

**RSPO PRINCIPLE AND CRITERIA  
PUBLIC SUMMARY REPORT**

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

<b>Client Company Name / Parent Company:</b> <b>Johor Corporation</b>
Client Company / Parent Company Address: Level 2, Persada Johor Jalan Abdullah Ibrahim, Johor Bahru, 80000, Malaysia
Certification Unit: <b>Johor Plantations Group Berhad - Sindora Palm Oil Mill</b> Location of Certification Unit: KM 23, Jalan Kota Tinggi – Kluang, 86000 Kluang, Johor Malaysia
Date of Final Report: 13/03/2024

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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	15/6/2009
Address	Level 2, Persada Johor Jalan Abdullah Ibrahim, Johor Bahru, 80000, Malaysia		
Palm Oil Mill / Group Manager / Estate (Certification Unit)	Johor Plantations Group Berhad – Sindora Palm Oil Mill		
Location / Address	KM 23, Jalan Kota Tinggi – Kluang, 86000 Kluang, Johor Malaysia		
Website	<a href="https://johorplantations.com/">https://johorplantations.com/</a>		
Management Representative	Wan Adlin Wan Mahmood	E-mail	<a href="mailto:wanadlin@johorplantations.com">wanadlin@johorplantations.com</a>
Telephone	07-8611611	Facsimile	N/A

2. Certification Information			
Certificate Number	RSPO 612392	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 type="checkbox"/> Annual Surveillance Assessment (ASA Choose an item.) <input checked="" type="checkbox"/> Recertification Assessment (RA 3) <input type="checkbox"/> Scope Extension		
Applicable Standards / Normative Reference	RSPO Certification System for P&C and RSPO ISH 2020 <input type="checkbox"/> Choose an item. <input checked="" type="checkbox"/> Malaysia National Interpretation 2019 for RSPO P&C 2018 for the Production of Sustainable Palm Oil		
Supply Chain Module	<input checked="" type="checkbox"/> Identity Preserved; <input type="checkbox"/> Mass Balance	Mill Capacity	60 mt/hr
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 697951	MSPO 2530-3:2013 General Principles for Oil Palm Plantations and Organized Smallholders	BSI Services (M) Sdn Bhd	9/03/2024
MSPO 697952	MSPO 2530-4:2013 General Principles for Palm Oil Mills		9/03/2024
BVC-MSPO/SC-0028	MSPO Supply Chain Certification Standard 2018	Bureau Veritas Certification (Malaysia) Sdn Bhd	10/03/2025
EU-ISCC-Cert-DE119-60222024	ISCC EU	ASG Certification	26/04/2024
ISCC-PLUS-Cert-60222024	ISCC PLUS		26/04/2024
A158822	MS 1500:2009	JAKIM	1/09/2024

4. Location(s) of Mill & Supply Bases			
Name (Mill / Supply Base / Group Manager / Smallholders)	Location	GPS Coordinates	
		Latitude	Longitude
Sindora Palm Oil Mill	KM 23, Jalan Kota Tinggi – Kluang, 86000 Kluang, Johor Malaysia	1° 59' 7.34"N	103° 27' 44.32"E
Sindora Estate	KM 23, Jalan Kota Tinggi – Kluang, 86000 Kluang, Johor Malaysia	1° 57' 48.11"N	103° 28' 17.98"E
REM Estate	KM 36 Johor Bahru, 81909 Kota Tinggi, Johor Malaysia	1°42' 12.43"N	103° 52' 54.96"E
Sg Papan Estate	KM 59 Kota Tinggi, Jalan Belungkor, 81606 Pengerang Johor, Malaysia	1° 31' 1.26"N	104° 6' 21.81"E
Basir Ismail Estate	KM 12 Tiram, Jalan Sg. Redan, 81800 Ulu Tiram, Johor Darul Takzim	1° 37' 47.84"N	103° 54' 52.07"E

5. Description of Supply Base					
<b>New Planting Development</b>	<input checked="" type="checkbox"/> No (no change in total planted area) <input type="checkbox"/> Yes (please refer to Principle 7 for details)				
Estate / Smallholders	Total Planted (Mature + Immature) (ha)	HCV (ha)	Infrastructure & Other (ha)	Total Area (ha)	% of Planted
Sindora Estate	3,655.04	20.21	243.81	3,919.06	93.26
Sungai Papan Estate	2,834.42	11.49	149.94	2,995.85	94.61
REM Estate	2,321.02	44.86	533.00	2,898.88	80.07

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Basir Ismail Estate	2,885.96	50.69	259.98	3,196.63	90.28
<b>Total</b>	<b>11,696.44</b>	<b>127.25</b>	<b>1,186.73</b>	<b>13,010.42</b>	<b>89.90</b>
<b>Note:</b> <ul style="list-style-type: none"> <li>- REM Estate planted area reduced from completion of housing development project Taman REM and some use for estate buildings</li> <li>- Basir Ismail Estate planted area reduced for estate facility development</li> </ul>					

## 6. Plantings &amp; Cycle

Estate / Smallholders	Age (Years) - ha				Mature	Immature
	0 - 3	4 - 14	15 - 25	>25		
Sindora Estate	100.56	2,840.28	714.20	-	3,554.48	100.56
Sungai Papan Estate	-	1,462.67	1,371.75	-	2,834.42	-
REM Estate	243.95	1,760.71	67.13	249.23	2,077.07	243.95
Basir Ismail Estate	477.37	1,630.47	778.12	-	2,408.59	477.37
<b>Total (ha)</b>	<b>821.88</b>	<b>7,694.13</b>	<b>2,931.20</b>	<b>249.23</b>	<b>10,874.56</b>	<b>821.88</b>

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

Estate / Smallholders	Tonnage (MT) / year			
	Estimated last year (Jan 23 – Dec 23)	Actual (Oct 22 - Sep 23)		Forecast (Jan 24 - Dec 24)
		Previous license period (Oct 22 - Dec 22)	Current license period (Jan 23 - Sep 23)	
Sindora Estate	79,657.00	18,261.82	43,192.93	70,591.00
Rem Estate	48,884.00	10,416.34	31,170.89	50,217.00
Sungai Papan Estate	83,468.00	17,856.93	34,347.48	81,414.00
Basir Ismail Estate	63,078.00	13,519.66	33,321.92	59,136.00
<b>Total</b>	<b>275,087.00</b>	<b>202,087.97</b>		<b>261,358.00</b>

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

Estate / Smallholders	Tonnage (MT) / year			
	Estimated last year (Jan 23 – Dec 23)	Actual (Oct 22 - Sep 23)		Forecast (Jan 24 - Dec 24)
		Previous license period (Oct 22 - Dec 22)	Current license period (Jan 23 - Sep 23)	
Eng Lee Heng		6,211.61	8,462.04	
Siang Estate		143.49	6,427.07	

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Rengam Estate		-	734.53	
Tunjuk Laut Estate		-	40.31	
<b>Total</b>			<b>22,019.05</b>	

9. Summary of Non-Certified Tonnage of FFB (outside supplier – excluded from certificate)				
Out growers / smallholders	Tonnage (MT) / year			
	Estimated last year (Jan 23 – Dec 23)	Actual (Oct 22 - Sep 23)		Forecast (Jan 24 - Dec 24)
		Previous license period (Oct 22 - Dec 22)	Current license period (Jan 23 - Sep 23)	
Nil	N/A	N/A	N/A	N/A
<b>Total</b>	N/A	N/A		N/A

9A. Monthly Records of Certified and Uncertified FFB Received since the last audit				
No.	Month - Year	Volume of FFB from certified supply base (mt)	Volume of FFB from uncertified supply base (mt)	Total FFB/Month (mt)
1	October 2022	22,828.510	-	22,828.510
2	November 2022	23,109.700	-	23,109.700
3	December 2022	20,471.640	-	20,471.640
4	January 2023	16,306.710	-	16,306.710
5	February 2023	10,600.810	-	10,600.810
6	March 2023	15,370.400	-	15,370.400
7	April 2023	9,427.290	-	9,427.290
8	May 2023	17,261.190	-	17,261.190
9	June 2023	18,212.660	-	18,212.660
10	July 2023	22,522.290	-	22,522.290
11	August 2023	24,263.830	-	24,263.830
12	September 2023	23,731.990	-	23,731.990
<b>TOTAL</b>		<b>224,107.02</b>	-	<b>224,107.02</b>

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<b>10. Summary of Certified Tonnage (MT) (not applicable for ISS)</b>			
<b>Estimated last year (Jan 23 – Dec 23)</b>	<b>Actual (Oct 22 - Sep 23)</b>		<b>Forecast (Jan 24 - Dec 24)</b>
	Previous license period (Oct 22 - Dec 22)	Current license period (Jan 23 - Sep 23)	
<b>FFB</b>	<b>FFB</b>		<b>FFB</b>
275,087.00 mt	65,559.51 mt	158,547.51 mt	261,358.00 mt
	<b>TOTAL</b>	224,107.02 mt	
<b>CPO (OER: 21.69 %)</b>	<b>CPO (OER: 19.72 %)</b>		<b>CPO (OER: 21.32%)</b>
59,659.00 mt	13,157.35 mt	31,037.48 mt	62,181.00 mt
	<b>TOTAL</b>	44,194.83	
<b>PK (KER: 5.14 %)</b>	<b>PK (KER: 5.31 %)</b>		<b>PK (KER: 5.2 %)</b>
14,151.00 mt	3,565.24 mt	8,334.23 mt	15,166.00 mt
	<b>TOTAL</b>	11,899.47 mt	

<b>10A. Monthly Records of Certified CPO &amp; PK since the last audit</b>			
<b>No.</b>	<b>Month - Year</b>	<b>Certified CPO (MT)</b>	<b>Certified PK (MT)</b>
1	October 2022	4,648.83	1,247.25
2	November 2022	4,547.60	1,185.14
3	December 2022	3,960.92	1,132.85
4	January 2023	3,307.88	937.00
5	February 2023	2,068.84	583.10
6	March 2023	3,029.52	836.37
7	April 2023	1,957.53	533.15
8	May 2023	3,479.74	867.44
9	June 2023	3,482.91	984.34
10	July 2023	4,401.95	1,133.13
11	August 2023	4,676.87	1,225.74
12	September 2023	4,632.24	1,233.96
<b>TOTAL</b>		<b>44,194.83</b>	<b>11,899.47</b>

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<b>11. Summary of Actual Volume sold</b>					
<b>Current License period (Jan 23 - Sep 23)</b>					
	<b>RSPO Certified</b>	<b>Other Schemes Certified</b>		<b>Conventional</b>	<b>Total</b>
		<b>ISCC</b>	<b>Others</b>		
<b>CPO (MT)</b>	30,306.16	-	-	-	30,306.16
<b>PK (MT)</b>	8,334.02	-	-	-	8,334.02
<b>Credits</b>		-	-	-	-
<b>Previous License period (Oct 22 - Dec 22)</b>					
<b>CPO (MT)</b>	11,125.33	-	-	-	11,125.33
<b>PK (MT)</b>	3,532.06	-	-	-	3,532.06
<b>Credits</b>	-	-	-	-	-

<b>11A. Records of Certified CPO &amp; PK Sold under PalmTrace since the last audit (if any)</b>				
<b>No.</b>	<b>Buyers Name</b>	<b>PalmTrace Trading License Number</b>	<b>Certified CPO Sold (MT)</b>	<b>Certified PK Sold (MT)</b>
1	XXX1	YYY1	11,976.82	-
2	XXX2	YYY2	3,182.90	-
3	XXX3	YYY3	3,639.22	4,496.67
4	XXX4	YYY4	744.86	-
5	XXX5	YYY5	1,900.98	-
6	XXX6	YYY6	2,144.85	-
7	XXX7	YYY7	79.08	-
8	XXX8	YYY8	9,972.31	4,287.44
9	XXX9	YYY9	297.20	-
10	XXX10	YYY10	2,034.27	1,503.95
11	XXX11	YYY11	228.72	-
12	XXX12	YYY12	5,230.28	242.61
13	XXX13	YYY13	-	388.73
14	XXX14	YYY14	-	748.24
15	XXX15	YYY15	-	198.44
<b>TOTAL</b>			<b>41,431.49</b>	<b>11,866.08</b>



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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)
Nil	N/A	N/A	N/A	N/A
TOTAL				

11C. Records of CPO & PK Sold as conventional since the last audit (if any)			
No.	Buyers Name	CPO Sold (MT)	PK Sold (MT)
Nil	N/A	N/A	N/A
Nil	N/A	N/A	N/A
TOTAL		-	-

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
Nil	N/A	N/A	N/A
TOTAL			N/A

12. Independent Smallholders Certified Tonnage (MT) / Volume									
Phase	Estimated last year (Jan 23 – Dec 23)			Actual (Oct 22 - Sep 23)			Forecast (Jan 24 - Dec 24)		
	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	N/A	N/A	N/A	N/A	N/A	N/A
IS-CSPO	N/A	N/A	N/A	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	N/A	N/A	N/A
IS-CSPKE	N/A	N/A	N/A	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	N/A	N/A	N/A

12A. Monthly Records of Certified CPO, PK & PKE (equivalent) produced since the last audit						
No.	Month - Year	FFB (MT)	Certified CPO (MT)	Certified PK (MT)	Certified PKO (MT)	Certified PKE (MT)
1	N/A	N/A	N/A	N/A	N/A	N/A
TOTAL		N/A	N/A	N/A	N/A	N/A

13. Independent Smallholders Actual Sold Tonnage / Volume							
	FFB	FFB Conventional	FFB Other schemes	IS-CSPO	CSPK	IS-CSPKO	IS-CSPKE
Current License period (Jan 23 - Sep 23)							
Credits	N/A	N/A	N/A	N/A	N/A	N/A	N/A
Physical	N/A	N/A	N/A	N/A	N/A	N/A	N/A
Previous License period (Oct 22 - Dec 22)							
Credits	N/A	N/A	N/A	N/A	N/A	N/A	N/A
Physical	N/A	N/A	N/A	N/A	N/A	N/A	N/A

13A. Records of Certified FFB, CPO, PK & PKE (including credits) sold since the last audit							
No.	Buyers Name	PalmTrace Trading License Number	FFB Sold (MT)	Certified CPO Sold (MT/credit)	Certified PK Sold (MT/credit)	Certified PKO Sold (MT/credit)	Certified PKE Sold (MT/credit)
Nil	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 **1/10/2023 – 05/10/2023**. The audit programme is included as Section 2.3. Where applicable, prior to the initial certification and recertification audit, 30 days Public Notification was made through the RSPO and BSI website on **28/08/2023 - 27/09/2023**.

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 **21/12/2023**. 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 company with respect to the RSPO requirements and aspects where they considered that improvements could be made. At the start of each meeting, the interviewer explained the purpose of the audit followed by an evaluation of the relationship between the stakeholder and the company before discussions proceeded. The interviewer recorded comments made by stakeholders and these have been incorporated into the assessment findings.

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

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.

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 (Recertification 3)	Year 2 (ASA 3_1)	Year 3 (ASA 3_2)	Year 4 (ASA 3_3)	Year 5 (ASA 3_4)
Sindora Palm Oil Mill	✓	✓	✓	✓	✓
Sindora Estate	✓	✓	✓	✓	✓
REM Estate	✓	✓	✓	✓ (Ulu Tiram Estate)	✓
Sungai Papan Estate	✓	✓	✓	✓	✓
Basir Ismail Estate	✓	✓	✓	✓	✓

**Tentative Date of Next Visit: October 1, 2025 - October 5, 2024**

**Total Number of Mandays: 15 Mandays**

## 2.2 BSI Assessment Team

Name	Role	Competency
Hafriazhar bin Mohd Mokhtar (HMM)	Team Leader	<p><b>Education:</b> Bachelor of Engineering (Hons.) Chemical Engineering, UTM.</p> <p><b>Work Experience:</b> Environmental Officer (2002-2003), Mill Engineer (2003-2008), Project Control Engineer (2008-2011), Auditor/Client Manager (2011-present)</p> <p><b>Training attended:</b> Social Auditing &amp; SMETA Training (2021), ISO 45001 LA Training (2018), RSPO LA Training (2017), RSPO SCCS LA Training (2016), RSPO P&amp;C LA Training (2015), ISO 9001 LA Training (2013), ISO 50001 LA Training (2012), ISO 14001 LA Training (2011)</p> <p><b>Language proficiency:</b> Fluent in both verbal/written Bahasa Malaysia and English Language.</p> <p><b>Aspect covered in this audit:</b> Economic management plan, environment responsibility, environment impact assessment and management plan, natural and biodiversity conservation, Waste management, GHG, HCV, and RSPO supply chain requirements.</p>
Ahmad Rufi Bin Abu Talib Khan (ARK)	Team Member	<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</p>

		<p>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></p> <p>Fluent in in both verbal/written Bahasa Malaysia and English</p> <p><b>Aspect covered in this audit:</b></p> <p>Legal Requirements, land &amp; legal issue, Occupational health and safety requirement, HIRARC and management plan, mill best practices, estate best practices training, environment impact assessment and management plan.</p>
Rahayu Zulkifli	Team Member	<p><b>Education:</b> Law Degree from John Moores University, Liverpool, United Kingdom</p> <p><b>Work Experience:</b> She was a practicing lawyer before she joined several public listed companies as Head of Legal Department. In 2003 she joined an environmental NGO as a turtle conservationist, and in 2014 joined RSPO as Dispute Settlement Facility Manager. Rahayu is now a freelance auditor specializing in social aspects of the RSPO and MSPO standards, with audit experiences in Malaysia, Indonesia and Ghana.</p> <p><b>Training attended:</b> Rahayu successfully attended the RSPO-endorsed Lead Auditor course in 2014, ISO 14001 Lead Auditor course in 2016, the MSPO Awareness Training in 2016, and RSPO-endorsed Lead Auditor Refresher course in 2018. Additionally, Rahayu also assists in HCV assessments (in particular HCV 5 &amp; 6), as well as carry out Social Impact Assessments. Rahayu is also a trained and certified Mediator.</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>Policy and commitment, social requirements, contract agreement, human rights, workers' welfare, smallholder welfare and Stakeholder Consultation</p>
Dr. Suhaili Sahari	Peer Reviewer	<p><b>Education:</b> Graduated from University Technology Mara (UiTM), Malaysia in Diploma in Science in 1990. He furthers his first degree in B.Sc (Hons) in Chemistry with Industrial Chemistry in 1995 from Liverpool University, England. He later advances his study in Master in Business Administration (General) in 2002 and graduated in 2005 from University of Multimedia, Malaysia. Completed his PhD from University Science Islam Malaysia (Faculty of Economy and Muamalat - Management) under the supervision of previous University Vice Chancellor Dato' Mohd Muda.</p> <p><b>Work Experience:</b> Worked with Hong Leong Group of Companies as a production executive cum TQM facilitator and continues to advance in his career as a manager and senior manager in management, production, training and quality for more than 11 years. During his tenure with Hong Leong Group of Companies, he heavily involved in strategic management decision issues such as developing SWOT analysis, Vision, Mission, Business and Corporate Strategy formulation, Acquisition and restructuring strategies.</p>

		<p>Strategic actions and implementation etc. Then he joint Kumpulan Guthrie and Sime Darby Group of Companies for more than 7 years as a manager, heads of department and Assistant Vice President in management, quality and training. Part of his duty is to strategies the departmental vision; mission, critical success factors and action plan into actions and support the corporate strategic plan.</p> <p><b>Training attended:</b></p> <ol style="list-style-type: none"> <li>1. ISO 9001:2015 Lead Auditor and Internal Auditor</li> <li>2. ASI reviewer training</li> <li>3. Safety and Health</li> <li>4. ISO 14001:2015 Standard</li> <li>5. RSPO Standards: RSPO P&amp;C 2018 MY-NI 2019</li> <li>6. MSPO Standards: MS 2530: 2013 part 1, 2, 3 and 4</li> <li>7. Problem Solving Technique: 8 D, ICC, QCC, Systematic PS</li> <li>8. HACCP MS 1480:2019</li> <li>9. GAP Standard: GLOBALGAP, Euro GAP</li> <li>10. MSPO Peer Reviewer Training 2 - 2017 by MPOCC.</li> </ol> <p><b>Expertise:</b> General Management, Auditing, Environment and Plantation Management.</p>
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**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	HMM	ARK	RAZ	FO
Saturday, 30/9/2023	PM	Audit team travel to Johor Bahru	✓	✓	✓	✓
Sunday, 1/10/2023 Day 1 <b>Sindora Estate</b>	9:00 AM – 9:30 AM	<b>Opening meeting @ Sindora 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>Sindora 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, worker housing, clinic, Landfill etc.	✓	✓	✓	✓

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Date	Time	Subjects	HMM	ARK	RAZ	FO
	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>	✓	✓	✓	✓
Monday, 2/10/2023  Day 2 <b>Sungai Papan Estate</b>	9:00 AM – 12:30 PM	<b>Sungai Papan 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, worker 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: 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>	✓	✓	✓	✓

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Date	Time	Subjects	HMM	ARK	RAZ	FO
Tuesday, 3/10/2023  Day 3 <b>Sindora POM</b>	9:00 AM – 12:30 PM	<b>Sindora POM</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	✓	✓	✓	✓
	1:30 PM – 4:30 PM	Document Review P1 – P7: SOPs, review on management plans, SEIA documents, GHG records, wage records, employee data, training records, legal permits, mill inspection and internal monitoring records, CIP & implementation	✓	✓	✓	✓
		RSPO SCC general requirements, supply chain for CPO mill, internal audit, management review, sales and purchasing documents, mass balance accounting and other relevant documents and records.	✓	✓	-	✓
	4:30 PM – 5:00 PM	<ul style="list-style-type: none"> <li>Auditors' discussion</li> <li>Day 3 Interim Closing Briefing</li> </ul>	✓	✓	✓	✓
Wednesday, 4/10/2023  Day 4 <b>REM Estate</b>	9:00 AM – 12:30 PM	<b>REM 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, worker 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	✓	✓	✓	✓



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Date	Time	Subjects	HMM	ARK	RAZ	FO
	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 4 Interim Closing Briefing</li> </ul>	✓	✓	✓	✓
Thursday, 5/10/2023 Day 5 <b>Basir Ismail Estate</b>	9:00 AM – 12:30 PM	<b>Basir Ismail 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, worker 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: 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>Preparation for Closing Meeting</li> </ul>	✓	✓	✓	✓
	5:00 PM – 5:30 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. However the Indonesian units, PT RAJ & PT TPR had 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
Any deviations from the maximum periods requires approval by the RSPO Secretariat.	No. There are no 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 are no changes to the time-bound plan since the last audit.	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	No fundamental failure and no isolated lapse in the Time Bound Plan implementation.	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.	There are no new plantings that replace primary forest. No uncertified units of holdings under Johor Plantations 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.	There are no new plantings since January 1 <sup>st</sup> , 2010. No uncertified units of holdings under Johor Plantations Berhad. Thus, this requirement is not applicable.	Not Applicable

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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.	There is No land conflict. No uncertified units of holdings under Johor Plantations 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	There is No labour dispute. No uncertified units of holdings under Johor Plantations 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	There is No legal non-compliance. No uncertified units of holdings under Johor Plantations 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 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 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 Berhad. Thus, this requirement is not applicable.	Not Applicable

### **3.2 Progress of scheme smallholders and/or outgrowers**

<b>Progress of scheme smallholders or outgrowers towards compliance with relevant standards</b>		
<b>Requirement</b>	<b>Remarks</b>	<b>Compliance</b>
Has 100% of scheme smallholders and/or scheme outgrowers comply with the standard within three years of the mill's initial certification? 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 is no smallholder scheme under Sindora 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	Location Address	GPS Coordinates (in decimal degree)		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)			
				Latitude	Longitude						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
Sedenak Palm Oil Mill	Malaysia	Sedenak Estate	Lot 136, Geran 237961, Mukim Sedenak, Daerah Johor Darul Takzim	1° 42' 48.79" N	103° 31' 36.24" E	2808	Certified	Nil	2009	20-Apr-22	Yes	Nil	JPB completed the disposal of Indonesia operation in August 2023	Nil
		Kuala Kabong Estate	PTD 35021, HSD 71140, Mukim Bukit Batu, Daerah Johor Darul Takzim	1° 41' 20.1012" N	103° 26' 0.87" E	1718.32	Certified	Nil	2009	20-Apr-22	Yes	Nil	JPB completed the disposal of Indonesia operation in August 2023	Nil
Sindora Palm Oil Mill	Malaysia	Sindora Estate	KM 23, Jalan Kota Tinggi – Kluang, 86000 Kluang, Johor Malaysia	1° 57' 48.11" N	103° 28' 17.98" E	3,919.06	Certified	Nil	2009	20-Apr-22	Yes	Nil	JPB completed the disposal of Indonesia operation in August 2023	Nil
		Basir Ismail Estate	KM 12 Tiram, Jalan Sg. Redan, 81800 Ulu Tiram, Johor Darul Takzim	1° 42' 12.43" N	103° 52' 54.96" E	3594.39	Certified	Nil	2009	20-Apr-22	Yes	Nil	JPB completed the disposal of Indonesia operation in August 2023	Nil

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Tereh Palm Oil Mill		<i>REM Estate</i>	KM 36 Johor Bahru, 81909 Kota Tinggi, Johor Malaysia	1° 31' 1.26"	104° 6' 21.81"	2898.88	Certified	Nil	2009	20-Apr-22	Yes	Nil	JPB completed the disposal of Indonesia operation in August 2023	Nil
		<i>Sungai Papan Estate</i>	KM 59 Kota Tinggi, Jalan Belungkor, 81606 Pengerang Johor, Malaysia	1° 37' 47.8416"	103° 54' 52.0704"	2,995.85	Certified	Nil	2009	20-Apr-22	Yes	Nil	JPB completed the disposal of Indonesia operation in August 2023	Nil
	Malaysia	<i>Tereh Utara Estate</i>	Ptd 3504, Hsd 5655, Mukim Paloh, Daerah Kluang, Johor Darul Takzim	2° 15' 5.2092"	103° 20'36.0492"	3087.37	Certified	Nil	2009	20-Apr-22	Yes	Nil	JPB completed the disposal of Indonesia operation in August 2023	Nil
		<i>Tereh Selatan Estate</i>	Ptd 3326, Hsd 6766, Mukim Niyor, Daerah Kluang, Johor Darul Takzim	2° 11' 38.3784"	103° 21' 8.3772"	2707.22	Certified	Nil	2009	20-Apr-22	Yes	Nil	JPB completed the disposal of Indonesia operation in August 2023	Nil
		<i>Selai Estate</i>	GRN 562233, Lot 8848, Mukim Paloh, Daerah Kluang, Johor Darul Takzim	2° 6' 14.4156"	103° 23' 14.816	3535.07	Certified	Nil	2009	20-Apr-22	Yes	Nil	JPB completed the disposal of Indonesia operation in August 2023	Nil
		<i>Mutiara Estate</i>	PN 74877, Lot 3918, Mukim Kahang, Daerah Kluang, Johor Darul Takzim	2° 17' 16.6164"	103° 28' 52.1328"	3695.06	Certified	Nil	2009	20-Apr-22	Yes	Nil	JPB completed the disposal of Indonesia operation in August 2023	Nil
		<i>Sungai Tawing Estate</i>	PTD 2137, Hsd 6060, Mukim Paloh, Daerah	2°17' 46.7556"	103° 21' 11.5848"	2225.77	Certified	Nil	2009	20-Apr-22	Yes	Nil	JPB completed the disposal of Indonesia	Nil

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			Kluang, Johor Darul Takzim										operation in August 2023	
		<i>Wawasan Estate</i>	YPJ Plantations Sdn Bhd, 510, 81900 Kota Tinggi, Johor	2° 14' 15.108" E	103° 22' 45.12" N	362.30	Certified	Nil	2009	20-Apr-22	Yes	Nil	JPB completed the disposal of Indonesia operation in August 2023	Nil
		<i>Felda Paloh Estate</i>	FGV Plantations (M) Sdn Bhd, 111, 86007 Kluang, Johor	2° 14' 51.072" E	103° 22' 7.5" N	1331.8	Certified	Nil	2009	20-Apr-22	Yes	Nil	JPB completed the disposal of Indonesia operation in August 2023	Nil
		<i>Rengam Estate</i>	Lot 1912, Grn 84384, Mukim Rengam, Daerah Kluang, Johor Darul Takzim	103° 24' 49.0212"	1° 53' 21.9768"	2418.24	Certified	Nil	2009	20-Apr-22	Yes	Nil	JPB completed the disposal of Indonesia operation in August 2023	Nil
<i>Palong Palm Oil Mill</i>	<i>Malaysia</i>	<i>Palong Estate</i>	PTD 15677, HSD 52397, Mukim Buloh Kasap, Segamat, Johor, Malaysia	2° 44' 55.89" N	102° 44' 55.53" E	3701.9	Certified	Nil	2009	20-Apr-22	Yes	Nil	JPB completed the disposal of Indonesia operation in August 2023	Nil
		<i>Mungka Estate</i>	PTD 15678, HSD 52398, Mukim Buloh Kasap, Segamat, Johor, Malaysia	2° 41' 15.44" N	102° 47' 8.35" E	2898.27	Certified	Nil	2009	20-Apr-22	Yes	Nil	JPB completed the disposal of Indonesia operation in August 2023	Nil
		<i>UMAC Estate</i>	PTD 298, HSD 3746, Mukim Keratong, Daerah Rompin, Bandar Tun	2° 53' 3.31" N	102° 48' 23.94" E	1616.33	Certified	Nil	2009	20-Apr-22	Yes	Nil	JPB completed the disposal of Indonesia operation in August 2023	Nil

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			Razak, Pahang, Malaysia											
		<i>Labis Bahru Estate</i>	LOT 1265, GERAN 38197, Mukim Pogoh, Segamat, Johor, Malaysia	2° 25' 49.29" N	102° 52' 27.92" E	2108.16	Certified	Nil	2009	20-Apr-22	Yes	Nil	JPB completed the disposal of Indonesia operation in August 2023	Nil
<i>Pasir Panjang Palm Oil Mill</i>	<i>Malaysia</i>	Pasir Panjang Estate	KM 30 Kota Tinggi/ KM 63 Mersing, JalanJemaluang, 81900, Kota Tinggi, Johor Darul Takzim.	2° 1' 4.8504"	103° 56' 54.8736"	4013.63	Certified	Nil	2009	20-Apr-22	Yes	Nil	JPB completed the disposal of Indonesia operation in August 2023	Nil
		Tunjuk Laut Estate	KM 30 Kota Tinggi/ KM 63 Mersing, JalanJemaluang, 81900, Kota Tinggi, Johor Darul Takzim.	2° 0' 34.7616"	103° 57' 15.9372"	2867.8	Certified	Nil	2009	20-Apr-22	Yes	Nil	JPB completed the disposal of Indonesia operation in August 2023	Nil
		Siang Estate	KM 3 Tg. Balau / 87 Johor Bahru, Jalan Ladang Siang – Tanjung Balau, 82200, Bandar Penawar, Johor Darul Takzim.	1° 57' 41.6916"	103° 59' 9.5208"	3443.1	Certified	Nil	2009	20-Apr-22	Yes	Nil	JPB completed the disposal of Indonesia operation in August 2023	Nil
		Bukit Kelompok Estate	KM 30 Kota Tinggi/ KM 63 Mersing, JalanJemaluang, 81900, Kota Tinggi, Johor Darul Takzim.	1° 39' 10.1556"	104° 12' 40.2372"	2613.8	Certified	Nil	2009	20-Apr-22	Yes	Nil	JPB completed the disposal of Indonesia operation in August 2023	Nil

