

RSPO PRINCIPLE AND CRITERIA PUBLIC SUMMARY REPORT

☐ Initial Assessment

☒ Annual Surveillance Assessment (1_2)

☐ Recertification Assessment (Choose an item.)

☐ Extension of Scope

Client Company Name / Parent Company: Johor Corporation
Client Company / Parent Company Address: Level 2, Persada Johor Jalan Abdullah Ibrahim, 80000, Johor Bahru, Malaysia
Certification Unit: Johor Plantations Group Berhad - Pasir Panjang Palm Oil Mill
Location of Certification Unit: KM 30, Jalan Jemaluang, Kota Tinggi, 81900 Johor, Malaysia
Date of Final Report: 30/03/2024

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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	15/06/2009
Address	Level 2, Persada Johor Jalan Abdullah Ibrahim, 80000, Johor Bahru, Malaysia		
Palm Oil Mill / Group Manager / Estate (Certification Unit)	Johor Plantations Group Berhad - Pasir Panjang Palm Oil Mill		
Location / Address	KM 30, Jalan Jemaluang, Kota Tinggi, 81900 Johor, Malaysia		
Website	https://johorplantations.com/		
Management Representative	Munira Rahim	E-mail	munira@johorplantations.com
Telephone	07-8611611	Facsimile	07-8631084

2. Certification Information			
Certificate Number	RSPO 657192	Certificate Start Date	09/03/2022
Date of First Certification	09/03/2017	Certificate Expiry Date	08/03/2027
Scope of Certification	Production of Sustainable Crude Palm Oil (CPO) and Palm Kernel (PK)		
Visit Objectives	<ul style="list-style-type: none"> • Determination of the conformity of the client's management system, or parts of it, with audit criteria. • Evaluation of the ability of the management system to ensure the client organization meets applicable statutory, regulatory and contractual requirements 		
Assessment Cycle	<input type="checkbox"/> Pre Assessment (Choose an item.) <input type="checkbox"/> Initial Assessment <input checked="" type="checkbox"/> Annual Surveillance Assessment (ASA 1_2) <input type="checkbox"/> Recertification Assessment (Choose an item.) <input type="checkbox"/> Scope Extension		
Applicable Standards / Normative Reference	RSPO Certification System for P&C and RSPO ISH 2020 <input checked="" type="checkbox"/> Malaysia National Interpretation 2019 of the RSPO P&C 2018		
Supply Chain Module	<input 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 696199	MSPO 2530-4:2013 General Principles for Palm Oil Mills	BSI Services Malaysia Sdn Bhd	07/03/2024
MSPO 696200	MSPO 2530-3:2013 General Principles for Oil Palm Plantations and Organized Smallholders		07/03/2024
BVC-MSPO/SC-0030	MSPO Supply Chain Certification Standard 2018	Bureau Veritas Malaysia Sdn Bhd	10/03/2025
EU-ISCC-Cert-PL214-60960621	ISCC EU	ASG CERT	10/08/2024
ISCC-Plus-Cert-DE119-60226096	ISCC PLUS	ASG CERT	10/08/2024
A191414	MS 1500:2019	JAKIM	28/02/2025

4. Location(s) of Mill & Supply Bases			
Name (Mill / Supply Base / Group Manager / Smallholders)	Location	GPS Coordinates	
		Latitude	Longitude
Pasir Panjang POM	KM 30 Kota Tinggi/ KM 63 Mersing, Jalan Jemaluang, 81900, Kota Tinggi, Johor Darul Takzim.	02°01'04.85"N	103° 56' 54.87"E
Pasir Panjang Estate & Bukit Payung Division	KM 30 Kota Tinggi/ KM 63 Mersing, Jalan Jemaluang, 81900, Kota Tinggi, Johor Darul Takzim.	02°00'34.76"N	103° 57'15.93"E
Tunjuk Laut Estate	KM 30 Kota Tinggi/ KM 63 Mersing, Jalan Jemaluang, 81900, Kota Tinggi, Johor Darul Takzim.	01°57'41.69"N	103°59'09.52"E
Siang Estate	KM 3 Tg. Balau / 87 Johor Bahru, Jalan Ladang Siang – Tanjung Balau, 82200, Bandar Penawar, Johor Darul Takzim.	01°39'10.15"N	104°12'40.23"E
Bukit Kelompok Estate	KM 30 Kota Tinggi/ KM 63 Mersing, Jalan Jemaluang, 81900, Kota Tinggi, Johor Darul Takzim.	02°00'24.31"N	103°59'54.39"E
Pasir Logok Estate	KM 30 Kota Tinggi/ KM 63 Mersing, Jalan Jemaluang, 81900, Kota Tinggi, Johor Darul Takzim.	02°01'53.38"N	104°02'20.35"E

