (based on the situation and management approval). A land encroachment flowchart is available in the procedure to simplify the steps for handling land disputes and negotiations. There is no new planting and acquisition on the new land planned or currently in progress, made by operating units visited for the coming future project. This has been verified through document review, field visit and interview with sampled stakeholders during the audit.</p>	Complied



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4.6.3	Evidence is available that equal opportunities are provided to both men and women to hold land titles for scheme small holdings. - Minor compliance -	No new planting and acquisition on the new land is planned and occurred in all operating unit visited. This has been verified through document review, field visit and interview with sampled stakeholders during the audit.	Complied
4.6.4	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. - Minor compliance -	No new planting and acquisition on the new land is planned and occurred in all operating unit visited. This has been verified through document review, field visit and interview with sampled stakeholders during the audit.	Complied
<b>Criterion 4.7:</b> 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.			
4.7.1	<b>(C)</b> A mutually agreed procedure for identifying people entitled to compensation is in place. - Critical (Major) compliance -	Johor Plantations Group Berhad (JPG) has established procedure entitled Land Encroachment (Doc. No.: KMB.PMD/MP/05; Issue No.: 0; Rev No.: 4; Date: 09/06/2020). The procedure among others, outlines the following steps in handling properties encroachment cases: <ul style="list-style-type: none"> <li>• Estate land encroachment case</li> <li>• Confirmation of case</li> <li>• Identify potential local communities or their representatives</li> <li>• Management recommendation</li> <li>• Notification and evidence</li> <li>• Surrender</li> </ul> In addition, the procedure also mentions a proposal for compensation calculation (based on the situation and management approval). A land encroachment flowchart is available in the procedure to simplify the steps for handling land disputes and negotiations. There is no new planting and acquisition on the new land planned or currently in progress, made by operating units visited for the coming future project. This has been verified through	Complied

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		document review, field visit and interview with sampled stakeholders during the audit.	
4.7.2	<p><b>(C)</b> 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>Johor Plantations Group Berhad (JPG) has established procedure entitled Land Encroachment (Doc. No.: KMB.PMD/MP/05; Issue No.: 0; Rev No.: 4; Date: 09/06/2020). The procedure among others, outlines the following steps in handling properties encroachment cases:</p> <ul style="list-style-type: none"> <li>• Estate land encroachment case</li> <li>• Confirmation of case</li> <li>• Identify potential local communities or their representatives</li> <li>• Management recommendation</li> <li>• Notification and evidence</li> <li>• Surrender</li> </ul> <p>In addition, the procedure also mentions a proposal for compensation calculation (based on the situation and management approval). A land encroachment flowchart is available in the procedure to simplify the steps for handling land disputes and negotiations. There is no new planting and acquisition on the new land planned or currently in progress, made by operating units visited for the coming future project. This has been verified through document review, field visit and interview with sampled stakeholders during the audit.</p>	Complied
4.7.3	<p>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.</p> <p>- Minor compliance -</p>	<p>There is no customary right land for all operating unit visited. All operating units has documents indicates the legal ownership and lease land which clearly indicates that the approved usage of the land is for oil palm plantation activities.</p> <p>Further verification during interview with sampled stakeholders during the audit confirms that there are no land dispute issues. It</p>	Complied

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		also has been verified on documentation review by review the complaint and enquiry register book.	
<b>Criterion 4.8:</b> The right to use the land is demonstrated and is not legitimately contested by local people who can demonstrate that they have legal, customary, or user rights.			
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 -	There is no customary right land for all operating unit visited. Further verification during interview with sampled of the relevant stakeholders confirms that there are no land dispute issues. Boundary stone and trenches were available to demarcate boundary of land.	Complied
4.8.2	<b>(C)</b> 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 -	There is no customary right land for all operating unit visited. Further verification during interview with sampled of the relevant stakeholders confirms that there are no land dispute issues. Boundary stone and trenches were available to demarcate boundary of land.	Complied
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 -	There is no customary right land for all operating unit visited. Further verification during interview with sampled of the relevant stakeholders confirms that there are no land dispute issues. Boundary stone and trenches were available to demarcate boundary of land.	Complied
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 -	There is no customary right land for all operating unit visited. Further verification during interview with sampled of the relevant stakeholders confirms that there are no land dispute issues. Boundary stone and trenches were available to demarcate boundary of land.	Complied

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<b>Principle 5: Support smallholder inclusion</b>			
<b>Criterion 5.1:</b> 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 -	The mill provides both current and past FFB prices in accordance with MPOB guidelines. Prices for FFB from January to September'24 have been posted at the weighbridge area, following MPOB's established rates. Additionally, the MPOB grading guidelines are also prominently displayed at the weighbridge area.	Complied
5.1.2	<b>(C)</b> 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 -	There is evidence that the FFB pricing has been communicated to all FFB supplier on 19/12/2023 with attendance of all FFB supplier that has been done at Legend Golf and country Resort, Sedenak. By Haji Kamaroulzaman bin Thinh.	Complied
5.1.3	<b>(C)</b> 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 -	FFB pricing is determined by the latest MPOB rates and is made publicly available at the weighbridge. There are no binding contracts between the mill and suppliers, allowing suppliers the freedom to deliver their crop to other mills or collection centres.	Complied
5.1.4	<b>(C)</b> 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 -	There are no binding contracts between the mill and FFB suppliers at Sedenak POM that involve financing, loans/credit, or repayment through FFB price deductions for replanting or other mechanisms. As a result, this indicator is not applicable.	Not Applicable
5.1.5	Contracts are fair, legal and transparent and have an agreed timeframe. - Minor compliance -	Contract agreement sighted in the document "Letter of offer to purchase fresh fruit bunch" which has been signed by all FFB supplier. In the agreement has clearly stated the pricing, manner of payment, penalty on poor quality FFB, weigh deduction and termination of contract.	Complied

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		<p>As per interview with sample FFB supplier, there is evidence that the contract has been agreed, explained and transparent.</p> <p>Sample has been taken for as per below;</p> <ol style="list-style-type: none"> <li>1. Sudiana Enterprise dated 19/12/2023 reference 26/SDKM/OCP 2024 for period 01/01/2024 until 31/12/2024.</li> <li>2. Koperasi Penanam Sawit Mampan Daerah Pontian dated 19/12/2023 reference 21/SDKM/OCP 2024 for period 01/01/2024 until 31/12/2024.</li> <li>3. Nirwana Ceria Sdn Bhd dated 19/12/2023 reference 24/SDKM/OCP 2024 for period 01/01/2024 until 31/12/2024.</li> </ol>	
5.1.6	<p><b>(C)</b> Agreed payments are made in a timely manner and receipts specifying price, weight, deductions and amount paid are given.</p> <p>- Critical (Major) compliance -</p>	<p>There are no changes compare to last year where both refer to the agreement, under Clause 3, "Monthly payments shall be made in three (3) instalments. The first instalment payment being made on or before 15th of the month in payment of FFB delivered in the first 10 days of the same month at a price per ton based on 80% of the previous month's price calculated in accordance with the agreement. Records of payment vouchers, payment memo and transaction record.</p>	Complied
5.1.7	<p>Weighbridges used for determining payment to smallholders are verified by an independent third party on a regular basis (this can be government).</p> <p>- Minor compliance -</p>	<p>Calibration of weighbridge has been done annual basis and in line with the local regulations under Peraturan-peraturan timbang dan sukat, 1981. Latest calibration has been done on 14/08/2024 through Metrology Corporation Malaysia Sdn Bhd certificate number B2186419 and B2186418 and based on results, the weighbridge are fit for usage.</p>	Complied
5.1.8	<p>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</p>	<p>No independent smallholder at Sedenak Certification Unit. Thus, this indicator was not applicable.</p>	Not Applicable

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	system (ICS), who holds the certificates, and who holds and sells the certified material. - Minor compliance -		
5.1.9	<b>(C)</b> The unit of certification has a grievance mechanism for smallholders and all grievances raised are dealt with in a timely manner. - Critical (Major) compliance -	Grievance procedure has been documented in the Sustainable Management System; document number; JPG/PRO/SID/SD/SMS effective date 14/11/2023 clause 6.16; Grievance which is applicable to internal and external parties.	Complied
<b>Criterion 5.2:</b> 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 supply base, to assess their needs for support to improve their livelihoods and their interest in RSPO certification. - Minor compliance -	The mill does not receive any crop from smallholders. Thus, this indicator is not applicable.	Not Applicable
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 -	The mill does not receive any crop from smallholders. Thus, 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 -	The mill does not receive any crop from smallholders. Thus, this indicator is not applicable.	Not Applicable
5.2.4	<b>(C)</b> Evidence exists that the unit of certification trains Scheme Smallholders on pesticide handling. - Critical (Major) compliance -	The mill does not receive any crop from smallholders. Thus, this indicator is not applicable.	Not Applicable

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5.2.5	The unit of certification regularly reviews and publicly reports on the progress of the Smallholder support programme. - Minor compliance -	The mill does not receive any crop from smallholders. Thus, this indicator is not applicable.	Not Applicable
<b>Principle 6: Respect workers' rights and conditions</b>			
<b>Criterion 6.1:</b> Any form of discrimination is prohibited.			
6.1.1	<b>(C)</b> A publicly available non-discrimination and equal opportunity policy is implemented in such a way to prevent discrimination based on ethnic origin, caste, national origin, religion, disability, gender, sexual orientation, gender identity, union membership, political affiliation or age. - Critical (Major) compliance -	<p>The policies that have been developed by Johor Plantations Group Berhad (JPG) to deal with equal opportunity and non-discrimination are as follows:</p> <ol style="list-style-type: none"> <li>1. Sustainability Policy (Document No.: JPG/POL/SID/SD/001; Issue No.: 00; Revision No.: 00; Effective Date: 01/07/2023). Under section 6.10 of the policy states that the company commitment to do not engage in discrimination of race, ethnic origin, caste, national origin, religion, disability, gender, sexual orientation, gender identity, union membership, political affiliation or age.</li> <li>2. Core Labour Standards Policy (Document No.: JPG/POL/SID/SD/003; Issue No.: 00; Revision No.: 00; Effective Date: 01/07/2023). Under section 6.2.2 of the policy mentions that JPG will not engage in nor support discrimination in any form. JPG does not support and will not engage in the use of corporate punishment, mental or physical coercion, and verbal abuse.</li> <li>3. People Policy (Document No.: JPB/POL/HCD/GA/03; Issue No.: 00; Revision No.: 00; Effective Date: 01/07/2023). The purpose of the policy is to treat all employees with respect, dignity, and fairness.</li> </ol> <p>The above documents could be downloaded from <a href="https://johorplantations.com/corporate-governance/">https://johorplantations.com/corporate-governance/</a>.</p>	Complied

		<p>It was found that the above policies are communicated to all level of workforce via series of training or briefing, besides policy are displayed at appropriate places, at sampled visited operating unit under Sedenak Complex. While for relevant stakeholders, communication of the policy was conducted during stakeholder meeting on 18/09/2024 and attended by several stakeholders consists of neighbouring, contractors, government bodies and local communities. The meeting was conducted combining all stakeholders in Sedenak Estate, Sedenak POM and Kuala Kabong Estate. The interviewees, including managerial level, workers, contractors and their workers, local community have given feedback they understood that the gist of the policies. Based on records of employment and interviews conducted on-site with sampled internal and external stakeholders, it has been confirmed that workers and groups, including local communities, women, and migrant workers, have not been subjected to discrimination.</p>	
6.1.2	<p><b>(C)</b> 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.</p> <p>- Critical (Major) compliance -</p>	<p>Evidence is available that there has been no form of discrimination against any employee, or group of employees. Review of payslips and employment contracts confirm that all workers irrespective of nationalities, gender, religion, etc., are accorded the same terms of employment, pay, benefits and living standards. Operating units provides all the related mandated applicable social benefits to all its local and foreign workers, for example Employee Provident Fund (EPF), Social Security Organization (SOCSO), Employment Insurance System (EIS), Annual Leave, Public Holidays &amp; Statutory Holidays, Medical Leave and Maternity Leave.</p> <p>Based on interview with the sampled workers from different gender and nationalities at estate and mill under Sedenak Complex, it was confirmed that there was no discrimination reported. The management has treated all employees equally for example in term of providing accommodation, medical treatment, job opportunity,</p>	Complied



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		<p>wages rate, etc. The promotions were based on employees' capabilities and discipline at work. For example, a migrant worker was appointed as a mandore, a position typically held by local workers. In addition, there was one Indonesian worker at POM who worked as an electrician, a position that is typically dominated by local workers. Moreover, there is a Bangladeshi workers work as spraying mandore and the workers under his supervision are from Indonesian. This demonstrates an equal opportunity environment for workers without discrimination, while typically, Indonesian supervisors are only for Indonesian workers. Other example is one Indonesian worker mentioned in an interview that he now works in the office, having previously been a general worker in the field, where office tasks are usually assigned to female workers.</p> <p>There was also no charging of recruitment fees incurred for foreign workers. The company's bear all the recruitment fees which includes food, accommodation, transportation and repatriation.</p>	
6.1.3	<p>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.</p> <p>- Minor compliance -</p>	<p>Johor Plantations Group Berhad (JPG) has developed procedure entitled Recruitment of Local Workers for Operating Units (Document No.: JPG/PRO/SID/SD/SMS; Issue No.: 00; Revision No.: 00; Effective Date: 14/11/2023) and Ethical Recruitment Migrant Workers (Document No.: JPB/PRO/OPERATIONS/PLANTATION/01; Issue No.: 00; Revision No.: 00; Effective Date: 05/07/2023) to provide a guideline on recruitment selection and promotion process to ensure all employees are given fair and equal opportunity based on the set requirements such as work performance and suitability of the position. In the procedure stated any promotion for further career development of the workers is subject on vacancy of the position and job performance of the candidates, Direct promotion for workers will be to Mandore whilst for estates/mills staff category,</p>	Complied