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		Pasir Logok Estate	KM 30 Kota Tinggi/ KM 63 Mersing, Jalan Jemaluang, 81900, Kota Tinggi, Johor Darul Takzim.	2° 0' 24.3108"	103° 59' 54.3984"	2097.73	Certified	Nil	2009	20-Apr-22	Yes	Nil	JPB completed the disposal of Indonesia operation in August 2023	Nil
Bukit Layang Estate	Malaysia	Bukit Layang Estate	PTD 713, GERAN 105390, Mukim Sg. Tiram, Daerah Johor Bahru, Johor Darul Takzim.	1° 34' 56.7012"	103° 57' 46.9332"	397.76	Certified	Nil	12-Jul	20-Apr-22	Yes	Nil	JPB completed the disposal of 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 major (1) Critical; three (3) Minor nonconformities and four (4) Opportunity For Improvement raised. The Johor Plantations Berhad - Sindora 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			
NCR Ref #	2402549-202309-M1	Issued Date	05/10/2023
Due Date	03/01/2024	Closure Date	02/01/2024
Indicator & Category (Critical / Minor)	3.6.1 (Critical)		
Statement of Nonconformity:	The implementation of risk assessment identification and implementation was insufficient.		
Requirement Reference:	All operations are risk assessed to identify H&S issues. Mitigation plans and procedures are documented and implemented.		
Objective Evidence:	<p><u>Sindora Palm Oil Mill:</u></p> <p>The management has established the HIRARC Form for boiler operation dated 24/01/2023 with floating dusts identified as hazard and control measure taken is PPE of goggles and facemask. Site visit at Boiler station found that the workers working at the station did not use the facemask.</p> <p><u>Basir Ismail Estate / REM Estate / Sungai Papan Estate/ Sindora Estate:</u></p> <p>The management has conducted the Noise Risk Assessment at each estate visited. Verified during site visit and interview it was found that the manuring activity was conducted using mechanical spreader attached to the tractor and Mechanical Buffalo (MB) was use at REM Estate. However it was found that the process of noise identification process was yet to be conducted as per the requirement in the Occupational Safety And Health (Noise Exposure) Regulations 2019 Clause 3(2)(a) "The employer shall reidentify whether his employee may be exposed to excessive in the place of work under sub-regulation 1 – (a) if there is a change in the machinery, equipment, process, work, control measure or operation at place of work which may expose his employee to excessive noise."</p> <p><u>Basir Ismail Estate:</u></p> <p>The management has conducted the NRA on the fogging activity dated 13/04/2023 (Report No: HQ/18/PEB/00/00014-2023/006) , of which the recommendation stated, " Management shall attach prominent warning notices to Fogging Machine indicating that PHP must be worn when operating them". Site inspection at workshop verified that there is no prominent warning notices attached on the Fogging Machine.</p>		

<b>Corrections:</b>	<p><u>Sindora Palm Oil Mill:</u></p> <ul style="list-style-type: none"> <li>- Review of the HIRARC register and update with respective unsafe condition cases.</li> </ul> <p><u>Basir Ismail Estate / REM Estate / Sungai Papan Estate/ Sindora Estate:</u></p> <ul style="list-style-type: none"> <li>- Estate to notify KSTS to arrange and conduct Noise Risk Assessment (NRA).</li> </ul> <p><u>Basir Ismail Estate:</u></p> <ul style="list-style-type: none"> <li>- Estate management had immediately prominent warning notices attached on the Fogging Machine</li> </ul>
<b>Root Cause Analysis:</b>	<p><u>Sindora Palm Oil Mill:</u></p> <ul style="list-style-type: none"> <li>- Inadequate awareness of PPE usage by boiler operators and inadequate enforcement by mill management, as identified through HIRARC (Hazard Identification, Risk Assessment, and Risk Control).</li> </ul> <p><u>Basir Ismail Estate / REM Estate / Sungai Papan Estate/ Sindora Estate:</u></p> <ul style="list-style-type: none"> <li>- Inadequate monitoring of the requirement in the Occupational Safety And Health (Noise Exposure) Regulations</li> </ul> <p><u>Basir Ismail Estate:</u></p> <ul style="list-style-type: none"> <li>- There was a lack of monitoring on the recommendation from the NRA report with regards to no prominent warning notices attached on the Fogging Machine.</li> </ul>
<b>Corrective Actions:</b>	<p><u>Sindora Palm Oil Mill:</u></p> <ul style="list-style-type: none"> <li>- Site-specific risks involving safety cases and other associated hazards will be thoroughly reviewed and discussed in the OSH Meeting.</li> <li>- Conduct a brief training session emphasizing the importance of wearing facemasks to protect against floating dust hazards. Additionally, ensure an adequate supply of facemasks and goggles is readily available for workers.</li> <li>- Conduct enforcement on PPE usage for all workers and supervise to ensure PPE compliance through checklist. Quarterly monitor their adherence to safety protocols, including PPE usage.</li> <li>- Mill to seek consultation from KSTS for any new machinery, in terms of regulations/ requirements and/or required actions to be done to comply with legal requirements and regulations.</li> </ul> <p><u>Basir Ismail Estate / REM Estate / Sungai Papan Estate/ Sindora Estate:</u></p> <ul style="list-style-type: none"> <li>- The estate will ensure comprehensive noise identification at all workplaces in future assessments by periodically reviewing and updating noise control measures based on assessment results.</li> </ul> <p><u>Basir Ismail Estate:</u></p> <ul style="list-style-type: none"> <li>- Estate management to implement a mandatory training program for all employees involved in fogging activities. The training emphasizes the</li> </ul>

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	<p>importance of attaching warning notices, and educate employees on the proper use of PHP.</p> <ul style="list-style-type: none"> <li>- Estate management to conduct a quarterly inspection to monitor and compliance through checklist</li> </ul>
<b>Assessment Conclusion:</b>	<p>CAP has been accepted. On-site verification of implementation confirmed that the effectiveness of CAP was evidence to address the issue as per Major NC close out evidence as following:</p> <ul style="list-style-type: none"> <li>- Review of HIRARC register was done on 15/10/23 and approved on 31/10/23. Associated hazards such as dust/mist hazard updated in the register.</li> <li>- Notification to KSTS was done on 7/11/2023 for excessive noise self-assessment and list of machineries/areas for NRA have been identified.</li> <li>- Sighted related PHP signages have been displayed based on NRA recommendation.</li> <li>- OSH meeting dated 12/10/23 has included HIRARC review element in the meeting agenda. Any review of HIRARC will be discussed in the upcoming meeting.</li> <li>- Briefing/training on PPE compliance was carried out on 12/10/23 and memo dated 16/10/23 was issued to boiler operators on the importance and mandatory compliance of PPE.</li> <li>- PPE audit was carried out as part of workplace inspection on quarterly basis and used as input for safety meeting. Safety audit checklist dated 5/10/23 was verified.</li> <li>- A comprehensive excessive self-assessment (ESA) was carried out by REM estate on 10/10/23. The result of ESA submitted to KSTS on 7/11/2023 to arrange and conduct Noise Risk Assessment (NRA). NRA was done by appointed consultant, AMCEN LAB SDN BHD. Refer to PO#4800000042 dated 9/11/2023. Recommendation from assessor will be further verified in the next assessment.</li> <li>- Checklist for fogging dated 26/10/23 was sighted and use as part of workplace inspection records for quarterly safety meeting.</li> </ul> <p>Implemented evidence for major NC was found to be sufficient to close the Major NC effectively on 3/1/2024. Continuous implementation will be further verified in the next assessment.</p>

Non-conformity			
<b>NCR Ref #</b>	2402549-202309-N1	<b>Issued Date</b>	05/10/2023
<b>Due Date</b>	4/11/2023	<b>Closure Date</b>	"Open"
<b>Indicator &amp; Category (Critical / Minor)</b>	2.2.2 (Minor)		
<b>Statement of Nonconformity:</b>	Sundry shop operators in R.E.M Estate and Ladang Basir Ismail were unable to demonstrate compliance with the applicable legal requirements related to Control of Supply Act 1961.		
<b>Requirement Reference:</b>	All contracts, including those for FFB supply, contain specific clauses on meeting applicable legal requirements, and this can be demonstrated by the third party. Evidence of legal due diligence of all contracted third parties, recruitment agencies		

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	(licensed/ accredited) for migrant workers, service providers and labour contractors, is available.
<b>Objective Evidence:</b>	R.E.M. Estate and Ladang Basir Ismail signed tenancy agreements dated 1/1/2023 with sundry shop owners Ah Siong Trading and Kedai Runcit Mastura Mahfol respectively. Under Clause 3(I) of the agreement, both shop owners would comply with all legal requirements and would obtain licenses required by law in connection with the business. However, both Kedai Runcit Mastura Mahfol and Ah Siong Trading were not able to demonstrate license to sell scheduled controlled items such as sugar, flour and cooking oil. This is not in compliant with Section 7 of the Control of Supply Act 1961.
<b>Corrections:</b>	<ul style="list-style-type: none"> <li>- Estate had notified the sundry shop owner (KEDAI RUNCIT MASTURA MAHFOL) with a reminder letter dated 8th October 2023 to take fast action by registering legal license on scheduled controlled items.</li> <li>- The sundry shop owner was immediately register Legal Licensing through website BLESS dated 12th October 2023. The reference number were as followed: BL22023040994</li> </ul>
<b>Root Cause Analysis:</b>	Inadequate monitoring over Legal Licensing in Section 7: The Control of Supply Act 1961 in rural areas including estates.
<b>Corrective Actions:</b>	<ul style="list-style-type: none"> <li>- Estate management will review and update the list legal of Legal Licensing in Section 7: The Control of Supply Act 1961 in Company's legal register bimonthly</li> <li>- The training/briefing will be conducted on Legal Licensing in Section 7: The Control of Supply Act 1961 to all respective shop owner.</li> </ul>
<b>Assessment Conclusion:</b>	CAP has been accepted. Verification of effectiveness of CAP implementation will be conducted during next assessment.

Non-conformity			
<b>NCR Ref #</b>	2402549-202309-N2	<b>Issued Date</b>	05/10/2023
<b>Due Date</b>	4/11/2023	<b>Closure Date</b>	"Open"
<b>Indicator &amp; Category (Critical / Minor)</b>	4.2.2 (Minor)		
<b>Statement of Nonconformity:</b>	There is inadequate understanding of the system for dealing with complaints and grievances.		
<b>Requirement Reference:</b>	Procedures are in place to ensure that the system is understood by the affected parties, including by illiterate parties.		
<b>Objective Evidence:</b>	Based on the records verified and interview conducted during on-site assessment, it was found that the sample workers in Sindora Palm Oil Mill did not understand the system for dealing with complaints and grievances ensures anonymity for complainants and whistle-blowers where requested; and that disputes can be resolved in an effective, timely and appropriate manner without risk of reprisal or intimidation.		
<b>Corrections:</b>	Mill management to conduct a briefing to all workers and stakeholders on Complaints and Grievance procedures.		
<b>Root Cause Analysis:</b>	Inadequate understanding over complaints and grievance procedures.		

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<b>Corrective Actions:</b>	<ul style="list-style-type: none"> <li>- Refresher training on Complaints and Grievance procedures to be conducted annually.</li> <li>- To develop and implement training programs to educate workers about the complaint and grievance handling system. Include information on how to file complaints, expected timelines, and escalation procedures.</li> <li>- To records of all complaints and their resolutions is crucial for easy tracking of trends and ensuring accountability within the organization.</li> </ul>
<b>Assessment Conclusion:</b>	CAP has been accepted. Verification of effectiveness of CAP implementation will be conducted during next assessment.

Non-conformity			
NCR Ref #	2402549-202309-N3	Issued Date	05/10/2023
Due Date	4/11/2023	Closure Date	“Open”
Indicator & Category (Critical / Minor)	7.3.2 (Minor)		
Statement of Nonconformity:	Proper disposal of waste material according to procedures was insufficiently demonstrated.		
Requirement Reference:	Proper disposal of waste material, according to procedures that are fully understood by workers and managers, is demonstrated.		
Objective Evidence:	<u>REM Estate</u>		
	During REM Estate visit to landfill area located within field P92 of Ulu Tiram Division, it was found that there were broken metal equipment and plastic bottles being dumped into the landfill ground hole that was recently opened on 3/10/2023. Upon discovery, the workers been immediately instructed to remove the broken metal equipment from the landfill ground hole but left the plastic bottles that was wrapped in plastic bag. This was not in-line with the established Waste Management and Pollution Prevention Plan which requires the following:		
	Waste Management and Pollution Prevention Plan; REM Estate; Review Date: 1/9/2023.		
	Waste type	Source	Action
	Domestic	Line site	- Provide adequate garbage bins at the line-site - Provide recycle bins centre at the line-site to encourage the habit of waste recycling among the employees/ workers - Burning of waste must be prohibit within estate premises - Broken garbage bins must be replaced
Plastics, Bottle (Recyclable Material)	Line site	Where possible, to be recycle	
Broken metal equipment	Workshop	For capital items, get approval to write off collect and place in a secure area possibly near the workshop to prevent misuse. Use drip tray if	

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			there are any possibilities of oil leaks. When there is adequate quantity, contact the license contractor (refer to Procurement & Contract Department) for collection and disposal.
<b>Corrections:</b>	Estate management had immediately instructed the workers to remove the broken metal equipment and plastic bottles from the landfill. The recyclable plastic bottles had been recycled as per Waste Management and Pollution Prevention Plan.		
<b>Root Cause Analysis:</b>	Inadequate understanding on landfill procedure amongst the contractor and workers.		
<b>Corrective Actions:</b>	<ul style="list-style-type: none"> <li>- Estate management will conduct a regular briefing during muster/roll-call.</li> <li>- Estate management will conduct a regular briefing during muster/roll-call to all workers include workers contractor.</li> <li>- Mandore will do the inspection during the work activities at landfill, to ensure all waste being collected and disposed at designated area.</li> </ul>		
<b>Assessment Conclusion:</b>	CAP has been accepted. Verification of effectiveness of CAP implementation will be conducted during next assessment.		

Opportunity for Improvements	
OFI #	Description
<b>OFI 1</b>	<b>2402549-202309-I1</b> <u>Indicator 3.3.2</u> Mechanism to check consistent implementation of Safe Working Procedure (Doc No: KULIM/PKS/OSH-1, dated 01/03/2021) in Sungai Papan Estate could be improved further.
<b>OFI 2</b>	<b>2402549-202309-I2</b> <u>Indicator 3.3.3</u> The JKPP-approved assessor (HQ/16/ASS/00/35) conducted the latest Chemical Health Risk Assessment (CHRA) for all operating unit audited. The details of the assessment was conducted as following: <ol style="list-style-type: none"> <li>1. Sungai Papan Estate – 28/05/2023</li> <li>2. Sindora Estate – 19/06/2023</li> <li>3. Sindora Palm Oil Mill – 19/06/2023</li> <li>4. REM Estate – 21/06/2023</li> <li>5. Basir Ismail Estate – 03/07/2023</li> </ol> The final version of the report for this CHRA is still pending until the Recertification Assessment is conducted. This OFI was raised to track the status of the report during the next assessment.
<b>OFI 3</b>	<b>2402549-202309-I3</b> <u>Indicator 3.4.3</u> The review and update of Environmental Risk (Aspect & Impact) Register could be improved further in reflective of specific site areas and on-going operations in Sungai Papan Estate and Sindora Palm Oil Mill respectively.

<b>OFI 4</b>	<b>2402549-202309-I4</b> <u>Indicator 6.1.5</u> WOW meetings are held once a year among its members, to discuss their annual activities, briefing on sexual harassment, domestic violence, needs of new mothers, grievance mechanism, discussion on how to improve their economic wellbeing, company policies, etc. It would be an opportunity for improvement if the WOW meetings be conducted more frequently so that members can benefit from refresher briefings.
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Positive Findings	
PF #	Description
PF 1	The operation of completed biogas project will significantly reduce the greenhouse gas emission (Sindora Palm Oil Mill)
PF 2	Positive feedbacks from stakeholders interviewed
PF 3	Good establishment & implementation of IPM within visited estates field
PF 4	Excellent logistics arrangement and hospitality by auditors' guide

### 3.3.1 Status of Nonconformities Previously Identified and Observations

Non-conformity			
NCR Ref #	2257985-202209-N1	Issued Date	06/10/2022
Due Date	1/10/2023	Closure Date	01/10/2023
Indicator & Category (Critical / Minor)	6.7.2 (Minor)		
Statement of Nonconformity:	First aid equipment was not available at worksite.		
Requirement Reference:	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.		
Objective Evidence:	At REM Estate (Ulu Tiram Div.), 6 workers (2 from spraying gang, and 4 from manuring gang) were assigned to do landscape maintenance work at the staff housing complex. However, it was found that first aid equipment was not available at site.		
Corrections:	1. Estate management calls the appointed First Aider for the respective gang to brief the first aid are present in both field and other operations, and first aid equipment should be available at worksites. 2. Estate management has conducted refresher training for the appointed First Aider as per requirement.		
Root Cause Analysis:	Lack of monitoring by estate management regarding the placement of first aid kits.		



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<b>Corrective Actions:</b>	<p>1. EHA will conduct an inspection for each First Aid Kit and ensure the availability of the First Aid Kit at the appropriate area and workstation.</p> <p>2. Records of all first aid kit checklists are kept and periodically reviewed.</p>
<b>Assessment Conclusion:</b>	The correction and corrective action plans are found to be adequate. Verification of implementation of the corrective actions shall be carried out in the next assessment visit.
<b>Effectiveness Closure (for previous audit closed Critical NC):</b>	<p>A comprehensive inspection for each First Aid Kit was conducted by the Environmental Health and Safety (EHA) at each estate visited. During site visits to all operations, it was confirmed that the First Aid Boxes are available at appropriate areas and workstations. Additionally, the lists inside the boxes were updated to reflect accurate content, and no expired items were found.</p> <p>All Operating Unit have implemented a system for maintaining records of all First Aid Kit checklists. These records are regularly updated, and periodic reviews are undertaken to ensure continual compliance. This proactive approach to record-keeping enhances the estate management ability to monitor each First Aid Kit's status and promptly address any potential issues.</p> <p>With the implementation of the corrective action and the positive findings during site visits, the non-compliance has been effectively addressed and rectified. Thus, the Minor NC was closed.</p> <p>Verification conducted during on-site assessment confirmed that the CAP implementation effective to address the issue as evidence. No recurrence of issue found. Hence, Minor NC has been closed on 1/10/2023.</p>

Opportunity for Improvement	
OFI#	Description
<b>OFI 1</b>	<p><b>OFI Statement:</b></p> <p><u>Indicator 6.7.2</u></p> <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 operative strained in first aid are present in both field and other operations, and first air equipment is available at worksites. Records of all accidents are kept and periodically reviewed.</p> <p>Details: Management could further ensure the sub-contractor of EFB collection from Sindora Palm Oil Mill, transportation and spreading in Sindora Estate contractors' monitoring of compliance on relevant labour requirements.</p> <p><b>Verification / Follow-up actions:</b></p> <p>Verification on both the operation of transporting and levelling of EFB found that the workers working with full PPE. Management of both operating units does conducted the monitoring by not allowing the workers to be working without the PPE. Verification on the salary slips found that the workers are paid accordingly with the compliance to Minimum Wages Order 2022, and to the work agreement.</p>



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### 3.3.2 Summary of the Nonconformities and Status

CAR Ref.	Category (Critical / Minor)	P&C Indicator	Issued Date	Status & Date (Closure)
2186605-202204-M1	Critical	6.7.3	7/4/2022	Closed out on 20/5/2022
2186605-202204-M2	Critical	2.2.2	7/4/2022	Closed out on 20/5/2022
2257985-202209-N1	Minor	6.7.2	06/10/2022	Closed out on 01/10/2023
2402549-202309-M1	Major	3.6.1	05/10/2023	Closed on 02/01/2024
2402549-202309-N1	Minor	2.2.2	05/10/2023	"Open"
2402549-202309-N2	Minor	4.2.2	05/10/2023	"Open"
2402549-202309-N3	Minor	7.3.2	05/10/2023	"Open"

### 3.4 Stakeholders and previous land owner / user consultation

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

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

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

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)
Governmental department	Hj Jauhari Hamdan/DOSH, Johor Baharu Abdul Rahim Ghazali/Labour Office, Kluang	Face to face interview
Contractors and suppliers	Ghulam Qodir/GQ Engineering Chong Wai Joon/YH Plantation Enterprise Chahyono/Chahyono Enterprise Sahimi Yahya/Perusahaan Amiza Mohd Yusof/MIA Agro	Face to face interview

	Mohd Muharram Hassan/Canteen Sindora Mill Norhidayu Abd Rahim/Semai Setia Transport Abd Rahim Daik/Semai Setia Transport Mohd Jalal Kamal/Perniagaan Insan Permai Wan Syazwani Wan Sani/ Perniagaan Insan Permai Mohd Hanapi Ismail/Pengangkutan Sempurna Sdn Bhd Yegananthan a/I Kanakarajoo/KS Nantan Enterprise Nurnabila Farhana Abd Rahman/Integrated Man Sdn Bhd Siti Abdullah/IRCT Enterprise	
School	Mohd Asstrull Jamaluddin/SK LKTP Belitong	Face to face interview
Local communities	Hj Kamsari Abd Rahman/Kg Tg Serindit Miswan Kartho/Kg Sg Berangan Azmi Ismail/Kg Baru Pasak Salleh A.Rasid/Kg Baru Pasak	Face to face interview
Grocery stores/canteen	Khoo Kok Chai/Grocery shop Sindora Estate Mastura Mahfol/Kedai Runcit Mastura, R.E.M. Estate Shanmugam a/I Suppiah/Grocery store, R.E.M. Estate	Face to face interview

Stakeholders comment	
1	<p><b>Feedbacks:</b> Government departments</p> <p>Labour Office representative confirmed there has been no complaints received against any of the units under Sindora POM and its supply base. The Labour Officer praised the level of understanding and accuracy of Johor Plantation who briefed on labour issues during the stakeholder consultation which he attended.</p> <p>The DOSH representative confirmed that there has been no complaints received, and neither was there been any violation of the DOSH laws and regulations. Recent applications for the renewal of compressor licences is still pending at DOSH and he advised the Mill to follow-up with the relevant officer.</p> <p><b>Audit Team verification and response:</b> No further issue.</p>
2	<p><b>Feedbacks:</b> Contractors and suppliers</p>

	<p>Generally, the contractors and suppliers confirmed that they have no issues with the units within Sindora POM and its supply base. One contractor said that they receive "late payment" for work done at Sg Papan Estate i.e., up to 10 to 12 days from issuance of invoice. This has caused them a shortfall in their cashflow, and as a result, they had to pay their workers beyond the 7<sup>th</sup> of each month.</p> <p><b>Audit Team verification and response:</b> The audit team reviewed the relevant contract signed by the contractor and Mahamurni Plantations Sdn Bhd (Ref: MPSB/LSPN 2/165/2020) which commenced on 1/3/2021, and verified that the terms of payment is 30 days from the date of undisputed invoice. Additionally, further verifications of the contractor's Maybank statements for July, Aug and Sept 2023 as well as their worker payslips, showed that their salaries were paid between 27<sup>th</sup> to 28<sup>th</sup> of the same month. i.e., there has been no delay and not in contravention of Section 19 Employment Act 1955.</p>
3	<p><b>Feedbacks:</b> School</p> <p>The teacher from SK LKTP Belitong informed that many of the workers' children attend the school, and there has been good cooperation between the school (via its Parents-Teacher' Association) where requests for fundings are always responded to promptly. There has been no cases of discipline and truancy. The school has no further issues to raise and thanked Johor Plantation for all help and cooperation.</p> <p><b>Audit Team verification and response:</b> No further issues.</p>
4	<p><b>Feedbacks:</b> Local communities</p> <p>The local community representatives stated that relationship with Sindora POM and its supply base have always been good. Villagers from Kg Baru Pasak, Pengkalan Kg Baru Pasak and Kg Sg Berangan are able to access their villages via R.E.M. estate road. Requests for road repairs have always been attended to promptly. They also confirmed that the job opportunities have been offered to the local communities. Invitations to attend meetings are also extended to the local community representatives.</p> <p><b>Audit Team verification and response:</b> No further issues.</p>
5	<p><b>Feedbacks:</b> Grocery stores/canteen</p> <p>Generally, the grocery stores and canteen operators do not have any issues to raise. They are satisfied with the existing rental arrangements with the respective estates. There is regular monitoring of the items sold by the estates to look at pricing, hygiene, expiry dates of items sold. Workers are able to buy items on credit. Cases of workers absconding without paying their debts are minimal. However, Kedai Runcit Mastura admitted that it does not have the necessary permit to sell controlled food items such as rice, flour and cooking oil as she finds it tedious to do so.</p> <p><b>Audit Team verification and response:</b> Verified that Kedai Runcit Mastura (R.E.M Estate) and Ah Siong Trading (Ladang Basir Ismail) do not have such licence as required under Section 7 of the Control of Supply Act 1961. Therefore a Minor non-compliance was raised under Indicator 2.2.2 of the RSPO P&amp;C.</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
Not applicable as the estates have undergone 2nd cycle of replanting.					

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

### 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

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 Berhad - Sindora Palm Oil Mill has complied with the Malaysia National Interpretation 2019 of the RSPO P&C 2018 and audit criteria identified within the audit report. It is deemed that the management system has achieved its intended outcomes. Therefore, it is recommended that Johor Plantations Berhad - Sindora Palm Oil Mill is remain certified.	
Report prepared by	Acceptance of Assessment Conclusion
<b>Name:</b> Hafriazhar Mohd. Mokhtar	<b>Name:</b> Wan Adlin Wan Mahmood
<b>Company Name:</b> BSI Services Malaysia Sdn. Bhd.	<b>Company Name:</b> Johor Plantations Group Berhad
<b>Title:</b> Client Manager	<b>Title:</b> General Manager
<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:</b> 06/02/2024	<b>Date:</b> 06/02/2024

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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	<b>(C)</b> Documents that are specified in the RSPO P&C are made available to the public. - Critical (Major) compliance -	Evidence was available that all units within Sindora Complex provided documents specified in the RSPO P&C to the public. Verified during the audit the availability of the following documents for public review: - Land titles/user rights - Occupational health and safety plans - Plans and impact assessments relating to environmental and social impacts - HCV documentation - Pollution prevention and reduction plans - Details of complaints and grievances - Continuous improvement plans - Public summary of certification assessment report - Group Sustainability Policy - Record of contributions to community development The stakeholders were briefed on the availability of documents during external stakeholder consultations held on 20/09/2023 (Southern Region units) and 3/9/2023 (Northern Region units).	Complied
1.1.2	Information is provided in appropriate languages and accessible to relevant stakeholders.	Information requested are provided in appropriate language and accessible to the stakeholders. Sampled during the audit were	Complied

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	- Minor compliance -	documents which was prepared in Bahasa Malaysia and English, such as company policies and procedures, code of business ethics, whistle-blowing policy, grievance mechanism, continuous improvement plans, RSPO and MSPO requirement updates, etc.  During stakeholder meetings held on 20/09/2023 (Southern Region units) and 3/9/2023 (Northern Region units), briefings and discussions were carried out in Bahasa Malaysia, the language that all participants are conversant in. Stakeholders interviewed during the audit confirmed their understanding of the information shared during this stakeholder meeting.	
1.1.3	<b>(C)</b> Records of requests for information and responses are maintained. - Critical (Major) compliance -	Records of requests for information from stakeholders and responses given are adequately maintained. Sighted during the audit were letters sent by Badan Masjid An-Nur, Kg Tg Serindit dated 12/12/2022 and from PIBG SK Bukit Tongkat dated 8/2/2023 to Ladang Sg Papan and Sindora POM respectively. These letters and the responses from the operating units dated 15/12/2022 and 27/2/2023 were maintained in the stakeholder files and verified during the audit.	Complied
1.1.4	<b>(C)</b> Consultation and communication procedures are documented, disclosed, implemented, made available, and explained to all relevant stakeholders by nominated representative. - Critical (Major) compliance -	The Company's consultation and communication procedures are available under the Communication and Consultation Management System Issue No. 1 Doc. No. SQD/SMS/1.1 dated 1/08/2020. This procedure applies to all communications and consultations between the Company and its stakeholders.  As shown in the stakeholder meeting minutes, disclosure of this procedure was given by the Company representative from the Sustainability Team during stakeholder meetings held on 20/09/2023 (Southern Region units) and 3/9/2023 (Northern Region units). Stakeholders interviewed during the audit also confirmed the same.	Complied

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		<p>Implementation of the procedure was evident in the stakeholder meeting minutes dated 20/9/2023 and 3/9/2023 when several issues were raised and the answers were communicated clearly by the Company representative.</p> <p>Based on the above, Sindora Complex was able to demonstrate that the consultation and communication procedures are being documented, disclosed, implemented, made available and explained to all relevant stakeholders.</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>Each unit within the Sindora Complex has its own updated stakeholder list. The lists contain names of the stakeholders, name of villages (such as Kg Sg Berangan, Kg Muhibbah, Kg Tg Serindit) their addresses, telephone numbers, and their nominated representatives. The stakeholders also include suppliers, contractors, service providers, nearby clinics, transporters, list of CPO and PKO buyers, government agencies such as Dept of Wildlife and National Parks, Labour Department, Immigration Dept, Dept of Safety and Health, Indonesian Consulate, Bangladeshi High Commission, neighbouring estates, nearby businesses, 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 is available and is known as Ethics Policy which was updated on 7/12/2021. This Policy was signed by the Executive Director. The Policy pledges to deal with customers and suppliers based on performance, fairness and transparency, and in an environment free from harassment or discrimination. Other pledges in the Policy include the assurance that employees are treated equally and fairly, and that all employees understand and adhere to Ethics Policy.</p> <p>In addition to the above, there is also a No Gift and Entertainment Policy dated August 2021, signed by its Executive Director. A review of the stakeholder meeting minutes confirmed that these Policies</p>	Complied

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		<p>were communicated to all external stakeholders during the stakeholder meetings held on 20/9/2023 (Southern Region) and 3/9/2023 (Northern Region).</p> <p>Implementation of this Policy was verified when contractors were required to sign the Code of Business Ethics, and in audit interviews, the contractors confirmed their understanding. Records sighted such as contractual documents, invoices, purchase orders also showed no breach of this Ethics Policy. Among the contracts reviewed were agreements with Perniagaan Insan Permai, YH Enterprise, Khoo Kok Chai and Kedai Runcit Mastura. At Ladang Basir Ismail, the vendor's letter of declaration was signed by canteen operators and Mohamad bin Hamzah and Ng Kok Siong on 1/1/2023.</p> <p>All levels of employees were also required to sign Borang Akujanji Integriti Pekerja (Workers' Integrity Pledge) upon commencement of employment. Briefings were also given on the Ethics Policy at the following sampled estates: Sindora Estate (5/4/2023), R.E.M. Estate (19/1/2023), Ladang Basir Ismail (14/6/2023 and 26/4/2023).</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>Among the system in place to monitor compliance and implementation of the Ethics Policy include the Company's Contracts Administration Guidelines &amp; Procedures. This guideline and procedures impose a limit on the value of transaction for each management level to ensure no abuse of proper business practices. In addition, internal audits were also conducted annually as follows:</p> <p>Sindora Mill: 28/8/2023</p> <p>Basir Ismail Estate: 22/6/2023</p> <p>R.E.M. Estate – 26/6/2023</p> <p>Sindora Estate – 13/8/2023</p> <p>Sg Papan Estate -19/6/2023</p>	Complied