5. Description of Supply Base					
New Planting Development	<input checked="" type="checkbox"/> No			<input type="checkbox"/> Yes	
Estate / Smallholders	Total Planted (Mature + Immature) (ha)	HCV (ha)	Infrastructure & Other (ha)	Total Area (ha)	% of Planted
Pasir Panjang Estate & Bukit Payung Division	3,372.08	424.56	216.99	4,013.63	84.02
Tunjuk Laut Estate	2,657.35	22.70	187.75	2,867.80	92.66
Siang Estate	3,204.69	71.11	167.30	3,443.10	93.08
Bukit Kelompok Estate	2,437.75	41.19	134.86	2,613.80	93.26
Pasir Logok Estate	1,992.68	17.40	87.13	2,097.73	95.02
Total	13,664.55	576.96	794.03	15,035.54	90.88

6. Plantings & Cycle						
Estate / Smallholders	Age (Years) - ha				Mature	Immature
	0 - 3	4 - 14	15 - 25	>25		
Pasir Panjang Estate & Bukit Payung Division	0	3,372.08	0.00	0.00	3,372.08	0
Tunjuk Laut Estate	0	1,962.61	694.74	0.00	2,657.35	0
Siang Estate	0	1,217.39	1987.3	0.00	3,204.69	0
Bukit Kelompok Estate	0	1,449.42	988.33	0.00	2,437.75	0
Pasir Logok Estate	140.91	759.17	1092.6	0.00	1,851.77	140.91
Total (ha)	140.91	8,760.67	4,762.97	0.00	13,523.64	140.91

7. Summary of Certified Tonnage of FFB (Own Certified Scope)				
Estate / Smallholders	Tonnage (MT) / year			
	Estimated last year (Mar 23 – Feb 24)	Actual (Dec 22 - Nov 23)		Forecast (Mar 24 - Feb 25)
		Previous license period (Dec 22 - Feb 23)	Current license period (Mar 23 - Nov 23)	
Pasir Panjang Estate & Bukit Payung Division	67,156.00	8,569.89	48,762.9	65,097.85
Tunjuk Laut Estate	67,651.00	11,129.72	47,614.02	64,850.37
Siang Estate	82,702.00	6,125.14	38,209.34	73,388.71
Bukit Kelompok Estate	61,018.00	10,447.05	37,709.48	56,811.50

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Pasir Logok Estate	52,641.00	9,826.27	31,428.85	47,485.21
Total	331,168.00	249,822.70		307,633.65

Note: Expected higher yield > 25mt/ha with all areas become mature during forecast period in Pasir Logok Estate

8. Summary of Certified Tonnage of FFB (from other certified unit(s))				
Estate / Smallholders	Tonnage (MT) / year			
	Estimated last year (Mar 23 – Feb 24)	Actual (Dec 22 - Nov 23)		Forecast (Mar 24 - Feb 25)
		Previous license period (Dec 22 - Feb 23)	Current license period (Mar 23 - Nov 23)	
REM Estate	0	0	631.39	
Sungai Papan Estate	0	0	1,307.19	
Total		1,938.58		

Note: REM Estate & Sungai Papan Estate are the supply bases of sister mill Sindora POM; RSPO cert. # RSPO 612392

9. Summary of Non-Certified Tonnage of FFB (outside supplier – excluded from certificate)				
Out growers / smallholders	Tonnage (MT) / year			
	Estimated last year (Mar 23 – Feb 24)	Actual (Dec 22 - Nov 23)		Forecast (Mar 24 - Feb 25)
		Previous license period (Dec 22 - Feb 23)	Current license period (Mar 23 - Nov 23)	
Nil	N/A	N/A	N/A	N/A
Total	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	Dec 2022	18,264.09	0	18,264.09
2	Jan 2023	14,970.770	0	14,970.770
3	Feb 2023	12,863.210	0	12,863.210
4	Mar 2023	11,584.790	0	11,584.790
5	Apr 2023	14,811.790	0	14,811.790
6	Mei 2023	18,960.060	0	18,960.060
7	Jun 2023	20,953.130	0	20,953.130
8	Jul 2023	25,706.630	0	25,706.630