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		<p>the HQ promotion procedure will be in force. In sight of the flowchart on recruitment for workers level, for example:</p> <p>4. Appendix A – Recruitment of Foreign Workers Process Flow</p> <p>5. Flowchart Recruitment Local</p> <p>Through interviews with sampled workers who were promoted to their current positions confirmed that the promotion was based on their performance and skill. Some of the interviewed workers started as general workers who were promoted to Mandores. Some other workers initially worked as general workers and, after a few years of good performance, advanced to P&amp;D sprayers.</p> <p>During the interview with the female workers, they mentioned that there is room for them to move around but within the job scope that suitable with their performance and skill. For example, at Sedenak Estate, a female worker initially cared for babies and toddlers at the crèche, and she is now working as a general worker (linesweeper) in the office. Most of the female workers are employed as office helpers for administrative tasks.</p>	
6.1.4	<p>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.</p> <p>- Minor compliance -</p>	<p>Based on interview with sampled female workers at the mill and the estates confirmed that the management has never impose any pregnancy test during their tenure in the operating unit. No requirement for pregnancy test to be conducted in each operating unit under Sedenak Complex. The test is only carried out by themselves if they suspected to be pregnant. The female workers are aware that they need to inform their superior once they are confirmed pregnant to ensure that they will be assessed to whether they are fit to carry out their current tasks. According to the female workers, they are responsible for their own family planning.</p> <p>Most of the female workers at Sedenak POM are not involved in mill operating works, mostly as administration workers in the office and gardeners. For Sedenak Estate and Kuala Kabong Estate, some of</p>	Complied

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		female workers are given tasks such as general workers at nursery and lighter work such as linesweeper at the line site, administration at the office and gardener. Once they inform the management that they are pregnant, they will be provided with alternative equivalent employment until the baby reached two years old. If there are any cases of delaying on menstrual, the female workers will conduct test in nearest government health clinic.	
6.1.5	<p><b>(C)</b> A gender committee is in place specifically to raise awareness, identify and address issues of concern, as well as opportunities and improvements for women.</p> <p>- Critical (Major) compliance -</p>	<p>At the Sedenak POM and its supply bases, there is a Women OnWards (WOW) committee, a women employee outreach program endorsed and funded by the company. Its members include female employees and the wives of workers, executives, and staff. WOW promotes gender equality and empowers women through knowledge and skill development.</p> <p>In 2024, committee meetings were held to discuss various topics, including reproductive rights, sexual harassment, and domestic violence. Referring to the minutes meeting, gender committee meetings took place at Sedenak Estate on 13/09/2024, Sedenak POM on 17/09/2024, and Kuala Kabong Estate on 08/08/2024.</p> <p>According to the minutes reviewed, committee members were briefed on sexual harassment, domestic violence, complaint procedures, reproductive rights, new census information for new mothers, and company policies, as well as activities planned throughout the year.</p> <p>So far, there have been no issues raised by female workers, as confirmed by feedback forms and meeting minutes regarding discrimination, unfair treatment, and opportunity disparity. Interviews with Gender Committee representatives at each visited operating unit confirmed that there have been no reported cases of sexual harassment or violence.</p>	Complied

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6.1.6	<p>There is evidence of equal pay for the same work scope.</p> <p>- Minor compliance -</p>	<p>The wage structure in the Sedenak POM and its supply bases follows the Malayan Agricultural Procedures Association (MAPA) rates which also follow the Minimum Wages Order 2022. Each of the job has their own work scope which also included in the contract agreement of the workers. The salary structure is comprised of the total daily rates (based on performance), overtime, and other benefits.</p> <p>For the harvester, the wage structure is based on the MAPA/NUPW rates of pay for harvesting and other criteria which include the height of the oil palm trees. The workers were paid accordingly.</p> <p>Based on the sampled payslips for workers (as per indicator 6.2.3), which consists of both genders, it was noted that workers were paid equally for the same job scope. They were paid according to the Minimum Wage Order 2022 and MAPA/NUPW collective agreements without any form of discrimination. This was also evident through interview with a group of workers sampled. Sample of workers for each visited operating units listed as per below worker’s ID:</p> <p><u>Sedenak Estate</u></p> <table><tr><td>E37000XX27</td><td>E37000XX11</td></tr><tr><td>E37000XX54</td><td>E37000XX15</td></tr><tr><td>E37000XX76</td><td>E37000XX16</td></tr><tr><td>E37000XX79</td><td>E37000XX59</td></tr><tr><td>E37000XX07</td><td>E37000XX37</td></tr><tr><td>E37000XX69</td><td>E37000XX21</td></tr><tr><td>E37000XX15</td><td>E37000XX62</td></tr><tr><td>E37000XX75</td><td>E37000XX80</td></tr></table>	E37000XX27	E37000XX11	E37000XX54	E37000XX15	E37000XX76	E37000XX16	E37000XX79	E37000XX59	E37000XX07	E37000XX37	E37000XX69	E37000XX21	E37000XX15	E37000XX62	E37000XX75	E37000XX80	Complied
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<b>Criterion 6.2:</b> 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	<p><b>(C)</b> 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.</p> <p>- Critical (Major) compliance -</p>	<p>Johor Plantations Group Berhad (JPG) has signed the Collective Agreement (For field/ oil palm harvesters/oil mill and other general employees) with NUPW [MAPA circular No. 12/2019, dated 02/04/2019] and the collective agreement is valid for three (3) years or until superseded by new Collective Agreement or an Award of the Industrial Court. Employment contract was established based on the collective agreement and available in all languages of which</p>	Complied

		the workers are from. Samples of employment contracts were reviewed and found that the agreements were signed by the employees. Applicable labour laws related to duration, hours of work, overtime, annual/medical leave, public holiday, mutual termination, salary deductions, maternity entitlement, etc. are stipulated in the employment contracts. Any new foreign workers will be inducted for the terms and conditions of employment contract and briefed on the company's policies, upon arrival to the operating units. The implementation of this practice was evident through interview with the sampled workers. Sampled employment contracts for Malaysian and Indonesian workers which have been prepared in Bahasa Malaysia. For Bangladeshi workers, the contracts were in the workers' language, i.e. Bengali. Interviews conducted with the sampled workers confirmed their understanding of salient points in their employment contracts.	
6.2.2	<p><b>(C)</b> 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 Employment Act, and the MAPA/NUPW agreement.</p> <p>Payroll documents, namely the payslip, also give accurate information on compensation for all work done. This includes those who receive daily-rated wages, piece rated wages, payment for any overtime work done, and public holiday pay. Also confirmed via sampled payslips that wages and overtime pay were paid in compliance with national legal requirements such as Minimum Wages Order 2020, Employment Act, SOCSO Act 1969, EPF Act 1991, EIS Act 2017.</p>	Complied

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6.2.3	<p><b>(C)</b> 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>Johor Plantations Group Berhad (JPG) between National Union of Plantation Workers (NUPW) has established 'MAPA/NUPW Palm Oil Mill Employees' Agreement' that describes the term and condition of workers employment. Sighted the agreement is available in English and valid for three (3) years or until superseded by new Collective Agreement or an Award of the Industrial Court.</p> <p>Each visited operating unit under Sedenak POM, and its supply bases has established a contract agreement and offer letter for foreign and local workers, respectively. The contract agreement is available in Bahasa Malaysia, Indonesia and Bengali depends on which country they are from. The contract agreement found signed by both parties (management and workers). Document review found, the employment contract has included a terms and condition of employment as example below:</p> <ul style="list-style-type: none"> <li>• Salary rate</li> <li>• Position</li> <li>• Salary payment terms</li> <li>• Salary payment system</li> <li>• Working hours</li> <li>• Overtime and overtime pay rates</li> <li>• Notice termination service by both parties</li> <li>• Paid sick leave, vacation leave pay, rest day and paid hospitalization leave</li> <li>• Maternity leave</li> <li>• Paternity leave</li> <li>• Other benefits</li> </ul>	Complied
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- Trade union

According to the interviewed with sampled workers, their working days are from Sunday to Friday, with Saturday is the rest day. Each visited operating unit provides a 98-day maternity leaves to the female workers regardless of the worker's race, religious and political attraction. While annual and medical leaves are offered based on the worker's service period. The unused annual leaves are paid during the December salary. The calculation of the paid annual leaves is based on their monthly salary which fluctuate depending on their performance and the rate is calculated as Ordinary Rate Pay as specified in the Employment Act.

Samples payslip for workers from various operations such as mill operators, harvester, field workers and general workers were verified. Overtime was found to be appropriate, and deduction was fairly made as per the agreement and approval from the Labour Department. Sample of workers for each operating units listed as per below worker's ID:

Sedenak Estate

E37000XX27	E37000XX11
E37000XX54	E37000XX15
E37000XX76	E37000XX16
E37000XX79	E37000XX59
E37000XX07	E37000XX37
E37000XX69	E37000XX21
E37000XX15	E37000XX62
E37000XX75	E37000XX80



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6.2.4	<p><b>(C)</b> 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 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>The management provides adequate living quarters with basic amenities to ensure the workers are comfortable doing their daily routine. Workers are accommodated at the housing complex quarters of the operating units without any charges.</p> <p>Based on visits made to Sedenak POM, Sedenak Estate and Kuala Kabong Estate housing areas, adequate housing, sanitation facilities, water supplies, medical and welfare amenities are being provided to all employees and their family members residing within</p>	Non-compliance

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		<p>the premises. Houses have 3 bedrooms with between 2 to 4 occupants per house.</p> <p>Linesite inspection was carried out Estate Hospital Assistant (EHA) on weekly basis in Sedenak Estate, Kuala Kabong Estate and Sedenak POM by using the Linesite Inspection Checklist Form. Reviewed the records of inspection from August to September 2024. The inspection will be verified by Assistant Manager and Senior Manager. Sighted the form were categorized into:</p> <ul style="list-style-type: none"><li>• Surrounding cleanliness</li><li>• Drainage system</li><li>• Grass/domestic waste</li><li>• Condition of toilet</li><li>• Environment including no open burning practice</li><li>• Safety including illegal wiring, illegal housing extension.</li></ul> <p>At Kuala Kabong Estate Water and electricity were supplied by government and subsidized by the management to the workers. Free electricity supply is limited to the maximum amount of free electricity borne by the employer of 50kWh for each house per month. While for free water supplied is limited to the maximum amount of free water supply borne by employer of 35 gallons/160 liters for each employee and dependants per day. For Sedenak Estate and POM, water and electricity provided at zero cost as the electricity and water supplied by the POM from water treatment plant. Clinic was available in the estates and the workers were provided with free medical facilities.</p> <p>During a site visit at linesite area, it was observed that the condition of the surrounding worker quarters area is unsatisfactory. Section</p>	
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		<p>23 (1) of Employees' Minimum Standards of Housing, Accommodations and Amenities Act 1990 (Act 446) stated:</p> <p>It shall be the duty of the employer of a place of employment where employees and their dependants are provided with housing accommodation to ensure that—</p> <p>(a) the area surrounding the employees' housing is kept clear of undergrowth and maintained in a clean and sanitary condition;</p> <p>(b) the perimeter drains around each dwelling or block of dwellings including all outlet drains are kept in a good state of repair and clear of refuse or undergrowth to permit free flow of water;</p> <p>(c) all refuse in the housing site is collected daily and disposed of satisfactorily; and</p> <p>(d) all communal latrines and bathrooms are kept in a clean, sanitary and working condition.</p> <p>However, during a site visit to the mill linesite area, it was observed that there were damaged drains and undergrowth behind houses No. M113 and M114. Further verification of the linesite inspection record, under the criteria 'kebersihan luar rumah, kawasan sekeliling, and longkang,' conducted on 12/09/2024, showed good remarks, which do not reflect the actual conditions observed onsite. Hence, a Major non-conformity is raised against this indicator.</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>There was no issue on accessibility to adequate and sufficient food supplies as sundry shops were available in housing complex at Kuala Kabong Estates. In Sedenak Estate and Sedenak POM, the estate and mill are located nearby to the town which easily accessible by the workers. The sundry shop at Kuala Kabong Estate supplies basic food and cooking utensils at reasonable prices. Shop owners are required to submit a price list of items sold to the estate management regularly for price monitoring. Workers are also free to go to nearby towns for more grocery options. No complaints have</p>	Complied