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<b>Principle 2: Operate legally and respect rights</b>			
<b>Criterion 2.1:</b> 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>Sindora Certification Unit continues to ensure compliance towards all applicable local, national and ratified international laws and regulations. The compliances is guided by the document Sustainable Management System; Compliance To Legal Requirement; Document Number: SQD/SMS/2.0; Document Date: 01/08/2020; Issue: 01.</p> <p>Among permit and license sampled were as following::</p> <p><u>Sindora POM</u></p> <ol style="list-style-type: none"> <li>1. MPOB License; License Number: 621521004000; License Validity Period until 31/12/2023</li> <li>2. Permit Barang Kawalan Berjadual; Serial Number: J005298; Reference Number: BPGK JH (KLU) 0730 SK; Description: Diesel; Storage Quantity: 13,000 Litres; License validity until 26/01/2024</li> <li>3. DOE License – License to Occupy or Use the Designated Premises; License Number: 004718; License Validity until 30/06/2024</li> <li>4. Energy Commission – Private Installation License: License Number: 2022/02874; Serial Number: 53715; License Validity Period until 23/10/2023</li> </ol> <p><u>Sindora Estate</u></p> <ol style="list-style-type: none"> <li>1. MPOB License; License Number: 621317002000; License Validity: 30/09/2023. The estate management has applied for renewal of MPOB License dated 03/08/2023 through "Sistem MyLesen MPOB". Further communication to MPOB was conducted by management.</li> </ol>	Complied

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		<p>2. Permit Barang Kawalan Berjadual; Reference Number: BPGK JH (KLU) 2403 SK; Description: Diesel (10,000 Litres); Validity Period until 06/02/2025.</p> <p>3. License for River Water Diversion and Extraction; License Number: 06/A/Klg/105; File Number: BAKAJ/334/300/05/07/06/15; License Expiry Date: 31/12/2023.</p> <p>4. Syarat Syarat Pemasangan Pagar Elektrik, Ref No: ST(KAW/J)11/2/4(1), Serial No: ST(KAW/J)11/2/4(1)(1/2014) dated 16/07/2014.</p> <p><u>Sungai Papan Estate</u></p> <p>1. MPOB License; License Number: 570243002000; License Validity Period until 29/02/2024</p> <p>2. Permit Barang Kawalan Berjadual; Reference Number: KPDNKK.J.KTG/Permit Khas 0167 (PD)(R) ; Description: Petrol RON 95 200 liter/day</p> <p>3. Permit Barang Kawalan Berjadual; Reference Number: KPDNKK.J.KTG/Permit0048(PD); Description: Diesel EURO 2M 10500 liter.</p> <p>4. License for River Water Diversion and Extraction; License Number: 06/A/KT/027; File Number: BAKAJ/334/300/05/08/06/05; License Expiry Date: 31/12/2023.</p> <p><u>REM Estate</u></p> <p>1. MPOB - FFB License; License Number: 621347002000; License Validity period until: 31/10/2023.</p> <p>2. Energy Commission – Private Installation License; License Number: 2022/02225; Serial Number: 56986; License Validity period: 26/08/2022 – 25/08/2023. Renewal inspection done by</p>	
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		<p>EC on 7/9/2023. Invoice received by estate dated on 17/9/2023. Payment made by estate dated on 18/9/2023. Pending license issuance by EC.</p> <p>3. Permit Barang Kawalan Berjadual; Reference Number:KPDNKK.J.KTG/PERMIT0127(PD)(R); Description: Diesel; Storage Capacity: 10,000 Litres; License Validity Period: until 28/01/2024.</p> <p>4. Permit Barang Kawalan Berjadual; Reference Number: KPDNKK.J.KTG/PERMITKHAS 0801(PD); Description: Petrol; Purchase Capacity: 100 liter/day; License Validity Period: until 07/06/2024</p> <p><u>Basir Ismail Estate</u></p> <p>1. MPOB - FFB License; License Number: 621312002000; License Validity period until: 30/09/2024.</p> <p>2. Permit Barang Kawalan Berjadual; Reference Number:KPDNKK.J.KTG/PERMIT0153(PD)(R); Description: Diesel; Storage Capacity: 10,000 Litres; License Validity Period: until 09/01/2024</p> <p>3. Perakuan Pentuan Timbang Dan Sukat; Serial No: B218914; Dated 12/12/2022, Expiry date: 11/12/2023.</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>Sindora certification unit continued to implement and maintain their established documented system for identifying, accessing, tracking updates and monitoring of compliance with the legal requirements that are applicable to the Certification Unit's operation.</p> <p>Each office of the operating unit (mill and estate) has its own legal requirements register (LRR) and were being evaluated individually from time to time for compliance mainly through internal audit. Among the applicable legal laws registered are EQA, OSHA, Factory &amp; Machinery Act, Employment Act, Workers' Minimum Standard of</p>	Complied

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		<p>Housing and Amenities Act, Minimum Wages order 2022. Other related legal for Employment Act 2022 was also updated in LORR.</p> <p>Tracking system available to identify changes in the relevant regulations through head office, sustainability team, website information and the information are communicated from the Head Office. Johor Plantation Berhad have centralised system for tracking any changes in the law. Verification on the Group Compliance Framework is conducted at each estate visited. Sample at Basir Ismail Estate is taken on the Group Compliance Framework conducted for the period of 01/07/2023 to 31/08/2023.</p>	
2.1.3	<p>Legal or authorised boundaries are clearly demarcated and visibly maintained, and there is no planting beyond these legal or authorised boundaries.</p> <p>- Minor compliance -</p>	<p>Legal boundaries were clearly demarcated with red and white colour concrete pole.</p> <p><u>Sindora Estate</u></p> <p>As sighted during site visit P07/01 adjacent with FELDA Ulu Belitong, the legal boundaries were clearly demarcated with red and white colour concrete pole and trenches.</p> <p><u>Sungai Papan Estate</u></p> <p>During site visit, sighted the demarcation of estate legal boundaries at field P04/03 adjacent with Kampung Muhibbah was clearly demarcated with red and white colour concrete pole.</p> <p><u>REM Estate</u></p> <p>Estate legal boundaries was clearly demarcated concrete pole as sighted at field P10/01 adjacent with Sim Nam Heng Estate.</p> <p><u>Basir Ismail Estate</u></p> <p>Estate legal boundaries was clearly demarcated concrete pole as sighted at P22 adjacent with Kg. Sg. Redan.</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.			

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2.2.1	<p>A list of contracted parties is maintained.</p> <p>- Minor compliance -</p>	<p>The operating units has listed all contracted parties and documented in Stakeholder List. In the list includes internal stakeholders such as employee and workers union and external stakeholders such as suppliers, contractors, transporters, products buyers, head of local communities and other interested parties such as government department. Hospitals, schools and etc. the list was reviewed and updated on annually basis.</p>	Complied
2.2.2	<p>All contracts, including those for FFB supply, contain specific clauses on meeting applicable legal requirements, and this can be demonstrated by the third party.</p> <p>Evidence of legal due diligence of all contracted third parties, recruitment agencies (licensed/ accredited) for migrant workers, service providers and labour contractors, is available.</p> <p>- Minor compliance -</p>	<p>All contracts including FFB supplier, contain specific clauses on meeting applicable legal requirements.</p> <p>For FFB transporters contractor suppliers, the clauses on meeting applicable legal requirements were stated in clause 17 which stated as follows:</p> <p>"The Vendor shall comply with the provisions of statues, regulations, requirements and instruments for the time being in force and requirements of any federal an/or local government and/or any appropriate authorities in respecting of undertaking this contract"</p> <p>Reviewed the sampled contracts as follows:</p> <ol style="list-style-type: none"> <li>Contract agreements between Johor Plantation Berhad. with YH Plantations Enterprise, ref: JPB/LSA/165/1/2022 for Loading and Transporting of FFB from Field P06, P07, P08 P13, (Assist) P15A, P15B, P16A, P16B, &amp; P17B at Sindora Estate to Sindora Palm Oil Mill. Contract period 01/09/2023 until 30/06/2024</li> <li>Contract agreement between Mahamurni Plantations Sdn bhd. with Perniagaan Insan Permai, ref: MPSB/LSPN 2/165/2020 for Transportation of FFB from Sungai Papan Estate to Sindora Palm Oil Mill. Contract period until 31/12/2023</li> <li>Contract extension agreement between Johor Plantation Berhad. with Pengangkutan Sempurna ,for FFB Transportation</li> </ol>	Non-compliance

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		<p>To Sindora Palm Oil Mill. Contract period September 2023 until December 2023.</p> <p>R.E.M. Estate and Ladang Basir Ismail signed tenancy agreements dated 1/1/2023 with sundry shop owners Ah Siong Trading and Kedai Runcit Mastura Mahfol. Under Clause 3(l) of the agreement, both shop owners would comply with all legal requirements and would obtain licenses required by law in connection with the business.</p> <p>However, both Kedai Runcit Mastura and Ah Siong Trading were not able to demonstrate license to sell scheduled controlled items such as sugar, flour and cooking oil. This is not in compliant with Section 7 of the Control of Supply Act 1961.</p> <p>Therefore, a Minor non-compliance was raised.</p>	
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>All contracts including FFB supplier, contain clauses on disallowing child, forced and trafficked labour. Where young workers are employed, the contracts include a clause for their protection.</p> <p>For FFB suppliers, the clauses on disallowing child, forced and trafficked labour. Where young workers are employed, the contracts include a clause for their protection were stated in clause 14 which stated as follows:</p> <p>"The supplier represents and warrants that the supplier shall comply with applicable labour and employment laws regarding; and prohibit any form of child labour, forced and trafficked labour. Any eligible young labour will be employed only accordance with Children and Young Person (Employment) Act 1966."</p> <p>Reviewed the sampled contracts as follows:</p> <p>a. Contract agreements between Johor Plantation Berhad. with YH Plantations Enterprise, ref: JPB/LSA/165/1/2022 for Loading and Transporting of FFB from Field P06, P07, P08 P13, (Assist)</p>	Complied

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		<p>P15A, P15B, P16A, P16B, &amp; P17B at Sindora Estate to Sindora Palm Oil Mill. Contract period 01/09/2023 until 30/06/2024</p> <p>b. Contract agreement between Mahamurni Plantations Sdn bhd. with Perniagaan Insan Permai, ref: MPSB/LSPN 2/165/2020 for Transportation of FFB from Sungai Papan Estate to Sindora Palm Oil Mill. Contract period until 31/12/2023</p> <p>c. Contract extension agreement between Johor Plantation Berhad. with Pengangkutan Sempurna ,for FFB Transportation To Sindora Palm Oil Mill. Contract period September 2023 until December 2023.</p>																
<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>Sindora mill received only crop from the Johor Plantation Berhad and its own supply bases within the certification scope, or other if any are diversion from the sister mills (RSPO Certified) as results of mill breakdown or annual maintenance.</p> <p>All estates from the same certification scope possessed the following information were sighted and verified during the audit</p> <p>1. Geo locations are as follows:</p> <table><tr><th>Estate</th><th>Latitude</th><th>Longitude</th></tr><tr><td>Sindora Estate</td><td>1° 57' 47.47" N</td><td>103° 27' 59.62" E</td></tr><tr><td>Sungai Papan Estate</td><td>1° 31' 01.25" N</td><td>104° 6' 21.81" E</td></tr><tr><td>REM Estate</td><td>1°42' 12.43" N</td><td>103° 52' 54.96" E</td></tr><tr><td>Basir Ismail Estate</td><td>1° 37' 47.84" N</td><td>103° 54' 52.07" E</td></tr></table>	Estate	Latitude	Longitude	Sindora Estate	1° 57' 47.47" N	103° 27' 59.62" E	Sungai Papan Estate	1° 31' 01.25" N	104° 6' 21.81" E	REM Estate	1°42' 12.43" N	103° 52' 54.96" E	Basir Ismail Estate	1° 37' 47.84" N	103° 54' 52.07" E	Complied
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		<p>2. All FFB from the supply base estates was supported by the delivery documents and weighbridge tickets.</p> <p>3. Valid land title with ownership status (refer indicator 4.4.1)</p> <p>4. Valid MPOB licence</p>	
2.3.2	<p>For all indirectly sourced FFB, the unit of certification obtains from the collection centres, agents or other intermediaries, the evidence as listed in Indicator 2.3.1.</p> <p>- Minor compliance -</p>	<p>Inspected and verified delivery records showed there is no indirect sourced FFB at Sindora Palm Oil Mill. All FFB supplied are from Johor Plantation Berhad own estates and RSPO Certified Smallholder group under Wild Asia Sdn Bhd (Wild Asia Group Scheme). They come from own estate (Sindora Estate, Sungai Papan Estate, REM Estate, Basir Ismail Estate) and 1 RSPO certified smallholder group which was established under Wild Asia Sdn Bhd. The RSPO Certificate is available for review with certificate number: RSPO 660787.</p>	Complied
<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	<p><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.</p> <p>- Critical (Major) compliance -</p>	<p>Annual business plan in the form of annual budget with latest documented 5 Years Projection 2024 to 2028. The business plan for estates includes the following:</p> <ul style="list-style-type: none"> <li>- Capital Expenditure</li> <li>- General Charges Expenditure</li> <li>- Oil Palm – Mature Field Expenditure</li> </ul> <p>The business plan for mill includes the following:</p> <ul style="list-style-type: none"> <li>- Buildings</li> <li>- Processing plant and machinery</li> <li>- Furniture, fittings and equipment</li> </ul> <p>Plantations:</p> <p>1. Production – FFB tonnes</p>	Complied



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		<div>2. General Charges<div>a. Supervision</div><div>b. Rent, rates and taxes</div><div>c. Office expense</div><div>d. Maintenance</div><div>e. Water and lights</div><div>f. Labour welfare</div><div>g. Medical</div></div> <div>3. Production</div> <div>4. Maintenance</div> <div>5. Harvesting</div> <div>Palm Oil Mill</div> <div>1. FFB process</div> <div>2. CPO and PK</div> <div>3. OER and KER</div> <div>4. General Charges<div>a. Supervision</div><div>b. Rent, rates and taxes</div><div>c. Office expense</div><div>d. Maintenance</div><div>e. Water and lights</div><div>f. Labour welfare</div><div>g. Medical</div></div> <div>5. Production</div> <div>6. Maintenance</div>							
3.1.2	An annual replanting programme projected for a minimum of five years with yearly review, is available. - Minor compliance -	<div>Latest review documented as Johor Plantations Berhad Replanting Programme 2023-2027 as following:</div> <table><tr><td>Estate</td><td>2023</td><td>2024</td><td>2025</td><td>2026</td><td>2027</td></tr></table>	Estate	2023	2024	2025	2026	2027	Complied
Estate	2023	2024	2025	2026	2027				

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		<table><tr><td>Sindora</td><td>-</td><td>256.66 ha</td><td>-</td><td>-</td><td>-</td></tr><tr><td>Sg. Papan</td><td>-</td><td>-</td><td>-</td><td>-</td><td>-</td></tr><tr><td>REM</td><td>100.35 ha</td><td>-</td><td>-</td><td>-</td><td>-</td></tr><tr><td>Basir Ismail</td><td>-</td><td>114.99 ha</td><td>-</td><td>136.31 ha</td><td>-</td></tr></table> <p>Sg. Papan Estate earliest next replanting would be in year 2029. REM Estate earliest next replanting after 2023 is in 2030 while Sindora Estate earliest next replanting after 2024 is in 2031 until year 2048.</p>	Sindora	-	256.66 ha	-	-	-	Sg. Papan	-	-	-	-	-	REM	100.35 ha	-	-	-	-	Basir Ismail	-	114.99 ha	-	136.31 ha	-	
Sindora	-	256.66 ha	-	-	-																						
Sg. Papan	-	-	-	-	-																						
REM	100.35 ha	-	-	-	-																						
Basir Ismail	-	114.99 ha	-	136.31 ha	-																						
3.1.3	<p>The unit of certification holds management reviews at planned intervals appropriate to the scale and nature of the activities undertake.</p> <p>- Minor compliance -</p>	<p>Latest internal audit and management review meeting conducted as following:</p> <ul style="list-style-type: none"><li>- Sindora Estate: Internal audit: 13/8/2023; Management review meeting: 22/8/2023</li><li>- Sungai Papan Estate: Internal audit: 19/6/2023; Management review meeting: 22/8/2023</li><li>- Sindora POM: Internal audit: 28/8/2023; Management review meeting: 11/7/2023</li><li>- REM Estate: Internal audit: 26/6/2023; Management review meeting: 24/9/2023</li></ul>	Complied																								
<p><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.</p>																											

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3.2.1	<p><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.</p> <p>- Critical (Major) compliance -</p>	<p>Sindora POM and all estates visited established individual operating unit's (OU) continuous improvement plan (CIP) for year 2023 based on consideration of main social and environmental impacts and operational needs. Generally, the CIP covers aspects as following:</p> <ul style="list-style-type: none"><li>- Social</li><li>- Environmental</li><li>- Productivity</li><li>- Occupational Safety &amp; Health</li></ul> <p>Among CIP implemented for 2023 were as following:</p> <table><tr><th>Program</th><th>Action /Initiatives</th></tr><tr><td rowspan="5">Chemical Reduction</td><td>Manual grass cutting</td></tr><tr><td>Only circle and strip spraying in fields</td></tr><tr><td>Apply low volume spraying equipment</td></tr><tr><td>Follow manufacturer dosage</td></tr><tr><td>Cattle integration - grassing in field.</td></tr><tr><td rowspan="2">Waste reduction</td><td>Awareness among employees</td></tr><tr><td>Enhancement of waste segregation.</td></tr><tr><td rowspan="4">Employment condition</td><td>Enhancement of workers quarters</td></tr><tr><td>Schedule repair and painting</td></tr><tr><td>Conducive environment</td></tr><tr><td>Housing roofing / ceiling upgrading</td></tr><tr><td>Labour ratio</td><td>Expansion of in-field FFB collection- grabber</td></tr></table>	Program	Action /Initiatives	Chemical Reduction	Manual grass cutting	Only circle and strip spraying in fields	Apply low volume spraying equipment	Follow manufacturer dosage	Cattle integration - grassing in field.	Waste reduction	Awareness among employees	Enhancement of waste segregation.	Employment condition	Enhancement of workers quarters	Schedule repair and painting	Conducive environment	Housing roofing / ceiling upgrading	Labour ratio	Expansion of in-field FFB collection- grabber	Complied
Program	Action /Initiatives																				
Chemical Reduction	Manual grass cutting																				
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Labour ratio	Expansion of in-field FFB collection- grabber																				

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			Expand mechanization in manuring	
		Environmental	Desilting field drain for maintenance	
3.2.2	<p>As part of the monitoring and continuous improvement process, annual reports are submitted to the RSPO Secretariat using the [RSPO metrics template].</p> <p><b>PROCEDURAL NOTE:</b></p> <p>The RSPO metrics template is awaiting decision/agreement by RSPO and the issue is still being discussed.</p> <p>Until such metrics is agreed and developed, companies will carry on with existing reporting e.g. PalmGHG, Annual Communication of Progress (ACOP) reporting, and information provided to Certification Body and feedback via RSPO Secretariat is required.</p> <p>- Minor Compliance -</p>	<p>Sindora POM and supply base certification unit completed their RSPO metrics template version 2.1 and submitted to the CB prior to this assessment. The input data was found to be accurate based on the following records verification:</p> <ul style="list-style-type: none"><li>• SAP accounting system</li><li>• Land titles</li><li>• Complaints &amp; grievance records</li><li>• Dept. of Safety &amp; Health’s JKPP8 form</li></ul>		Complied
Criterion 3.3: Operating procedures are Appropriately documented, consistently implemented and monitored.				
3.3.1	<p><b>(C)</b> Standard Operating Procedures (SOPs) for the unit of certification are in place.</p> <p>- Critical (Major) compliance -</p>	<p>Sindora mill and its supply base continued to use the documents established by Johor Plantations Berhad which include the following:</p> <ul style="list-style-type: none"><li>- Agricultural Manual</li><li>- Quality Manual (SPOM/QM) document no SPOM/QM.4.0</li><li>- Standards Operating Procedure (SPOM/SOP)</li><li>- Palm Oil Mill Lab Process Control Procedure / Oil Mill Lab operations &amp; Test Method Guidelines</li><li>- RSPO Supply Chain Manual</li><li>- Security Guidelines</li></ul> <p>In addition, technical guidelines as listed in the Agricultural Reference Manual were also used. In general, the documents included operation activities in the estates and the mills such as following:</p> <ul style="list-style-type: none"><li>- Seedlings in nursery to planting of young palms.</li></ul>		Complied

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		<ul style="list-style-type: none"> <li>- Plantation upkeep to mill FFB receipt, grading, processing.</li> <li>- Quality analysis and dispatch of CPO &amp; PK.</li> </ul> <p>The Manuals are also kept in the administration office to facilitate reference by any interested parties. Site inspection and interview with workers confirmed that the SOP had been implemented and the employees understood the requirements of the SOP.</p> <p>In addition, there are also manuals available within the industry and MPOB that are used as guidelines. The procedures were communicated to workers through training and infield supervision. Interview with workers showed that the information in the procedures had been effectively communicated. Site inspection and interview with workers confirmed that the SOP had been implemented and they understood the requirements of the SOP.</p>	
3.3.2	<p>A mechanism to check consistent implementation of procedures is in place.</p> <p>- Minor Compliance -</p>	<p>Mechanism to check consistent implementation of procedures is in place from daily routine supervision, internal audit, and Regional Controller (RC) visit including agronomist visit.</p> <p>Notwithstanding, the mechanism to check consistent implementation of Safe Working Procedure (Doc No: KULIM/PKS/OSH-1, dated 01/03/2021) in Sungai Papan Estate could be improved further. Hence, an OFI has been raised.</p>	OFI
3.3.3	<p>Records of monitoring and any actions taken are maintained and available.</p> <p>- Minor Compliance -</p>	<p>The operating units maintain all the records of monitoring and actions taken for all issues raised during the visit as per sample as following:</p> <ul style="list-style-type: none"> <li>- Sindora Estate: Agronomy Report: 1/2023 (Full Visit); Date: 22-23/5/2023</li> <li>- Sungai Papan Estate: Agronomy Report: 1/2023 (Full Visit); Date: 7-8/5/2023</li> <li>- REM Estate: Agronomy Report: 1/2023 (Full Visit); Date: 7 &amp; 13/2/2023:</li> </ul>	OFI

		<div>- Sindora POM DOE License Compliance Audit based on mill DOE license # 004718 and Compliance Schedule Ref. # JAS.JHQ.600-3/1/68/(SK04); Validity period: 1/7/2023 – 30/6/2024; Max processing capacity 45 mt/hr; BOD limit 100 mg/l; Final discharge method: Land application</div> <div>Notwithstanding, the JKKP-approved assessor (HQ/16/ASS/00/35) conducted the latest Chemical Health Risk Assessment (CHRA) for all operating unit audited. The details of the assessment was conducted as following:</div> <div>1. Sungai Papan Estate – 28/05/2023</div> <div>2. Sindora Estate – 19/06/2023</div> <div>3. Sindora Palm Oil Mill – 19/06/2023</div> <div>4. REM Estate – 21/06/2023</div> <div>5. Basir Ismail Estate – 03/07/2023</div> <div>The final version of the report for this CHRA is still pending until the Recertification Assessment is conducted. Hence, an OFI was raised to track the status of the report during the next assessment.</div>				
<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	<div>(C) In new plantings or operations including mills, an independent SEIA, undertaken through a participatory methodology involving the affected stakeholders and including the impacts of any smallholder/out-grower scheme, is documented.</div> <div>- Critical (Major) compliance -</div>	<div>There are no new plantings or new operations within Sindora POM and its supply base. Nevertheless, each unit has its own Social Impact Assessments done which have been prepared internally. Details of the Social Impact Assessment are contained in Indicator 3.4.2 below.</div> <div>The operating units have conducted the aspects and impacts analysis and documented in the Environmental Risk Assessment Register. The analysis was reviewed on annually basis for estate operational activities as following:</div> <table><tr><td>Operational Activities</td><td>Code</td><td>Revision #</td></tr></table>	Operational Activities	Code	Revision #	Complied
Operational Activities	Code	Revision #				

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		Clinic	ER 002	1.0		
		Compound	ER 003	1.0		
		Harvesting	ER 004	1.0		
		Workshop	ER 005	1.0		
		Manuring	ER 006	1.0		
		Office	ER 007	1.0		
		Nursery	ER 008	1.0		
		Scheduled Waste	ER 009	1.0		
		Storage	ER 010	1.0		
		Chemical Application	ER 011	1.0		
		Use of Machine and Tractor	ER 012	1.0		
		Mill operational activities as following:				
		Operational Activities	Code	Revision #		
		Chemical Mixing and Storage	ER 001	1.0/2023		
		CPO Storage	ER 002	1.0/2023		
		Generating Power	ER 004	1.0/2023		
		Lab Operation	ER 005	1.0/2023		
		Machine and Vehicle Maintenance	ER 006	1.0/2023		
		Office Work	ER 007	1.0/2023		
		Oil Clarification	ER 008	1.0/2023		

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		<table><tr><td>Oil Pressing ###</td><td>ER 009</td><td>1.0/2023</td></tr><tr><td>POME Treatment-Effluent IETS</td><td>ER 010</td><td>1.0/2023</td></tr><tr><td>Shredding EFB</td><td>ER 011</td><td>1.0/2023</td></tr><tr><td>Storage of Scheduled Waste</td><td>ER 012</td><td>1.0/2023</td></tr><tr><td>Use of Vehicle</td><td>ER 013</td><td>1.0/2023</td></tr><tr><td>Water Treatment</td><td>ER 014</td><td>1.0/2023</td></tr><tr><td>Diesel Engine for Power Generation</td><td>ER 016</td><td>1.0/2023</td></tr><tr><td>Storage of Hydrocarbon</td><td>ER 017</td><td>1.0/2023</td></tr><tr><td>Community</td><td>ER 019</td><td>1.0/2023</td></tr><tr><td>Construction-Maintenance</td><td>ER 020</td><td>1.0/2023</td></tr><tr><td>POME Treatment-Biogas &amp; Polishing Plant</td><td>ER 021</td><td>1.0/2023</td></tr></table> <p>Latest review was conducted as following:</p> <ul style="list-style-type: none"><li>- Sindora Estate; Date: 24/8/2023</li><li>- Sungai Papan Estate: 23/2/2023</li><li>- Sindora POM; Date: 15/9/2023</li><li>- REM Estate; Date: 27/8/2023</li><li>- Basir Ismail; Date: 27/8/2023</li></ul>	Oil Pressing ###	ER 009	1.0/2023	POME Treatment-Effluent IETS	ER 010	1.0/2023	Shredding EFB	ER 011	1.0/2023	Storage of Scheduled Waste	ER 012	1.0/2023	Use of Vehicle	ER 013	1.0/2023	Water Treatment	ER 014	1.0/2023	Diesel Engine for Power Generation	ER 016	1.0/2023	Storage of Hydrocarbon	ER 017	1.0/2023	Community	ER 019	1.0/2023	Construction-Maintenance	ER 020	1.0/2023	POME Treatment-Biogas & Polishing Plant	ER 021	1.0/2023	
Oil Pressing ###	ER 009	1.0/2023																																		
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Water Treatment	ER 014	1.0/2023																																		
Diesel Engine for Power Generation	ER 016	1.0/2023																																		
Storage of Hydrocarbon	ER 017	1.0/2023																																		
Community	ER 019	1.0/2023																																		
Construction-Maintenance	ER 020	1.0/2023																																		
POME Treatment-Biogas & Polishing Plant	ER 021	1.0/2023																																		
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>Social Impact Assessment (SIA) as well as the Social Management and Monitoring Plans for Sindora POM and its supply base were documented and available. These Plans were developed with participation of affected stakeholders via stakeholder meetings, interviews and feedback. Among the stakeholders who participated</p>	Complied																																	



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		<p>were external stakeholders, WOW (gender committee), NUPW, canteen and grocery store operators.</p> <p>The Environmental Management Action Plan available for each operating unit with inputs gathered from the meeting minutes as following:</p> <ul style="list-style-type: none"> <li>- Environmental Performance Management Committee Meeting</li> <li>- Management Review Meeting</li> <li>- Complaint &amp; Request from internal &amp; external stakeholders</li> <li>- and muster briefing</li> <li>- Stakeholders meeting</li> </ul> <p>Documented management plan includes the environmental information or issues, PIC and timeframe and monitoring of action status as per sample sighted as following:</p> <ul style="list-style-type: none"> <li>- Sindora Estate Environmental Management Plan; Doc. # LS-EMP 01; Rev. # 01/2023; Objective: To minimize environmental impact (pollution and emission) from all estate operation; Target: End July 2024</li> <li>- REM Estate Environmental Management Plan; Doc. # REM-EMP 01; Rev. # 01/2023; Objective: To minimize environmental impact (pollution and emission) from all estate operation; Target: End July 2024</li> </ul>	
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 social management and monitoring plans for all units within Sindora Mill and its supply base are being implemented, reviewed and updated regularly in a participatory way. These were done by way of stakeholder meetings, WOW and NUPW meetings. The reviews and updates are done on an annual basis, and the last update was done on 25/9/2023.</p> <p>Implementations of the monitoring plan was verified as follows: One of the negative impacts identified was the non-payment of foreign</p>	OFI

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		<p>workers' SOCSO employer's contributions for March, April and May 2023. Implementation of the Action Plan was verified upon reviewing SOCSO's Form 8A showing the payments of employer's SOCSO contributions for the affected workers.</p> <p>Similarly, a negative impact was discovered at Sg Papan Estate where foreign workers were subjected to Employment Insurance System deductions in April, contrary to the EIS Act 2017. Implementation of the action plan was verified when the foreign workers' payslips were sampled and showed no further deductions were made in the following months.</p> <p>The environmental management and monitoring plan is implemented, reviewed and updated regularly in a participatory way during external stakeholder consultations held on 20/09/2023. Notwithstanding, the review and update of Environmental Risk (Aspect &amp; Impact) Register could be improved further in reflective of specific site areas and on-going operations in Sungai Papan Estate and Sindora Palm Oil Mill respectively. Hence an OFI has been raised.</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>The recruitment, selection, hiring, promotion, retirement and termination procedures are available and kept at the respective office premises and available to all workers and their representatives, where applicable.</p> <p>The said SOPs are as follows:</p> <ul style="list-style-type: none"> <li>- Recruitment of New Foreign Workers Rev. No. 1 Issue No. 1 dated 1 Jan 2019; and</li> <li>- Recruitment of Local Workers for Operating Units Rev No. 00 Issue No. 01 dated 1 October 2020. This SOP contains procedures for recruitment, promotion, retirement, and termination.</li> </ul>	Complied