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9	Aug 2023	27,635.540	0	27,635.540
10	Sept 2023	28,382.710	0	28,382.710
11	Oct 2023	29,649.58	0	29,649.58
12	Nov 2023	27,978.94	0	27,978.94
TOTAL		251,761.24	0	251,761.24

10. Summary of Certified Tonnage (MT) (not applicable for ISS)

Estimated last year (Mar 23 – Feb 24)	Actual (Dec 22 - Nov 23)		Forecast (Mar 24 - Feb 25)
	Previous license period (Dec 22 - Feb 23)	Current license period (Mar 23 - Nov 23)	
FFB	FFB		FFB
331,168.00 mt	46,098.07 mt	205,663.17 mt	307,633.65 mt
	TOTAL	251,761.24 mt	
CPO (OER: 22.80 %)	CPO (OER: 20.40 %)		CPO (OER: 21.39 %)
75,506.00 mt	9,271.14 mt	42,092.28 mt	65,802.84 mt
	TOTAL	51,363.42 mt	
PK (KER: 5.50 %)	PK (KER: 5.20 %)		PK (KER: 5.47 %)
18,214.00 mt	2,332.23 mt	10,749.50 mt	16,827.56 mt
	TOTAL	13, 081.73 mt	

10A. Monthly Records of Certified CPO & PK since the last audit

No.	Month - Year	Certified CPO (MT)	Certified PK (MT)
1	Dec 2022	3,595.69	922.81
2	Jan 2023	3,088.06	792.68
3	Feb 2023	2,587.39	616.74
4	Mar 2023	2,355.64	563.98
5	Apr 2023	3,189.36	817.48
6	Mei 2023	3,890.05	908.79
7	Jun 2023	4,243.82	1,069.59
8	Jul 2023	5,072.50	1,299.43
9	Aug 2023	5,482.83	1,394.25
10	Sept 2023	5,729.15	1,517.96
11	Oct 2023	6,241.69	1,650.00
12	Nov 2023	5,887.24	1,528.02

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TOTAL	51,363.42	13,081.73
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11. Summary of Actual Volume sold					
Current License period (Mar 23 - Nov 23)					
	RSPO Certified	Other Schemes Certified		Conventional	Total
		ISCC	Others		
CPO (MT)	41,971.72	0	0	0	41,971.72
PK (MT)	10,627.99	0	0	0	10,627.99
Credits	0	0	0	0	0
Previous License period (Dec 22 - Feb 23)					
CPO (MT)	9,225.29	0	0	0	9,225.29
PK (MT)	2,441.38	0	0	0	2,441.38
Credits	0	0	0	0	0

11A. Records of Certified CPO & PK Sold under PalmTrace since the last audit (if any)				
No.	Buyers Name	PalmTrace Trading License Number	Certified CPO Sold (MT)	Certified PK Sold (MT)
1	Carotino	TR-2ba25394-9405	428.80	0
2	Intercontinental	TR-85cf4a16-3336	4,963.80	0
3	Mewaholeo	TR-656265f0-948e	4,013.90	0
4	Pal:maju	TR-d114371d-f2d4	28,456.65	6,138.01
5	PGEO	TR-73dee20c-776e	13,333.86	5,443.82
6	JIN LEE	TR-548543e6-4974	0	295.81
7	Premium Vegetable Oils Sdn. Bhd	TR-1a966d5d-a86e	0	125.73
8	Ragamo	TR-6d476469-efe6	0	994.40
9	Sehcom	TR-42a59bf5-b9f8	0	71.60
TOTAL			51,197.01	13,069.37

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

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

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

12. Independent Smallholders Certified Tonnage (MT) / Volume									
	Estimated last year (Mar 23 – Feb 24)			Actual (Dec 22 - Nov 23)			Forecast (Mar 24 - Feb 25)		
Phase	Eligibility	MS A	MS B	Eligibility	MS A	MS B	Eligibility	MS A	MS B
	40%	70%	100%	40%	70%	100%	40%	70%	100%
FFB	N/A	N/A	N/A	N/A	N/A	N/A	N/A	N/A	N/A
IS-CSPO	N/A	N/A	N/A	N/A	N/A	TOTAL	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	TOTAL	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)
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