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		been received regarding the prices of supplies. Based on interviews with sampled workers, the basic supplies are considered affordable.													
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><b>PROCEDURAL NOTE:</b></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>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</i></p>	<p>Document review of sampled worker's payslips, sighted with evidence that daily rated workers receive at least minimum wages is RM57.69 per day. For piece-rated workers paid according to capability of the workers to achieve daily target. The piece-rated workers received their wages from RM1,500.00 and above per each month.</p> <p>Sedenak POM and its supply base have also carried out the calculation of prevailing wages and in-kind benefits. The calculation took into account housing, electricity, water, education, clothing, food and healthcare. Sample breakdown of the prevailing wage calculation is therefore as follows:</p> <table border="1"> <thead> <tr> <th>Estate</th><th>Total cost of in-kind benefits</th><th>Average monthly take home salary per worker</th><th>Prevailing wages</th></tr> </thead> <tbody> <tr> <td>Kuala Kabong Estate</td><td>768.98</td><td>2,196.27</td><td>2,965.27</td></tr> <tr> <td>Sedenak Estate</td><td>508.83</td><td>1,755.56</td><td>2,264.39</td></tr> </tbody> </table> <p>Based on the breakdown given, the calculation of prevailing wages including in-kind benefits is reasonable.</p>	Estate	Total cost of in-kind benefits	Average monthly take home salary per worker	Prevailing wages	Kuala Kabong Estate	768.98	2,196.27	2,965.27	Sedenak Estate	508.83	1,755.56	2,264.39	Complied
Estate	Total cost of in-kind benefits	Average monthly take home salary per worker	Prevailing wages												
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	<p>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).</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"> <li>• Updated assessment on prevailing wages and in-kind benefits</li> <li>• There is annual progress on the implementation of living wages</li> <li>• 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</li> <li>• 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.</li> </ul> <p>- Minor compliance -</p>		
6.2.7	<p>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</p> <p>- Minor compliance -</p>	<p>All the core works are performed by permanent and full-time employees in Sedenak Complex. There were contractors' workers employed for harvesting and transporting FFB in the estates permanently. There were no casual or temporary workers used in the company as evidenced by documents sighted (employment contract and list of workers) and interviews conducted with workers and management.</p>	Complied
<p><b>Criterion 6.3:</b> 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.</p>			
6.3.1	<p><b>(C)</b> 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>	<p>Policy to respect the rights of all employees has been embedded in Johor Plantations Group Berhad (JPG) established policy of Core Labour Standard (Document No.: JPG/POL/SID/SD/003; Issue No.: 00; Revision No.: 00; Effective Date: 01/07/2023) which was signed by Chairman of the company, dated 01/07/2023. In section 6.2.2 of the policy states that JPG recognizes the rights of employees to form</p>	Complied

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		<p>and/or join trade unions of their choice which are given due to recognition by JPG.</p> <p>Employees were given freedom to associate and bargain collectively with company and to organize among themselves through association meetings as per sample latest minutes of meeting between Management and NUPW representatives. The policy has been communicated to the workers through musters call as verified during the interview session with sampled workers during the audit.</p>									
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>	<p>Based on documentation review, each visited operating unit has conducted a meeting between NUPW representatives at operating units and management as follows:</p> <table><tr><th>Estate/Mill</th><th>Latest Union Meeting</th></tr><tr><td>Sedenak Estate</td><td>06/09/2024</td></tr><tr><td>Sedenak POM</td><td>18/09/2024</td></tr><tr><td>Kuala Kabong Estate</td><td>10/07/2024</td></tr></table> <p>Reflecting to the above, all minutes of meetings were prepared and documented in Bahasa Malaysia. Management plan was developed for the issues raised by the NUPW representatives and action has been taken accordingly. Interviewed with the NUPW representatives confirmed that the issues raised during the meeting were resolved. Sampled workers interview also informed that union representatives are freely elected where there is no interference from management, and they are also involved in voting to appoint representatives.</p>	Estate/Mill	Latest Union Meeting	Sedenak Estate	06/09/2024	Sedenak POM	18/09/2024	Kuala Kabong Estate	10/07/2024	Complied
Estate/Mill	Latest Union Meeting										
Sedenak Estate	06/09/2024										
Sedenak POM	18/09/2024										
Kuala Kabong Estate	10/07/2024										
6.3.3	<p>Management does not interfere with the formation or operation of registered unions/ labour organisations or associations, or other freely</p>	<p>The management through National Union of Plantation Workers (NUPW) (Peninsular Malaysia) has appointed workers</p>	Complied								

	<p>elected representatives for all workers including migrant and contract workers.</p> <p>- Minor compliance -</p>	<p>representatives from various group of workers regardless of their nationality, religion, race, political view, or gender.</p> <p>The worker's representatives were selected through the election by the workers, witness by NUPW state representatives. The workers will nominate their representatives before the election take place. After the election and the workers have selected their representatives, NUPW will issue an appointment letter to the selected representative and a copy of the appointment letter will be submitted to the management for information purposes.</p> <p>It was further confirmed during interview with the NUPW representatives and the workers that the election of the representatives were freely done by the workers without any influence or interference from the management.</p>	
<b>Criterion 6.4:</b> 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>	<p>Policy to protect children and young person has been embedded in Johor Plantations Group Berhad (JPG) established policy of Core Labour Standard (Document No.: JPG/POL/SID/SD/003; Issue No.: 00; Revision No.: 00; Effective Date: 01/07/2023) which was signed by Chairman of the company. In section 6.1.1 of the policy states that JPG shall not knowingly engage in or support the use of child labour as defined by Malaysia law and will provide adequate support to enable children of its employee to attend and remain in school until no longer a child. Children and/or young person shall not be exposed to situations in or outside of the workplace that are hazardous, unsafe or unhealthy.</p> <p>All contractors were required to read and sign the Vendor Code of Business Ethics (VCOBE) before signing the contract agreement, where they were obligated to comply with labor and human rights. Evidence of signed VCOBE documents by the contractors was made available for verification during the audit. The contractors were also</p>	Complied

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		briefed on the prohibition of child labor during a stakeholder meeting conducted on 18/09/2024, at The Legends Golf and Country Resort, as documented in the minutes of the meeting entitled "Mesyuarat dan Sesi Taklimat Bersama Pihak-Pihak Berkepentingan Komplek Sedenak (Northern Region)." This meeting included stakeholders from Sedenak POM, Sedenak Estate, and Kuala Kabong Estate. This also has been further confirmed with the sampled stakeholders through stakeholder consultation during the audit.	
6.4.2	<p><b>(C)</b> 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>	<p>As stated in procedure entitled Recruitment of Local Workers for Operating Units (Document No.: JPG/PRO/SID/SD/SMS; Issue No.: 00; Revision No.: 00; Effective Date: 14/11/2023) and Ethical Recruitment Migrant Workers (Document No.: JPB/PRO/OPERATIONS/PLANTATION/01; Issue No.: 00; Revision No.: 00; Effective Date: 05/07/2023), the company will not employ anyone under the age of 18 years. The minimum age requirement outlined in the procedure is 18 years old. Age screening is based on identification documents and/ or passport and from the stated date of birth. The local employees were required to submit a photocopy of identification card during application of job to the management for verification purpose.</p> <p>From the list of employees which has the date of birth and date of join the estate, it can be confirmed that there are no children working in each operating unit. Further confirmation was made through site visit at the workplace area and interviews with the workers onsite.</p>	Complied
6.4.3	<p><b>(C)</b> Young persons may be employed only for non- hazardous work, with protective restrictions in place for that work.</p> <p>- Critical (Major) compliance -</p>	<p>From the list of employees which has the date of birth and date of join the estate, it can be confirmed that there are no children nor young workers working in each operating unit, including the contractors' workers. Further confirmation was made through site</p>	Complied



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		visit at the workplace area and interviews with the workers onsite. Identity documentation such as passports and identity cards were verified.	
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>	<p>Johor Plantations Group Berhad (JPG) has established Core Labour Standard Policy Core Labour Standard (Document No.: JPG/POL/SID/SD/003; Issue No.: 00; Revision No.: 00; Effective Date: 01/07/2023) stating that the company does not engage in or support the use of child labor and will provide adequate support to enable the children of its employees to attend and remain in school until they are no longer considered children. This policy is displayed on the main notice boards.</p> <p>This policy was also communicated during a stakeholder meeting conducted on 18/09/2024, at The Legends Golf and Country Resort, as documented in the minutes of the meeting entitled "Mesyuarat dan Sesi Taklimat Bersama Pihak-Pihak Berkepentingan Komplek Sedenak (Northern Region)."</p> <p>Contractors are also required to sign Vendor Code of Business Ethics (VCOBE) which contain a provision stating that the contractor shall prohibit any form of child labour, forced or trafficked labour. Interviews held with sampled of contractors and FFB suppliers also confirmed their understanding of this obligation.</p>	Complied
<b>Criterion 6.5:</b> There is no harassment or abuse in the workplace, and reproductive rights are protected.			
6.5.1	<p><b>(C)</b> 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>	<p>Johor Plantations Group Berhad (JPG) has developed Sexual Harassment Policy (Document No.: JPB/POL/HCD/OHR/05; Issue No.: 00; Revision No.: 00; Effective Date: 01/07/2023) which was signed by Chairman of the company where stated the policy and commitment of the company to prevent all forms of sexual harassment and violence at the workplace. Furthermore, the policy aims to protect employees in the organization from unwanted sexual harassment and give them guidance and direction on the</p>	Complied

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		<p>channel, process and procedures for managing sexual harassment and violence complaint. JPG reserves the right to take necessary legal actions against visitors, clients, customer and contractors if the need arises.</p> <p>Based on the interview with the workers (male and female), no issues on sexual harassment have been lodged or happened. They were also aware of the channels that they can use to lodge their concern. This has also been reminded during muster call once in a while. Furthermore, the female workers are aware of the procedure if such incident occurs whereby, they can reports using the Grievance channel such as Panel Aduan Wanita and whistleblowing, or direct report to the management.</p>	
6.5.2	<p><b>(C)</b> 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>	<p>The policies that have been developed by Johor Plantations Group Berhad (JPG) to protect the reproductive rights of all, are as follows:</p> <ol style="list-style-type: none"> <li>1. Sustainability Policy (Document No.: JPG/POL/SID/SD/001; Issue No.: 00; Revision No.: 00; Effective Date: 01/07/2023). Under section 6.10 of the policy states that the reproductive right that is in line with the countries/regions laws where the company operate shall be respected.</li> <li>2. Core Labour Standards Policy (Document No.: JPG/POL/SID/SD/003; Issue No.: 00; Revision No.: 00; Effective Date: 01/07/2023). Under section 6.2.2 of the policy mentions that JPG recognizes and respects the rights and freedom of employees relating to reproduction and reproductive health which will include the right to make decisions concerning reproduction.</li> </ol> <p>There is evidence that the policy has been implemented where there is no restriction by the management for pregnancy and there are no pregnant/breastfeeding women handling with chemical. It has been further confirmed through interview with the female workers.</p>	Complied

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		Communication of the policy sighted based on briefing records for each operating units and further verified based on interview with the sampled stakeholders and workers which can demonstrate their understanding on the policy that has been established.	
6.5.3	<p>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.</p> <p>- Minor compliance -</p>	<p>Assessment for new mothers using dedicated checklist were conducted by each operating unit. This has been verified in form entitled New Mother Census. This form enables the assessment to be done of new mothers' needs for creche/childcare, antenatal, vaccination, maternity and paternity, postpartum care, prenatal check-up, breastfeeding facilities, awareness and counselling. The management has appointed a female employee (from the Gender Committee) to conduct the assessment. The assessment was conducted through direct interviews, and the New Mother Census questionnaire will be completed by the female workers. Briefing on the new mothers also was conducted during gender committee meeting.</p> <p>Based on the verification of the assessment report and interviews, management has addressed all identified needs. In Sedenak Estate, 3 new mothers were identified, while Sedenak POM also identified 3 new mothers. However, there are no new mothers at Kuala Kabong Estate.</p>	Complied
6.5.4	<p>A grievance mechanism, which respects anonymity and protects complainants where requested, is established, implemented and communicated to all levels of the workforce.</p> <p>- Minor compliance -</p>	<p>Johor Plantations Group Berhad (JPG) has established Panel Complaint for Women Onwards (WOW) in all the operating units as a grievance mechanism to make complaint related to sexual harassment and violence. JPG also has established grievance procedure entitled Grievance (Doc. No.: SQD/SMS/4.1; Date: 01/08/2020). The scope of procedures is covers all those who deal with JPG and may have complaints or grievances. The aim of this mechanism is to have a documented system for dealing with complaints and grievances that is agreeable and accepted by all</p>	Complied

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		<p>stakeholders. Section 5.8 of the procedure states that anonymity of complainants will be respected and protected if requested.</p> <p>Based on interviews conducted with sampled of workers, indicates that the grievance mechanism has been communicated effectively and implemented.</p>	
<b>Criterion 6.6:</b> No forms of forced or trafficked labour are used.			
6.6.1	<p><b>(C)</b> All workers have entered into employment voluntarily and the following are prohibited:</p> <ul style="list-style-type: none"> <li>• Retention of identity documents or passports (except for administration purposes including legalisation and renewal processes)</li> <li>• Charging the workers for recruitment fees.</li> <li>• Contract substitution</li> <li>• Involuntary overtime</li> <li>• Lack of freedom of workers to resign</li> <li>• Penalty for termination of employment</li> <li>• Debt bondage</li> <li>• Withholding of wages</li> </ul> <p>- Critical (Major) compliance -</p>	<p>The commitment of the company to comply with this indicator are demonstrates by developed Core Labour Standards Policy (Document No.: JPG/POL/SID/SD/003; Issue No.: 00; Revision No.: 00; Effective Date: 01/07/2023). Under section 6.1.2 of the policy mentions that JPG shall not engaged in or support the use of force labour and trafficked labour in all operations and administration.</p> <p>Based on interview with the sampled workers, observation, documentation review and site visit to the labour quarters and estate facilities, the following were verified:</p> <p>a. Retention of identity documents or passports: All workers are free to keep their own passports. There is no retention of identity documents or passports unless these are needed for passport/work permit renewal. Sampled workers were interviewed and confirmed that they keep their passports themselves. This was further verified during the site visit to the labour quarters, where passport was observed to be kept in the workers houses. Furthermore, the management provides lockers for workers to keep their passport safely. The locker keys are kept by the workers with no duplicate keys held by the management.</p> <p>b. Charging of recruitment fee: Reviewed the contract agreement dated 29/11/2023 between Johor Plantations Group Berhad (JPG) and PT Hamparan Karya Insani for manpower supply from Indonesia for period January to March 2024. The company will</p>	Complied