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3.5.2	Employment procedures are implemented, and records are maintained. - Minor Compliance -	Implementation of the employment procedures were verified when a review of the sampled employment file showed job applications, interview records, medical checks by medical assistant and signing of employment contracts. The sampled files were for the following workers:  - R.E.M. Estate: Workers No. E13000XXXX and E13000XXXX - Sindora Estate: Workers No. E6XXXXXXX6 and E6XXXXXXX8 - Sindora Mill: Workers No. E6XXXXXXX1 and E6XXXXXXX7 - Sg Papan Estate: Workers No. E6XXXXXXX2 and E6XXXXXXX5	Complied
<b>Criterion 3.6:</b> An occupational health and safety (H&S) plan is documented, effectively communicated and implemented.			
3.6.1	<b>(C)</b> All operations are risk assessed to identify H&S issues. Mitigation plans and procedures are documented and implemented. - Critical (Major) compliance -	HIRARC was available for all operations within the mill and estates to identify the hazards, assess and recommended control measures to minimize the risks. Among the HIRARC sampled were Harvesting of FFB, P&D Control, Landfill Activities, manuring and Spraying Activities. Risks were also assessed in accordance to legal requirements and its recommendations were implemented as below. <u>Sindora POM</u>  1. Chemical Health Risk Assessment was done in compliance with USECHH Regulation 2000. The assessment was conducted by QMSPRO Sdn Bhd on 13/08/2023. The CHRA Report (Report Number: JKKP HQ/03/ASS/00/154-2018/056) was available for verification. The CHRA assessment was conducted on 19/06/2023. The report is yet to be available during the audit.  2. Medical Surveillance for 2023 was conducted for 30 mill workers on 27/07/2023 for workers exposed to n-hexane, mineral oi, alum and methane gas and hazardous fumes. The medical surveillance was conducted at Uni Klinik, Permas Jaya. The	Non-compliance

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		<p>results indicated that all workers had no abnormal results that were occupational caused.</p> <ol style="list-style-type: none"> <li>Noise Risk Assessment was conducted in compliance with Occupational Safety and Health (Noise Exposure) Regulations 2019. The assessment was conducted by Kulim Safety Training and Services Sdn Bhd on 03/02/2020. The NRA Report (Report Number: JKKP HIE 127/5/3-1 (No.169) – 2020/001) was available for verification.</li> <li>Audiometric test was conducted by PAC Testing &amp; Consulting Sdn. Bhd for 33 mill workers on 04/07/2023. The results indicated 8 workers were diagnosed with Standard Threshold Shift (STS) and required to undergo retest within 3 months, and 18 workers were having NIHL and 8 working were having hearing impairment. Mill received the report on 25/09/2023. The management has send the worker affected with STS on 03/10/2023.</li> </ol> <p><u>Sindora Estate</u></p> <ol style="list-style-type: none"> <li>Chemical Health Risk Assessment (CHRA) was done in compliance with USECHH Regulation 2000. The assessment was conducted by QMSPRO Sdn Bhd on 26/03/2018 – 13/08/2018. The CHRA Report (Report Number: JKKP HQ/03/ASS/00/154-2018/034) was available for verification. The management has conducted the CHRA on 19/06/2023, however the report is yet to be available during the audit. Latest email on 27/09/2023 verified that the report is to be available on November 2023.</li> <li>Medical Surveillance has been conducted for 28 sprayers, 3 workers exposed to pesticides, and 20 manurers found that all are fit to work. Medical Surveillance were conducted on 27/07/2023.</li> </ol>	
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		<p>3. Noise Risk Assessment was conducted in compliance with Occupational Safety and Health (Noise Exposure) Regulations 2019. The assessment was conducted by NRA Assessor (JKKP Registration Number: HQ/18/PEB/00/00014) on 23/12/2021. The NRA Report (Report Number: HQ/18/PEB/00/00014 – 2021/019) was available for verification.</p> <p>4. Audiometric test was conducted by BP Healthcare Group for 35 estate workers on 22/12/2022 based on the requirements in the NRA. Result from audiometric testing found that 23 workers having normal hearing, 11 workers having hearing impairment and 1 worker having hearing loss. All of the 12 workers went for Medical Examination dated 19/01/2023 and OHD recommended to refit and retrain. Training has been conducted on 07/03/2023.</p> <p><u>Sungai Papan Estate</u></p> <p>1. Chemical Health Risk Assessment was conducted to assess the use of hazardous chemicals in the estate. The CHRA Assessment was conducted on 27/02/2018 – 13/08/2018 by QMSPro Sdn Bhd. The CHRA Report (JKKP HQ/03/ASS/00/154-2018/030) was available for verification.</p> <p>Supplementary CHRA Report was conducted due to additional chemicals used in the estate. The assessment was done on 22/12/2020 – 31/01/2021 by QMSPro Sdn Bhd. The CHRA Report (Report Number: JKKP HQ/03/ASS/00/154-2021/021) was available for verification.</p> <p>2. Medical Surveillance was conducted for 20 estate workers, deemed to be exposed to pesticides, fertilisers and mineral oils. The assessment was conducted on 03/08/2023 through JPGterrasolutions. The results indicated that 11 workers had no abnormal results that were occupational caused.</p>	
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		<p>3. Noise Risk Assessment was conducted in compliance with Occupational Safety and Health (Noise Exposure) Regulations 2019. The assessment was conducted on 30/12/2021. The NRA Report (Report Number: HQ/18/PEB/00/00014 – 2021/026) was available for verification.</p> <p>Additional NRA was conducted on 12/04/2023 with Report No: HQ/18/PEB/00/00014 – 2023/005 conducted to assessed the activity of grass cutting and field mist blower.</p> <p>4. The management has conducted the audiometric testing dated 21/09/2023, the report is yet to be available during the audit.</p> <p><u>REM Estate</u></p> <p>1. Supplementary CHRA Assessment was conducted by QMSPRO Sdn Bhd on 22/12/2020 – 31/01/2021 due to usage of different chemicals in the operations. The CHRA Report (Report Number: JKKP HQ/03/ASS/00/154-2021/027) was available for verification.</p> <p>2. CHRA Assessment was conducted by QMSPRO Sdn Bhd on 01/04/2018 – 13/08/2018. The CHRA Report (Report Number: JKKP HQ/03/ASS/00/154-2018/040) was available for verification.</p> <p>3. Medical Surveillance was conducted for workers expose to hazardous chemicals in the estate. The medical surveillance was conducted at REM Estate Clinic on 08/08/2023 for 55 workers. All workers were declared fit to work as per report.</p> <p>4. Baseline Noise Risk Assessment was conducted in compliance with Occupational Safety and Health (Noise Exposure) Regulations 2019. The assessment was conducted by DOSH</p>	
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		<p>certified assessor, Mr. Lee Kean Heng (JKKP Registration Number: HQ/18/PEB/00/00014) on 29/12/2021. The assessment report (HQ/18/PEB/00/00014 – 2021/025) was available for verification.</p> <p>5. Audiometric Assessment was conducted on 07/07/2023, result indicated that all workers are found normal.</p> <p><u>Basir Ismail Estate</u></p> <p>1. Supplementary CHRA Assessment was conducted by QMSPRO Sdn Bhd on 22/12/2020 – 31/01/2021 due to usage of different chemicals in the operations. The CHRA Report (Report Number: JKKP HQ/03/ASS/00/154-2021/002) was available for verification.</p> <p>2. CHRA Assessment was conducted by QMSPRO Sdn Bhd on 01/04/2018 – 13/08/2018. The CHRA Report (Report Number: JKKP HQ/03/ASS/00/154-2018/061) was available for verification.</p> <p>3. Medical Surveillance was conducted for workers expose to hazardous chemicals in the estate. The medical surveillance was conducted at Basir Ismail Estate Clinic on 07/08/2023 for 42 workers. All workers were declared fit to work as per report.</p> <p>4. Baseline Noise Risk Assessment was conducted in compliance with Occupational Safety and Health (Noise Exposure) Regulations 2019. The assessment was conducted by DOSH certified assessor, Mr. Lee Kean Heng (JKKP Registration Number: HQ/18/PEB/00/00014) on 06/12/2021. The assessment report (HQ/18/PEB/00/00014 – 2021/033) was available for verification.</p> <p>5. Review Noise Risk Assessment conducted on 13/04/2023 conducted by DOSH certified assessor, Mr. Lee Kean Heng (JKKP</p>	
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		<p>Registration Number: HQ/18/PEB/00/00014) on 06/12/2021. The assessment report (HQ/18/PEB/00/00014 – 2023/006) was available for verification.</p> <p>6. Audiometric Assessment was conducted on 23/09/2023, result is yet to be available during the audit.</p> <p>At Sindora Palm Oil Mill, a Hazard Identification, Risk Assessment, and Risk Control (HIRARC) Form for boiler operation were established on 24/01/2023, identifying floating dusts as a hazard. The control measures included the use of personal protective equipment (PPE) such as goggles and facemask. However, during a site visit at the Boiler station, it was observed that workers did not adhere to the facemask requirement.</p> <p>For Basir Ismail Estate, REM Estate, Sungai Papan Estate, and Sindora Estate, a Noise Risk Assessment was conducted at each estate, focusing on manuring activities using mechanical spreaders and Mechanical Buffalo (MB). It was noted that the noise identification process, as required by the Occupational Safety and Health (Noise Exposure) Regulations 2019, had not been conducted after changes in machinery or equipment, potentially exposing employees to excessive noise.</p> <p>In Basir Ismail Estate, a Noise Risk Assessment was carried out for fogging activity on 13/04/2023. The recommendation included attaching prominent warning notices to Fogging Machines indicating the mandatory use of personal protective equipment (PHP). However, a site inspection revealed the absence of prominent warning notices on the Fogging Machine at the workshop.</p> <p>Thus, Critical NC was raised.</p>	
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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>Annual H&amp;S plan established by each Operating Unit are mostly implemented through Annual Training Program 2023 to address the identified health and safety risks. The emphasis is on safe work by providing</p> <ul style="list-style-type: none"> <li>▪ Knowledge and skills needed to do their work safely and avoid creating hazards that could place themselves or others at risk.</li> <li>▪ Awareness and understanding of workplace hazards and how to identify, report, and control them.</li> <li>▪ Specialized training, when their work involves unique hazards.</li> </ul> <p>Besides formal classroom training other means include on-the-job training and worksite demonstrations to effectively convey safety concepts, ensuring understanding of hazards and their controls, and promoting good work practices.</p> <p>The safety performance of each Operating Unit is monitored via:</p> <ul style="list-style-type: none"> <li>• Internal Audit conducted by the Johor Plantation Berhad office Sustainability Palm Oil Department;</li> <li>• Workplace inspection by site OSH Committee;</li> <li>• Direct involvement of supervisor and rounds by Asst Manager;</li> <li>• Safety occurrence reporting;</li> <li>• Health / medical surveillance;</li> <li>• Chemical exposure monitoring, and</li> </ul> <p>The results of monitoring are discussed at meetings and informed to employees, and where applicable, appropriate corrective actions are taken.</p>	Complied
<b>Criterion 3.7:</b> All staff, workers, Scheme Smallholders, out-growers, and contract workers are appropriately trained.			

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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>	<p>The Annual Training Program 2023 was established that covers mainly Health and Safety but extends to include all aspects of RSPO P&amp;C and Supply Chain Certification Standard (SCCS).</p> <p>Means implemented by Kulim Plantation to assess understanding of participants include:</p> <ul style="list-style-type: none"><li>• Participants completing post-training evaluation/feedback form and give suggestions;</li><li>• Learners engagement such as interactive quizzes;</li><li>• Knowledge acquisition and behavioural application rated by immediate supervisor at workplace post training attended.</li></ul> <p>Random interviews with workers showed that they understood what is RSPO, the several subsidiaries policies, what does their work/job SOP states and the consequences if deviated, the need to put on PPE and demonstrate donning PPE and when it should be changed, the use of fire extinguishers, understanding workplace hazards, risks and needed control measures, etc.</p>	Complied								
3.7.2	<p>Records of training are maintained.</p> <p>- Minor Compliance -</p>	<p>Training records are maintained by each Operating Unit. Sample some records at each Operating as follows:</p> <p>Sindora POM</p> <table><tr><th>Training</th><th>Date</th></tr><tr><td>Schedule Waste management</td><td>21/08/2023</td></tr><tr><td>Chemical Handling</td><td>19/07/2023</td></tr><tr><td>Confine Space</td><td>18-19/09/2023</td></tr></table>	Training	Date	Schedule Waste management	21/08/2023	Chemical Handling	19/07/2023	Confine Space	18-19/09/2023	Complied
Training	Date										
Schedule Waste management	21/08/2023										
Chemical Handling	19/07/2023										
Confine Space	18-19/09/2023										

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		Safety Training	11/06/2023	
		Spillage and Bund Rupture Training	25/04/2023	
		ERP Training	18-19/09/2023	
		First Aid & CPR	25-26/06/2023	
		LOTO Training	28/04/2023	
		Sindora Estate		
		Training	Date	
		Safety Chemical Handling & IPM Training	22/08/2023	
		Harvesting	02/08/2023	
		Emergency Respond Plan (ERP) And CPR	10/08/2023	
		First Aid Training	26-27/09/2023	
		PPE Training	22/08/2023	
		Nursery – Spraying & Manuring	14/06/2023	
		Fertiliser Sampling & Handling	07/08/2023	

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		Sungai Papan Estate		
		Training	Date	
		Harvesting Training	19/03/2023	
		Spraying, Spraying Calibration and HCV Buffer Zone	09/02/2023	
		Schedule Waste	07/02/2023	
		Chemical handling	12/04/2023	
		Emergency Respond Plan (ERP)	15/02/2023	
		PPE Training	17/08/2023	
		Safety work at chemical store	23/08/2023	
		REM Estate		
		Training	Date	
		Manuring	17/02/2023	
		Spraying and Spraying calibration	16/03/2023	
		Chemical handling	03/08/2023	
		First Aider Competency Training	25-26/08/2023	
		Basir Ismail Estate		
		Training	Date	
		Harvesting training	11/06/2023	

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		<table><tr><td>Schedule Waste management</td><td>28/08/2023</td></tr><tr><td>Chemical handling training</td><td>23/05/2023</td></tr><tr><td>PPE Training</td><td>12/04/2023</td></tr><tr><td>SOP Training on Fogging/Grass Cutting</td><td>02/05/2023</td></tr><tr><td>ERP, Fire Extinguisher and First Aid training</td><td>07/05/2023</td></tr><tr><td>Fertilizer Store SOP Training</td><td>12/06/2023</td></tr><tr><td>Triple Rinse training</td><td>23/05/2023</td></tr></table>	Schedule Waste management	28/08/2023	Chemical handling training	23/05/2023	PPE Training	12/04/2023	SOP Training on Fogging/Grass Cutting	02/05/2023	ERP, Fire Extinguisher and First Aid training	07/05/2023	Fertilizer Store SOP Training	12/06/2023	Triple Rinse training	23/05/2023	
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3.7.3	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.  - Minor Compliance -	Supply chain training carried out for personnel carrying out the tasks critical to the effective implementation of the Supply Chain Certification Standard (SCCS).  Training conducted on 13/09/2023 – attended by Mill representatives.	Complied														
Criterion 3.8: 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	Identity Preserved Module  A mill is deemed to be Identity Preserved (IP) if the FFB processed by the mill are sourced from plantations/estates that are certified against the RSPO Principles and Criteria (RSPO P&C), or against the Group Certification scheme.  Certification for CPO mills is necessary to verify the volumes and sources of certified FFB entering the mill, the implementation of any processing controls (for example, if physical separation is used), and volume sales of RSPO certified products. If a mill process certified and uncertified FFB	Sindora Palm Oil Mill only receives certified FFB from its own certified supply base . Therefore, Sindora POM uses the Identity Preserved supply chain system and 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.	Complied														

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	without physically separating them, then only Mass Balance Module is applicable.								
3.8.2	<p>Mass Balance Module</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 only the volume of oil palm products produced from processing of the certified FFB as MB.</p>	Sindora Palm Oil Mill only receives certified FFB from own certified supply base. Therefore, qualifies for the Identity Preserved supply chain system and module. Hence this indicator is not applicable.	Not Applicable						
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. Summary of CPO and PK production for the assessment period is available in table 10 of this summary report.	Complied						
3.8.4	The mill shall also meet all registration and reporting requirements for the appropriate supply chain through the RSPO IT platform.	<p>The mill has met all registration and reporting requirements for the appropriate supply chain through the RSPO supply chain managing organization, PalmTrace.</p> <p>The registration of PalmTrace will be carried out by the Marketing Department in HQ. Company has registered in PalmTrace system as follows:</p> <table><tr><td>License ID</td><td>CB140243 (Active)</td></tr><tr><td>Member name</td><td>Johor Plantations Berhad- Sindora Palm Oil Mill</td></tr><tr><td>Member ID</td><td>RSPO_PO1000001264</td></tr></table>	License ID	CB140243 (Active)	Member name	Johor Plantations Berhad- Sindora Palm Oil Mill	Member ID	RSPO_PO1000001264	Complied
License ID	CB140243 (Active)								
Member name	Johor Plantations Berhad- Sindora Palm Oil Mill								
Member ID	RSPO_PO1000001264								

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		<table><tr><td>RSPO Membership No</td><td>1-0080-09-000-00 (Johor Corporation)</td></tr><tr><td>Issued by</td><td>BSI Services Malaysia Sdn Bhd.</td></tr><tr><td>Start date</td><td>23-01-2023</td></tr><tr><td>End date</td><td>22-01-2024</td></tr></table>	RSPO Membership No	1-0080-09-000-00 (Johor Corporation)	Issued by	BSI Services Malaysia Sdn Bhd.	Start date	23-01-2023	End date	22-01-2024	
RSPO Membership No	1-0080-09-000-00 (Johor Corporation)										
Issued by	BSI Services Malaysia Sdn Bhd.										
Start date	23-01-2023										
End date	22-01-2024										
3.8.5	<p>Documented procedures</p> <p>The mill shall have written procedures and/or work instructions or equivalent to ensure the implementation of all elements of the applicable supply chain model specified. This shall include at minimum the following:</p> <ul style="list-style-type: none"><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><u>Document Procedure</u></p> <p>The SCCS Operations are guided by 2 operating procedures as follows.</p> <ul style="list-style-type: none"><li>1. Mahamurni Plantations Sdn Bhd; Procedure Title: CSPO &amp; CSPK Supply Chain; Procedure No: MKTG 04; Document Date: January 2021; Revision; 02.</li><li>2. Sustainable Management system – Traceability; Document Number: SQD/SMS/2.1; Document Date: 17/02/2022; Issue No: 01; Rev Number; 06.</li></ul> <ul style="list-style-type: none"><li>– Seen the records that included in the procedure are as below Weighbridge tickets, Training records, Internal audit report, Invoice and contracts, Delivery and storage records and Daily Production Report.</li><li>– Training records for RSPO Supply Chain &amp; Stamping was sighted where the training was conducted on 13/09/2023 for the critical control point responsible person such as Weighbridge Operators and Security Guards. Seen the attendance list and interviewed with the attendees confirmed that they are understand the procedure.</li></ul>	Complied								

		<ul style="list-style-type: none"> <li>Head of each operating unit appointed as person responsible for all certification inclusive of RSPO SCCS. Responsibility of the person-in-charge has clearly stated in the appointment letter, SQD/ADMIN/019/21 dated 15/09/2021.</li> </ul> <p>Sindora POM has developed Sustainable Management system – Traceability; Document Number: SQD/SMS/2.1; Document Date: 17/02/2022; Issue No: 01; Rev Number; 06, which has covered the process of incoming of FFB and ensuring no contamination in the IP mill.</p>	
3.8.6	<p><b>Internal Audit</b></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 Plantation Berhad has developed Internal Audit Procedure (Doc. No.: SQD/SMS/3.2, Issue No.: 1, Rev. No.: 0 dated 01/08/2020) where the objective is to ensure that the implementation of company's RSPO, ISCC and MSPO management system is in line with the policies, procedures and other requirements. The frequency of the internal audit to be carried out is at least once within 12 months (before expiry of the certificate).</p> <p>The latest internal audit was carried out on 28/08/2023 by SQD team. There no non-conformance was raised based on Internal Audit Report. All the clauses in RSPO SCCS and RSPO Market Communications and Claims were covered during the audit.</p>	Complied
3.8.7	<p><b>Purchasing and Goods In</b></p> <p>i) The mill shall verify and document the tonnage and sources of certified and the tonnage of non-certified FFBs received.</p> <p>ii) The mill shall inform the CB immediately if there is a projected overproduction of certified tonnage.</p>	<p>When FFB delivered to the mill from the estate, the transporters presented FFB despatch report to the mill weighbridge clerk in order the FFB to be received by the mill.</p> <p>E.g. of information available in the FFB despatch report is as follows: FFB from Own Supply Base</p> <ul style="list-style-type: none"> <li>FFB despatch no. - 49278</li> </ul>	Complied



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	<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>Estate's names – Sungai Papan Estate</li> <li>Date of delivery – 18/04/2023</li> <li>Field No. - Field P08, P08A, P09A</li> <li>Lorry No – JNA 6624</li> <li>Weight – 31,510 kg</li> <li>WB ticket: 080959</li> <li>Traceability Identification - RSPO certified FFB (RSPO 612392)</li> </ul> <p>Sample of RSPO Certified Smallholder</p> <ul style="list-style-type: none"> <li>FFB despatch no. - 58616</li> <li>Estate's names – Eng Lee Heng</li> <li>Date of delivery – 26/08/2023</li> <li>Field No. – Field P08</li> <li>Lorry No – JSQ 9078</li> <li>Weight – 20,400 kg</li> <li>WB ticket: 085986</li> </ul> <p>Traceability Identification - RSPO certified FFB (RSPO 660787)</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> <p>a) The name and address of the buyer;</p> <p>b) The name and address of the seller;</p>	<p>Sindora Palm Oil Mill ensured the required information is available in document form.</p> <p>Sampled of CPO contract: CPOIP-M22XXX dated 22/12/2022, quantity 3,000 mt (delivery month – January 2023)</p> <ol style="list-style-type: none"> <li>The name and address of the buyer: XXX</li> <li>The name and address of the seller; Ladang Sindora Mill</li> <li>The delivery date: 05/01/2023</li> <li>The date on which the documents were issued:</li> <li>RSPO Certificate Number: RSPO 612392</li> </ol>	Complied

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	<ul style="list-style-type: none"> <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> <li>f) A description of the product, including the applicable supply chain model (Identity Preserved or Mass Balance or the approved abbreviations);</li> <li>g) The quantity of the products delivered;</li> <li>h) Any related transport documentation;</li> <li>i) A unique identification number.</li> </ul>	<ul style="list-style-type: none"> <li>6. A description of the product, including the applicable supply chain model: Crude Palm Oil (CSPO) RSPO IP</li> <li>7. The quantity of the products delivered: 41.16 mt</li> <li>8. Any related transport documentation: Collection Note - 023975</li> <li>9. A unique identification number: Weighbridge Ticket Number: C06445</li> </ul> <p>Sampled of PK contract: MPOK22XXXX dated 07/12/2022, quantity 2,500 mt (delivery month – March 2023)</p> <ul style="list-style-type: none"> <li>1. The name and address of the buyer: XXX</li> <li>2. The name and address of the seller: Ladang Sindora Mill</li> <li>3. The delivery date: 26/04/2023</li> <li>4. The date on which the documents were issued: 26/04/2023</li> <li>5. RSPO Certificate Number: RSPO 612392</li> <li>6. A description of the product, including the applicable supply chain model: Kernel (CSPK) RSPO IP</li> <li>7. The quantity of the products delivered: 37.41 mt</li> <li>8. Any related transport documentation: Collection Order – 56361</li> </ul> <p>A unique identification number: Weighbridge Ticket Number: K01727</p>	
3.8.9	<p><b>Outsourcing Activities</b></p> <ul style="list-style-type: none"> <li>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</li> <li>ii) The mill shall ensure the following: <ul style="list-style-type: none"> <li>a) The mill has legal ownership of all input material to be included in outsourced processes</li> </ul> </li> </ul>	<p>No CPO and PK process, bulking facilities outsourced by the mill. Transporter for PK was assigned by buyer. For CPO, contract agreement with a few contractors as per below:</p> <ul style="list-style-type: none"> <li>1. SBK Logistic Sdn Bhd Contract Number: MPSB/CPO/1/2020 dated 05/10/2020. Date commencement: 01/06/2020, completion date: 31/05/2023.</li> <li>2. Semai Setia Transport, MPSB/CPO1/2020 dated 05/10/2020. Date commencement: 01/06/2020, completion date: 31/05/2023.</li> </ul>	Complied

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	<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>3. Selama Masai Sdn Bhd; Contract Number: MPSB/CPO/1/2020 SELAMA dated 05/10/2020. Date commencement: 01/06/2020, completion date: 31/05/2023</p> <p>Addendum to the contract found there is a statement regarding the <i>"Contractor shall comply with all Kulim's relevant business policies and all certification program standard requirement related to the execution of this contract."</i></p>	
3.8.10	The mill shall record the names and contact details of all contractors used for the physical handling of RSPO certified oil palm products.	Names and contact details of all contractors used for the physical handling of CSPO listed under stakeholder list September 2023	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 change of names and contract details of transporter for the physical handling of RSPO certified oil palm products. The mill ae aware that the CB are to be informed if there are any changes of updates.	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>1. The mill has maintained the accurate, complete, up-to-date and accessible records and reports covering all aspects of these Sustainability Management System as below:</p> <ul style="list-style-type: none"> <li>a. Dispatch of CPO/PK delivery order</li> <li>b. Daily Production Report</li> <li>c. FFB Despatch Report from supplying estate</li> <li>d. Training records</li> <li>e. FFB Transaction records</li> </ul>	Complied

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	<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 (3) months. However, a mill is allowed to sell short (i.e. product can be sold before it is in stock).</p>	<p>2. Traceability Procedure (Doc. No.: SQD/SMS/1.2, Issue No. 1, Rev. No.: 05 dated 1/8/20, the records retention for all RSPO Supply Chain related records to be retained for a minimum of 5 years' period.</p> <p>3. Records and balance of all receipts of RSPO certified FFB and deliveries of RSPO certified CPO and PK monitored on a real-time basis on daily/monthly production figure.</p>	
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>	Conversion factor of CPO and PK production is depending on the actual OER and KER. Extraction average from March 2023 to September 2023 were 19.62% (OER) & 5.21 (KER).	Complied
3.8.14	Extraction rates shall be updated periodically to ensure accuracy against actual performance or industry average if appropriate.	The facility is using the actual extraction rate and therefore updating of rates is not necessary.	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>	No incoming of uncertified FFB and mill only process RSPO certified FFB from Johor Plantation Berhad group estates. Hence there are no uncertified products being produced, stored or transported for this certification unit.	Complied

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3.8.16	<p>Registration of Transactions</p> <p>i) Shipping Announcement in the RSPO IT platform shall be carried out by the mills when RSPO certified products are sold as certified to refineries, crushers, and traders not more than three months after dispatch with the dispatch date being the Bill of Lading or the dispatch documentation date.</p> <p>ii) Remove: RSPO certified volumes sold under different scheme or as conventional, or in case of underproduction, loss or damage shall be removed in the RSPO IT platform.</p>	<p>Shipping announcement in the RSPO IT platform carried out by by the mills when RSPO certified products are sold as certified to refineries. Details of transaction summarized under table.</p> <p>Total of registered transaction from March 2023 to September 2023;</p> <table><tr><td>CPO</td><td>PK</td></tr><tr><td>20,665.49</td><td>6110.78</td></tr></table>	CPO	PK	20,665.49	6110.78	Complied
CPO	PK						
20,665.49	6110.78						
3.8.17	<p>Claims</p> <p>The mill shall only make claims regarding the production of RSPO certified oil that are in compliance with the RSPO Rules on Market Communications and Claims.</p>	<p>Kulim (Malaysia) Berhad has obtained Trademark License from RSPO and seen the trademark license# 1-0080-09-100-01 which valid from 13/8/2023 – 12/8/2025 for IP Model for Sindora Palm Oil Mill. The facility is aware with the requirements of the RSPO Rules on Market Communications and Claims.</p>	Complied				
General corporate communications							
4.1	<p>A corporate communication is one made by any RSPO member that highlights its membership of the RSPO and/or its commitment to the principles of the RSPO. Corporate communication is an 'off-product' claim.</p>	<p>The company's website (<a href="https://johorplantations.com/sustainability/">https://johorplantations.com/sustainability/</a>) was reviewed and confirm that the communication made did not explicitly highlight its RSPO membership but had communicated its commitments towards production of sustainable palm oil. The communication did not imply any such that being an RSPO member means had certified to RSPO related certifications.</p>	Complied				
4.2	<p>In corporate communications a member is allowed to:</p> <p>a. Display its RSPO membership status</p> <p>b. Display the RSPO web address (<a href="http://www.rspo.org">www.rspo.org</a>)</p> <p>c. State that the member supports the work of the RSPO</p> <p>d. State the member's history with regard to the RSPO.</p> <p>e. Use the RSPO trademark to promote its membership of the RSPO.</p>	<p>The company's website (<a href="https://johorplantations.com/sustainability/">https://johorplantations.com/sustainability/</a>) was reviewed and confirm that the communication made did not explicitly highlight its RSPO membership but had communicated its commitments towards production of sustainable palm oil.</p> <p>The website had not displayed the RSPO Logo and had not display any RSPO Trademark.</p>	Complied				

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	Additionally, where an RSPO member displays the RSPO trademark in digital format this must be accompanied by the text 'Check our progress at <a href="http://www.rspo.org">www.rspo.org</a> ' where the link must lead to the member's profile page.		
4.3	In corporate communications RSPO members must not make any statement that may lead consumers to believe that RSPO membership by itself implies the selling of RSPO-certified oil palm products.	The communication did not imply any such that being an RSPO member means had certified to RSPO related certifications and selling of its oils are considered RSPO certified.	Complied
4.4	Members must ensure that all communication is consistent, clear and cannot mislead consumers or other stakeholders as to the certified content of oil palm products in the member's own products.	The company's website ( <a href="https://johorplantations.com/sustainability/">https://johorplantations.com/sustainability/</a> ) was reviewed and confirm the communications are mainly on the efforts and commitments of JPB towards production of sustainable palm oil. The website has published reports, statements, policies, procedures and performances of such implementation. The website did not specifically publish its product as RSPO certified product.	Complied
4.5	Members are not allowed to use the RSPO corporate logo as shown in the RSPO Rules on Market Communications & Claims document. This is for the sole use of the RSPO secretariat.	No evidence of RSPO corporate logo used by Sindora POM and verified through document and site review (notice board, business card, shipping documentation, etc.	Complied
<b>Business to business communications</b>			
5.1	Business to Business communication relates to RSPO members in the supply chain selling to and/or communicating with other organizations in the supply chain about the use of certified sustainable oil palm products.	In business-to-business communication within the supply chain, the exchange of information is demonstrated through shipping documentation and invoices provided to the subsequent supply chain actor or buyer. As part of this process, the authenticity of the claims regarding Certified Sustainable Palm Oil (CSPO), specifically of the Identity Preserved type, is verified. This verification involves checking the weighbridge tickets, where the claim of CSPO (Identity Preserved) is stamped, ensuring accuracy and transparency in the supply chain.	Complied
5.2	When confirming the sale of certified oil palm products, members must adhere to the requirements of the RSPO SCCS. This includes stating the	The shipping documentation has undergone verification to ensure compliance with the requirements of RSPO SCCS (Roundtable on Sustainable Palm Oil Supply Chain Certification Standard). The	Complied