13. Independent Smallholders Actual Sold Tonnage / Volume							
	FFB	FFB Conventional	FFB Other schemes	IS-CSPO	CSPK	IS-CSPKO	IS-CSPKE
Current License period (Mar 23 - Nov 23)							
Credits				N/A	N/A	N/A	N/A

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Physical	N/A	N/A	N/A			
Previous License period (Dec 22 - Feb 23)						
Credits				N/A	N/A	N/A
Physical	N/A	N/A	N/A			

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

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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 **10/12/2023 -14/12/2023**. The audit programme is included as Section 2.3.

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

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

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

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

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

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

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.

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

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

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

Assessment Program					
Name (Mill / Supply Base)	Year 1 (Re-Certification)	Year 2 (ASA1-1)	Year 3 (ASA1-2)	Year 4 (ASA1-3)	Year 5 (ASA1-4)
Pasir Panjang POM	✓	✓	✓	✓	✓
Pasir Panjang Estate	✓	✓	-	✓	✓
Tunjuk Laut Estate	-	-	✓	✓	✓
Siang Estate	-	✓	✓	-	✓
Bukit Kelompok Estate	✓	✓	✓	✓	-
Pasir Logok Estate	-	✓	✓	✓	✓

Tentative Date of Next Visit: December 1, 2024 - December 5, 2024

Total Number of Mandays: 15

2.2 BSI Assessment Team

Name	Role	Competency
Hafriazhar Mohd. Mokhtar (HMM)	Team Leader	<p>Education: Bachelor of Engineering (Hons.) Chemical Engineering, UTM</p> <p>Work Experience: Environmental Officer (2002-2003), Mill Engineer (2003-2008), Project Control Engineer (2008-2011), Auditor/Client Manager (2011-present)</p> <p>Training attended: Social Auditing & SMETA Training (2021), ISO 45001 LA Training (2018), RSPO LA Training (2017), RSPO SCCS LA Training (2016), RSPO P&C LA Training (2015), ISO 9001 LA Training (2013), ISO 50001 LA Training (2012), ISO 14001 LA Training (2011)</p> <p>Language proficiency: Fluent in both verbal/written Bahasa Malaysia and English Language.</p> <p>Aspect covered in this audit:</p> <p><input checked="" type="checkbox"/> Good Agriculture Practice <input checked="" type="checkbox"/> Health and Safety <input checked="" type="checkbox"/> Supply chain requirements</p> <p><input type="checkbox"/> Social <input checked="" type="checkbox"/> Environmental <input checked="" type="checkbox"/> Market Communication and claim requirements</p> <p><input type="checkbox"/> ISH context (ICS, internal audit, policy, business planning and trading system)</p>
Haji Amir Bahari (HAB)	Team Member	<p>Education: Holds a Bachelor of Science (Hons) in Chemistry, University Science Malaysia & a Diploma in Palm Oil Milling Tech/Management, Malaysian Palm Oil Board.</p> <p>Work Experience: He has more than 30 years of plantation experience including managing rubber factories, palm oil mills and estates. Since 2014 he</p>

		<p>has started auditing professionally for various schemes including RSPO and MSPO for various accredited certification bodies.</p> <p>Training attended: He has completed ISO 9001 Lead Auditor Course, ISO 14001 Lead Auditor Course, OHSAS 18001 Lead Auditor Course, Endorsed RSPO P&C Lead Auditor Course Endorsed RSPO P&C Refresher Training, HCV Awareness for RSPO/ MSPO auditors and RSPO HCV Audit Guidelines.</p> <p>Language proficiency: Fluent in both verbal/written Bahasa Malaysia and English Language.</p> <p>Aspect covered in this audit:</p> <p><input checked="" type="checkbox"/> Good Agriculture Practice <input type="checkbox"/> Health and Safety <input type="checkbox"/> Supply chain requirements</p> <p><input type="checkbox"/> Social <input checked="" type="checkbox"/> Environmental <input type="checkbox"/> Market Communication and claim requirements</p> <p><input type="checkbox"/> ISH context (ICS, internal audit, policy, business planning and trading system)</p>
Rahayu (RAZ)	Zulkifli Team Member	<p>Education: Law Degree from John Moores University, Liverpool, United Kingdom</p> <p>Work Experience: 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>Training attended: 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 & 6), as well as carry out Social Impact Assessments. Rahayu is also a trained and certified Mediator.</p> <p>Language proficiency: Fluent in both verbal/written Bahasa Malaysia and English</p> <p>Aspect covered in this audit:</p> <p><input type="checkbox"/> Good Agriculture Practice <input type="checkbox"/> Health and Safety <input type="checkbox"/> Supply chain requirements</p> <p><input checked="" type="checkbox"/> Social <input type="checkbox"/> Environmental <input type="checkbox"/> Market Communication and claim requirements</p> <p><input type="checkbox"/> ISH context (ICS, internal audit, policy, business planning and trading system)</p>