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		<p>cover all recruitment costs for workers in Indonesia according to the 'Zero Cost' policy for each supplied worker. The details of the costs covered by the company include flight tickets, insurance, medical check-ups, airport handling, local transport, online biometrics, immigration security clearance, online visas, passports, administrative fees, meal allowances, and recruitment fees. No recruitment fees are imposed on any of the foreign workers. Interviews conducted with sampled workers also confirmed that they have not been charged any recruitment fees.</p> <p>c. Contract substitution: Based on document review, worker interview and site tour, it was noted all the migrant workers are legally recruited. Written employment contract was provided to them in a language that was understood by the workers. Explanation of terms and condition in the contracts was conducted in their origin country and reiterated upon their arrival at the operating unit. Interview with the sampled workers confirmed that they have entered employment by voluntarily and freely basis. They also informed that all contract signed in their origin country is consistent with the terms and condition that they received upon arrival.</p> <p>d. Involuntary overtime: Based on interviews conducted with the sampled workers, all overtime work was carried out on a voluntary basis. Workers are free to decline any offers for overtime work.</p> <p>e. Lack of freedom to resign: Workers are free to resign as per stated in their employment contracts. Clause 5 of employment contracts allow for early termination of contract by giving of 2 months' notice (upon confirmation) and 2 weeks' notice (on probation). There is no mention of any penalty payable. This was confirmed during interviews with workers. There is no term</p>	
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		<p>and condition for any resignation and the flight tickets will bear by the company. Verification of the repatriation records and interview with the sampled workers, shows that the workers are given freedom to going back for long leaves or going back for goods. Some workers, who have been employed in the estate and mill for 5 to 10 years, have taken long leaves 2 or 3 times during their services.</p> <p>f. Debt bondage: There is no evidence of any incidence of debt bondage. It has been verified based on sample of pay slips where there is no deduction of salary for debt. Further verification has been done through interview where there is no loan/borrowing money has been given by the management to the workers. There is also no recruitment fee has been charged to the workers hence confirmed that there is no debt bondage implement.</p> <p>g. Withholding of wages: There is no evidence of withholding of wages. Workers' wages have been paid by account and can be withdraw at the nearest bank and sighted evidence of payment that has been signed by the workers. There is evidence that there no workers' wages have been withheld. It has been further confirmed through interview with sampled workers. Salaries are deposited into their accounts before the 7th of every month.</p>	
6.6.2	<p><b>(C)</b> 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 special labour policy entitled Core Labour Standards Policy (Document No.: JPG/POL/SID/SD/003; Issue No.: 00; Revision No.: 00; Effective Date: 01/07/2023). This policy emphasizes company commitment on:</p> <ul style="list-style-type: none"> <li>prohibits the employment of children and young persons, forced and trafficked labour</li> </ul>	Complied

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		<ul style="list-style-type: none"> <li>• provides for signing of written employment contracts in a language they understand with clear remuneration and description of duties</li> <li>• workers' entitlement to housing and basic amenities which</li> <li>• are at par with statutory requirements</li> <li>• free of discrimination, coercion or violence</li> <li>• rights of employees to join trade unions</li> <li>• accessibility to grievance procedure</li> </ul> <p>In addition, procedure entitled Recruitment of Local Workers for Operating Units (Document No.: JPG/PRO/SID/SD/SMS; Issue No.: 00; Revision No.: 00; Effective Date: 14/11/2023) was established as operational guidance on company commitments to the above policy.</p> <p>There are migrant workers has been recruited from Indonesia, and Bangladesh to work in Sedenak Estate, Sedenak POM and Kuala Kabong Estate. Verification during the audit found that there is evidence that the policy and procedures has been implemented where each process of recruitment has been done such as signing employment contract, interview, and consultation with migrant workers at origin countries and operating unit. Based on interview with sampled workers, it has been confirmed that all facilities and benefits has been provided equally for all foreign workers. Passport has been kept by the workers itself. There is no evidence of contract substitution where all migrant workers have been explained the content of the employment contract at the origin countries. It has been confirmed through interview with the workers itself.</p>	
<b>Criterion 6.7:</b> The unit of certification ensures that the working environment under its control is safe and without undue risk to health.			
6.7.1	<b>(C)</b> The responsible person(s) for H&S is identified. There are records of regular meetings between the responsible person(s) and workers.	Person in charge has been appointed for all operating units which the manager will be appointed as chairman and employer and	Complied

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	<p>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>employee representative. There is evidence that OSH meeting has been conducted every 3 months and in line with local regulations to discussed issues related to safety, health and welfare.</p> <p><u>Sedenak Estate</u></p> <p>Mr Mohd Abdul Wahib bin Nawawi, estate manager has been appointed as chairman. Minutes meeting sighted and latest meeting has been conducted on 26/03/2024 and 27/06/2024.</p> <p><u>Sedenak POM</u></p> <p>Mr Kamarouzzaman Thinth, POM manager has been appointed as chairman and verified based on the appointment letter. Latest meeting has been conducted on 18/03/2024, 13/06/2024 and 12/09/2024 and the minutes meeting has been recorded and maintained.</p> <p><u>Kuala Kabong Estate</u></p> <p>Mr Noorazri has been appointed as OSH committee chairman. OSH meeting has been conducted every 3 months and latest has been done 25/06/2024 and 11/09/2024</p>	
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>There are no changes since the management adopt the same procedure that made available in Emergency Procedures and Safe Working Procedures were available at the office, workshops and chemical stores. Emergency Plans were available for identified incidences such as Fire, Accident, Chemical Spillage and Evacuation. Emergency Response Team was formed in the estate to counter any unwanted emergencies.</p> <p>Procedure established for emergency is as the following:</p>	Complied



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		<ol style="list-style-type: none"> <li>1. Emergency Response Procedure for Injuries/Fire and Boiler (Doc No: SDM/WI/15, Date: 10/02/2008)</li> <li>2. Control Of CPO/POME/Diesel/ Chemical Spillage/ETP Bund Rupture (Doc No: SDM/WI/14, dated 01/07/2007)</li> </ol> <p>The management has conducted the training for emergency procedure and first aid. Sample of the details taken of the training is as the following:</p> <p><u>Sedenak Estate</u></p> <ol style="list-style-type: none"> <li>1. Emergency response plan training dated - 15/06/2023.</li> <li>2. 1<sup>st</sup> aid training - 04/07/2024</li> <li>3. Fire drill training and use of fire extinguisher - 19/09/2024.</li> </ol> <p><u>Sedenak POM</u></p> <ol style="list-style-type: none"> <li>1. Safe work procedure for boiler operations - 12/02/2024</li> <li>2. Safe work procedure for loading ramp and sterilizer - 12/02/2024</li> </ol> <p><u>Kuala Kabong Estate</u></p> <ol style="list-style-type: none"> <li>1. Safety work at diesel tank - 23/02/2024</li> <li>2. Chemical handling - 24/07/2024</li> <li>3. Fire drill - 19/02/2024.</li> <li>4. 1<sup>st</sup> aid training - 18/02/2024</li> </ol>	
6.7.3	<b>(C)</b> 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	All workers have been supplied with the necessary personal protective equipment (PPE), which is provided by management at no cost. During field visits for spraying and manuring activities, as well as inspections of estate and mill stores, it was observed that all	Complied

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	those applying pesticides are available, so that workers can change out of PPE, wash and put on their personal clothing. - Critical (Major) compliance -	workers were wearing the required PPE. Verification of PPE issuance records at Sedenak POM, Sedenak Estate and Kuala Kabong Estate confirmed that workers were given appropriate PPE specific to their stations and operations with samples showing that the PPE was provided on their first day of work. The estates also maintain well-kept facilities for workers to sanitize themselves before going home. The showers were found to be in good working condition, and interviews with workers indicated that they are fully aware of the importance of sanitizing before returning home to avoid potential hazards from chemical residues.	
6.7.4	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. - Minor compliance -	Medical care is provided to all the employees by the organization. Local workers and foreign workers were covered under SOCSO scheme. It has been verified based on the documentation and interview with the workers.	Complied
6.7.5	Occupational injuries are recorded using Lost Time Accident (LTA) metrics. - Minor compliance -	Occupational injuries are recorded using Lost Time Accident (LTA) has been recorded in the JKKP 8 and in line with local legal requirement.  <u>Sedenak POM</u> JKKP 8 has been submitted on 14/01/2024 with reference JKKP 8/161529/2023. It has been recorded total 1 case of lost day with total of 17 days of lost days. Severity rate at 52.19 and frequency rate at 3.07. <u>Kuala Kabong Estate</u> JKKP 8 has been submitted on 15/01/2024 with reference number JKKP 8/163427/2023 with total 28 cases of lost day and total 136 lost days. Severity rate at 665.57 and frequency rate 137.03	Complied

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<b>Principle 7: Protect, conserve and enhance ecosystems and the environment</b>			
<b>Criterion 7.1: Pests, diseases, weeds and invasive introduced species are effectively managed using appropriate Integrated Pest Management (IPM) techniques.</b>			
7.1.1	<p><b>(C)</b> IPM plans are implemented and monitored to ensure effective pest control.</p> <p>- Critical (Major) compliance -</p>	<p>The estates have established Integrated Pest Management focusing on controlling the pest infestation such as rat and bagworm. Among the plan established as follows:</p> <ol style="list-style-type: none"> <li>1. Rat damage census</li> <li>2. Rat baiting program</li> <li>3. Barn owl census</li> <li>4. Maintenance of barn owl box</li> <li>5. Beneficial plant planting program</li> </ol> <p>Reviewed the implementation of the management plan as follows:</p> <ol style="list-style-type: none"> <li>1. The estate conducted pheromone trap census when on monthly basis. Reviewed the census conducted on July, August, and September 2024.</li> <li>2. Rat baiting was conducted at 2 campaign per year. Reviewed the latest campaign conducted in the month of May and June 2023</li> <li>3. Owl census of occupancy which was conducted in September 2024 stated that 45.37% occupancy at Kuala Kabong Estate.</li> </ol>	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>There were no species referenced in the Global invasive Species database and CABI.org sighted within the estate and POM premises.</p>	Complied

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7.1.3	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. - Minor compliance -	No evidence of fire use to control pest in the estates sampled.	Complied															
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 -	The written justification for all agrochemicals can be found in the Kulim Malaysia Berhad Agricultural Manual under the section titled "Justification of Chemical Use," specifically in Tables H01-2 to H01-6. These tables outline the weed situation, active ingredients, chemical brand names, product application rates per hectare, and CKS dosage per 16 litres.	OFI															
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 -	<p>Records of pesticides use (including active ingredients used and their LD 50, area treated, amount of a.i applied per ha and number of applications) had been maintained and kept by the estate. Sighted the sampled records of pesticides usage (A.I.) per ha at estates visited FY 2023 (to date) as follows:</p> <p><u>Sedenak Estate</u></p> <table><tr><td>Month</td><td>Quantity (a.i/Ha)</td><td>Quantity (a.i/FFB)</td></tr><tr><td>April'24</td><td>0.14</td><td>0.20</td></tr><tr><td>May'24</td><td>0.09</td><td>0.15</td></tr><tr><td>June'24</td><td>0.08</td><td>0.19</td></tr></table> <p><u>Kuala Kabong Estate</u></p> <table><tr><td>Month</td><td>Quantity (a.i/Ha)</td><td>Quantity (a.i/FFB)</td></tr></table>	Month	Quantity (a.i/Ha)	Quantity (a.i/FFB)	April'24	0.14	0.20	May'24	0.09	0.15	June'24	0.08	0.19	Month	Quantity (a.i/Ha)	Quantity (a.i/FFB)	Complied
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		April'24	0.17	0.12	
		May'24	0.00	0.13	
		June'24	0.00	0.14	
7.2.3	<p><b>(C)</b> 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>The required quantities of agrochemicals for various field conditions are documented and justified in Kulim Malaysia Berhad Agricultural Manual under the section titled "Justification of Chemical Use," specifically in Tables H01-2 to H01-6. Field implementation aligns with this section of the manual. The estates have adopted a Continuous Improvement Plan, aiming to reduce chemical usage through an Integrated Pest Management Plan. During site visits to all the estates, beneficial plants were observed along estate roads and in immature areas, along with barn owl boxes placed in strategic locations. Paraquat has been eliminated and replaced with alternatives like Glyphosate.</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 per verification through site visit to field, chemical storage, and document review (chemical register, chemical issuance records, chemical application records, there is no prophylactic has been used.</p>			Complied
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> <p>a) Judgment of the threat and verify why this is a major threat</p> <p>b) Why there is no other alternative which can be used</p>	<p>As per verification through site visit to field, chemical storage and document review (chemical register, chemical issuance records, chemical application records), there is no class 1A and 1B has been used.</p>			Complied