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	supply chain model and certificate number under which the claim is being made.	weighbridge ticket associated with the shipment explicitly states that the product is Certified Sustainable Palm Oil (CSPO) of the Identity Preserved type, and it includes the RSPO certificate number: RSPO 612392. Details of shipping document verified is as per indicator 3.8.8	
5.3	<p>Where a distributor or wholesaler takes title to products containing certified sustainable oil palm products, the requirements of the RSPO SCCS can follow either of two options:</p> <p>a. If the distributor or wholesaler holds only a Distributor license, it may only communicate RSPO-certified oil palm products by linking the product to the manufacturer using the manufacturer's SCCS certificate number. This covers both brand and own brand products. However, in the case of own brand products it is essential that customers are aware that the product has been made on behalf of the distributor or wholesaler, with specific evidence either through on-pack claims or documentation.</p> <p>b. If the distributor or wholesaler is supply chain-certified they should follow the requirements outlined in section 5.2.</p>	Sindora Palm Oil Mill is confirmed not to fall under the distributor or wholesaler category, rendering the specified requirement is not applicable.	Not Applicable
<b>MODULE A – IDENTITY PRESERVED &amp; SEGREGATED SPECIFIC RULES</b>			
<b>Certified oil palm content (IP)</b>			
	For IP, 95% or above of the oil palm content must be RSPO IP-certified.	Oil palm content is 100% CPO and claim as RSPO IP-certified.	Complied
	For SG, 95% or above of the oil palm content must be SG, or a combination of SG and IP.	No SG claim made	Complied
	Where there is any percentage of non-certified oil palm within the product, the reason for this must be fully justified and an action plan for moving to fully certified oil palm must be in place, in accordance with the requirements of the RSPO SCCS. In addition, the volume of non-certified oil palm products must be covered by the purchase of RSPO Credits of equivalent volume.	Oil palm content is 100% CPO and claim as RSPO IP-certified. All infeed material (FFB) is RSPO certified.	Complied

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Labelling and trademark (IP)			
	<p>Members are allowed to use the RSPO label in one of the following ways:</p> <ul style="list-style-type: none"><li>• RSPO trademark which includes the tag 'CERTIFIED' or</li><li>• RSPO trademark which includes the tag 'This product contains certified sustainable palm oil'. Wherever a RSPO trademark is displayed, the applicable trademark license number must be shown immediately under or next to the trademark or the 'statement'. Font must be Calibri, font size must be at least 4pt (1.4 mm or 0.06 inch). In on-pack communications, the RSPO trademark can be printed anywhere on the pack.</li></ul>	<p>Currently, no RSPO (Roundtable on Sustainable Palm Oil) trademark is being utilized on RSPO products by Johor Plantation Berhad. The company has provided information about its membership history with RSPO on its website and in the annual report for the year 2022. Notably, the documentation does not include the use of the RSPO trademark logo.</p>	Complied
Messaging (IP)			
	<p>Messaging ALLOWED in storytelling in product-related communications may include some or all of the following elements:</p> <ul style="list-style-type: none"><li>• The oil palm products contained in this product have been certified to come from RSPO sources. <a href="http://www.rspo.org">www.rspo.org</a></li><li>• By choosing this product, you are sure it contains RSPO-certified palm oil. For more information: <a href="http://www.rspo.org">www.rspo.org</a></li><li>• RSPO-certified sustainable oil palm products were kept apart from other oil palm products throughout the supply chain. <a href="http://www.rspo.org">www.rspo.org</a></li><li>• Certified sustainable oil palm products can be traced back to RSPO-certified mills and plantations. <a href="http://www.rspo.org">www.rspo.org</a></li><li>• The entire supply chain is monitored by independent, RSPO-accredited auditors. <a href="http://www.rspo.org">www.rspo.org</a></li><li>• RSPO-certified sustainable palm oil has been produced to stringent environmental and social criteria. <a href="http://www.rspo.org">www.rspo.org</a></li><li>• References to (or images of) particular RSPO-certified production units, if the relationship to those units can be shown by company records</li></ul>	<p>Currently, no RSPO (Roundtable on Sustainable Palm Oil) trademark is being utilized on RSPO products by Johor Plantation Berhad. The company has provided information about its membership history with RSPO on its website and in the annual report for the year 2022. Notably, the documentation does not include the use of the RSPO trademark logo.</p>	Complied



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<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>	<p>The Policy to respect human rights is documented under the Company's Sustainability Policy dated 1/10/2021 signed by its Managing Director. This Policy pledges, among other things, the Company's commitment to respect, support and protect international human rights against violence, threats, all forms of retaliation, and effective elimination of all forms of violation of human rights which include against HRD, whistleblowers, complainants and community spokespersons.</p> <p>This Policy was communicated to stakeholders including local communities during stakeholder meeting held on 3/9/2023 (Northern Region) and on 20/9/23 (Southern Region). Briefings were also given to all levels of workforce during the following sampled briefings at Sindora Mill (1/5/2023), Sindora Estate (26/6/2023), Sg Papan Estate (20/6/2023), R.E.M. Estate (25/6/2023), and Basir Ismail Estate (26/6/2023).</p>	Complied
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>There was no evidence of any use of violence or the instigation of violence within Sindora Mill and its supply base. This was further verified during interviews held with the workers and external stakeholders such as local communities from Kg Sg Berangan, Kg Baru Pasak and Kg Tanjong Serindit.</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			
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-</p>	<p>An agreed and documented system which deals with complaints and grievances is available and documented as Grievance Procedure Doc No. SQD/SMS/4.1 dated 1 August 2020. This SOP is applicable</p>	Complied

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	<p>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>to all parties who deal with the Company who may have complaints and grievances. Clause 5.8 states that complainants' anonymity would be respected and protected if requested.</p> <p>In addition, the Company's Sustainability Policy also states that it respects, supports and protects international human rights against violence, threats, all forms of retaliation, and effective elimination of all forms of violation of human rights which include against HRD, whistleblowers, complainants and community spokespersons.</p> <p>Sampled during the audit were Whistleblowing Policy briefings to the workers at Sindora Mill (1/5/2023) &amp; Sindora Estate (12/1/2023), and Basir Ismail Estate (19/4/2023).</p>	
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>To ensure understanding by illiterate parties, the briefings were given verbally, and when necessary, translators from among the workers (usually a worker representatives) are sought to translate documents including procedures for dealing with complaints and grievances.</p> <p>Briefings on the available grievance procedures were given during muster briefings at Sindora Estate (27/2/2023 &amp; 25/1/2023), Sg Papan (20/6/2023), R.E.M. Estate (25/6/2023). At R.E.M. Estate, the grievance mechanism process was also explained during a Union Meeting with management on 15/8/2023.</p> <p>However, based on interviews held with workers at Sindora Mill, there is inadequate understanding of the system for dealing with complaints and grievances. Workers at Sindora Palm Oil Mill did not understand that the system for dealing with complaints and grievances ensures anonymity for complainants and whistle-blowers where requested; and that disputes can be resolved in an effective,</p>	Non-compliance

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		timely and appropriate manner without risk of reprisal or intimidation. Therefore, a Minor Non-Compliance was raised.	
4.2.3	The unit of certification keeps parties to a grievance informed of its progress, including against agreed timeframe and the outcome is available and communicated to relevant stakeholders. - Minor compliance -	Based on complaints book sighted, no grievances from external stakeholders have been filed against Sindora Mill and its supply base.  Records of complaints can only be seen from housing defects at the linesite. Reports of repairs that needed to be carried out also contained status of repair works done and acknowledged by the complainants. This shows that parties to a grievance were informed of the progress of their complaints against agreed timeframe.	Complied
4.2.4	The conflict resolution mechanism includes the option of access to independent legal and technical advice, the ability for complainants to choose individuals or groups to support them and/or act as observers, as well as the option of a third-party mediator. - Minor compliance -	The Company's conflict resolution mechanism is contained in Clause 5.5 of Grievance Mechanism Doc. No. SQD/SMS/4.1 Issue No. 1 dated 1 August 2020. This mechanism applies throughout the Company including Sindora Mill and its supply base.  A mechanism which provides an option for parties to engage independent legal, technical advice and third-party mediator is available under Clause 5.5 of the same document.	Complied
<b>Criterion 4.3:</b> The unit of Certification contributes to local sustainable development as agreed by local communities.			
4.3.1	Contributions to community development that are based on the results of consultation with local communities are demonstrated. - Minor compliance -	Contributions to local development offered by Sindora Mill and its supply base include the following: a. Providing job and business opportunities to the local communities; b. Estate clinic at Basir Ismail estate also provides medical treatment to the nearby local communities, as well as inviting Klinik Ibu dan Kanak-Kanak Kota Tinggi once a month to provide ante and post-natal care for its employees and the local communities;	Complied

		<ul style="list-style-type: none"> <li>c. Allowing access by local communities from Kg Muhibbah, Kg Tg Serindit to access their property using Sg Papan estate road;</li> <li>d. Allowing local community to have access and send their children to schools SJK (Tamil) in REM Estate and SK Nam Heng (Basir Ismail Estate);</li> <li>e. Following a written request dated 21/9/2023, R.E.M. Estate allowed worshippers from outside the estate to use the Sri Muniandy Kaliamman Alayam temple to conduct special prayers;</li> <li>f. PIBG SK Bukit Tongkat also wrote on 8/2/2023 seeking funds for the purchase and installation of fans in the school hall;</li> </ul> <p>In addition to written requests, these contributions were also made based on the consultations with the local communities, and long-standing practice from the surrounding community.</p>	
<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.			
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>Copies of land titles were sighted and duly verified and quit rents have been paid accordingly. Land titles were duly sampled during the audit. Sindora Mill is located within Sindora Estate with land title HSD No. 17660; PT PTF4435 Daerah Kluang, Mukim Rengam, with a total land area of 2,800.5108ha.</p> <p>Basir Ismail Estate has a total of 29 separate land titles with total 3,196.63 ha. A sample land title verified with an area of 1,061.4888 ha (after land acquisition increased to 2,002.0814 ha) under land title No. 22664; Lot No. 1419; Daerah Johor Bahru, Mukim Sg. Tiram.</p>	Complied

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4.4.2	Copies of documents evidencing agreement-making processes and negotiated agreements detailing the FPIC process are available and include:	It was verified during the audit that no land dispute exists between any of the units within Sindora Mill and its supply base with any third party or the local communities. This was verified by reviewing land titles, minutes of stakeholder meetings, and confirmed by the local communities Kg Tg Serindit, Kg Sg Baru Pasak and Kg Sg Berangan. Therefore, this indicator is not applicable.	Not Applicable
4.4.2a	Evidence that a plan has been developed through consultation and discussion in good faith with all affected groups in the communities, with particular assurance that vulnerable, minorities' and gender groups are consulted, and that information has been provided to all affected groups, including information on the steps that are taken to involve them in decision making. - Minor compliance -	It was verified during the audit that no land dispute exists between any of the units within Sindora Mill and its supply base with any third party or the local communities. This was verified by reviewing land titles, minutes of stakeholder meetings, and confirmed by the local communities Kg Tg Serindit, Kg Sg Baru Pasak and Kg Sg Berangan. Therefore, this indicator is not applicable.	Not Applicable
4.4.2b	Evidence that the unit of certification has respected communities' decisions to give or withhold their consent to the operation at the time that these decisions were taken. - Minor compliance -	It was verified during the audit that no land dispute exists between any of the units within Sindora Mill and its supply base with any third party or the local communities. This was verified by reviewing land titles, minutes of stakeholder meetings, and confirmed by the local communities Kg Tg Serindit, Kg Sg Baru Pasak and Kg Sg Berangan. Therefore, this indicator is not applicable.	Not Applicable
4.4.2c	Evidence that the legal, economic, environmental and social implications of permitting operations on their land have been understood and accepted by affected communities, including the implications for the legal status of their land at the expiry of the unit of certification's title, concession or lease on the land. - Minor compliance -	It was verified during the audit that no land dispute exists between any of the units within Sindora Mill and its supply base with any third party or the local communities. This was verified by reviewing land titles, minutes of stakeholder meetings, and confirmed by the local communities Kg Tg Serindit, Kg Sg Baru Pasak and Kg Sg Berangan. Therefore, this indicator is not applicable.	Not Applicable
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	It was verified during the audit that no land dispute exists between any of the units within Sindora Mill and its supply base with any	Not Applicable

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	involving affected parties (including neighbouring communities where applicable, and relevant authorities). - Critical (Major) compliance -	third party or the local communities. This was verified by reviewing land titles, minutes of stakeholder meetings, and confirmed by the local communities Kg Tg Serindit, Kg Sg Baru Pasak and Kg Sg Berangan. Therefore, this indicator is not applicable.	
4.4.4	All relevant information is available in appropriate forms and languages, including assessments of impacts, proposed benefit sharing, and legal arrangements. - Minor compliance -	It was verified during the audit that no land dispute exists between any of the units within Sindora Mill and its supply base with any third party or the local communities. This was verified by reviewing land titles, minutes of stakeholder meetings, and confirmed by the local communities Kg Tg Serindit, Kg Sg Baru Pasak and Kg Sg Berangan. Therefore, this indicator is not applicable.	Not Applicable
4.4.5	<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. - Critical (Major) compliance -	It was verified during the audit that no land dispute exists between any of the units within Sindora Mill and its supply base with any third party or the local communities. This was verified by reviewing land titles, minutes of stakeholder meetings, and confirmed by the local communities Kg Tg Serindit, Kg Sg Baru Pasak and Kg Sg Berangan. Therefore, this indicator is not applicable.	Not Applicable
4.4.6	There is evidence that implementation of agreements negotiated through FPIC is annually reviewed in consultation with affected parties. - Minor compliance -	It was verified during the audit that no land dispute exists between any of the units within Sindora Mill and its supply base with any third party or the local communities. This was verified by reviewing land titles, minutes of stakeholder meetings, and confirmed by the local communities Kg Tg Serindit, Kg Sg Baru Pasak and Kg Sg Berangan. Therefore, this indicator is not applicable.	Not Applicable
<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.			
4.5.1	<b>(C)</b> Documents showing identification and assessment of demonstrable legal, customary and user rights are available. - Critical (Major) compliance -	It was verified during the audit via SIA report and monitoring plans, management reviews, and triangulated with field observations and interviews held with local communities from Kg Baru Pasak, Kg Tg Serindit and Kg Berangan that no new plantings have been or are	Not Applicable

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		being established on local peoples' land. Therefore, this Indicator is not applicable.	
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>	It was verified during the audit via SIA report and monitoring plans, management reviews, and triangulated with field observations and interviews held with local communities from Kg Baru Pasak, Kg Tg Serindit and Kg Berangan that no new plantings have been or are being established on local peoples' land. Therefore, this Indicator is not applicable.	Not Applicable
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>	It was verified during the audit via SIA report and monitoring plans, management reviews, and triangulated with field observations and interviews held with local communities from Kg Baru Pasak, Kg Tg Serindit and Kg Berangan that no new plantings have been or are being established on local peoples' land. Therefore, this Indicator is not applicable.	Not Applicable
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>	It was verified during the audit via SIA report and monitoring plans, management reviews, and triangulated with field observations and interviews held with local communities from Kg Baru Pasak, Kg Tg Serindit and Kg Berangan that no new plantings have been or are being established on local peoples' land. Therefore, this Indicator is not applicable.	Not Applicable
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>	It was verified during the audit via SIA report and monitoring plans, management reviews, and triangulated with field observations and interviews held with local communities from Kg Baru Pasak, Kg Tg Serindit and Kg Berangan that no new plantings have been or are	Not Applicable

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	- Minor compliance -	being established on local peoples' land. Therefore, this Indicator is not applicable.	
4.5.6	Evidence is available that the communities (or their representatives) gave consent to the initial planning phases of the operations prior to the issuance of a new concession or land title to the operator. - Minor compliance -	It was verified during the audit via SIA report and monitoring plans, management reviews, and triangulated with field observations and interviews held with local communities from Kg Baru Pasak, Kg Tg Serindit and Kg Berangan that no new plantings have been or are being established on local peoples' land. Therefore, this Indicator is not applicable.	Not Applicable
4.5.7	New lands are not acquired for plantations and mills after 15 November 2018 as a result of recent (2005 or later) expropriations without consent under the right of eminent domain of the federal and state land acquisition legislations. - Minor compliance -	It was verified during the audit via SIA report and monitoring plans, management reviews, and triangulated with field observations and interviews held with local communities from Kg Baru Pasak, Kg Tg Serindit and Kg Berangan that no new plantings have been or are being established on local peoples' land. Therefore, this Indicator is not applicable.	Not Applicable
4.5.8	<b>(C)</b> New lands are not acquired in areas inhabited by communities in voluntary isolation. - Critical (Major) compliance -	It was verified during the audit via SIA report and monitoring plans, management reviews, and triangulated with field observations and interviews held with local communities from Kg Baru Pasak, Kg Tg Serindit and Kg Berangan that no new plantings have been or are being established on local peoples' land. Therefore, this Indicator is not applicable.	Not Applicable
<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 -	Procedure for identifying legal, customary or user rights, and a procedure for identifying people entitled to compensation is in place and is contained in Property Department Management Manual Doc KMD/PMB/MP/05 dated 9/6/2020. This procedure is to ensure any negotiation with regards to compensation for loss of local rights are dealt with fairly.	Complied



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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>	Procedure for calculating and distributing fair compensation is contained in Property Department Management Manual Doc KMD/PMB/MP/05 dated 9/6/2020. The implementation and evaluation of the procedure could not be verified because there was no evidence of any payment of compensation made for loss of legal customary or user rights.	Complied
4.6.3	<p>Evidence is available that equal opportunities are provided to both men and women to hold land titles for scheme small holdings.</p> <p>- Minor compliance -</p>	Sindora Mill does not have any arrangements for scheme smallholdings. Therefore, this indicator is not applicable.	Not Applicable
4.6.4	<p>The process and outcomes of any negotiated agreements, compensation and payments are documented, with evidence of the participation of affected parties, and made publicly available to them.</p> <p>- Minor compliance -</p>	Based on documents sighted and interviews conducted with stakeholders, there was no evidence of any dispute with any previous owner or occupants. Therefore, this indicator is not applicable.	Not Applicable
<p><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.</p>			
4.7.1	<p><b>(C)</b> A mutually agreed procedure for identifying people entitled to compensation is in place.</p> <p>- Critical (Major) compliance -</p>	The procedure for identifying people entitled to compensation is contained in Property Department Management Manual Doc KMD/PMB/MP/05 dated 9/6/2020.	Complied
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>	The procedure for calculating and distributing fair and gender-equal compensation (monetary or otherwise) is established under Property Department Management Manual Doc KMD/PMB/MP/05 dated 9/6/2020. The implementation and evaluation of the procedure could not be verified because there was no evidence of any calculation and distribution of compensation for any agreed land acquisitions and relinquishment of rights.	Complied

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4.7.3	Communities that have lost access and rights to land for plantation expansion are given opportunities including employment and supply contracts to benefit from plantation development. - Minor compliance -	Based on documents sighted and interviews conducted with stakeholders, there was no evidence of any dispute with any previous owner or occupants. However, Sindora Mill and its supply base offer job opportunities to local communities living within its vicinity.	Not Applicable
<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 -	Based on documents sighted (minutes of stakeholder meeting, internal audit reports) and interviews conducted with local communities from Kg Tg Serindit, Kg Sg Berangan and Kg Batu Pasak, there was no evidence of any dispute with any previous owner or occupants. Therefore, this indicator is not applicable.	Not Applicable
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 -	Based on documents sighted (minutes of stakeholder meeting, internal audit reports) and interviews conducted with local communities from Kg Tg Serindit, Kg Sg Berangan and Kg Batu Pasak, there was no evidence of land conflict with any previous owner or occupants. Therefore, this indicator is not applicable.	Not Applicable
4.8.3	Where there is evidence of acquisition through dispossession or forced abandonment of customary and user rights prior to the current operations and there remain parties with demonstrable customary and land use rights, these claims will be settled using the relevant requirements (Indicators 4.4.2, 4.4.3 and 4.4.4) - Minor compliance -	Based on documents sighted (minutes of stakeholder meeting, internal audit reports) and interviews conducted with local communities from Kg Tg Serindit, Kg Sg Berangan and Kg Batu Pasak, there was no evidence of acquisition through dispossession or forced abandonment of customary and user rights prior to the current operations. Therefore, this indicator is not applicable.	Not Applicable

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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 -	Based on documents sighted (minutes of stakeholder meeting, internal audit reports) and interviews conducted with local communities from Kg Tg Serindit, Kg Sg Berangan and Kg Batu Pasak, there was no evidence of conflict or dispute over the land. Therefore, this indicator is not applicable.	Not Applicable
<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 -	Current and previous period prices paid for FFB are publicly available via display in front of weighbridge counter of the mill. Notwithstanding, only RSPO certified group smallholders of Wild Asia Group Smallholders (WAGS) certification unit being the external FFB suppliers of Sindora POM. The smallholders' group being co-managed by FFB collection centre company Eng Lee Heng that have access to the FFB pricing by Sindora POM.	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 -	Sindora POM explains the FFB pricing to WAGS suppliers via co-manager Eng Lee Heng during external stakeholder consultation meeting date on 20/09/2023.	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 -	Sindora POM has fair RSPO certified FFB purchase agreement with the FFB collection centre company Eng Lee Heng while the group smallholders' members of WAGS have the agreement with Wild Asia and Eng Lee Heng that fairly calculated the FFB price based on MPBOB CPO market price.	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	Both Wild Asia and Eng Lee Heng as the representative of WAGS were involved in the decision-making processes and understand the contracts of RSPO certified FFB purchase by Sindora POM. These include the supports given by Johor Plantations Berhad via its	Complied

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	repayments through FFB price reductions for replanting and or other support mechanisms where applicable. - Critical (Major) compliance -	sustainability department personnel on all aspects related to the commitment of RSPO certified FFB by WAGS.	
5.1.5	Contracts are fair, legal and transparent and have an agreed timeframe. - Minor compliance -	<p>All contracts are fair, legal and transparent and have an agreed timeframe. Sample contracts including FFB supplier, contain clauses on disallowing child, forced and trafficked labour. Where young workers are employed, the contracts include a clause for their protection.</p> <p>For FFB suppliers, the clauses on disallowing child, forced and trafficked labour. Where young workers are employed, the contracts include a clause for their protection were stated in clause 14 which stated as follows:</p> <p>"The supplier represents and warrants that the supplier shall comply with applicable labour and employment laws regarding; and prohibit any form of child labour, forced and trafficked labour. Any eligible young labour will be employed only accordance with Children and Young Person (Employment) Act 1966."</p> <p>Reviewed the sampled contracts as following:</p> <ul style="list-style-type: none"> <li>- Contract agreements between Johor Plantation Berhad. with YH Plantations Enterprise, ref: JPB/LSA/165/1/2022 for Loading and Transporting of FFB from Field P06, P07, P08 P13, (Assist) P15A, P15B, P16A, P16B, &amp; P17B at Sindora Estate to Sindora Palm Oil Mill. Contract period 01/09/2023 until 30/06/2024</li> <li>- Contract agreement between Mahamurni Plantations Sdn bhd. with Perniagaan Insan Permai, ref: MPSB/LSPN 2/165/2020 for Transportation of FFB from Sungai Papan Estate to Sindora Palm Oil Mill. Contract period until 31/12/2023</li> </ul>	Complied
5.1.6	<b>(C)</b> Agreed payments are made in a timely manner and receipts specifying price, weight, deductions and amount paid are given.	For WAGS RSPO certified FFB supply via Eng Lee Heng, agreed payments were made in a timely manner and receipts specifying	Complied

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	- Critical (Major) compliance -	price, weight, deductions, and amount paid are given. So does for other vendor including FFB transporters who confirmed on the matter during on-site consultation without any negative feedback.	
5.1.7	Weighbridges used for determining payment to smallholders are verified by an independent third party on a regular basis (this can be government). - Minor compliance -	Weighbridges used for determining payment to smallholders were verified by the De Metrology Sdn. Bhd. under the KPDN license as following: - Weighbridge 1: M. Toledo ATK00249 – 60,000 kg; Stamping Date: 24/07/2023; Ref. # B18005710 - Weighbridge 2: M. Toledo ATK00349 – 60,000 kg; Stamping Date: 29/05/2023; Ref. # B18005711	Complied
5.1.8	The unit of certification supports Independent Smallholders with certification, where applicable, ensuring mutual agreements between the unit of certification and the smallholders on who runs the internal control system (ICS), who holds the certificates, and who holds and sells the certified material. - Minor compliance -	No independent smallholders within Sindora POM certification unit. Notwithstanding, Johor Plantation Berhad via its sustainability department support the commitment of RSPO certification by WAGS through purchase of their RSPO certified FFB.	Complied
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 -	Sindora POM established a system to deal with complaints and grievances and documented as Grievance Procedure Doc No. SQD/SMS/4.1 dated 1 August 2020. This SOP is applicable to all parties who deal with the Company who may have complaints and grievances including WAGS. Clause 5.8 states that complainants' anonymity would be respected and protected if requested.	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 -	Among Sindora Mill's FFB supplier include the Wild Asia Groups of Independent Smallholders who are already RSPO certified. There are no other groups of smallholders involved. Therefore, this Indicator is not applicable.	Not Applicable

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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 -	Among Sindora Mill's FFB supplier include the Wild Asia Groups of Independent Smallholders who are already RSPO certified. There are no other groups of smallholders involved. Therefore, this Indicator is not applicable.	Not Applicable
5.2.3	Where applicable, the unit of certification provides support to smallholders to promote legality of FFB production. - Minor compliance -	Among Sindora Mill's FFB supplier include the Wild Asia Groups of Independent Smallholders who are already RSPO certified. There are no other groups of smallholders involved. Therefore, 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 -	Among Sindora Mill's FFB supplier include the Wild Asia Groups of Independent Smallholders who are already RSPO certified. There is no scheme smallholders involved. Therefore, this Indicator is not applicable.	Not Applicable
5.2.5	The unit of certification regularly reviews and publicly reports on the progress of the Smallholder support programme. - Minor compliance -	Among Sindora Mill's FFB supplier include the Wild Asia Groups of Independent Smallholders who are already RSPO certified, therefore 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 -	The publicly available policies developed by the Company on non-discrimination and equal opportunities are available as follows: <ul style="list-style-type: none"> <li>• Business Policy</li> <li>• Core Labour Standard</li> <li>• People Policy</li> </ul> These Policies emphasise on fairness and equal opportunities for relevant group such as all employees, including foreign and local are embedded. These Policies prevent discrimination based on	Complied

		<p>ethnic origin, caste, national origin, religion, disability, gender, sexual orientation, gender identity, union membership, political affiliation or age.</p> <p>The implementation of these Policies were evidenced from reviews of employment contracts of foreign and local workers, as well as interviews conducted with sampled workers. These workers confirmed the absence of any form of discrimination and that they were accorded equal opportunities.</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>Contract dated 19/05/2022 signed between Kulim (Malaysia) Berhad and PT Hamparan Karya Insani (manpower supplier from Indonesia) states among others, that cost of workers' transportation to the respective estates/mill will be borne by Kulim following Kulim's 'Zero Cost Policy'. No recruitment fees are imposed on any of the foreign workers, and this was further confirmed by foreign workers interviewed and supported by the review of their respective payslips.</p> <p>All sampled workers interviewed at the estates and mill confirmed that they have not faced any no form of discrimination.</p>	Complied
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>Sampled during the audit were the recruitment of the following workers:</p> <p>R.E.M. Estate: Workers No. E13XXXXXX6 and E13XXXXXX5</p> <p>Sindora Estate: Workers No. E6XXXXXX6 and E6XXXXXX8</p> <p>Sindora Mill: Workers No. E63XXXXXX1 and E6XXXXXX7</p> <p>Sg Papan Estate: Workers No. E6XXXXXX2 and E6XXXXXX5</p> <p>Among the records reviewed were the workers' relevant certificates, educational records, previous job experience, and medical test results. Based on the above, evidence was available that recruitment selection, hiring, access to training and promotion are</p>	Complied

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		based on skills, capabilities, qualities and medical fitness necessary for the jobs available.	
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 the interviews held with Health Assistants, female workers and clinic records, there was no evidence that pregnancy testing was conducted as a discriminatory measure. If a female worker who works in the field is confirmed pregnant, she would be offered alternative equivalent employment.</p> <p>At Sg Papan Estate, a female manurer who was confirmed pregnant was transferred to do general work. A letter dated 1/7/2023 was issued to the said worker (No. E670001122) to be excluded from chemical handling works throughout the duration of her pregnancy.</p>	Complied
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>Women OnWards (WOW) is a committee that comprises all female employees including employees' wives. WOW was set up to promote gender equality and empower women's knowledge and skills.</p> <p>Among the awareness given to members during WoW meetings include issues discussed were sexual harassment, domestic violence, how to make complaints if there was a case, reproductive right and briefings on Company policies. Interview conducted with two WoW committee member confirmed that there has been no sexual harassment cases, and that she was aware of the grievance process.</p> <p>Among the records of annual meetings sighted. The meeting minutes recorded briefings on company policies, grievance procedure under Panel Aduan Wanita, sexual harassment, domestic violence, no discrimination, needs of new mothers, and that pregnant mothers to avoid contact with chemicals, matters related to human rights, grievance policy, etc. The meetings were held as follows:</p> <p>a. Sindora Estate 19/6/2023</p>	OFI



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		<ul style="list-style-type: none"> <li>b. Sindora Mill: 10/9/2023</li> <li>c. R.E.M. Estate: 16/03/2023</li> <li>d. Basir Ismail Estate: 12/7/2023</li> </ul> <p>It was noted that WOW meetings are held once a year among its members, to discuss their annual activities, briefing on sexual harassment, domestic violence, needs of new mothers, grievance mechanism, discussion on how to improve their economic wellbeing, company policies, etc. It would be an opportunity for improvement (OFI) if the WOW meetings be conducted more frequently so that members can benefit from refresher briefings.</p>	
6.1.6	<p>There is evidence of equal pay for the same work scope.</p> <p>- Minor compliance -</p>	<p>Sindora Mill and its supply base were able to demonstrate that that workers receive equal pay for the same work scope. Sampled were the following workers:</p> <ul style="list-style-type: none"> <li>a. Sindora Estate: Workers No. E62XXXXXXX and E6XXXXXXX1 (both male Indonesian general workers)</li> <li>b. Sg. Papan Estate: Workers No. E6XXXXXXX9 (male general worker) and E6XXXXXXX4 (female general worker)</li> <li>c. Sindora Mill: Workers No. E6XXXXXXX7 and E6XXXXXXX7 (both male workshop electricians)</li> <li>d. R.E.M. Estate: Workers No. E1XXXXXXX8 (male Bangladeshi general worker) and E1XXXXXXX3 (male Indonesian general worker)</li> </ul>	Complied
<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>Johor Plantations Berhad is a member of the Malaysian Agricultural Producers Association (MAPA) and is therefore subjected to the agreement between MAPA and the National Union of Plantation Workers (NUPW). Applicable labour laws related to duration, hours</p>	Complied

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	- Critical (Major) compliance -	<p>of work, overtime, annual/medical leave, public holiday, mutual termination, salary deductions, maternity entitlement, etc are contained in workers' employment contracts. Clause 9 of the employment contracts also specifically states that unless otherwise stated, all terms and conditions of contract are subjected to the Employment Act 1955 and SOCSO Act 1969, and the current MAPA/NUPW contract.</p> <p>Sampled were employment contracts for Malaysian and Indonesian workers which have been prepared in Bahasa Malaysia, and Bangladeshi contracts prepared in Bengali. These were also explained to the workers by the worker representatives in a language they understand.</p> <p>The terms of their employment e.g., paid annual leave, minimum wages, piece-rated wages, medical benefits, etc, were explained to the workers. Sampled were the following trainings:</p> <ul style="list-style-type: none"> <li>a. Sindora Estate on 24/8/2023 &amp; 4/7/2023</li> <li>b. Basir Ismail Estate on 19/6/2023.</li> <li>c. Sindora Mill on 10/9/2023.</li> </ul>	
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>Reviewed during the audit were employment contracts entered into between the sampled workers and Johor Plantations Berhad. Also reviewed were the sampled monthly payslips. The payslips were sampled based on months with the highest, lowest and median crop production in order to get a clear representation of the workers' wages. The workers were sampled using the <math>n = \sqrt{x}</math> (0.8) formula, or more.</p> <p>The employment contracts contain details of employment terms such as contract duration, hours of work, overtime, annual/medical</p>	Complied