Accompanying Persons:

Name	Role
N/A	N/A

2.3 Assessment Plan

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

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Date	Time	Subjects	HMM	HAB	RAZ
Saturday, 9/12/2023	PM	Audit team travel to Johor Bahru	✓	✓	✓
Sunday, 10/12/2023 Day 1 Tunjuk Laut Estate	9:00 AM – 9:30 AM	Opening meeting @ Pasir Panjang POM (with MSPO) • Opening presentation by audit team leader • Confirmation of assessment scope and finalize audit plan	✓	✓	✓
	9:30 AM – 12:30 PM	Tunjuk Laut Estate Field visit: Boundary inspection, field operations, staff & workers interview, buffer zone, HCV area, IPM implementation, OSH & ERP, workshop, storage area (agrochemical, fertilizer, lubricant etc.), agrochemical mixing area, Schedule waste management, worker housing, clinic, Landfill etc.	✓	✓	✓
	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	• Auditors discussion • Day 1 Interim Closing Briefing	✓	✓	✓
Monday, 11/12/2023 Day 2 Siang Estate	9:00 AM – 12:30 PM	Siang Estate Field visit: Boundary inspection, field operations, staff & workers interview, buffer zone, HCV area, IPM implementation, OSH & ERP, workshop, storage area (agrochemical, fertilizer, lubricant etc.), agrochemical mixing area, Schedule waste management, worker housing, clinic, Landfill etc.	✓	✓	✓
	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	HAB	RAZ
	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"> Auditors' discussion Day 2 Interim Closing Briefing 	✓	✓	✓
Tuesday, 12/12/2023 Day 3 Pasir Panjang POM	9:00 AM – 12:30 PM	Pasir Panjang POM 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"> Auditors' discussion Day 3 Interim Closing Briefing 	✓	✓	✓
Wednesday, 13/12/2023 Day 4 Bukit Kelompok Estate	9:00 AM – 12:30 PM	Bukit Kelompok Estate Field visit: Boundary inspection, field operations, staff & workers interview, buffer zone, HCV area, IPM implementation, OSH & ERP, workshop, storage area (agrochemical, fertilizer, lubricant etc.), agrochemical mixing area, Schedule waste management, worker housing, clinic, Landfill etc.	✓	✓	✓

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Date	Time	Subjects	HMM	HAB	RAZ
	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"> Auditors' discussion Day 4 Interim Closing Briefing 	✓	✓	✓
Thursday, 14/12/2023 Day 5 Pasir Logok Estate	9:00 AM – 12:30 PM	Pasir Logok Estate Field visit: Boundary inspection, field operations, staff & workers interview, buffer zone, HCV area, IPM implementation, OSH & ERP, workshop, storage area (agrochemical, fertilizer, lubricant etc.), agrochemical mixing area, Schedule waste management, worker housing, clinic, Landfill etc.	✓	✓	✓
	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"> Auditors' discussion Preparation for Closing Meeting 	✓	✓	✓
	5:00 PM – 5:30 PM	Closing Meeting @ Pasir Panjang POM (with MSPO)	✓	✓	✓