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	<p>c) Which process was applied to verify why there is no other less hazardous alternative</p> <p>d) What is the process to limit the negative impacts of the application</p> <p>e) Estimation of the timescale of the application and steps taken to limit application to the specific outbreak.</p> <p>- Minor compliance -</p>		
7.2.6	<p><b>(C)</b> 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>The pesticides operators have been given training regarding the usage safety and health issue and proper way for chemical application and attend monthly health surveillance done by the Medical Assistant. Pesticide operators are given training on the safe handling and application of the pesticides. Suitable personal protective equipment's and application equipment provided to the operators based on the PPE issuance forms. Reviewed the training records as per criteria 3.7.2. Sampled the training conducted for pesticide handlers as below;</p> <p>Sedenak Estate: 13/05/2024</p> <p>Kuala Kabong Estate: 27/04/2024</p>	Complied
7.2.7	<p><b>(C)</b> Storage of all pesticides is in accordance with recognised best practices.</p> <p>- Critical (Major) compliance -</p>	<p>Pesticides were found stored in the mill and all estate's Chemical Store in accordance with the Occupational Safety and Health Act 1994 (Act 514) and Pesticides Act 1974 (Act 149) and their Regulations. The stores were at all times locked and at the time of visit the storekeeper was seen to unlock the padlock to open entrance door for auditor to inspect the store. At the entrance door, signage requiring donning of PPE were visibly posted. The Chemical Store signage with required Hazard Symbols were available at the entrance. The facility ventilation fan was found working with adequate ventilation available, up-to-date chemical register, trade and generic names, and their Safety Data Sheet were available.</p>	Complied

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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>Empty pesticides containers were disposed through scheduled wastes method. Labelling of the containers was found to be in accordance with the legal requirements that has the information about type of scheduled waste, waste code, name &amp; address of the generators, and date of generations. Hazard label used was also found to be appropriate. Verification of inventory records and consignment notes (transaction receipts) confirmed that the containers were collected by the authorised vendors.</p>	Complied
7.2.9	<p><b>(C)</b> 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>	<p>As per verification for both operating units, there is no aerial spraying has been practices. It has been confirmed through interview and site visits.</p>	Complied
7.2.10	<p><b>(C)</b> Specific annual medical surveillance for pesticide operators, and documented action to treat related health conditions, is demonstrated.</p> <p>- Critical (Major) compliance -</p>	<p><u>Sedenak Estate</u></p> <p>Medical surveillance conducted by Dr Aidilnurul Fareena binti Ishak, Occupational Health Doctor on 03/07/2024 and there is no abnormal results due to occupational cause.</p> <p><u>Sedenak POM</u></p> <p>Medical surveillance has been done 03/07/2024 for 48 workers. 16 workers have been identified with abnormalities with non-occupational cause.</p> <p><u>Kuala Kabong Estate</u></p> <p>Medical surveillance for year 2024 conducted on 04/07/2024 with total 16 workers and all has been declared fit for works.</p>	Complied

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7.2.11	<p><b>(C)</b> 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>	There are no female workers, and young workers handling chemical for both operating units. It has been verified based on site visit and interview with sample workers. Verified medical surveillance, there is no medical restrictions has been identified.	Complied																
<b>Criterion 7.3:</b> 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>Wastes management plan is developed based on the environmental aspects and impacts assessment. The mitigation measures were then derived from this exercise. The Waste Management Action Plans 2024 were established to mitigate and control the identified wastes and source of pollution. Generally, the scheduled wastes were disposed through licensed vendors, organic wastes were disposed through landfill and recyclable wastes were sent to recycle centres as reported under indicator 7.2.8.</p> <p>The Waste Management Plan dated 01/08/2024 at Sedenak Estate, Sedenak Palm Oil Mill and Kuala Kabong Estate is available for review detail each of the waste type include the schedule waste, and domestic waste.</p>	Complied																
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>In Sedenak POM and the estates, procedure SPO/W1/06-10 – Scheduled Wastes (Hazardous Waste) Management has been established. The disposal of scheduled waste was available and disposed at Kualiti Alam Sdn Bhd.</p> <table border="1"> <thead> <tr> <th>Type SW</th><th>Consignment note</th><th>Dated</th><th>Weight (mt)</th></tr> </thead> <tbody> <tr> <td colspan="4">Sedenak Estate</td></tr> <tr> <td>SW307</td><td>2024091011XP2VFZ</td><td>10/09/2024</td><td>0.084</td></tr> <tr> <td>SW110</td><td>2024091009OX0TA2</td><td>10/09/2024</td><td>0.0055</td></tr> </tbody> </table>	Type SW	Consignment note	Dated	Weight (mt)	Sedenak Estate				SW307	2024091011XP2VFZ	10/09/2024	0.084	SW110	2024091009OX0TA2	10/09/2024	0.0055	Complied
Type SW	Consignment note	Dated	Weight (mt)																
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		SW305	2024091011L8B6D5	10/09/2024	0.522		
		Sedenak Palm Oil Mill					
		SW409	2024082016Y8GJIO	20/08/2024	0.26		
		SW429	2024082016XWQENT	20/08/2024	0.007		
		SW305	2024082016A4FYZN	20/08/2024	1.80		
		Kuala Kabong Estate					
		SW110	2024091009ZQM&3C	12/09/2024	0.012		
		SW307	2024091009VGH60U	12/09/2024	0.078		
		SW305	2024091009OKCVDN	12/09/2024	0.044		
		The management has submitted the Schedule Waste Inventory with reference AS(B)J11/123/000/177 dated 30/08/2024 at Sedenak Estate. Inventory of SW102, SW110, SW305, SW307, SW404, SW408, SW409, SW410.					
		Sedenak Palm Oil Mill has submitted the Schedule Waste Inventory with reference JAS.JHQ.600-3/1/34 through e-swiss system dated 05/09/2024. Inventory of SW102 ,SW110 ,SW305 ,SW306 ,SW307 ,SW409,SW410 and SW429 is verified.					
		Kuala Kabong Estate has submitted the Schedule Waste Inventory with reference AS(B)J11/123/000/178 through e-swiss system dated 25/09/2024. Inventory of SW102 ,SW110 ,SW305 ,SW306 ,SW307 ,SW409,SW410 and SW429 is verified.					
		Site visit at all Schedule Waste Store verified that the labelling is and packaging is well maintain. The generated date is available at each SW.					

		<p>Verification on the training record found that the training were conducted on waste management which was conducted on 22/05/2024 at Sedenak POM. Interview with Schedule Waste Person In Charge found to be competent for the SW operation.</p> <p>The mill Assistant Manager is the competent person on handling the Schedule Waste. Verified the certificate with Reference No: CePSWaM/01886</p>	
7.3.3	<p>The unit of certification does not use open fire for waste disposal.</p> <p>- Minor compliance -</p>	<p>Johor Plantation Group practices of "Zero open burning" is enforced and elaborated in the Sustainability Policy.</p> <p>The operating units adhered to the policy of "Zero open burning" for any replanting. From field visits and interviews with the workers there is no open burning being practiced in the estates. All the estates had replanting program spanned over the forthcoming years as shown in 3.1.2.</p> <p>There was no evidence that fire had been used to prepare land for replanting in the estate No fire was used for waste disposal.</p>	Complied
<b>Criterion 7.4:</b> Practices maintain soil fertility at, or where possible improve soil fertility to, a level that ensures optimal and sustained yield.			
7.4.1	<p>Good agriculture practices, as contained in SOPs, are followed to manage soil fertility to optimise yield and minimise environmental impacts.</p> <p>- Minor compliance -</p>	<p>SOPs of good agricultural practices to manage soil fertility to optimise yield and minimise environmental impacts were documented in Johor Plantation Group – Agricultural Manual under section D: Manuring. The procedure includes:</p> <p>D01 – General Information</p> <p>D02 – Fertiliser Order</p> <p>D03 – Fertiliser Application</p> <p>D04 – Quality Check And Storage</p> <p>D05 – EFB Utilization</p> <p>D06 – Bio Compost Application</p>	Complied

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		D07 – Nutrient Feeding Site	
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 Internal Agronomist from Agronomy Advisory and Services Department 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.</p> <p>Sample of the soil sample and leaf analysis taken is as following:</p> <ol style="list-style-type: none"> <li>1. <u>Kuala Kabong Estate</u> Latest Soil Sampling was conducted in August 2019. Refer report no. SI/1908/0245-0248 dated 30/08/2019. Latest leaf sampling was conducted on January 2020. Refer report no. LI/2001/KK/0054-0063 dated 30/01/2020. The estate management is maintaining the operation at minimum cost with basic fertiliser as the estate is planned for further development.</li> <li>2. <u>Sedenak Estate</u> Latest leaf and soil Sampling was conducted On 23/05/2024. Report with Ref No: SI/2024/05/70 for the foliar sample and LI/2024/05/189 for soil sample were verified.</li> </ol>	Complied
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>The estates implement several practices as part of their nutrient recycling strategy, fostering sustainable agricultural practices. These include:</p> <ol style="list-style-type: none"> <li>1. Application of Empty Fruit Bunches (EFB) in designated fields at specific dosages, guided by recommendations from Agronomists.</li> <li>2. Stacking of cut fronds in between palm rows, allowing them to decompose naturally.</li> <li>3. Utilization of Palm Oil Mill Effluent (POME) through a furrow system at the host estate of Sedenak POM.</li> </ol>	Complied

		For the fiscal year 2024, the estate has established an EFB application program, and site visits to both estates confirmed the application of EFB to the fields. Records of EFB and compost application reviewed through Compost Programme Monitoring for both estates.	
7.4.4	Records of fertiliser inputs are maintained. - Minor compliance -	The fertiliser application was conducted as per recommendation by agronomist base on foliar sampling conducted. The fertiliser application records were available at the estate visited for review. The estate reported the fertilised application to the Agronomy Advisory and Services Department on monthly basis. Reviewed the report for the month of June, July and August 2024	Complied
<b>Criterion 7.5:</b> Practices minimise and control erosion and degradation of soils.			
7.5.1	<b>(C)</b> Maps identifying marginal and fragile soils, including steep terrain, are available. - Critical (Major) compliance -	The operating units have meticulously identified soil series in the estates and created corresponding soil series maps. In Sedenak Estate, various soil series have been recognized, with percentages as follows: Alma (0.11%), Batang Merbau (4.97%), Batu Lapan (5.24%), Binjai (0.38%), Bungor (10.24%), Gajah Mati (2.92%), Kampong Pasu (3.34%), Kaya (1.01%), Rengam (21.82%), Slime Tailings (4.63%), Tai Tak (27.27%), Tawar (3.91%), Tebok (6.52%), Terap (7.56%), and Kawasan Bandaran (0.08%). Meanwhile, in Kuala Kabong Estate, the identified soil series include Deep Peat (78.18%), Batang Merbau (4.2%), Gajah Mati (10.59%), Rengam (6.82%), and Unclassified (0.21%). This comprehensive identification of soil series reflects a thorough understanding of the soil composition in each estate. Such knowledge is crucial for effective land management and strategic planning in agricultural activities.	Complied
7.5.2	No replanting on steep slopes (above 25 degrees) unless approved by state governments. In case of replanting is permitted, no replanting in	Addressed in the Agricultural Manual under chapter as follows: 1. BO11 – Terrace and Platform Construction	Complied

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	contiguous area of steep terrain (greater than 25 degrees) larger than 25 Ha within the Unit of Certification. - Minor compliance -	2. BO6 – Pre Felling Lining 3. BO3 – Planting Density 4. BO7 – Felling 5. BO13 – Bunding 6. BO14 – lining For Planting 7. BO15 – Harvester Path Construction 8. BO16 - Drainage No replanting was conducted on steep slopes more than 25 degree.	
7.5.3	There is no new planting of oil palm on steep terrain. - Minor compliance -	No new planting conducted at all estates visited as verified and sighted during site visit.	Complied
<b>Criterion 7.6:</b> 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.			
7.6.1	<b>(C)</b> 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. - Critical (Major) compliance -	The sampled estates possess both soil series and topography maps, aiding in comprehensive land assessment. Notably, no fragile soil has been identified in the sampled estates. In the planning of the 2024 replanting, the estates have thoughtfully considered factors such as land terrain, drainage, and road systems. This holistic approach underscores the estate's commitment to informed and sustainable agricultural practices for the upcoming replanting cycle. The management has conducted the soil sample test for each of the parameter pH, Total Nitrogen, Total Organic Carbon, Phosphorus, Exchangeable K,Mg,and Ca. The sample taken for Sedenak Estate test report dated 29/05/2023 is available for review.	Complied
7.6.2	Extensive planting on marginal and fragile soils, is avoided, or, if necessary, done in accordance with the soil management plan for best practices. - Minor compliance -	Addressed in the Agricultural Manual under chapter as follows: 1. BO11 – Terrace and Platform Construction 2. BO6 – Pre Felling Lining	Complied