		<p>leave, public holiday, mutual termination, salary deductions, maternity entitlement, etc. Salary deductions and overtime were in accordance with relevant laws (SOCISO, EPF, EIS) and Labour Office permits. The contracts entered by the were all found to be valid and complies with national legal requirements such as the Employment Act 1955, Employees' Social Security Act 1969, Employees Provident Fund Act 1991 and Minimum Wages Act 2022.</p> <p>The sampled payslips gave accurate information on compensation for work done (none of which was done by workers' family members). The payslips contain details on days and overtime hours worked (verified against punch cards), basic wages, allowances received, paid annual leave, paid medical leave, statutory deductions (EPF, SOCISO, income tax PCB), non-statutory deductions (water and electricity bills, NUPW, surau, etc).</p> <p>The sampled employment contracts and payslips were as follows:</p> <ul style="list-style-type: none"> <li>a. R.E.M. Estate: Workers No. E130001996, E130000575, E130002095, E130003224, E130003129, E130003107, E130003108, E130003148, E130003204, E130001189, E130002063, E130002062.</li> <li>b. Sindora Estate: Workers No. E620000056, E620000058, E620000057, E620000102, E620000428, E620000074, E620000612, E620001057, E620001574, E620002026, E620001860, E620001822.</li> <li>c. Sindora Mill: Workers No. E630000401, E630000397, E630000399, E630000400, E630000320, E630000316, E630000395, E630000397, E63000341, E630000282.</li> </ul>	
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		<p>d. Sg Papan Estate: Workers No. E670000012, E670001265, E670000393, E670006622, E670001204, E670001210, E670001445, E670003594, E670001577, E670001040.</p> <p>e. Basir Ismail Estate: Workers No. E120001017, E120000992, E120000932, E120000832, E120000020, E120000385, E120000641, E120001595, E120001585, E120001721, E120001596, E120000758.</p> <p>Therefore, based on the sampled documents above, Sindora Mill and its supply base has demonstrated that employment contracts and payslips give accurate information on compensation for all work performed.</p>	
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>Based on interviews with workers and verified against sampled documents, evidence was available that regular working hours, deductions, overtime, sickness, maternity leave, etc comply with legal labour requirements such as:</p> <ul style="list-style-type: none"> <li>- Employment Act 1955</li> <li>- Employees' Social Security Act 1969</li> <li>- Employees Provident Fund Act 1991</li> <li>- Minimum Wages Act 2022.</li> </ul> <p>The documents sampled during the audit were:</p> <ul style="list-style-type: none"> <li>- Workers' employment contracts, payslips, and overtime cards</li> <li>- Labour Office permits obtained for non-statutory deductions</li> <li>- Labour Office permits for overtime work exceeding 117 hours</li> <li>- Labour Office permits for women working at night.</li> </ul>	Complied

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		<p>The workers' employment contracts and payslips sampled during the audit were as per samples in Indicator 6.2.2 above.</p> <p>There was no dismissal at any of the units within Sindora Mill and its supply base, and therefore this and the period of notice could not be verified.</p>	
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>Sindora Mill and its supply base provide adequate housing, sanitation facilities, water supplies, medical and welfare amenities. The houses are generally in good and well-maintained condition. Although some of the houses are already old, plans are afoot to have them refurbished. Sighted was a contract signed between Johor Plantations with SAZ Design Consultants Sdn Bhd Ref: JPB/EOS/156/86/2023 (NMZ) to refurbish existing workers' quarters at all estates and mills including Basir Ismail, Sg Papan and R.E.M. Estates. R.E.M. Estate has commenced refurbishment in September 2023 and this would be carried out in phases.</p> <p>Generally, the grass surrounding the houses were kept short, rubbish disposed of and perimeter drains permit free flow of water. Houses were provided free of charge with water and electricity. Free electricity supply is limited up to 50kWh per house/month. Free water supply is borne by employer up to 35 gallons/160 litres for each employee and dependants per day. Among the amenities provided include football field, children playground, surau, and meeting halls. Newly-arrived workers confirmed that they were given a new mattress and pillow, food basket worth RM100 per person, and a RM50 phone SIM card. A memo to remind the estate managers was sent by Estate Operation Support via memo dated 06/01/2023.</p>	Complied

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		<p>Housing inspections are carried out once a week. Sampled inspections were done at R.E.M. Estate (05/01/2023, 12/01/2023, 19/01/2023), Sindora Estate (18/9/2023, 4/9/2023, 20/8/2023, 7/8/2023) and at Sg Papan Estate (14/9/2023, 8/9/2023, 25/8/2023, 16/8/2023, 11/8/2023).</p> <p>Medical facilities are available at all units and a Visiting Medical Officer (VMO) visits the estate clinics once a fortnight. The VMO would attend to patients, prescribe medicines, visit the creche and housing and provide advice if needed, to the estate health assistants.</p> <p>Additionally, at Basir Ismail Estate, Klinik Kesihatan Ibu dan Anak visits the estate clinic monthly to dispense ante and post-natal examinations, carry out child vaccinations, advice on family planning not just for the estate workers but also the neighbouring villagers.</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>Evidence was available that efforts were made to improve workers' access to adequate, sufficient and affordable food. This includes permitting workers to plant vegetables behind their houses. Additionally, each estate has its own canteen and grocery shops where hot meals and basic daily necessities can be purchased. Price monitoring of the items sold in the shops are also done. Sighted at R.E.M Estate was price comparison of items sold at Kedai Runcit Mastura and Eonsave Kota Tinggi was done in September 2023.</p>	Complied
6.2.6	<p>A DLW is paid to all workers, including piece rate/quotas, for whom the calculation is based on achievable quotas during regular work hours.</p> <p><b>PROCEDURAL NOTE:</b></p>	<p>Based on pay slips sighted, all sampled workers who complete the number of days offered in a month receive at least minimum wages applicable, which is RM1,500 per month, or more.</p>	Complied

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#### STATEMENT FROM THE RSPO STANDARDS STANDING COMMITTEE REGARDING INDICATOR 6.2.6 ON DECENT LIVING WAGE

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).

*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.*

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.

*For countries where no living wage standard is established, until such time that an RSPO endorsed benchmark for the country is in place, national minimum wages shall be paid to all workers. In addition to the payment of minimum wages, the Unit of Certification (UoC) shall conduct an assessment of the prevailing wages and in-kind benefits provided to workers in the Unit of Certification aligned with the RSPO Guidance for Implementing a Decent Living Wage (RSPO Guidance for Implementing a Decent Living Wage. The RSPO will also develop further guidance and tools to calculate DLW in line with the RSPO endorsed methodology which may include independent studies by local experts in their respective region or country).*

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:

- Updated assessment on prevailing wages and in-kind benefits

Sindora Mill and its supply base have carried out the calculation of prevailing wages and in-kind benefits. The calculation took into account housing, electricity, water, sports and recreation, and healthcare. Below is the breakdown of the prevailing wage calculation:

Estate/Mill	In-kind benefits (RM)	Average monthly take home pay (RM)	Prevailing wages (RM)
Sindora Estate	579.23	2001.17	2580.40
Sg Papan Estate	649.26	1500.00	2149.26
Sindora Mill	386.46	2683.81	3070.27
REM Estate	728.46	2518.35	3246.81
Basir Ismail	457.79	1900.00	2357.79

Based on the above, the prevailing wages paid are fair and reasonable.

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	<ul style="list-style-type: none"> <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>	Based on documents sighted and interviews conducted with workers and management, Sindora Mill and its supply base only employs full-time employees. All employees are employed on either permanent or contractual full-time basis. There is no casual, temporary or day labour employed.	Complied
<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.			
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>The Company's Core Labour Standards (available in both Bahasa Malaysia and English) dated 01/10/2021 and signed by the Managing Director states that the Company recognises and respects the rights of employees to form and/or join trade unions of their choice which are given due recognition by the Company.</p> <p>Briefings were also given to workers as follows:</p> <ul style="list-style-type: none"> <li>a) Sindora Estate 19/6/2023</li> <li>b) Sindora Mill: 10/9/2023</li> <li>c) R.E.M. Estate: 16/03/2023</li> <li>d) Basir Ismail Estate: 12/7/2023</li> </ul> <p>This is demonstrably implemented as seen from the minutes of the meeting between management and union committees as follows:</p> <ul style="list-style-type: none"> <li>a. Sindora Estate 19/6/2023</li> </ul>	Complied



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		<p>b. Sindora Mill: 10/9/2023</p> <p>c. R.E.M. Estate: 16/03/2023</p> <p>d. Basir Ismail Estate: 12/7/2023</p> <p>In addition, there is also a Workers' Union Guidelines Doc No. KMB/GL/HCD/HRO/00 effective date 1/6/2023 which promotes and encourages union membership for the Company's workers.</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>Minutes of meetings between management and trade union members were reviewed and verified during the audit. The meetings were documented in Bahasa Malaysia, and attended by management and worker representatives (harvesters, sprayers, manurers) grocery owners, and contractor worker representatives. In addition to this, worker representatives and management also meet to discuss worker related issues. Among the sampled minutes were as follows:</p> <ul style="list-style-type: none"> <li>a) Sindora Estate: Management and NUPW Meeting minutes dated 10/4/2023;</li> <li>b) Sg Papan Estate: OSH Committee meeting minutes dated 13/9/2023.</li> <li>c) Sindora Mill: OSH meeting minutes dated 14/9/2023.</li> <li>d) R.E.M. Estate: Worker representative meeting minutes dated 26/1/2023.</li> </ul> <p>All the above meetings raised issues related to workers such as housing, safety and other worker requirements.</p>	Complied
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>Based on the records of NUPW representative meetings minutes, letters of appointment as NUPW representatives mentioned under</p>	Complied

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	<p>elected representatives for all workers including migrant and contract workers.</p> <p>- Minor compliance -</p>	<p>Indicator 6.3.2 above, and confirmed by workers interviewed during the audit, Sindora Mill and its supply base were able to demonstrate that management does not interfere with the formation and operation of NUPW and worker organisations such OSH and WoW.</p> <p>Evidence was also available from minutes of meetings and confirmation during audit interviews that Malaysian, migrant and contract workers were represented and freely chosen.</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>The Policy was in place for the protection of children is contained in the Company's Core Labour Standard dated 1/10/2021 which pledged to not engage in or support the use of child labour and that the Company will provide adequate support to enable children of its employees to attend and remain in school until no longer a child. This was verified during field observations and review of check roll list. The minimum age of workers to recruit is 18 years old. This requirement is also included in all agreements with its contractors via Addendum to the Agreement. The contracts sampled were with Ah Siong Trading and Kedai Runcit Mastura Mahfol dated 1/1/2023.</p>	Complied
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>Documentary evidence is available that minimum age requirements are met. This is based on workers' check roll list and copies of their passport/NRIC details. Based on workers' NRIC and passports, all workers were at least 18 years old when employed.</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>Based on the workers list of all units within Sindora Mill and its supply base, interviews conducted and observations made, there is no evidence that young persons are being employed at any of the operating units.</p>	Complied

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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>The Company's Core Labour Standard Policy dated 1/10/2021 stated that it would not engage in or support the use of Child Labour and will provide adequate support to enable children of its employees to attend and remain in school until no longer a child. This Policy was also communicated during stakeholder meeting held during stakeholder meetings held on 20/09/2023 (Southern Region units) and 3/9/2023 (Northern Region units).</p> <p>Contractors are also required to sign contract addendums which contain a provision stating that the contractor shall comply with applicable labour and employment laws regarding and prohibit any form of child labour, forced or trafficked labour. Sampled and reviewed during the audit were the contracts signed with Ah Siong Trading and Kedai Runcit Mastura Mahfol dated 1/1/2023.</p> <p>Interviews held with contractors and suppliers also confirmed their understanding of no child labour policy that exists within the Company.</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>A Policy to prevent sexual and harassment are available in Sexual Harassment Policy dated 7/12/2021 signed by Executive Director. This Policy has been communicated to all levels of workforce during Wow meetings and during musters. The sampled WoW meetings were as follows:</p> <ul style="list-style-type: none"> <li>- R.E.M Estate on 25/7/2023 and 21/3/2023;</li> <li>- Sindora Estate on 2/8/2023</li> <li>- Sindora Mill: 12/9/2023</li> </ul>	Complied

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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>A Policy to protect reproductive rights of all especially women is contained in the Core Labour Standard Policy dated 1/10/2021 signed by its Executive Director. The Policy provides protection of reproductive rights of all was briefed to all levels of workforce during muster as follows:</p> <ul style="list-style-type: none"> <li>a) Sindora Estate 19/6/2023</li> <li>b) Sindora Mill: 10/9/2023</li> <li>c) R.E.M. Estate: 16/03/2023</li> <li>d) Basir Ismail Estate: 12/7/2023</li> </ul> <p>The Labour Standard specifies that the Company recognizes the rights of employees to reproduction and reproductive health, including the right to make decision on reproduction.</p> <p>Interviews with female employees also show that this Standard is being implemented where female workers are entitled to 90 days paid maternity leave. This was sampled at R.E.M Estate where Worker No. E1XXXXXXX1 who was paid in full for the 3 months that she was on maternity leave.</p> <p>At Sg Papan Estate, a female manurer who was confirmed pregnant was transferred to do general work. A letter dated 1/7/2023 was issued to the said worker (No. E670001122) to be excluded form chemical handling works throughout the duration of her pregnancy.</p>	Complied
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>Evidence was available that needs of news mothers were assessed in consultation with them. Sindora Estate identified 4 new mothers on 1/9/2023. The assessment included the needs of pregnant mother such as ante-natal, pregnancy check, vaccination, post-partum care, maternity and paternity needs, nursing facilities, creche or child care centre, etc. At Sg Papan Estate, 3 new mothers</p>	Complied

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		and 2 expectant mothers were assessed, and at R.E.M. Estate the assessment was done on 17/8/2023.	
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>The Company's grievance mechanism is available and documented in Grievance Mechanism Doc. No. SQD/SMS/4.1 Issue No. 1 dated 1 Aug 2020. The scope covers all those who deal with the Company 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 stakeholders. Clause 5.8 states that anonymity of complainants will be respected and protected if requested. This mechanism was briefed during muster briefings as follows:</p> <ul style="list-style-type: none"> <li>- Sindora Mill (1/5/2023), Sindora;</li> <li>- Estate (26/6/2023);</li> <li>- Sg Papan Estate (20/6/2023);</li> <li>- R.E.M. Estate (25/6/2023); and</li> <li>- Basir Ismail Estate (26/6/2023).</li> </ul> <p>The Company has established a complaint flowchart for WOW (Carta Alir Aduan WOW). This flowchart shows the different stages involved when WOW receives and handles grievances. The efficiency of handling the grievances can be further improved by incorporating specific timeframes for each stage.</p>	Complied
<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> </ul>	<p>Sindora Mill and its supply base were able to demonstrate that all workers have entered into employment voluntarily. This was further confirmed from interviews conducted with the workers themselves.</p> <p><b>Passports:</b></p>	Complied

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	<ul style="list-style-type: none"> <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>Workers are given the option of either keeping their own passports, or to keep their passports at the management office for safety reasons.</p> <p><b>Recruitment fees:</b></p> <p>No recruitment fees are imposed on any of the foreign workers. This was further confirmed in interviews held with the workers from Indonesia and Bangladesh, and verified against their payslips.</p> <p><b>Contract substitution:</b></p> <p>Employment contracts that were sampled, and interviews held with the workers from Indonesia and Bangladesh confirmed that no contract substitution has occurred.</p> <p><b>Involuntary overtime:</b></p> <p>Based on sampled documents signed by workers on overtime, and based on interviews conducted, there is no evidence of involuntary overtime within the Sindora Mill and its supply base. All sampled workers confirmed that they were able to decline an offer for overtime.</p> <p><b>Lack of freedom of workers to resign &amp; penalty for termination of employment:</b></p> <p>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.</p> <p><b>Debt bondage &amp; withholding of wages:</b></p> <p>Based on payslips sighted and interview with workers, there was no evidence of any debt bondage and withholding of wages.</p>	
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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 and procedures have been established under the Company's Core Labour Standard signed by Executive Director dated 1/10/2021. This Policy prohibits the employment of children and young persons, forced and bonded labour, provides for signing of written employment contracts in a language they understand with clear remuneration and description of duties. It also includes:</p> <ul style="list-style-type: none"> <li>a) workers' entitlement to housing and basic amenities which are at par with statutory requirements;</li> <li>b) free of discrimination, coercion or violence;</li> <li>c) rights of employees to join trade unions;</li> <li>d) accessibility to grievance procedure;</li> <li>e) entitled to one day off per week.</li> </ul> <p>Based on pay slips, employment contracts, punch cards reviewed, and interviews conducted with workers at Sindora Mill and its supply base were able to demonstrate the implementation of this Policy.</p>	Complied
<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.</p>			
6.7.1	<p><b>(C)</b> The responsible person(s) for H&amp;S is identified. There are records of regular meetings between the responsible person(s) and workers. Concerns of all parties about health, safety and welfare are discussed at these meetings, and any issues raised are recorded.</p> <p>- Critical (Major) compliance -</p>	<p>The General Manager/ Senior Manager/ manager/ Deputy Manager/ Assistant In-Charge/ Acting manager of the respective Operating Units are appointed as the Chairman for Safety and Health Committee at the estate as stated in the appointment letter dated 10/01/2021 undersigned by the Chairman, ESG Committee Occupational Safety and Health Main Committee Kulim (M) Berhad.</p> <p>1. Sindora POM - The management has appointed Mr Muhammad Nasir Mohd Shah. OSHA safety meetings were conducted at an interval of 3 months at the estate to address all the OSH related issues. Sighted the meeting minutes dated 27/09/2023 (03/2023), 27/06/2023 (02/2023), 14/03/2023 (01/2023).</p>	Complied

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		<ol style="list-style-type: none"> <li>2. Sindora Estate - The management has appointed Mr Norhisham Bin A Wahid for Chairman of Safety And Health Committee . Safety meetings were conducted at an interval of 3 months at the estate to address all the OSH related issues. Sighted the meeting minutes dated 13/09/2023 (03/2023), 15/06/2023 (02/2023), 14/03/2023 (01/2023).</li> <li>3. Sungai Papan Estate – The management has appointed Mr Mohd Hazriqe Bin Soleh Huddin. OSHA safety meetings were conducted at an interval of 3 months at the estate to address all the OSH related issues. Sighted the meeting minutes dated 13/09/2023 (03/2023), 21/06/2023 (02/2023), 07/03/2023 (01/2023).</li> <li>4. REM Estate – The management has appointed Mr Fazli Bin Zainal. OSHA safety meetings were conducted at an interval of 3 months at the estate to address all the OSH related issues. Sighted the meeting minutes dated 25/09/2023 (03/2023), 27/05/2023 (02/2023), 28/03/2023 (01/2023).</li> <li>5. Basir Ismail Estate – The management has appointed Mr .Abu bakar Mohamed OSHA safety meetings were conducted at an interval of 3 months at the estate to address all the OSH related issues. Sighted the meeting minutes dated 18/09/2023 (03/2023), 15/05/2023 (02/2023), 20/03/2023 (01/2023).</li> </ol>	
6.7.2	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	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.	Complied



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	<p>equipment is available at worksites. Records of all accidents are kept and periodically reviewed.</p> <p>- Minor compliance -</p>	<ol style="list-style-type: none"> <li>1. Sindora POM <ul style="list-style-type: none"> <li>- ERP Training – 27/02/2023 and 18-19/09/2023</li> </ul> </li> <li>2. <u>Sindora Estate</u> <ul style="list-style-type: none"> <li>- Emergency Respond Plan (ERP), CPR Training dated 10/08/2023</li> <li>- Fire Drill Training and Use of Fire Extinguisher dated 10/08/2023</li> </ul> </li> <li>3. <u>Sungai Papan Estate</u> <ul style="list-style-type: none"> <li>- Fire Drill Training and Use of Fire Extinguisher Training – 15/02/2023.</li> <li>- Emergency Response Plan (ERP) and (CPR) – 15/02/2023.</li> </ul> </li> <li>4. <u>Basir Ismail Estate</u> <ul style="list-style-type: none"> <li>- Emergency Response Plan (ERP), Fire Extinguisher and First Aid Training – 07/05/2023</li> </ul> </li> </ol> <p>First Aid Kits were available at all sampled work units Spraying Gang, Harvesting Gang, Workshop, Boiler Station and Chemical Store. The first aid kits were well equipped with first aid items as stated in the list. All items were seen to be replenished at monitored regularly as per the monitoring checklist. The First Aid Kit holders were aware on how to use the items in case of an emergency.</p> <ul style="list-style-type: none"> <li>- First Aid Training was conducted for on 26/05/2023 at Sungai Papan Estate..</li> <li>- First Aid Training conducted at Sindora POM on 25-26/06/2023</li> <li>- First Aid Training conducted at Basir Ismail on 07/05/2023</li> </ul>	
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		<p>Accident Records were maintained in the operating units and verified as follows.</p> <p><u>Sindora POM</u></p> <p>Accident records for 2022 were maintained and updated on a monthly basis at the mill. The accident investigation have been conducted accordingly and the JKKP 6 forms have been submitted to DOSH and available for verification. The JKKP 8 form have been submitted for the year ending 2022 (Ref; JKKP8/130859/2023, dated 19/01/2023). As for 2023 there were 2 accident cases in the mill. The JKKP 6 forms have been submitted to DOSH accordingly.</p> <p><u>Sungai Papan Estate</u></p> <p>There were 1 accident cases reported for the year 2022 in the estate. The JKKP 8 Form has been submitted to DOSH (Ref No: JKKP8/129554/2022, dated 16/01/2023) and available for verification. As for 2023, there were no accident reported in the estate as of to date.</p> <p><u>REM Estate</u></p> <p>There were 0 accident cases reported for the year 2022 . The JKKP 8 Form ( Reference Number: JKKP 8/126005/2022) for the year ending 2022 have been submitted to DOSH on 11/01/2023 and available for verification.</p> <p><u>Basir Ismail Estate</u></p> <p>Accident records for 2022 were maintained and available for verification. There were 2 reported accident for the year reported in the estate. The JKKP 6 Form have been submitted accordingly and available for verification. As for 2022, there were 2 accident cases reported. The JKKP 8 form (Ref No: JKKP8/121062/2022, dated</p>	
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		06/01/2023) have been submitted to DOSH and available for verification.																									
6.7.3	<p><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 those applying pesticides are available, so that workers can change out of PPE, wash and put on their personal clothing.</p> <p>- Critical (Major) compliance -</p>	<p>All workers have been provided with appropriate personal protective equipment (PPE), which is provided by the management free of charge. During the field visit to the Spraying Gang and Manuring Gang and visit to the stores of the respective estates and mill, it was sighted that all required PPEs were worn by the personals.</p> <p>The estates have well maintained facilities for the workers to sanitise themselves prior to returning home from work. The showers were all in good working condition. Interview with workers indicated that they were all well aware that they have to sanitise themselves before returning home due to the hazard that the chemical residues could cause.</p>	Complied																								
6.7.4	<p>All workers are provided with medical care and covered by accident insurance. Costs incurred from work- related incidents leading to injury or sickness are covered in accordance with Malaysian law.</p> <p>- Minor compliance -</p>	<p>Medical care is provided to all the employees by the organization. Local workers and foreign workers were covered under SOCSO scheme. Sighted the contribution form (8A) for the month of April 2023, June 2023 and August 2023 for the mill and all sampled estate as below.</p> <table border="1"> <thead> <tr> <th>Operating Unit</th><th>Month</th><th>Total Workers</th><th>Amount</th></tr> </thead> <tbody> <tr> <td rowspan="3">Sindora POM</td><td>Apr 2023</td><td>100</td><td>RM 5,563.30</td></tr> <tr> <td>June 2023</td><td>96</td><td>RM 6,347.00</td></tr> <tr> <td>Aug 2023</td><td>236</td><td>RM 6,771.90</td></tr> <tr> <td rowspan="3">Sungai Papan Estate</td><td>Apr 2023</td><td>227</td><td>RM 7,303.30</td></tr> <tr> <td>June 2023</td><td>115</td><td>RM 8,884.00</td></tr> <tr> <td>Aug 2023</td><td>236</td><td>RM 10,208.00</td></tr> </tbody> </table>	Operating Unit	Month	Total Workers	Amount	Sindora POM	Apr 2023	100	RM 5,563.30	June 2023	96	RM 6,347.00	Aug 2023	236	RM 6,771.90	Sungai Papan Estate	Apr 2023	227	RM 7,303.30	June 2023	115	RM 8,884.00	Aug 2023	236	RM 10,208.00	Complied
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		<table><tr><td rowspan="3">REM Estate</td><td>Apr 2023</td><td>194</td><td colspan="2">RM 7,484.00</td></tr><tr><td>June 2023</td><td>284</td><td colspan="2">RM 10,742.70</td></tr><tr><td>Aug 2023</td><td>262</td><td colspan="2">RM 11,051.20</td></tr><tr><td rowspan="3">Basir Ismail Estate</td><td>Apr 2023</td><td>267</td><td colspan="2">RM 10,538.80</td></tr><tr><td>June 2023</td><td>278</td><td colspan="2">RM 12,219.90</td></tr><tr><td>Aug 2023</td><td>291</td><td colspan="2">RM 12.976.20</td></tr></table>	REM Estate	Apr 2023	194	RM 7,484.00		June 2023	284	RM 10,742.70		Aug 2023	262	RM 11,051.20		Basir Ismail Estate	Apr 2023	267	RM 10,538.80		June 2023	278	RM 12,219.90		Aug 2023	291	RM 12.976.20										
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6.7.5	Occupational injuries are recorded using Lost Time Accident (LTA) metrics. - Minor compliance -	<table><tr><td colspan="5">Occupational Injuries were recorded using the Lost Time Accident metrics as below:</td></tr><tr><td rowspan="2">Operating Unit</td><td colspan="2">2022</td><td colspan="2">2023 (to date)</td></tr><tr><td>Cases</td><td>Days</td><td>Cases</td><td>Days</td></tr><tr><td>Sindora POM</td><td>3</td><td>0</td><td>2</td><td>12</td></tr><tr><td>Sungai Papan</td><td>1</td><td>0</td><td>0</td><td>0</td></tr><tr><td>REM Estate</td><td>0</td><td>0</td><td>0</td><td>0</td></tr><tr><td>Basir Ismail Estate</td><td>2</td><td>130</td><td>0</td><td>0</td></tr></table> <p>* Death case is categorized as loss of 6000 days.</p>	Occupational Injuries were recorded using the Lost Time Accident metrics as below:					Operating Unit	2022		2023 (to date)		Cases	Days	Cases	Days	Sindora POM	3	0	2	12	Sungai Papan	1	0	0	0	REM Estate	0	0	0	0	Basir Ismail Estate	2	130	0	0	Complied
Occupational Injuries were recorded using the Lost Time Accident metrics as below:																																					
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REM Estate	0	0	0	0																																	
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Principle 7: Protect, conserve and enhance ecosystems and the environment																																					
Criterion 7.1: Pests, diseases, weeds and invasive introduced species are effectively managed using appropriate Integrated Pest Management (IPM) techniques.																																					

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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 has 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 bagworm census when necessary. Reviewed the boundary bagworm census conducted in February 2022.</li> <li>2. Rat baiting was conducted at 2 campaign per year. Reviewed the latest campaign conducted in the month of Jun and July 2023</li> <li>3. Barn Owl Box ratio in the Sindora Estate recorded at 1:15 ha. Reviewed the latest barn owl census FY 2023 with occupancy recorded at 56%.</li> <li>4. Barn Owl Box ratio in the Sindora Estate recorded at 1:15 ha. Reviewed the latest barn owl census conducted in September 2022 with occupancy recorded at 49%.</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>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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	- Minor compliance -																											
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																									
<b>Criterion 7.2:</b> 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 of all agrochemicals is available in the Johor Plantation Berhad Agricultural Manual; Justification of chemical use; Table H01-2 till Table H01-6. The table states the Weed Situation, Active Ingredient, Chemical Brand Name, Product Rate/Ha and CKS Dossage/18L	Complied																									
7.2.2	(C) Records of pesticides use (including active ingredients used and their LD50, area treated, amount of active ingredients applied per ha and number of applications) are provided. - Critical (Major) compliance -	Records of Pesticide/Agrochemicals used in the estate were recorded and monitored on a monthly basis and available for verification. Data were sampled as below: <table><tr><td>Estate</td><td></td><td>Jan 2023</td><td>Apr 2023</td><td>July 2023</td></tr><tr><td>Sindora Estate</td><td>a.i / Ha</td><td>0.0146</td><td>0.0817</td><td>0.1387</td></tr><tr><td>Sungai Papan Estate</td><td>a.i / Ha</td><td>0.023</td><td>0.017</td><td>0.028</td></tr><tr><td>REM Estate</td><td>a.i / Ha</td><td>0.000</td><td>0.111</td><td>0.385</td></tr><tr><td>Basir Ismail</td><td>a.i / Ha</td><td>0.063</td><td>0.068</td><td>0.077</td></tr></table>	Estate		Jan 2023	Apr 2023	July 2023	Sindora Estate	a.i / Ha	0.0146	0.0817	0.1387	Sungai Papan Estate	a.i / Ha	0.023	0.017	0.028	REM Estate	a.i / Ha	0.000	0.111	0.385	Basir Ismail	a.i / Ha	0.063	0.068	0.077	Complied
Estate		Jan 2023	Apr 2023	July 2023																								
Sindora Estate	a.i / Ha	0.0146	0.0817	0.1387																								
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REM Estate	a.i / Ha	0.000	0.111	0.385																								
Basir Ismail	a.i / Ha	0.063	0.068	0.077																								
7.2.3	(C) Any use of pesticides is minimised as part of a plan, eliminated where possible, in accordance with IPM plans. - Critical (Major) compliance -	The estates have implemented a Continuous Improvement Plan where they have stated the intention to reduce the usage of chemical through implementation of Integrated Pest Management Plan.	Complied																									

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		<p>Sighted during the site visit at all the estates, the establishment of beneficial plants along the estate roads and immature areas as well as barn owl boxes placed at strategic areas. Paraquat was eliminated. In its place, alternatives such as Glyphosate is used instead.</p> <p>The management has plan on using the roto slasher for possible filed which are suitable for using the slasher on the flat areas.</p> <p>The chemical usage of estate is as per the recommendation from agronomist. Agronomist report were sighted.</p>	
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>There is no prophylactic use of pesticides in all estates visited.</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> <ol style="list-style-type: none"> <li>Judgment of the threat and verify why this is a major threat</li> <li>Why there is no other alternative which can be used</li> <li>Which process was applied to verify why there is no other less hazardous alternative</li> <li>What is the process to limit the negative impacts of the application</li> <li>Estimation of the timescale of the application and steps taken to limit application to the specific outbreak.</li> </ol> <p>- Minor compliance -</p>	<p>The Chemical Registers for the mill and sampled estates were available for verification and reviewed yearly and as and when there are introductions of new chemicals in the operations.</p> <p>The register showed that only class III &amp; IV pesticides were used at the mill and estates. Paraquat and Monocrotophos was eliminated. In its place, less hazardous alternatives such as Glyphosate and Acephate was used instead.</p> <p>Paraquat was eliminated. In its place, alternatives such as Glyphosate is used instead. Monocrotophos was purchased in 2018 for the use of trunk injection to combat bagworm infestations. The management have stated in the continuous improvement plan to <i>"continuously use the chemical until balance is zero. To implement use of chemical Class III (Altacor/Adonis) onwards.</i> The last trunk injection was conducted in February 2020. The management intends to dispose the current stock of Class 1B chemicals and substituting to less hazardous chemicals. The management have</p>	Complied

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		also increased the planting of beneficial plants at the bagworm prone areas.																											
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>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.</p> <p>Sampled the training conducted for pesticide handlers as below: -</p> <table><tr><th><u>Estate</u></th><th><u>Training</u></th><th><u>Date</u></th></tr><tr><td rowspan="4">Sindora Estate</td><td>Spraying Training</td><td>05/08/2023</td></tr><tr><td>Chemical Handling</td><td>22/08/2023</td></tr><tr><td>Safety Work at Chemical Store</td><td>07/08/2023</td></tr><tr><td>Fogging</td><td>16/08/2023</td></tr><tr><td rowspan="4">Sungai Papan</td><td>Chemical handling</td><td>12/04/2023</td></tr><tr><td>Safety Work at chemical store</td><td>23/08/2023</td></tr><tr><td>PPE Usage</td><td>17/08/2023</td></tr><tr><td>Fogging</td><td>28/06/2023</td></tr><tr><td rowspan="2">Basir Ismail</td><td>Chemical handling training</td><td>23/05/2023</td></tr><tr><td>PPE Training</td><td>12/04/2023</td></tr></table>	<u>Estate</u>	<u>Training</u>	<u>Date</u>	Sindora Estate	Spraying Training	05/08/2023	Chemical Handling	22/08/2023	Safety Work at Chemical Store	07/08/2023	Fogging	16/08/2023	Sungai Papan	Chemical handling	12/04/2023	Safety Work at chemical store	23/08/2023	PPE Usage	17/08/2023	Fogging	28/06/2023	Basir Ismail	Chemical handling training	23/05/2023	PPE Training	12/04/2023	Complied
<u>Estate</u>	<u>Training</u>	<u>Date</u>																											
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Basir Ismail	Chemical handling training	23/05/2023																											
	PPE Training	12/04/2023																											



			SOP Training on Fogging	02/05/2023	
			Fertilizer Store SOP Training	12/06/2023	
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 store keeper was seen to unlock the pad-lock 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
7.2.8	<p>All pesticide containers are triple rinsed and punctured before being disposed of and/or handled responsibly if used for other purposes.</p> <p>- Minor compliance -</p>	<p>Excess chemical containers that were not used for premixing have been triple rinsed and punctured was categorized under scheduled waste and disposed through waste contractors.</p> <p>Verified the disposal records for the sampled estates as below.</p> <ol style="list-style-type: none"> <li>1. Sungai Papan has disposed the Empty Chemical Container to Licensed 3<sup>rd</sup> party Contractor, 5E Resources Sdn Bhd. Consignment Note (C.N Number: 202309031738GDKI) dated 03/09/2023 was available for verification. A total of 0.1 mt of Empty Chemical Containers was disposed under code SW409.</li> <li>2. REM Estate has disposed the Empty Chemical Container to Licensed 3<sup>rd</sup> party Contractor, Kualiti Alam Sdn Bhd. Consignment Note (C.N Number: 2023092011UCP0QJ) dated 20/09/2023 was available for verification. A total of 0.038 mt of Empty Chemical Containers was disposed under code SW409</li> </ol>			Complied

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		Basir Ismail Estate has disposed the Empty Chemical Container to Licensed 3 <sup>rd</sup> party Contractor, Kualiti Alam Sdn Bhd. Consignment Note (C.N Number: 2023040609PT256E) dated 06/04/2023 was available for verification. A total of 0.0364 mt of Empty Chemical Containers was disposed under code SW409.	
7.2.9	<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. - Critical (Major) compliance -	No aerial spraying for pesticide were done in all the estates	Complied
7.2.10	<b>(C)</b> Specific annual medical surveillance for pesticide operators, and documented action to treat related health conditions, is demonstrated. - Critical (Major) compliance -	The CHRA of each operating units have recommended the necessity of annual medical surveillance for pesticide applicators exposed to pesticides that are classified as organophosphates. There were no use of organophosphate chemicals in all the estates audited. This was verified via the Chemical Register, visit to the Chemical Store of each operating units as well as interview with the respective estate's pesticide applicators. Nevertheless, the estates conduct monthly health screening at the estate clinics by their own Medical Assistant and records were available for verification. Health surveillance are also done for the workers to identify general health conditions regularly. Records and details of medical surveillance is as per indicator 3.6.1	Complied
7.2.11	<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. - Critical (Major) compliance -	All estates visited have prohibited woman workers who are confirmed pregnant or breast-feeding to handle chemicals as per Internal Memo verified in the estates.  For Johor Plantation Berhad , the SOP for Agrochemical Management under Sustainable Management System; Doc Number: SQD/SMS/6.1; Doc Date: 01.08.2020 (Issue 01) states " <i>No work with pesticides is undertaken by persons under the age of 18,</i>	Complied

*pregnant or breastfeeding women or other people that have medical restrictions and they are offered alternative equivalent work."*

**Criterion 7.3:** Waste is reduced, recycled, reused and disposed of in an environmentally and socially responsible manner.

7.3.1	<p>A waste management plan which includes reduction, recycling, reusing, and disposal based on toxicity and hazardous characteristics, is documented and implemented.</p> <p>- Minor compliance -</p>	<p>Sindora POM and its supply base has identified all wastes and sources of pollution based on waste category and its characteristics as following:</p> <ul style="list-style-type: none"><li>- Scheduled waste - Spent IPA, hexane, filter, lubricants, hydraulic oil, grease, used batteries</li><li>- Domestic waste - rubbish from the mill/estate complex and employees' quarters</li><li>- Industrial waste - Fiber, palm kernel shell, boiler ash, scrap iron</li><li>- Sewage - Sewage from housing/office complex</li></ul> <p>Source of pollution from the mill and estate activities identified as following:</p> <ul style="list-style-type: none"><li>- Black smoke - Emission from Boilers/vehicles/engines</li><li>- Odor &amp; gases - Activities from the effluent treatment</li><li>- Leakage of lubricant - Storage &amp; vehicle maintenance</li></ul> <p>Management plan established on individual operating units basis as per sample Waste Management and Pollution Prevention Plan REM Estate; Review Date: 1/9/2023 as following:</p> <table><tr><td>Waste type</td><td>Source</td><td>Action</td></tr></table>	Waste type	Source	Action	Complied
Waste type	Source	Action				

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		Domestic	Line site	<ul style="list-style-type: none"> <li>- Provide adequate garbage bins at the line-site</li> <li>- Provide recycle bins centre at the line-site to encourage the habit of waste recycling among the employees/workers</li> <li>- Burning of waste must be prohibit within estate premises</li> <li>- Broken garbage bins must be replaced</li> </ul>	
		Plastics, Bottles (Recyclable Material)	Line site	Where possible, to be recycle	
		Broken metal equipment	Workshop	<ul style="list-style-type: none"> <li>- For capital items, get approval to write-off</li> <li>- Collect and placed in a secure area possibly near the workshop to prevent misuse. Use drip tray if there are any possibilities of oil leaks. When there is adequate quantity, contact the license contractor (refer to Procurement &amp; Contract Department) for collection and disposal</li> </ul>	
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>	The operating units has established and documented Waste and Pollution Management Plan as per waste identification. The plan was reviewed on annually basis. The plan includes Waste Type, Source, Action, Frequency, Records, and Person Responsible.			Non-compliance

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		<p>As procedure, the handling of scheduled waste generated include Labelling, handling, storage and disposal of scheduled waste. Refer documents ref. # LTM/WI/19; Rev. # 2; Date: 01/10/2020.</p> <p>Sample latest disposal records of scheduled wastes sighted as following:</p> <ul style="list-style-type: none"> <li>- Sindora Estate: Disposed the scheduled waste generated through licensed operator, Kualiti Alam Sdn. Bhd. reviewed the disposal records as following: <ul style="list-style-type: none"> <li>• 31/05/2023, SW 409, Cons. note # 202305311609Q6DY</li> <li>• 31/05/2023, SW 305, Cons. note # 2023053116D0IZAW</li> <li>• 31/05/2023, SW 110, Cons. note # 2023053116A3HTQ0</li> <li>• 31/05/2023, SW 408, Cons. note # 202305311680GIVK</li> <li>• 31/05/2023, SW 410, Cons. note # 20230531162YG0F8</li> <li>• 31/05/2023, SW 307, Cons. note # 20230531161RK7ZY</li> <li>• 18/07/2023, SW 404, Cons. note # 20230718124OWMK0</li> </ul> </li> <li>- Sindora estate maintained the records of empty pesticides containers generated in the estate. The pesticides were reused for premixing chemicals or triple rinsed and disposed through approved contractors. Reviewed the inventory records for the month of September, August, July and June 2023.</li> <li>- REM Estate disposed the scheduled waste generated through licensed operator, Kualiti Alam Sdn. Bhd. reviewed the disposal records as following: <ul style="list-style-type: none"> <li>• 20/09/2023, SW 305, Cons. note # 2023092012SCGM06</li> <li>• 20/09/2023, SW 307, Cons. note # 202309201192OUYZ</li> <li>• 20/09/2023, SW 307, Cons. note # 202309201192OUYZ</li> <li>• 20/09/2023, SW 110, Cons. note # 2023092011GQSWT5</li> </ul> </li> </ul>	
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		<ul style="list-style-type: none"><li>• 20/09/2023, SW 408, Cons. note # 2023092011RITCLO</li><li>• 20/09/2023, SW 409, Cons. note # 2023092011UCP0QJ</li><li>• 20/09/2023, SW 410, Cons. note # 202309201152XOWH</li></ul> <p>Notwithstanding, during REM Estate visit to landfill area located within field P92 of Ulu Tiram Division, it was found that there were broken metal equipment and plastic bottles being dumped into the landfill ground hole that was recently opened on 3/10/2023. Upon discovery, the workers been immediately instructed to remove the broken metal equipment from the landfill ground hole but left the plastic bottles that was wrapped in plastic bag. This was not in-line with the established Waste Management and Pollution Prevention Plan which requires the following:</p> <p>Waste Management and Pollution Prevention Plan; REM Estate; Review Date: 1/9/2023</p> <table><tr><th>Waste type</th><th>Source</th><th>Action</th></tr><tr><td>Domestic</td><td>Line site</td><td><ul style="list-style-type: none"><li>- Provide adequate garbage bins at the line-site</li><li>- Provide recycle bins centre at the line-site to encourage the habit of waste recycling among the employees/workers</li><li>- Burning of waste must be prohibit within estate premises</li><li>- Broken garbage bins must be replaced</li></ul></td></tr></table>	Waste type	Source	Action	Domestic	Line site	<ul style="list-style-type: none"><li>- Provide adequate garbage bins at the line-site</li><li>- Provide recycle bins centre at the line-site to encourage the habit of waste recycling among the employees/workers</li><li>- Burning of waste must be prohibit within estate premises</li><li>- Broken garbage bins must be replaced</li></ul>	
Waste type	Source	Action							
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		<div>Plastics, Bottles (Recyclable Material)</div> <div>Line site</div> <div>Where possible, to be recycle</div>	
		<div>Broken metal equipment</div> <div>Workshop</div> <div> <ul style="list-style-type: none"> <li>- For capital items, get approval to write-off</li> <li>- Collect and placed in a secure area possibly near the workshop to prevent misuse. Use drip tray if there are any possibilities of oil leaks. When there is adequate quantity, contact the license contractor (refer to Procurement &amp; Contract Department) for collection and disposal</li> </ul> </div>	
		This indicated that the proper disposal of waste material according to procedures was insufficiently demonstrated. Hence, a Minor NC has been raised.	
7.3.3	The unit of certification does not use open fire for waste disposal. - Minor compliance -	<p>All estates and mills within Johor Plantations Berhad company practices of "Zero open burning" as 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>During the on-site assessment, there was no evidence that fire had been used to prepare land for replanting in the estate and no fire being 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	Good agriculture practices, as contained in SOPs, are followed to manage soil fertility to optimise yield and minimise environmental impacts.	SOPs of good agricultural practices to manage soil fertility to optimise yield and minimise environmental impacts were	Complied

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	- Minor compliance -	documented in Kulim (Malaysia) Berhad – Agricultural Manual under section D: Manuring. The procedure includes: D01 – General Information D02 – Methods of Applications D03 – Precision Manuring D04 – Quality Check and Storage D05 – EFB Utilization D06 – POME Utilization D07 – MIWAMAS Composting System D08 – Bio-compost Application D09 – Bio-compost : Quality Check	
7.4.2	Periodic tissue and soil sampling is carried out by Companies to monitor and manage changes in soil fertility and plant health. - Minor compliance -	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. Reviewed the sampling records as follows: 1. <u>Sindora Estate</u> Latest Soil Sampling was conducted in December 2018. Refer report no. SI/1812/0310-013 dated 25/11/2018. Latest leaf sampling was conducted on November 2022. Refer report no. LI/2022/11/196 dated 16/11/2022 2. <u>Sungai Papan Estate</u> Latest leaf sampling was conducted on 30/04/2023 – 15/05/2023 as per the lab report dated 17/05/2023 with report no: LI/2023/05/144.	Complied



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		<p>The soil sample were conducted on 01/04/2023 to 06/04/2023 as per the lab report dated 10/04/2023 with report no: SI/2023/04/27</p> <p>3. REM Estate</p> <p>Latest Soil Sampling was conducted in 13/01/2022. Refer report no. SI/2022/01/11 dated 31/01/2022. Latest leaf sampling was conducted on 29/12/2022. Refer report no. LI/2023/01/13 dated 10/01/2023.</p> <p>4. Basir Ismail Estate</p> <p>Latest Soil Sampling was conducted in 17/08/2023. Refer report no. SI/2023/09/115 dated 17/08/2023. Latest leaf sampling was conducted on 10/05/2023. Refer report no. LI/2023/05/132 dated 10/05/2023.</p>					
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 following practices are applied in the estates in relation to the nutrient recycling strategy;</p> <p>1. EFB application in designated fields at dosage of 50 mt/ha applied in inter rows subject to Agronomist recommendations.</p> <p>2. Cut frond are stacked in between the palms rows left to discompose.</p> <p>3. Bio compost application in selected fields at rate of 7mt/ha</p> <p>4. POME utilization using furrow system at 17mt/ha or 125kg/palm at the host estate of Sindora Mill.</p> <p>The estate has established EFB and Bio-Compost application program FY 2023. Reviewed the application records as to date September 2023 as follows:</p> <table><tr><td>Estate</td><td>EFB Tonnage (mt)</td></tr><tr><td></td><td></td></tr></table>	Estate	EFB Tonnage (mt)			Complied
Estate	EFB Tonnage (mt)						

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			2022	Todate 09/2023	
		Sindora Estate	42,913.09	32,289.08	
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 was 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 2023 dated 13/06/2023 for Sindora Estate  Details records of fertliser application is available at each site. Records of fertiliser details the application for each field. Sample taken on P06/01 Sindora Estate found that on average 13.15 kg/palm with total of 1963 bags is applied.			Complied
Criterion 7.5: Practices minimise and control erosion and degradation of soils.					
7.5.1	(C) Maps identifying marginal and fragile soils, including steep terrain, are available. - Critical (Major) compliance -	Soil maps are available in all estates within Sindora POM certification unit. Notwithstanding, there is no marginal and fragile soils such as podzols and acid sulphate soils in all estates within Sindora POM certification unit. Some steep terrain also included entitled the slope maps as provided by the AASD (Agronomy Advisory Service Dept).			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 contiguous area of steep terrain (greater than 25 degrees) larger than 25 Ha within the Unit of Certification. - Minor compliance -	Some steep terrain presence in few estates within Sindora POM certification unit were being left out from future replanting.  Like all Johor Plantations Berhad Estates, the estates visited in Sindora POM certification unit continued to have a management strategy for planting on slopes in order to minimize and control erosion and degradation of soils. The plantings on slopes between 9 and 25 degrees was guided by:  - Slope & River Protection Policy in Section A17 Johor Plantations Berhad Manual			Complied

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		<ul style="list-style-type: none"> <li>- Buffer Region &amp; 25-degree slope in Section A07 Johor Plantations Berhad Manual</li> <li>- Land Preparation for Terracing in Section A08 Johor Plantations Berhad Manual</li> </ul> <p>It was observed that practices to minimize and control erosion and degradation of soils were in place through proper stacking of fronds, EFB application, avoidance of blanket spraying, construction terraces, road maintenance and maintenance of soft vegetation in the interlines. Cover crops were planted in the replants and in certain mature areas. The cover crop <i>mucuna bracteate</i> were planted along crucial slopes by management. Large areas with <i>neprolepis biserrata</i> in the inter rows were sighted during the visit.</p>	
7.5.3	<p>There is no new planting of oil palm on steep terrain.</p> <p>- Minor compliance -</p>	<p>This compliance being addressed in the Sustainable Policy - "Slope and River Protection" signed by the Managing Director dated on 01/10/2021 stated the following:</p> <p>"Slope of &gt;25 degree to be excluded from any new plantation development and replanting program. For slope &lt;25 degree the existing crop all vegetative shall be maintained accordingly".</p> <p>Similar commitments are also described in the Environmental Policy dated on 01/10/2021.</p>	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	<p><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.</p> <p>- Critical (Major) compliance -</p>	<p>Soil surveys are made and available in a soil map for all the estates. Topographic contour map is also available which are both used to manage the drainage and road works in the estates. No new planting in all estates within Sindora POM certification unit as the palm mostly on its 2<sup>nd</sup> cycle of planting (&gt;25 years) as some already entered its 3<sup>rd</sup> cycle.</p>	Complied

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		<p>Records of surveys and analysis available as provided by AASD (Agronomy Advisory Service Dept) as following:</p> <ul style="list-style-type: none"> <li>- Sindora Estate: Soil Analysis Test Report # L1/2022/11/196; Date tested: 10-16/11/2022; Date reported: 16/11/2022</li> <li>- Sungai Papan Estate: Soil Analysis Test Report # S1/2023/04/27; Date tested: 1-6/4/2023; Date reported: 10/4/2023</li> <li>- Sungai Papan Estate: Foliar Analysis Test Report # L1/2023/05/144; Date tested: 30/4/2023 – 15/5/2023</li> <li>- REM Estate: Soil Analysis Test Report # S1/2022/01/11; Date tested: 13/1/2022 – 27/1/2022</li> <li>- REM Estate: Leaf Analysis Test Report # L1/2023/01/13; Date tested: 1/12/2022 – 9/1/2023</li> </ul>	
7.6.2	<p>Extensive planting on marginal and fragile soils, is avoided, or, if necessary, done in accordance with the soil management plan for best practices.</p> <p>- Minor compliance -</p>	No extensive planting on marginal and fragile soils and estates with near future replanting program has set-aside the area with slope >25 degree from the program.	Complied
7.6.3	<p>Soil surveys and topographic information guide the planning of drainage and irrigation systems, roads and other infrastructure.</p> <p>- Minor compliance -</p>	Soil surveys are made and available in a soil map at all estates. Topographic contour map is also available which are both used to manage the drainage and road works in the estates. Details as per 7.5.1 and 7.5.2.	Complied
<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>	There is no peat soil or soil categorized as marginal or fragile soil in all estates visited. There was also no new planting in the estates.	Complied
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>	There is no peat soil or soil categorized as marginal or fragile soil in all estates visited. There was also no new planting in the estates.	Complied

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	<b>PROCEDURAL NOTE:</b> 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). - Minor compliance -		
7.7.3	<b>(C)</b> Subsidence of peat is monitored, documented and minimised. - Critical (Major) compliance -	There is no peat soil or soil categorized as marginal or fragile soil in all estates visited. Hence, this is not applicable.	Not Applicable
7.7.4	<b>(C)</b> A documented water and ground cover management programme is in place. - Critical (Major) compliance -	The water and ground cover management programme are documented in the Johor Plantations Berhad Agricultural Manual (Water Management in Inland, Coastal and Peat lands) issued on 01/07/2011. Details are described in 7.8.1. individual estates and mill had their respective water management plan mainly to monitor the following: <ul style="list-style-type: none"> <li>- Monitor the quality of main water inlet/outlet for pollutants from estate's operations.</li> <li>- Good drainage system to ensure adequate water supply for the palm trees via growth monitoring.</li> <li>- Construction of roadside pits for a good road drainage.</li> <li>- Contingency during water shortage.</li> <li>- Monitoring of water level at low lying fields during the monsoon months for flood mitigation.</li> </ul>	Complied
7.7.5	<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	There is no peat soil or soil categorized as marginal or fragile soil in all estates visited. Hence, this is not applicable.	Not Applicable

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	<p>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>		
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>- Critical (Major) compliance -</p>	There is no peat soil or soil categorized as marginal or fragile soil in all estates visited. Hence, this is not applicable.	Not Applicable
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>	There is no peat soil or soil categorized as marginal or fragile soil in all estates visited. Hence, this is not applicable.	Not Applicable
<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>The Water Management Plan 2023 has been established with the recent review made on respectively by Sindora POM and estates. The mill water management plan includes the following:</p> <ul style="list-style-type: none"> <li>- Rainwater harvesting for cleaning purposes,</li> <li>- Water from the reservoir/catchment for the mill operations</li> <li>- continual training for workers on water efficiency consumption,</li> <li>- Workers have adequate to clean water. The same water source</li> </ul>	Complied

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	<p>- Minor compliance -</p>	<p>supplied to the mill and estates are from the same source of supply, own catchment with WTP facilities.</p> <ul style="list-style-type: none"> <li>- Desilting of water reservoir to retain the reservoir optimal capacity.</li> <li>- The action plan in event of draught/water pollution.</li> </ul> <p>These were documented in the Sindora POM Water Management Plan; 1/8/2023 which main source of water are from Reservoir/Pond, Rain, River and Public (SAJ) supply.</p> <p>The estates similarly possessed the following water management plan covering the following:</p> <table border="1" data-bbox="1160 802 1910 1375"> <thead> <tr> <th>Source</th><th>Activity</th><th>Threat</th><th>Action Plan</th></tr> </thead> <tbody> <tr> <td rowspan="3">Reservoir/ pond/ Rain</td><td>Chemical mixing</td><td>Pollution Draught Wastage</td><td>Enforcement of buffer Region as non-spraying activities.</td></tr> <tr> <td>General Upkeep</td><td>Pollution Draught Wastage</td><td>Follow WI &amp; SOP to avoid water pollution. Follow SW SOP to avoid pollution caused from SW.</td></tr> <tr> <td>Line site</td><td>Pollution Draught Wastage</td><td>Every house is supplied with containers. To schedule water supply to avoid wastage. Awareness on water usage efficiency. Outsource from neighboring estates.</td></tr> </tbody> </table>	Source	Activity	Threat	Action Plan	Reservoir/ pond/ Rain	Chemical mixing	Pollution Draught Wastage	Enforcement of buffer Region as non-spraying activities.	General Upkeep	Pollution Draught Wastage	Follow WI & SOP to avoid water pollution. Follow SW SOP to avoid pollution caused from SW.	Line site	Pollution Draught Wastage	Every house is supplied with containers. To schedule water supply to avoid wastage. Awareness on water usage efficiency. Outsource from neighboring estates.	
Source	Activity	Threat	Action Plan														
Reservoir/ pond/ Rain	Chemical mixing	Pollution Draught Wastage	Enforcement of buffer Region as non-spraying activities.														
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	Line site	Pollution Draught Wastage	Every house is supplied with containers. To schedule water supply to avoid wastage. Awareness on water usage efficiency. Outsource from neighboring estates.														

			Drain upkeep	Interruption water flow at drainage system.	Periodic desilting Building of sand bags at specific points to contain water (weirs)										
				Water pollution	Prohibit workers from activities at water source Drinking water analysis. Monitor condition of septic tank Adhere SW management procedure.										
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 Regions has been verified at the 2 Estates and mill catchment. Riparian buffer Regions 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 in the Agricultural Manual SOP no A17 revised dated 01/07/2013. The buffer zones established as following:</p> <table><tr><td>River Width</td><td>Buffer Region</td></tr><tr><td>&gt;40 meters</td><td>50 meters</td></tr><tr><td>20 - 40 meters</td><td>40 meters</td></tr><tr><td>10 - 20 meters</td><td>20 meters</td></tr><tr><td>5 - 10 meters</td><td>10 meters</td></tr><tr><td>&lt; 5 meters</td><td>5 meters</td></tr></table>	River Width	Buffer Region	>40 meters	50 meters	20 - 40 meters	40 meters	10 - 20 meters	20 meters	5 - 10 meters	10 meters	< 5 meters	5 meters	Complied
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		<p>Buffer Regions is protected and water samples from the intake point are taken for phosphate and nitrate analysis for detection of fertilizer application effect to the water courses. Sighted sample records of sampling analysis for Sindora Estate surface water sampling analysis test report # WI/2023/08/502; Date Tested: 16-22/8/2023; Date Reported: 25/8/2023; Parameters: Nitrate Nitrogen &amp; Phosphorus both complied with limit.</p> <p>Also verified the sampling analysis by Sindora POM latest mill river water upstream &amp; downstream sample test report # WI/2023/09/551; Date Tested: 6-13/9/2023; Date Reported: 21/8/2023; Analysis by Central Analytical Laboratory; BOD result: Upstream &lt;10 mg/L; Downstream &lt;10 mg/L.</p>	
7.8.3	<p>Mill effluent is treated to be in compliance with national regulations. Discharge quality of mill effluent, especially Biochemical Oxygen Demand (BOD), is regularly monitored.</p> <p>- Minor compliance -</p>	<p>The effluent was treated in compliance with DOE license requirement as per Sindora POM DOE license # 004718 and Compliance Schedule Ref. # JAS.JHQ.600-3/1/68/(SK04); Validity period: 1/7/2023 – 30/6/2024; Max processing capacity 45 mt/hr; BOD limit 100 mg/l; Final discharge method: Land application.</p> <p>Visit to the effluent pond found no overflow was observed, and flow meter reading was recorded daily. The mill monitoring the effluent and submits to DOE via Online Environmental Reporting (OER) system.</p> <p>Results from final discharge were compliance within parameter limit as per recent records of POME Final Discharge sample test report # EI/2023/09/149; Date Tested: 7-14/9/2023; Date Reported: 21/9/2023; Analysis by Central Analytical Laboratory; BOD result: 71 mg/L.</p>	Complied
7.8.4	<p>Mill water use per tonne of FFB is monitored and recorded.</p> <p>- Minor compliance -</p>	<p>Based on the documented Sindora POM Water Management Plan; 1/8/2023, the main source of water is from Reservoir/Pond, Rain,</p>	Complied

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		River and Public (SAJ) supply. Hence, it is a priority by the mill to consume water efficiently with improvement sighted from Sindora POM water consumption records as following: <ul style="list-style-type: none"><li>- 2023: 0.64 m<sup>3</sup>/MT FFB todate August 2023</li><li>- 2022: 0.97 m<sup>3</sup>/MT FFB</li></ul>										
Criterion 7.9: Efficiency of fossil fuel use and the use of renewable energy is optimised												
7.9.1	A plan for efficiency of the use of fossil fuels and to optimise renewable energy is implemented, monitored and documented.  - Minor compliance -	<div>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 2023. The Environment Management Plan for efficiency of fossil fuel usage includes the following:</div> <table><tr><th>Target</th><th>Objective</th><th>Action Plan</th></tr><tr><td>Backhoe, tractor</td><td>To reduce fossil fuel consumption from company-owned vehicles and fuel using mobile equipment</td><td><ul style="list-style-type: none"><li>- To ensure the vehicle engine is turn off during idle time</li><li>- To record vehicle activity which consume fuel</li></ul></td></tr><tr><td>Van/Supervisory vehicle</td><td>To reduce fossil fuel consumption from company-owned vehicles and fuel using mobile equipment</td><td><ul style="list-style-type: none"><li>- To record vehicle activity to eliminate waste activity which consume fuel.</li><li>- To turn off vehicle engine during idle time.</li><li>- Scheduled servicing for optimal performance</li></ul></td></tr></table>	Target	Objective	Action Plan	Backhoe, tractor	To reduce fossil fuel consumption from company-owned vehicles and fuel using mobile equipment	<ul style="list-style-type: none"><li>- To ensure the vehicle engine is turn off during idle time</li><li>- To record vehicle activity which consume fuel</li></ul>	Van/Supervisory vehicle	To reduce fossil fuel consumption from company-owned vehicles and fuel using mobile equipment	<ul style="list-style-type: none"><li>- To record vehicle activity to eliminate waste activity which consume fuel.</li><li>- To turn off vehicle engine during idle time.</li><li>- Scheduled servicing for optimal performance</li></ul>	Complied
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		<p>Fossil fuel consumptions were monitored as per sample sighte as following:</p> <p>Sungai Papan Diesel vs FFB 2022 – 2023:</p> <ul style="list-style-type: none"> <li>- 2020: 0.69 Liter/MT FFB</li> <li>- 2021: 0.68 Liter/MT FFB</li> <li>- 2022: 0.62 Liter/MT FFB</li> <li>- 2023: 0.57 Liter/MT FFB todate July 2023</li> </ul> <p>Sindora POM Diesel vs FFB processed:</p> <ul style="list-style-type: none"> <li>- 2021: 0.62 Liter/MT FFB</li> <li>- 2022: 0.80 Liter/MT FFB</li> <li>- 2023: 0.91 Liter/MT FFB</li> </ul> <p>Sindora POM main action plan to optimize its renewable energy from the consumption of steam from biomass boiler for energy generation by steam turbine is to maintain the uptime of FFB process and minimize. The mill also in the midst of completing its biogas plant for commissioning and operation in 2024.</p>	
<b>Criterion 7.10:</b> 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>Sindora POM and supply base certification unit has identified emission of greenhouse gas (GHG) from their operations such as emission from their farm tractor and gen set operation.</p> <p>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>	Complied

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		<p>Fuel Consumption, Peat Oxidation, POME and reported in the Palm GHG Summary Report. Monitoring of GHG emissions conducted by the mill including the following:</p> <ul style="list-style-type: none"> <li>- Sindora POM Air Emission Monitoring Report in Compliance with Environmental Quality (Clean Air) Regulations 2024; Boiler # 4; Date of Monitoring: 27/7/2023; Report Ref. # PAC-AE-230725; Result: 144 mg/m<sup>3</sup>, dry @ 12% CO<sub>2</sub>; Limit: 150</li> <li>- Sindora POM Air Emission Monitoring Report in Compliance with Environmental Quality (Clean Air) Regulations 2024; Boiler # 3; Date of Monitoring: 17/1/2023; Report Ref. # PAC-AE-230117; Result: 41 mg/m<sup>3</sup>, dry @ 12% CO<sub>2</sub>; Limit: 150</li> </ul>	
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>	<p>Sindora POM and supply base certification unit has calculated the GHG using RSPO Palm GHG calculator and the calculation option used is Option 1. There is no new development within the estates audited.</p>	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. Sindora POM and supply base certification unit has continued to maintain its environmental aspects/impacts register associated with their activities. The documented environmental aspect and impact assessment covers all estates and mill activities/operation. Pollution Identification Environmental Improvement Management Plan' is used to identify the waste products and sources of pollution, was in place and is reviewed accordingly.</p> <p>The objectives are to minimize environmental impact (pollution and emission) from all estates and mill operations activities as following:</p>	Complied