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		<div>3. BO3 – Planting Density</div> <div>4. BO7 – Felling</div> <div>5. BO13 – Bunding</div> <div>6. BO14 – lining For Planting</div> <div>7. BO15 – Harvester Path Construction</div> <div>8. BO16 - Drainage</div>																								
7.6.3	<div>Soil surveys and topographic information guide the planning of drainage and irrigation systems, roads and other infrastructure.</div> <div>- Minor compliance -</div>	<div>The Agronomy Advisory and Services Department conducted a meticulous assessment, providing detailed topography maps for Sedenak Estate and Kuala Kabong Estate. The slope distribution data, expressed as percentages in various categories, offers valuable insights into the terrain characteristics of each estate.</div> <table><tr><th rowspan="2">Topography</th><th colspan="2">Estate</th></tr><tr><th>Sedenak Estate (%)</th><th>Kuala Kabong (%)</th></tr><tr><td>0°-2°</td><td>18.01%</td><td>76.40%</td></tr><tr><td>2°-6°</td><td>57.51%</td><td>16.89%</td></tr><tr><td>6°-12°</td><td>23.05%</td><td>6.08%</td></tr><tr><td>12°-20°</td><td>1.31%</td><td>0.63%</td></tr><tr><td>20°-25°</td><td>0.11%</td><td>0.00%</td></tr><tr><td>&gt;25°</td><td>0.01%</td><td>0.00%</td></tr></table> <div>This comprehensive data underscores the diverse slope profiles within each estate, providing a nuanced understanding of their respective landscapes.</div>	Topography	Estate		Sedenak Estate (%)	Kuala Kabong (%)	0°-2°	18.01%	76.40%	2°-6°	57.51%	16.89%	6°-12°	23.05%	6.08%	12°-20°	1.31%	0.63%	20°-25°	0.11%	0.00%	>25°	0.01%	0.00%	Complied
Topography	Estate																									
	Sedenak Estate (%)	Kuala Kabong (%)																								
0°-2°	18.01%	76.40%																								
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<b>Criterion 7.7:</b> No new planting on peat, regardless of depth after 15 November 2018 and all peatlands are managed responsibly.			
7.7.1	<p><b>(C)</b> 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>	As the day of audit, there is no new planting has been identified since there is no changes of planted hectare and further verified during the site visits.	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><b>PROCEDURAL NOTE:</b></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> <p>- Minor compliance -</p>	<p>The total peat area in Kuala Kabong Estate is at 1315.97 ha To ensure responsible and sustainable practices, the peat areas within the estate have been thoroughly inventoried, documented, and reported to the RSPO Secretariat in a document titled 'RSPO Peat Inventory, Drainability Assessment, and Revised BMP for Peat,' on 23/09/2022.</p> <p>The estate has further demonstrated its commitment to responsible management through the preparation of Peat Drainability Assessments for replanting in 2027. These reports, dated 14/11/2022 respectively, were meticulously compiled by the Agronomy Advisory Services Department at Johor Plantations Group Berhad. However, there is no replanting has been planned since Kuala Kabong Estate has been included in the development plan in the future.</p>	Complied
7.7.3	<p><b>(C)</b> Subsidence of peat is monitored, documented and minimised.</p> <p>- Critical (Major) compliance -</p>	<p>The estate implements a regular monitoring system for peat subsidence levels on a quarterly basis, while water levels are monitored monthly. At Kuala Kabong Estate, peat subsidence is monitored using 6 probes installed. The monitoring occurs quarterly with the latest reading taken on 17/09/2024, site visit at found both area were equipped with the peat Probe.</p> <p>Water levels, on the other hand, are monitored using 11 piezometers installed at a ratio of, with the latest record reviewed dated 21/09/2024.</p>	Complied

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7.7.4	<p><b>(C)</b> A documented water and ground cover management programme is in place.</p> <p>- Critical (Major) compliance -</p>	<p>The water management practices in the peat areas of Kuala Kabong Estate adhere to established procedures, specifically outlined in Procedure A18. These practices are designed to establish an extensive and efficient drainage system within the peat soil. The primary objectives are to maintain optimal water levels during dry periods and to facilitate the drainage of excess water during wet periods.</p> <p>The implemented drainage network follows a typical pattern, with cross-sectional details evident. In areas with a high water table, field drains are strategically placed at every eighth row, fourth row, and then at every alternate row of oil palm, depending on the water table levels.</p>	Complied
7.7.5	<p><b>(C)</b> 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.</p> <p>This is subject to transitional (5 years: 2019 to 2024) arrangement stated in the Drainability Assessment Procedure.</p> <p>Within 12 months initial implementation period, company could submit other alternate methodologies to be considered by RSPO for recognition.</p> <p>- Critical (Major) compliance -</p>	<p>Peat Drainability Assessments for replanting in 2027. These reports, dated 14/11/2022, compiled by the Agronomy Advisory Services Department at Johor Plantations Group Berhad. However, there is no replanting has been planned since Kuala Kabong Estate has been included in the development plan in the future.</p>	Complied
7.7.6	<p><b>(C)</b> 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.</p>	<p>The management of all current plantations on peat follows the guidelines outlined in the 'RSPO Manual on Best Management</p>	Complied



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	- Critical (Major) compliance -	Practices (BMPs) for existing oil palm cultivation on peat,' version 2 (2019), along with the accompanying audit guidance.	
7.7.7	<p><b>(C)</b> 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>	The management of all current plantations on peat follows the guidelines outlined in the 'RSPO Manual on Best Management Practices (BMPs) for existing oil palm cultivation on peat,' version 2 (2019), along with the accompanying audit guidance.	Complied
<b>Criterion 7.8:</b> 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 and action plans at all the sampled estates and mill for year 2024 were made available. Among the objectives of the management plan are:</p> <ul style="list-style-type: none"> <li>i) Monitor use of water</li> <li>ii) Monitor leakages and periodically maintenance</li> <li>iii) Construct drain to divert rainwater</li> <li>iv) Upkeep drain by desilting drain periodically</li> <li>v) To schedule water supply to avoid overuse of water</li> <li>vi) Plant Guatemala and soft grasses for rehabilitation of buffer zone including signage marking</li> </ul> <p>The mill collected water samples for the domestic water consumption collected by SPAN twice a year. All results were made available for verification. The analysis was conducted by an accredited laboratory (SAMB No. 146). Based on the reports dated 01/07/2024 with Ref No: LW/554(1-2)/24, the results were within the standard limits under the Drinking Water Quality Standard, MOH 2010.</p>	Complied

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		Result of the water sample is as the following:											
		Parameter	Limit	Result									
		pH	6.5-9.0	7.1									
		Turbidity	5	4.04									
		Aluminium	0.2	ND									
		Free Residual Chlorine	0.2-5	1.1									
		Total Coliform	Nil	ND									
		E-Coli	Nil	ND									
7.8.2	<p><b>(C)</b> 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 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>Protection of water courses and wetlands, including maintaining and restoring appropriate riparian buffer zones has been verified at the 2 Estates and mill catchment. Riparian buffer zones have been identified and demarcated. No chemicals and fertilizer application observed been used in their maintenance. In certain areas Guatemala grass / Vertivar sp were planted along the riverbanks. Guidelines of the width of the rivers and natural courses to be protected have been illustrated in the SOP revised dated 01/11/2018.</p> <p>Upstream and downstream river monitoring was done by Sedenak Estate, latest record was 09/09/2024 (WI/2024/09/496) and result as per below:</p> <table><tr><td>Parameter</td><td>Unit</td><td>WI-1494 (Upstream)</td><td>WI-1495 (Downstream)</td></tr><tr><td>Nitrate Nitrogen</td><td>mg NO3-N/L</td><td>0.06</td><td>&lt;0.05</td></tr></table>			Parameter	Unit	WI-1494 (Upstream)	WI-1495 (Downstream)	Nitrate Nitrogen	mg NO3-N/L	0.06	<0.05	Complied
Parameter	Unit	WI-1494 (Upstream)	WI-1495 (Downstream)										
Nitrate Nitrogen	mg NO3-N/L	0.06	<0.05										

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		Phosphorus	mg DO/L	<0.05	<0.05
		Same also for Kuala Kabong estate, the water sampling conducted after fertiliser application. The records of water sampling with Ref No: WI/2024/09/512 dated 19/09/2024 are as following:			
		Parameter	Unit	WI-1565 (Upstream)	WI-1566 (Downstream)
		Nitrate Nitrogen	mg NO3-N/L	1.62	1.58
		Phosphorus	mg DO/L	<0.05	<0.05
		The limit of Nitrate Nitrogen is as 7 mg and limit of Phosphorus is at 0.2. All the samples are found complied with the limit.			
		Water supply for the Kuala Kabong Estate is from Syarikat Air Johor (SAJ).			
		Sedenak Mill has conducted the upstream and downstream river water assessment which was conducted on 11/07/2024 (Ref No: WI/2024/07/363) The result is in line with the National Water Quality Standard (NWQS). Result is as following:			
		Parameter	Upstream	Downstream	
		pH	6.6	6.6	
		COD	68	14	
		BOD	15	<10	
		Nitrate Nitrogen	4.10	4.17	
		Ammoniacal Nitrogen	3.99	4.15	

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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>The mill applies the biological system with ponds in series for its treatment of effluent. The mill is disposing its effluent to land application and compost. The quality of discharged effluent was analysed every month an accredited laboratory (SAMB No. 307) and the parameters are T, pH, BOD, COD, TS, SS, O&amp;G, AN and TN. The last 12 months results were verified where all the BOD results were within the regulated limit.</p> <p>Sample of the Lab Test result are as following:</p> <table><tr><td>Date</td><td>Report Ref No</td><td>BOD at 30 °C</td></tr><tr><td>18/06/2024</td><td>EI/2024/06/11</td><td>532</td></tr><tr><td>25/07/2024</td><td>EI/2024/07/128</td><td>468</td></tr><tr><td>26/08/2024</td><td>EI/2024/08/147</td><td>308</td></tr></table> <p>As per compliance schedule for mill DOE License (Ref No: JAS.JHQ.600-3/1/34(SK03) the mill is to monitor the BOD result only with the limit of 2500 due to the wastewater is used for land application.</p>	Date	Report Ref No	BOD at 30 °C	18/06/2024	EI/2024/06/11	532	25/07/2024	EI/2024/07/128	468	26/08/2024	EI/2024/08/147	308	Complied
Date	Report Ref No	BOD at 30 °C													
18/06/2024	EI/2024/06/11	532													
25/07/2024	EI/2024/07/128	468													
26/08/2024	EI/2024/08/147	308													
7.8.4	<p>Mill water use per tonne of FFB is monitored and recorded.</p> <p>- Minor compliance -</p>	<p>The mill processing water is obtained from a water catchment adjacent to the mill complex. The water usage monitoring is made on a monthly basis. Based on the records, the water consumption of the mill is as follows:</p> <table><tr><td>Month/Year</td><td>Water Consumption (m<sup>3</sup>/FFB)</td></tr><tr><td>2023</td><td>0.96</td></tr><tr><td>June 2024</td><td>0.76</td></tr><tr><td>July 2024</td><td>1.11</td></tr><tr><td>August 2024</td><td>0.86</td></tr></table>	Month/Year	Water Consumption (m <sup>3</sup> /FFB)	2023	0.96	June 2024	0.76	July 2024	1.11	August 2024	0.86	Complied		
Month/Year	Water Consumption (m <sup>3</sup> /FFB)														
2023	0.96														
June 2024	0.76														
July 2024	1.11														
August 2024	0.86														

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		As of the the month of July, the mill has conducted some cleaning activities that required more water, that result the higher water consumption compared to other months.	
<b>Criterion 7.9:</b> Efficiency of fossil fuel use and the use of renewable energy is optimised			
7.9.1	<p>A plan for efficiency of the use of fossil fuels and to optimise renewable energy is implemented, monitored and documented.</p> <p>- Minor compliance -</p>	<p>A plan for improving the efficiency of the use of fossil fuels is in place and has been incorporated into the Environmental Aspect and Impact activities report for 2024. The document was reviewed/updated on August 2024.</p> <p>The estates and mill record and monitor the diesel utilization over the running hours of gen-set and other vehicles running. Performance variation in view of several factors i.e.</p> <p>a) Infrastructure of estates,  b) Community size / no of gen-sets,  c) No. of vehicles / age of machine.  d) Weather interference / crop production volume</p> <p>There is no opportunity for the estates to capitalize the utilisation of fibre/shell produced from the mill as part of their energy production in replacement of fossil fuel with the current technology limitation.</p> <p>The mill has established the management plan to improve the usage of fossil fuel, this includes inspection of machinery and proper maintenance of machinery for the optimum usage of it as well as records of diesel usage. Wherever any significant increase detected, the mill to conduct the inspection immediately.</p> <p>Both estates has established the management plan to reduce the usage of diesel through inspection and immediate repair of the machinery as well as campaign to reduce the electricity.</p>	Complied

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**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><b>(C)</b> 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>Sedenak Palm Oil Mill and estates had identified emission of greenhouse gas (GHG) from their operations such as emission from their farm tractor and gen set operation.</p> <p>a) The management from both estates and mill had planned to reduce emission by daily inspection and monitoring for their farm tractor and gen set to prevent any leakage and problem that could adversely impact the environment.</p> <p>b) Fuel Consumption, Peat Oxidation, POME and reported in the Palm GHG Summary Report.</p> <p>Sample of diesel consumption is as the following:</p> <table><tr><th>Month</th><th>Diesel (Liter/FFB)</th></tr><tr><td colspan="2">Sedenak Estate</td></tr><tr><td>June 2024</td><td>2.89</td></tr><tr><td>July 2024</td><td>2.47</td></tr><tr><td>August 2024</td><td>2.56</td></tr><tr><td colspan="2">Sedenak Palm Oil Mill</td></tr><tr><td>June 2024</td><td>1.09</td></tr><tr><td>July 2024</td><td>0.93</td></tr><tr><td>August 2024</td><td>1.84*</td></tr><tr><td colspan="2">Kuala Kabong Estate</td></tr><tr><td>June 2024</td><td>3.32</td></tr></table>	Month	Diesel (Liter/FFB)	Sedenak Estate		June 2024	2.89	July 2024	2.47	August 2024	2.56	Sedenak Palm Oil Mill		June 2024	1.09	July 2024	0.93	August 2024	1.84*	Kuala Kabong Estate		June 2024	3.32	Complied
Month	Diesel (Liter/FFB)																								
Sedenak Estate																									
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August 2024	2.56																								
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Kuala Kabong Estate																									
June 2024	3.32																								

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		<table><tr><td>July 2024</td><td>2.61</td></tr><tr><td>August 2024</td><td>2.35</td></tr></table> <p>*The mill has more diesel for the power generation as the mill having a low-pressure boiler.</p>	July 2024	2.61	August 2024	2.35						
July 2024	2.61											
August 2024	2.35											
7.10.2	<p><b>(C)</b> 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>	Sedenak Palm Oil Mill and estates has calculated the GHG using RSPO Palm GHG calculator version 4. There was no new development within the certified area.	Complied									
7.10.3	<p><b>(C)</b> Other significant pollutants are identified and plans to reduce or minimise them implemented and monitored.</p> <p>- Critical (Major) compliance -</p>	<p>An assessment of all polluting activities has been conducted and monitored. This included the gaseous emissions, particulate / soot emissions and effluent. The management has continued to maintain its environmental aspects/impacts register associated with their activities. Environmental aspect and impact (EAI) records i.e. which covers estates and mill activities / operation. 'Pollution Identification Environmental Improvement Action Plan' is used to identify the waste products and sources of pollution, was in place and is reviewed accordingly.</p> <p>Sample of pollution management plan is as following:</p> <table><tr><td>Emission</td><td>Source</td><td>Action</td></tr><tr><td>Dark Smoke</td><td>Running Vehicle</td><td>Inspection of vehicle conditions</td></tr><tr><td>GHG</td><td>Use of electricity</td><td>Awareness programme and campaign to reduce</td></tr></table>	Emission	Source	Action	Dark Smoke	Running Vehicle	Inspection of vehicle conditions	GHG	Use of electricity	Awareness programme and campaign to reduce	Complied
Emission	Source	Action										
Dark Smoke	Running Vehicle	Inspection of vehicle conditions										
GHG	Use of electricity	Awareness programme and campaign to reduce										

				the electricity consumption	
			Fertiliser Usage	Usage of EFB, Fertiliser as per agriculture manual and agronomist recommendation.	
<b>Criterion 7.11:</b> 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. - Critical (Major) compliance -	There is no land preparation by burning at Sedenak Complex Management Unit. Johor Plantation Berhad owned policy on sustainable crude oil palm has included zero open burning policy which signed by Managing Director on 1/10/2021. Management complying with the Malaysian environmental law – EQA and Regulations 1974.			Complied
7.11.2	The unit of certification establishes fire prevention and control measures for the areas directly managed by the unit of certification. - Minor compliance -	Johor Plantations Group has subscribed to ASEANFireAlert for the whole group estate's for aerial monitoring. FWI @ Fire Weather Index will be identified at each estate (i.e high risk area – peat soil) to monitor changes in FWI. ASEANFireAlert will trigger any changes in FWI and a notification will be sent to HQ personnel via mobile phone. Operating unit's personnel will be informed and reported to fire department for further action.			Complied
7.11.3	The unit of certification engages with adjacent stakeholders on fire prevention and control measures. - Minor compliance -	Johor Plantations Group engaged smallholders on the fire prevention and control measures. This was mentioned in the stakeholder meeting of respective units under item no 4 elaborating the following; <i>a. Memelihara dan memulihara kepelbagaian biologi</i>			Complied



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		<p><i>b. Pihak berkepentingan boleh melaporkan kepada KMB</i></p> <p><i>c. Jika berlaku kebakaran di persempadanan kawasan ladang/kilang</i></p> <p><i>d. Pihak ladang/kilang /pekebun kecil berhampiran juga boleh mendapatkan bantuan daripada KMB jika berlaku di kawasan mereka.</i></p> <p>Engagement process was done via stakeholder meeting on 18/09/2024</p>	
<b>Criterion 7.12:</b> 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><b>(C)</b> 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>	Not applicable as no new development within Sedenak Palm Oil Mill.	Not Applicable
7.12.2	<p><b>(C)</b> 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 stakeholder consultation and take into account wider landscape-level considerations.</p> <p><b>PROCEDURAL NOTE:</b></p>	<p>The Rapid Biodiversity Assessment of Fifteen Oil Palm Plantations of Kulim (M) Berhad Final Report February 2013 (Compiled from unchanged draft of January 2008). HCV assessment for the Sedenak Complex was conducted by A.J.F.M Dekker (RSPO Assessor, HCV/Biodiversity) was available for verification. The report has identified the list of natural habitats that is possible present in the operating units. The report details the findings of a rapid appraisal of the biodiversity in the estates and addresses the RSPO P&amp;C relevant to biodiversity conservation and HCV. Therein being provided details relating to the following:</p> <p>a) General biodiversity issues</p> <p>b) Watercourses and drainage</p>	Complied

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	<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>	<p>c) Habitats natural and man-made  d) Wildlife  e) Ponds and reservoirs  f) Wetlands /watercourses  g) Legal aspects  h) Immediate and long-term effect</p> <p>Identification of HCV under Sedenak POM complex as per the following:</p> <table border="1"> <thead> <tr> <th>Estate</th><th>Field</th><th>Type of RBA/HCV</th><th>Area (ha)</th></tr> </thead> <tbody> <tr> <td rowspan="5">Sedenak Estate</td><td>P00/04</td><td>Unplantable (RBA 3)</td><td>0.28</td></tr> <tr> <td>P00/05</td><td>Unplantable (RBA 3)</td><td>0.76</td></tr> <tr> <td>P00/08</td><td>Unplantable (RBA 3)</td><td>1.15</td></tr> <tr> <td>P02/04</td><td>Vacant (RBA 2)</td><td>0.02</td></tr> <tr> <td></td><td>River and buffer zone</td><td>9.8</td></tr> <tr> <td colspan="3">Total</td><td>12.01</td></tr> <tr> <td rowspan="2">Kuala Kabong Estate</td><td></td><td>Pond (RBA 2)</td><td>25.58</td></tr> <tr> <td>P06/04</td><td>Drain and buffer zone (RBA 4)</td><td>0.81</td></tr> </tbody> </table>	Estate	Field	Type of RBA/HCV	Area (ha)	Sedenak Estate	P00/04	Unplantable (RBA 3)	0.28	P00/05	Unplantable (RBA 3)	0.76	P00/08	Unplantable (RBA 3)	1.15	P02/04	Vacant (RBA 2)	0.02		River and buffer zone	9.8	Total			12.01	Kuala Kabong Estate		Pond (RBA 2)	25.58	P06/04	Drain and buffer zone (RBA 4)	0.81	
Estate	Field	Type of RBA/HCV	Area (ha)																															
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		Total	26.39										
7.12.3	Indicator is not applicable in Malaysia context	Not applicable		Not Applicable									
7.12.4	<p><b>(C)</b> 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>Based on the Rapid Biodiversity Assessment report, there were some RTE species identified to be present within the estates. The estates have developed their management plan based on recommendation of HCV assessment report. Generally, the management plans consist as follows:</p> <table><tr><td>HCV plan</td><td>Progress</td><td>Person In Charge</td></tr><tr><td>Develop and manage as wetland reserved</td><td><p>Installation of signage of prohibition activities</p><p>Minimise and avoid the use of chemical and heavy machinery around buffer zone</p></td><td>Estate team</td></tr><tr><td>Develop buffer zone</td><td><p>Maintain the buffer zone area by preserve vegetation growth</p><p>Install signages about prohibition activities at site</p></td><td>Estate team</td></tr></table>		HCV plan	Progress	Person In Charge	Develop and manage as wetland reserved	<p>Installation of signage of prohibition activities</p> <p>Minimise and avoid the use of chemical and heavy machinery around buffer zone</p>	Estate team	Develop buffer zone	<p>Maintain the buffer zone area by preserve vegetation growth</p> <p>Install signages about prohibition activities at site</p>	Estate team	Complied
HCV plan	Progress	Person In Charge											
Develop and manage as wetland reserved	<p>Installation of signage of prohibition activities</p> <p>Minimise and avoid the use of chemical and heavy machinery around buffer zone</p>	Estate team											
Develop buffer zone	<p>Maintain the buffer zone area by preserve vegetation growth</p> <p>Install signages about prohibition activities at site</p>	Estate team											

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		<div>Erosion control</div> <div>Monitor the sign of erosion, siltation and road maintenance programs</div> <div>Map bare area, guatamala planting, vertiar planting, and road side drain.</div>	<div>Estate team</div>	
		<div>Restore natural vegetation</div> <div>To brief workers on the importance of HCV areas, to continuously monitor and report any sign of encroachment.</div>	<div>Estate team.</div>	
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>No local communities have been identified in HCV areas within Sedenak POM complex.</p>		Complied
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>Although there is no RTE species identified at Sedenak complex group estate, there is evidence to continuously prevent and discourage illegal or hunting, fishing or collecting activities. Sighting as well as routine patrolling activities were carried out as part of the efforts to create awareness among employees about biodiversity.</p> <p>a. The management has recorded all the animal sighting. Records of animal sighting is available for review with latest of the sighting is on 29/08/2024 at Sedenak Estate. The latest</p>		Complied

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		awareness training on environmental and biodiversity was carried out on 20/01/2024 and 06/03/2024 on RTE for internal stakeholders (workers) at Sedenak Estate. For Kuala Kabong Estate, the training on the RTE species was conducted on 01/03/2024.										
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>- Minor compliance -</p>	<p>Management plan is incorporated with ongoing monitoring of the status of HCV and RTE species that are affected by plantation or mill operations and reported by the Kulim SQI Team from Head Office. Outcomes of monitoring are communicated with plantation management and with management plan. HCV monitoring/patrolling records available.</p> <p>Sample of latest sighting of animal and patrolling records as per below:</p> <table><tr><td>Date of monitoring</td><td>Visited area (hotspots/HCV)</td><td>Estate</td></tr><tr><td>07/24, 08/24</td><td>RBA 2, RBA 4 (P06/04)</td><td>Sedenak Estate</td></tr><tr><td>08/24</td><td>RBA 2 (P02/04), RBA 3(P00/4/5/8)</td><td>Kuala Kabong Estate</td></tr></table>	Date of monitoring	Visited area (hotspots/HCV)	Estate	07/24, 08/24	RBA 2, RBA 4 (P06/04)	Sedenak Estate	08/24	RBA 2 (P02/04), RBA 3(P00/4/5/8)	Kuala Kabong Estate	Complied
Date of monitoring	Visited area (hotspots/HCV)	Estate										
07/24, 08/24	RBA 2, RBA 4 (P06/04)	Sedenak Estate										
08/24	RBA 2 (P02/04), RBA 3(P00/4/5/8)	Kuala Kabong Estate										
7.12.8	<p><b>(C)</b> 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.</p> <p>- Critical (Major) compliance -</p>	No land clearing without prior HCV assessment since November 2005 occurred at visited estates.	Complied									



## Appendix B: GHG Reporting Executive Summary

The GHG emissions that were produced in 2023 for Sedenak Palm Oil Mill and supply base was calculated using the PalmGHG Calculator version 4.0. 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 2023 for Sedenak Palm Oil Mill and supply base are as following:

Emission per product	tCO <sub>2</sub> e/tProduct	Extraction	%
CPO	1.36	OER	19.15
PKO	1.36	KER	5.28

Production	t/yr	Land Use	Ha
FFB Process	40,8634.96	OP Planted Area	42,952.88
CPO Produced	78,246.65	OP Planted on peat	1,315.97
PKO Produced	21,588.48	Conservation (forested)	14.01
		Conservation (non-forested)	278.98
		<b>Total</b>	<b>44,561.84</b>