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		<ul style="list-style-type: none"> <li>- Monitoring of buffer Region near water course</li> <li>- Inlet/outlet water monitoring for nitrate and phosphate</li> <li>- Cleaning and monitoring on Pollution Control Device (PCD)</li> <li>- Maintenance and inspection of vehicles</li> <li>- Erosion control program - cover crop and Guatemala grass</li> <li>- Monitoring of SW disposal/transfer</li> <li>- Triple rinsing empty chemicals</li> </ul> <p>Identified significant environmental receptors for the estates and mill operations are following:</p> <ul style="list-style-type: none"> <li>- Air - Sources from boiler stack (smoke and particulate), vehicle &amp; generator (smoke and gases), anaerobic processes (ETP, EFB dumping)- GHG</li> <li>- Water - Cleaning water/run-off/process station waters (hydro-cyclone /sterilizer condensate/clarification waste) &amp; boiler quenching water and blowdown</li> <li>- Land - Scheduled waste, domestic waste and industrial/process waste.</li> </ul> <p>The boiler system of the mill was equipped with a Continuous Emission Monitoring System (CEMS). The audit team has verified the condition of the CEMS was found to be in functional condition. Data from the stack is connected online to DOE's office. Boiler smoke emission data are within the DOE limit.</p>	
<b>Criterion 7.11:</b> Fire is not used for preparing land and is prevented in the managed area			

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7.11.1	<p><b>(C)</b> Land for new planting or replanting is not prepared by burning.</p> <p>- Critical (Major) compliance -</p>	<p>There is no land preparation of existence or new planting in Southern Region Estates by burning ever since Johor Plantations Berhad practiced zero burning as per requirement as following:</p> <ul style="list-style-type: none"> <li>- Under KMB SOP A04-A07 Replanting felling/clearing &amp; land preparation</li> <li>- Environmental Policy signed by the Managing Director dated 01/10/2021</li> </ul> <p>Johor Plantations Berhad has a policy of no open burning. As advocated, the estates practiced zero burning. In the replants visited during the audit in the Estates, it was evident that all palms were felled, shredded, windrow-ed and left to decompose. There was no evidence that fire had been used to prepare land for replanting in the estates. No fire was used for waste disposal.</p>	Complied
7.11.2	<p>The unit of certification establishes fire prevention and control measures for the areas directly managed by the unit of certification.</p> <p>- Minor compliance -</p>	<p>This is established in the emergency response plan (ERP) procedure which contain the following:</p> <ul style="list-style-type: none"> <li>- Objective</li> <li>- Activity and prevention.</li> <li>- Function of Fire and Rescue Team</li> <li>- Emergency Evacuation Plan / Drill</li> </ul> <p>The procedure was formalized by Sustainability &amp; Innovation Department for use in all operating units in Southern Region Estates and Mills. Training related to fire drill /prevention were held respectively by all estates and mill as per latest as following:</p> <ul style="list-style-type: none"> <li>- Sindora POM: ERP procedure training; Date: 16/04/2023</li> <li>- Sindora Estate: Recycling Environment – Zero Fire training; Date: 25/07/2023</li> </ul>	Complied

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		- Sungai Papan Estate: Fire - ERP - Zero Burning training; Date: 02/07/2023	
7.11.3	The unit of certification engages with adjacent stakeholders on fire prevention and control measures. - Minor compliance -	The unit of certification engages with adjacent stakeholders on fire prevention and control measures during latest stakeholder consultation meeting dated on 20/9/2023. Additionally, the management also took initiative to organize an Emergency Response Programme, Fire Drill and CPR conducted on 5/8/2023 in Sindora Estate in cooperation with Kluang Civil Defence District Office.	Complied
<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	<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. A historic Land Use Change Analysis (LUCA) is conducted prior to any new land clearing, in accordance with the RSPO LUCA guidance document. - Critical (Major) compliance -	The audit findings have confirmed that there is no new planting affecting present HCV and primary forest. There was no land clearing activities made nor had damaged any forest to protect or enhance the HCV.	Complied
7.12.2	<b>(C)</b> HCVs, HCS forests and other conservation areas are identified as follows: 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. 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.	The assessment was conducted by M/s A.J.F.M Dekker titled "HCV Assessment for Pasir Panjang Complex" in July 2009. The assessment is being reviewed respectively as shown in the summary HCV table. The assessments were made in relation to the Rapid Biodiversity Assessment the reports have identified the list of natural habitats that is possible present in the operating units. The reports detail the findings of a rapid appraisal of the biodiversity in the estates and address the RSPO P&C relevant to biodiversity conservation and HCV. Therein providing details relating to the following: - General biodiversity issues	Complied

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	<p><b>PROCEDURAL NOTE:</b> 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>	<ul style="list-style-type: none"><li>- Watercourses and drainage</li><li>- Habitats natural and man-made</li><li>- Wildlife</li><li>- Ponds and reservoirs</li><li>- Wetlands /watercourses</li><li>- Legal aspects</li><li>- Immediate and long-term effect.</li></ul> <p>The HCV assessment methodologies are through site observation, interviews, stakeholders’ consultation and desktop review on available secondary data. The assessment covers the areas as following:</p> <ul style="list-style-type: none"><li>- Overview of HCV assessment.</li><li>- Description of assessment areas</li><li>- Findings and discussions</li><li>- Landscape context</li><li>- HCV criteria and application to agriculture</li><li>- HCV monitoring and management</li></ul> <p>The HCV present area within the estates and mill landholdings as summarized below as following:</p> <table><tr><th>Estate</th><th>HCV Area</th><th>HCV Categories</th></tr><tr><td>Sindora</td><td>20.21</td><td>HCV 4, HCV 6</td></tr><tr><td>Sungai Papan</td><td>11.49</td><td>HCV 4, HCV 6</td></tr><tr><td>REM</td><td>44.86</td><td>HCV 4, HCV 6</td></tr></table>	Estate	HCV Area	HCV Categories	Sindora	20.21	HCV 4, HCV 6	Sungai Papan	11.49	HCV 4, HCV 6	REM	44.86	HCV 4, HCV 6	
Estate	HCV Area	HCV Categories													
Sindora	20.21	HCV 4, HCV 6													
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		Basir Ismail	50.69	HCV 4, HCV 6	
		The audit findings have confirmed that there is no new planting affecting present HCV and primary forest. Hence the current HCV assessment of the estates remains valid.			
7.12.3	<i>Indicator is not applicable in Malaysia context</i>	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>The audit findings have confirmed that there is no new HCVs, HCS forests peatland and other conservation areas been identified after 15 Nov 2018 in CU estates.</p> <p>The HCV assessment methodologies are through site observation, interviews, stakeholders' consultation and desktop review on available secondary data. The assessment covers the areas as following:</p> <ul style="list-style-type: none"> <li>- Overview of HCV assessment.</li> <li>- Description of assessment areas</li> <li>- Findings and discussions</li> <li>- Landscape context</li> <li>- HCV criteria and application to agriculture</li> <li>- HCV monitoring and management</li> </ul> <p>Monitoring of these areas are made through the daily field supervision by the field staff and executives. There were also visits by the PI/RC and personnel from the SID Department. Sighting of RTE is made and recorded during the AP rounds in the estates if any. Highlights if any are discussed during the management review or management meetings subject to the urgency of the situation.</p>			Complied

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		<p>Monitoring records available as per sample in Sungai Papan Estate HCV Patrolling Book; Latest patrol date: 23/9/2023.</p> <p>During stakeholder consultation meeting conducted on 20/09/2023, information of RTE/HCV/Biodiversity management were presented. Information includes the integrated management plan comprise of following:</p> <ul style="list-style-type: none"> <li>- Biological Diversity</li> <li>- Management of High Conservation Value Area. <ul style="list-style-type: none"> <li>o There are 6 categories of HCV in the estates and mill</li> <li>o The HCV management using the concept of access, plan, action and monitoring</li> </ul> </li> <li>- Rare Threatened and Endangered Species <ul style="list-style-type: none"> <li>o Definition and protection under law</li> <li>o Disciplinary action / Punishment / Legality Consequences</li> <li>o Continuous monitoring of RTE / HCV</li> <li>o Flow chart of RTE Conflict management</li> </ul> </li> <li>- Emergency Evacuation Plan / Drill</li> </ul>	
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>There was no rights of local communities been identified in HCV areas, HCS forest after 15 November 2018, peat land and other conservation areas. The HCV Assessment report indicated that there is no threatened or endangered (RTE) species, or HCVs, are present or are affected by plantation or mill operations. There is only common bird, presence of wild boar and monkeys occasionally sighted. The appropriate measures that are expected to maintain and/or enhance them were implemented through an action plan reviewed in Jan 2023.</p>	Complied

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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>The audit findings have confirmed that there is no new HCVs, HCS forests peatland and other conservation areas been identified after 15 Nov 2018 in the audited estates and the mill.</p> <p>Regular education program of workforce conducted as per sample morning muster briefing as following:</p> <ul style="list-style-type: none"> <li>- Sungai Papan Estate; Biodiversity and HCV; Date: 3/5/2023; All workers</li> <li>- Sungai Papan Estate: Safety &amp; Health in HCV areas harvesting operation; Date: 30/3/2023</li> <li>- REM Estate: Animal Sighting Briefing; Date: 21/9/2023</li> <li>- REM Estate: Prohibition on petting and hunting of RTE; Date: 10/8/2023</li> </ul> <p>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 and to ensure the workforce understand, all workers provided with Training Evaluation Form; Doc. # SQD/SMS/3.7-F3; Rev. # 1; Date: 1/7/2022 after each briefing for management to measure their level of understanding.</p>	Complied
7.12.7	<p>The status of HCVs, HCS forests after 15 November 2018, other natural ecosystems, peatland conservation areas and RTE species is monitored. Outcomes of this monitoring are fed back into the management plan.</p> <p>- Minor compliance -</p>	<p>The audit findings have confirmed that there is no new HCVs, HCS forests peatland and other conservation areas been identified after 15 Nov 2018 in the Southern Region estates (refer 7.3.1 to 7.4.2). Monitoring of these areas are made through the daily field supervision by the field staff and executives. There were also visits by the Regional Controller and personnel from the Sustainability Department. Sighting of RTE is made and recorded during the AP rounds in the estates if any. Highlights if any are discussed during the management review or management meetings subject to the urgency of the situation.</p>	Complied

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7.12.8	<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. - Critical (Major) compliance -	The audit findings have confirmed that there is no new land clearing affecting areas of HCVs, HCS forests peatland and other conservation areas.	Complied
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## Appendix B: GHG Reporting Executive Summary

The GHG emissions that were produced in **2022** for **Johor Plantations Berhad- Sindora Palm Oil Mill** and supply base was calculated using the PalmGHG Calculator version 4.0.1. The assessment team had verified the data input in the PalmGHG Calculator against operations records. PalmGHG Calculation Options selected 'Full version' and 'Exclude LUC Emission' calculation option is not applied. The records verified includes:

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

The summary of the Net GHG emitted in **2022** for **Sindora Palm Oil Mill** and supply base are as following:

Emission per product	tCO <sub>2</sub> e/tProduct	Extraction	%
CPO	0.87	OER	20.61
PKO	0.87	KER	5.21

Production	t/yr	Land Use	Ha
FFB Process	219,824.64	OP Planted Area	11,696.44
CPO Produced	45,301.20	OP Planted on peat	0.00
PKO Produced	11,450.91	Conservation (forested)	31.65
		Conservation (non-forested)	95.60
		<b>Total</b>	<b>11,823.69</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	8.23	0.49	0.20	0.52	-	-	8.43	1.01
CO <sub>2</sub> Emission from fertilizer	0.55	0.03	0.01	0.03	-	-	0.56	0.06
NO <sub>2</sub> Emission	0.43	0.03	0.01	0.03	-	-	0.44	0.06
Fuel Consumption	0.12	0.01	0.01	0.01	-	-	0.13	0.02
Peat Oxidation	-	-	0.15	0.41	-	-	0.15	0.41
<b>Sink</b>								
Crop Sequestration	-7.78	-0.46	-0.19	-0.50	-	-	-7.97	-0.96
Conservation Sequestration	-	-	-	-	-	-	-	-
<b>Total</b>	1.55	0.09	0.21	0.56	-	-	1.76	0.65

*\*Note: Includes both estates and smallholders*

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#### Summary of Mill Emission and Credit

	tCO <sub>2</sub> e	tCO <sub>2</sub> e/tFFB
<b>Emission</b>		
POME	20,173.88	0.09
Fuel Consumption	658.26	-
Grid Electricity Utilization	-	-
<b>Credit</b>		
Export of Grid Electricity	-	-
Sales of PKS	- 1,365.96	- 0.01
Sales of EFB	-	-
<b>Total</b>	19,466.18	0.08

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

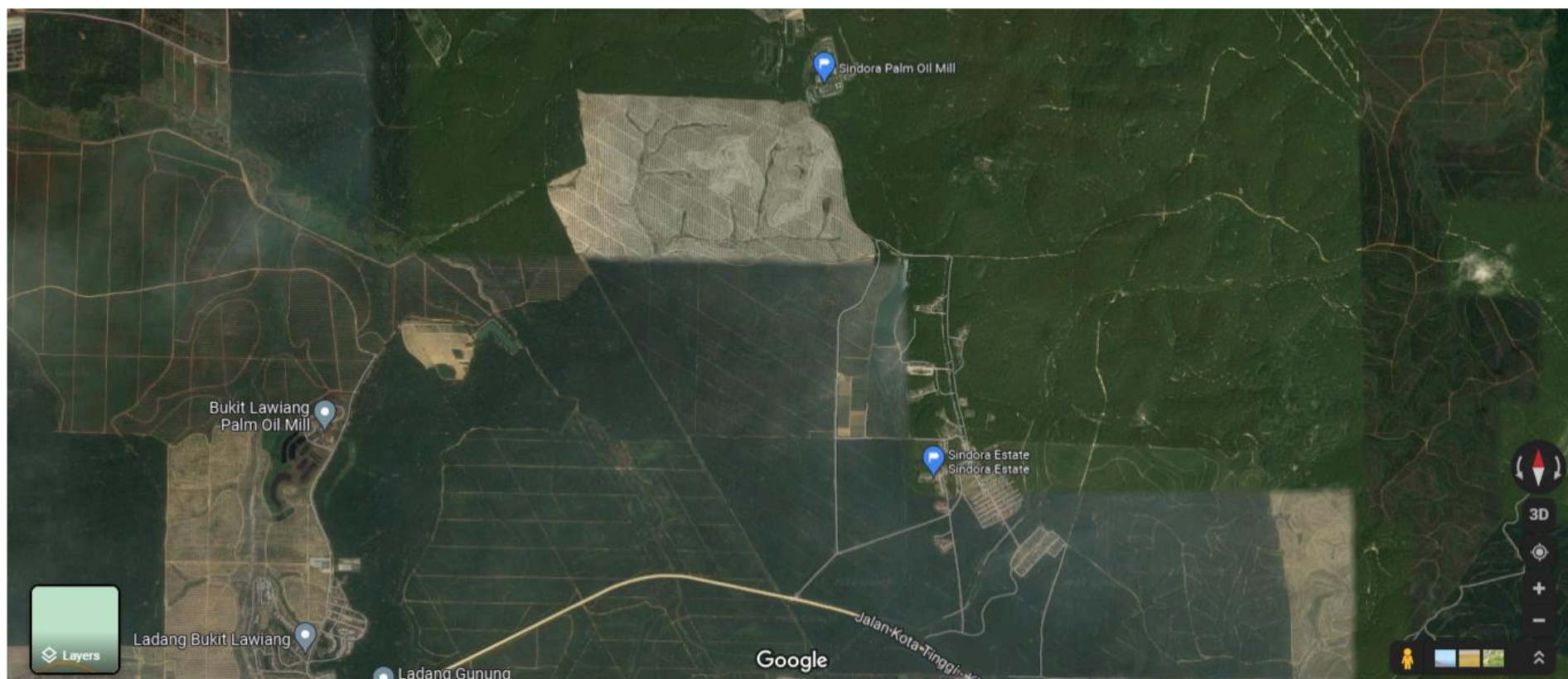
Emissions	tCO <sub>2</sub> e
PK from own mill	-
PK from other source	-
Fuel Consumptions	-
<b>Total Crusher emissions</b>	-

\*This mill has no kernel crusher operation.

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

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

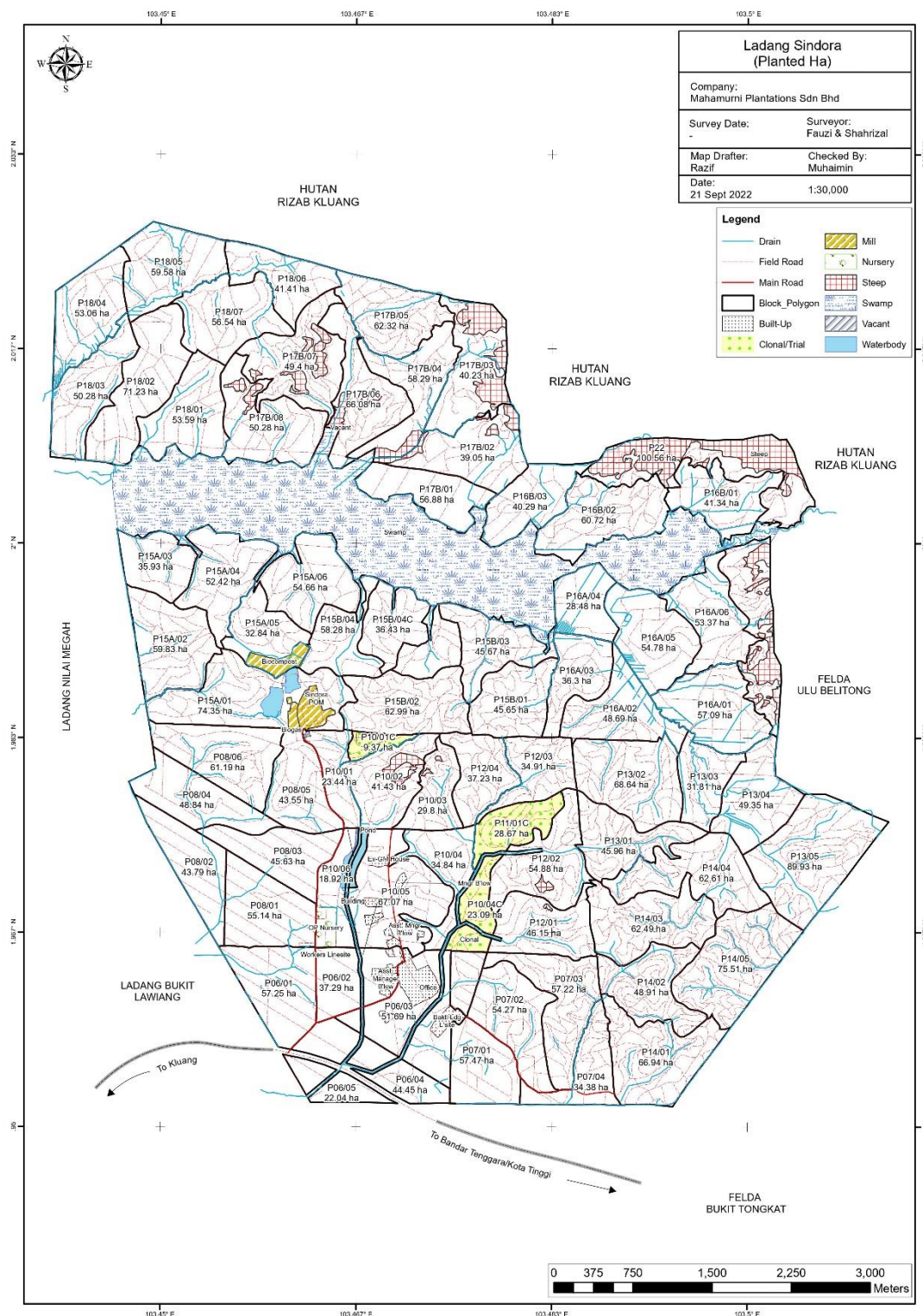
## Appendix C: Location Map of Certification Unit and Supply bases





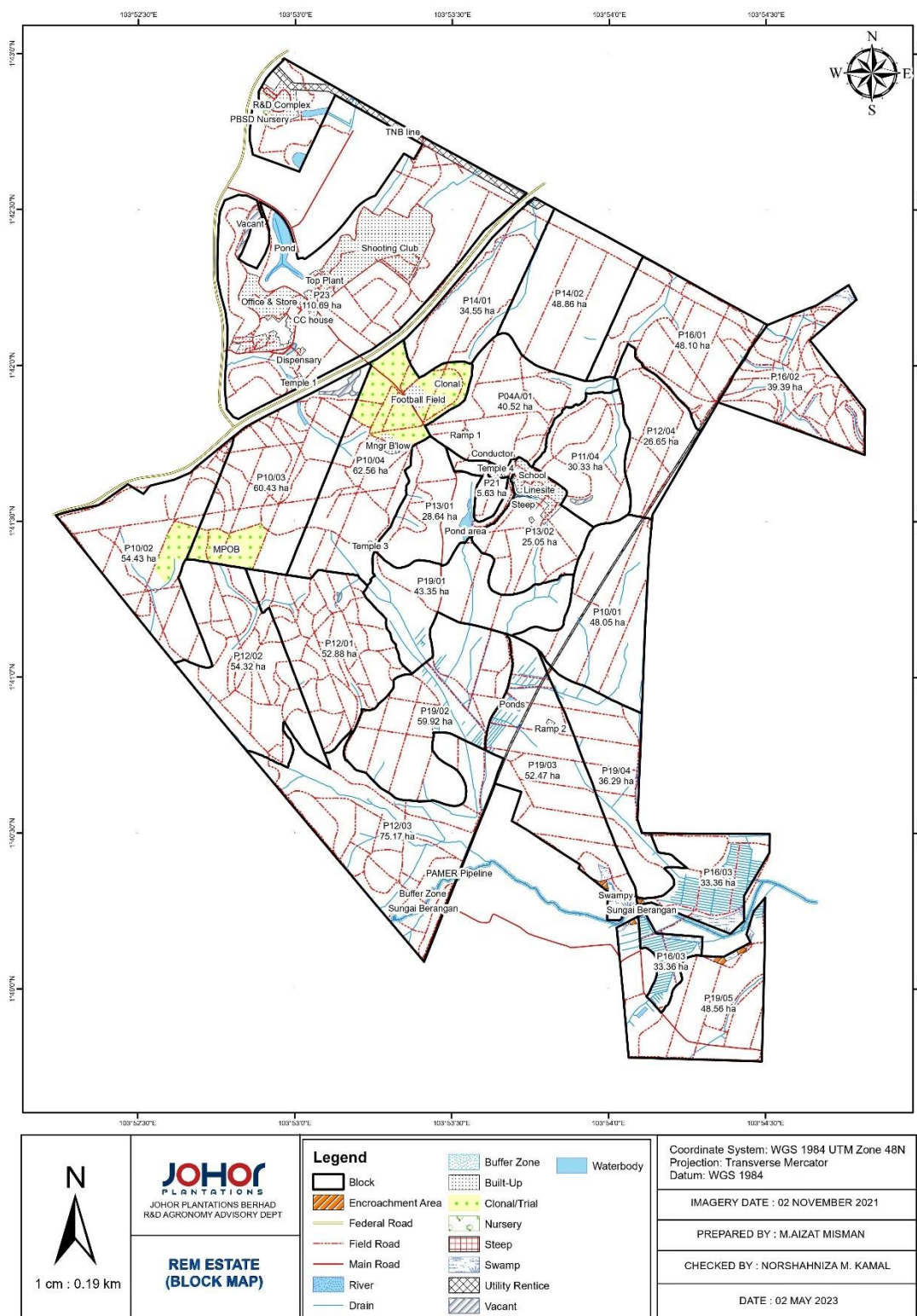
## Appendix D: Estate Field Map

Sindora Estate:



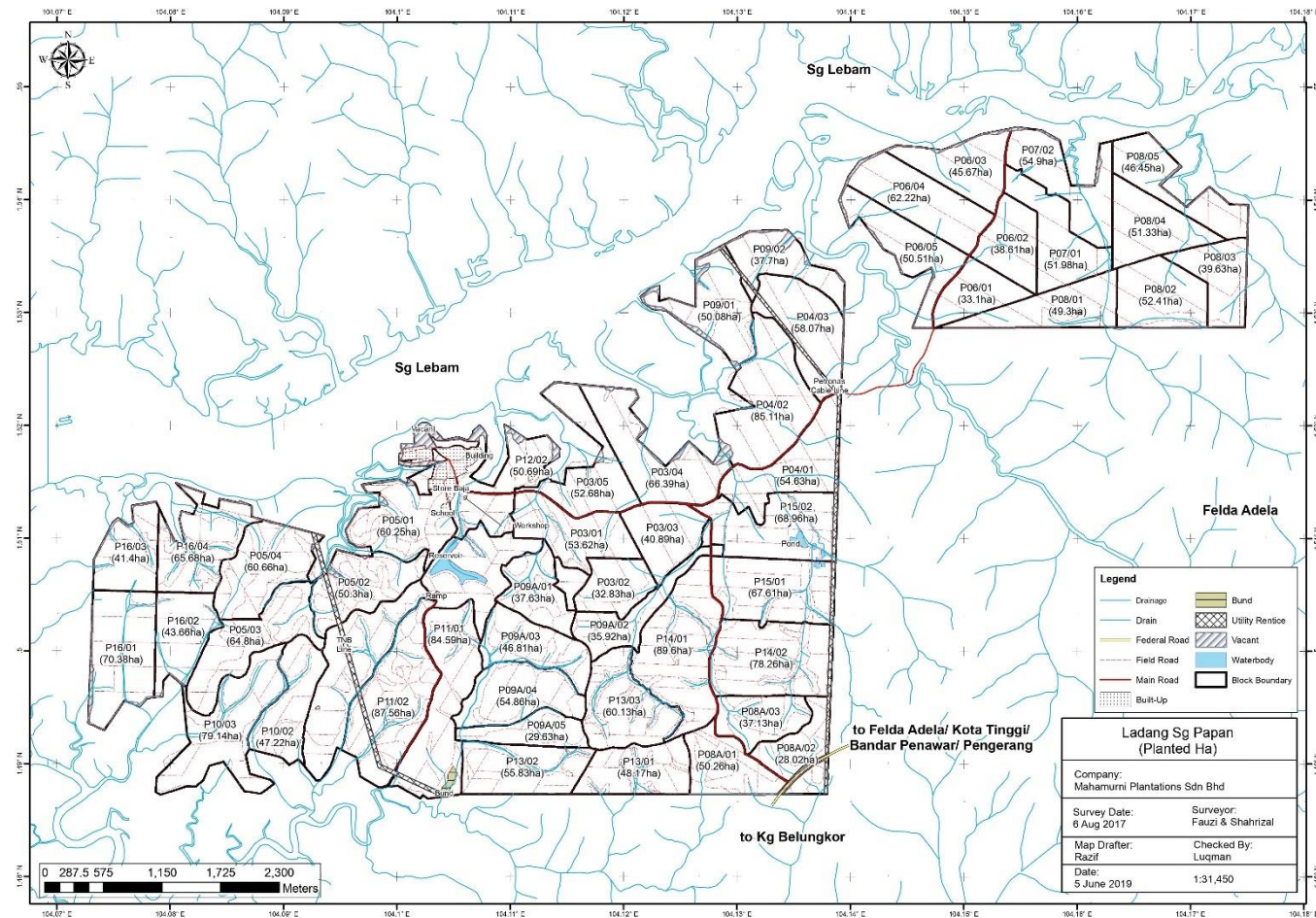


REM Estate:



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Sungai Papan Estate:

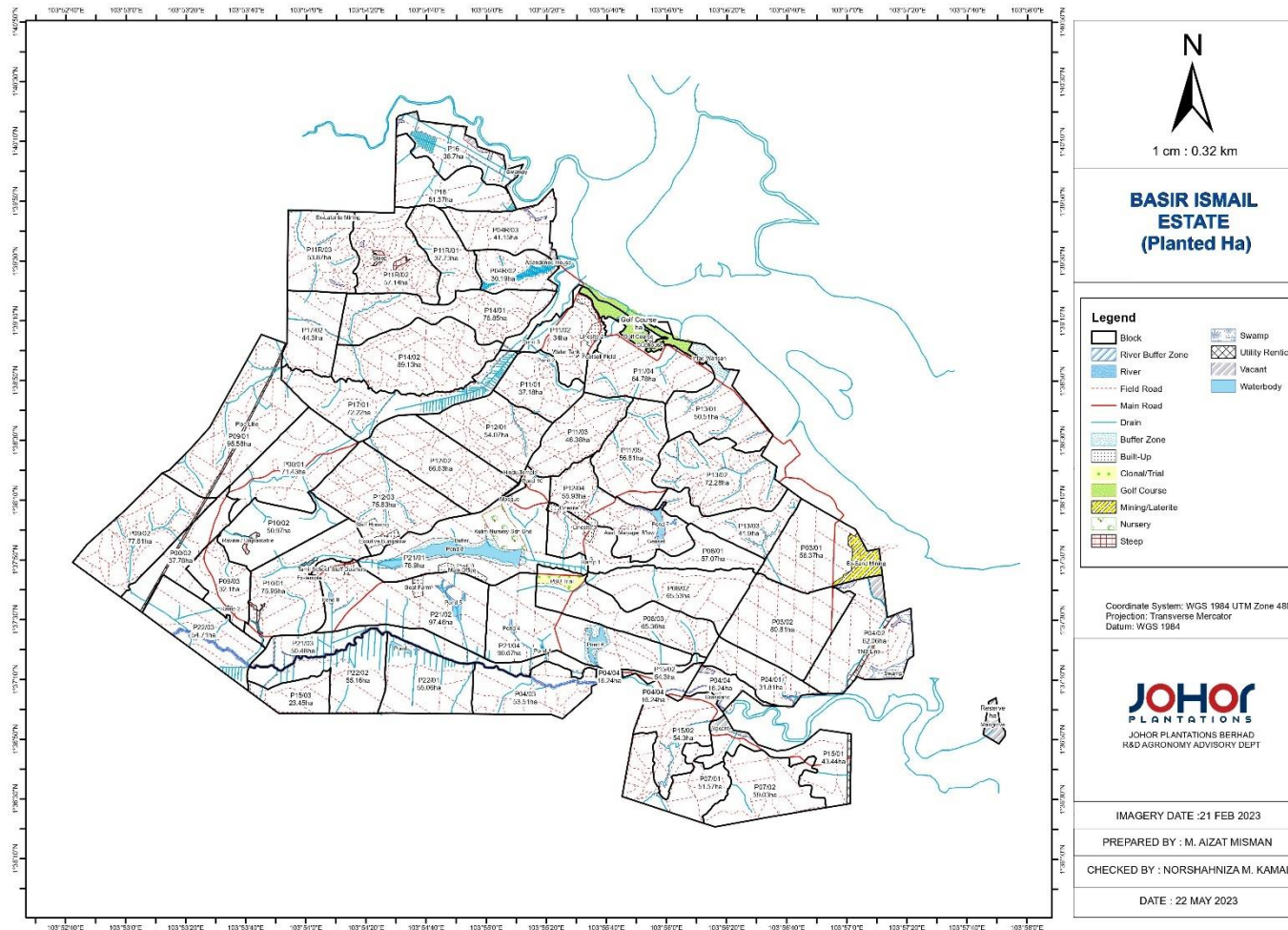


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Basir Ismail Estate:



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**Appendix E: List of Smallholder Registered and/or sampled**

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 (N/A)									
Total					N/A	N/A	N/A		
Note: * are smallholders sampled in this audit.									

## 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