### Summary of Field Emission and Sink

	Own Crop*		Group		3 <sup>rd</sup> Party		Total	
	tCO <sub>2</sub> e	tCO <sub>2</sub> e / FFB	tCO <sub>2</sub> e	tCO <sub>2</sub> e / FFB	tCO <sub>2</sub> e	tCO <sub>2</sub> e / FFB	tCO <sub>2</sub> e	tCO <sub>2</sub> e / FFB
<b>Emission</b>								
Land Conversion	40,716.25	0.66	22,128.00	0.43	49,876.23	0.00	11,2720.48	1.09
CO <sub>2</sub> Emission from fertilizer	2,663.09	0.04	2,267.92	0.04	2,824.17	0.00	7,755.18	0.08
NO <sub>2</sub> Emission	11,966.62	0.19	1,932.82	0.04	2,228.46	0.04	16,127.89	0.27
Fuel Consumption	723.62	0.01	708.65	0.01	2,502.15	0.00	3,934.42	0.02
Peat Oxidation	71,735.81	1.16	0.00	0.00	0.00	0.00	71,735.81	1.16
<b>Sink</b>								
Crop Sequestration	-38,593.56	-0.63	-20,969.73	-0.41	-46,127.87	0.00	-10,5691.16	-1.04
Conservation Sequestration	0.00	0.00	-9.29	0.00	0.00	0.00	-9.29	0.00
<b>Total</b>	<b>89,211.83</b>	<b>1.45</b>	<b>6,058.38</b>	<b>0.12</b>	<b>21,668.54</b>	<b>0.00</b>	<b>116,938.74</b>	<b>1.57</b>

\*Note: Includes both estates and smallholders

## Summary of Mill Emission and Credit

	tCO <sub>2</sub> e	tCO <sub>2</sub> e/tFFB
<b>Emission</b>		
POME	32786.57	0.08
Fuel Consumption	1232.12	0.00
Grid Electricity Utilization	0.00	0.00
<b>Credit</b>		
Export of Grid Electricity	-79.00	0.00
Sales of PKS	-14829.67	-0.04
Sales of EFB	0.00	0.00
<b>Total</b>	<b>19110.03</b>	<b>0.04</b>

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

Emissions	tCO <sub>2</sub> e
PK from own mill	0.00
PK from other source	0.00
Fuel Consumptions	0.00
<b>Total Crusher emissions</b>	<b>0.00</b>

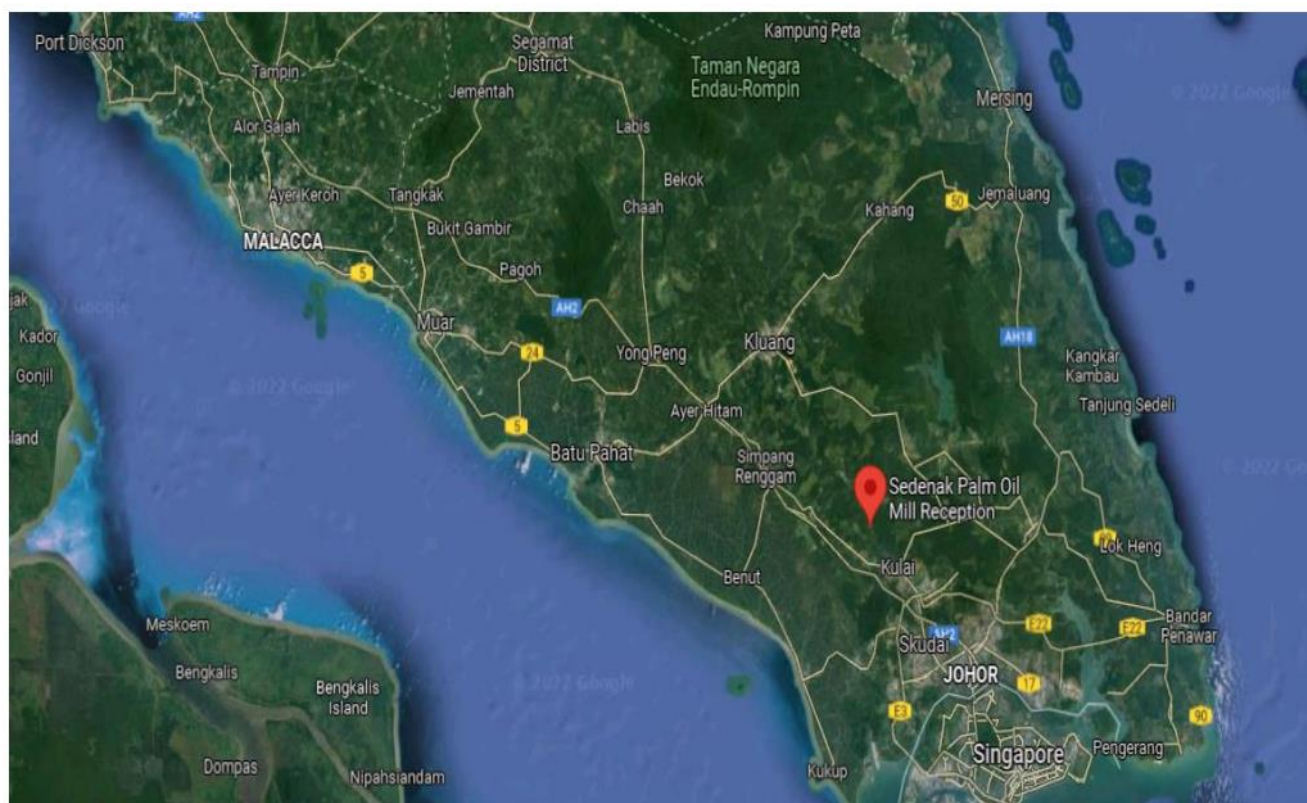
\*This mill has no kernel crusher operation.

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

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

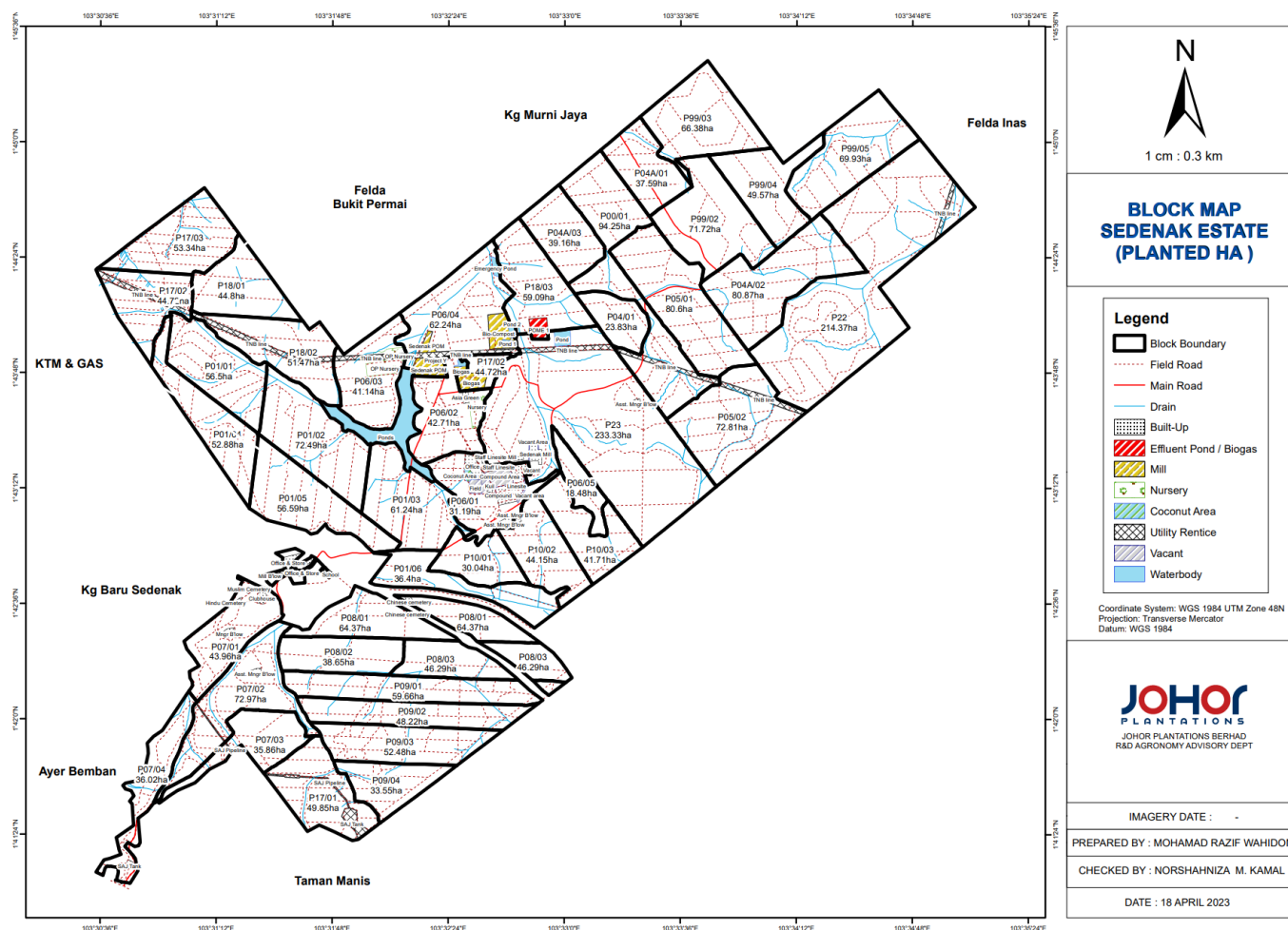


**Appendix C: Location Map of Certification Unit and Supply bases**

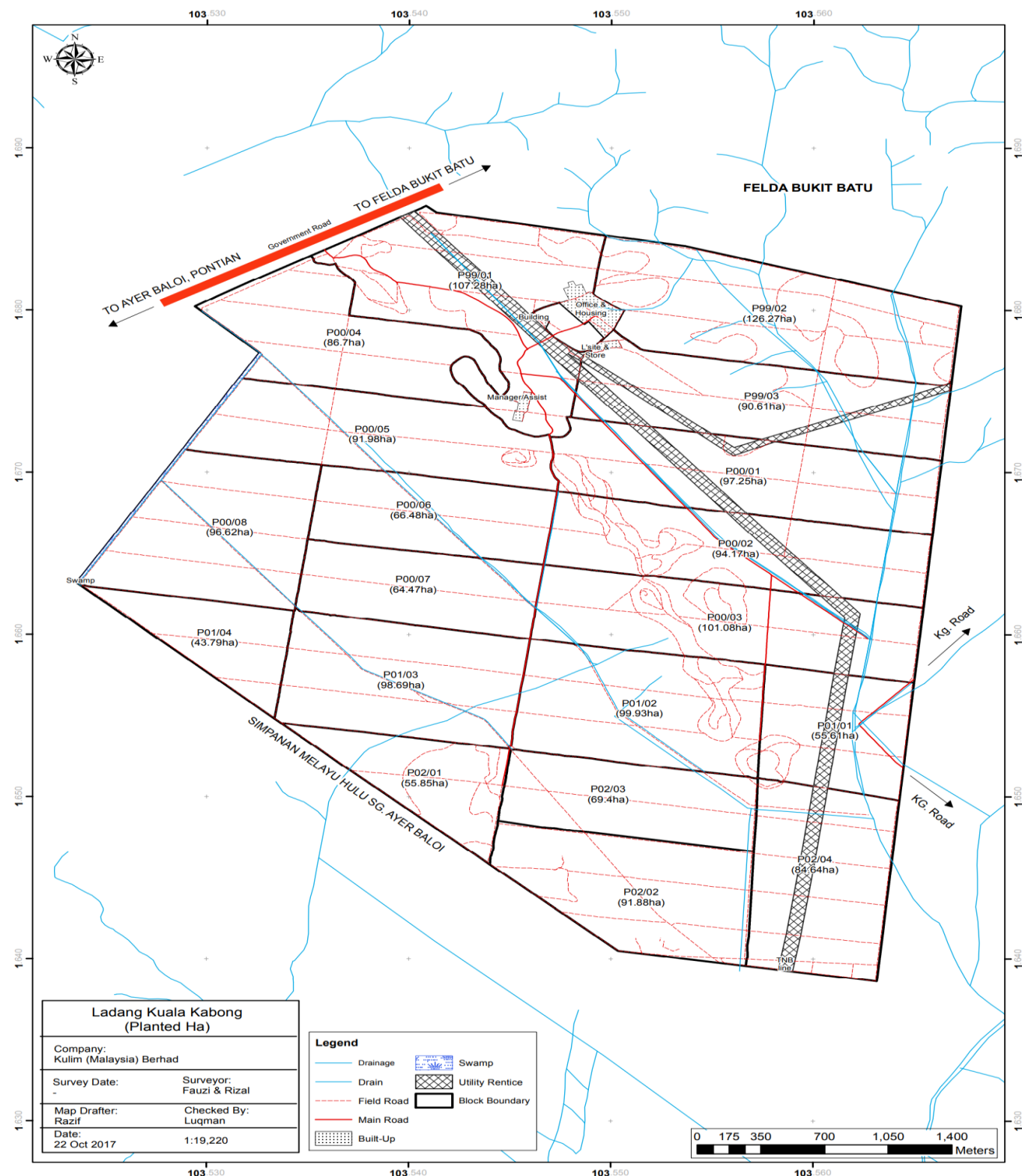


## Appendix D: Estate Field Map

### Sedenak Estate



Kuala Kabong Estate



# **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			

No	Name of farmer	Location	GPS Reference		Area Summary (Ha)		Forecasted annual FFB Production (MT)	Date of joining	Smallholder ID
			Latitude (N)	Longitude (E)	Total Certified Area	Planted Area			
Not Applicable									
Total									
Note: * are smallholders sampled in this audit.									

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#### 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