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 been disposed on 6th July2023 and completed disposal in August 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 have not been any new acquisitions.	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 have no any deviations from the maximum periods requires approval by the RSPO Secretariat.	Complied
Have there been any isolated lapses in implementation of the plan? If yes a Minor non-compliance shall be raised	No. There has no any 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 Major non-compliance shall be raised	Yes. There is no isolated lapse in Time Bound Plan.	Complied
Un-Certified Units or Holdings		
No replacement of primary forest or any area required to maintain or enhance HCVs and HCS in accordance with RSPO P&C criterion 7.12.	Yes. There is no new plantings that replace primary forest.	Complied
Any new plantings since January 1 st 2010 shall comply with the RSPO New Plantings Procedure.	Yes. There are no new plantings since January 1st 2010.	Complied
Any Land conflicts are being resolved through a mutually agreed process, such as RSPO Complaints System or Dispute Settlement Facility, in accordance with RSPO P&C criteria 4.4, 4.5, 4.6, 4.7 and 4.8.	Yes. There is No land conflict.	Complied
Any Labor disputes are being resolved through a mutually agreed process, in accordance with RSPO	Yes. There is No labour dispute.	Complied

P&C criterion 4.2		
Any Legal non-compliance is being addressed through measures consistent with the requirements of RSPO P&C criteria 2.1	Yes. There is No legal non-compliance.	Complied
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.	Yes. RSPO internal audit assessment for all units been conducted.	Complied
Are there any Critical (Major) non-compliance raised against any of the RSPO P&C criterion 2.1 4.2, 4.4, 4.5, 4.6, 4.7, 4.8 and 7.12 during the last internal audit of the uncertified estates? If yes is the NC(s) actively addressed with RSPO?	Yes. RSPO internal audit assessment for all units been conducted.	Complied
Have there been any stakeholder (including NGO) consultation conducted?	Yes. No stakeholder comments or complaints received	Complied

3.2 Progress of scheme smallholders and/or outgrowers

Progress of scheme smallholders or outgrowers towards compliance with relevant standards		
Requirement	Remarks	Compliance
Has 100% of scheme smallholders and/or scheme outgrowers comply with the standard within three years of the mill's initial certification? OFI shall be raised if after one year where 100% of the scheme smallholders and scheme outgrowers are not in compliance, a minor NC after two years, and a major NC if this requirement is not met after three years.	Not applicable as there are no scheme smallholders or scheme outgrowers under the certification unit.	Not Applicable

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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
<i>Sedenak Palm Oil Mill</i>	<i>Malaysia</i>	<i>Sedenak Estate</i>	Lot 136, Geran 237961, Mukim Sedenak, Daerah Kulai, 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 its Indonesia operation in August 2023	Nil
		<i>Kuala Kabong Estate</i>	PTD 35021, HSD 71140, Mukim Bukit Batu, Daerah Kulai, 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 its Indonesia operation in August 2023	Nil
<i>Sindora Palm Oil Mill</i>	<i>Malaysia</i>	<i>Sindora Estate</i>	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 its	Nil

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													Indonesia operation in August 2023	
		<i>Basir Ismail Estate</i>	KM 12 Tiram, Jalan Sg. Redan, 81800 Ulu Tiram, Johor Darul Takzim	1°42' 12.43"	103° 52' 54.96"	3594.39	Certified	Nil	2009	20-Apr-22	Yes	Nil	JPB completed the disposal of its Indonesia operation in August 2023	Nil
		<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 its 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 its Indonesia operation in August 2023	Nil
<i>Tereh Palm Oil Mill</i>	<i>Malaysia</i>	<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 its Indonesia operation	Nil

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													in August 2023	
		<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 its 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 its 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 its Indonesia operation in August 2023	Nil
		<i>Sungai Tawing Estate</i>	PTD 2137, Hsd 6060, Mukim Paloh, Daerah Kluang, Johor Darul Takzim	2°17' 46.7556"	103° 21' 11.5848"	2225.77	Certified	Nil	2009	20-Apr-22	Yes	Nil	JPB completed the disposal of its Indonesia operation in August 2023	Nil

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		<i>Wawasan Estate</i>	YPJ Plantations Sdn Bhd, 510, 81900 Kota Tinggi, Johor	2° 14' 15.108" E	103° 22' 45.12" N	362.3000	Certified	Nil	2009	20-Apr-22	Yes	Nil	JPB completed the disposal of its 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 its 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 its 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 its Indonesia operation in August 2023	Nil

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		<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 its Indonesia operation in August 2023	Nil
		<i>UMAC Estate</i>	PTD 298, HSD 3746, Mukim Keratong, Daerah Rompin, Bandar Tun Razak, Pahang, Malaysia	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 its Indonesia operation in August 2023	Nil
		<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 its 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, Jalan Jemaluang, 81900, Kota Tinggi, Johor Darul Takzim.	2° 1' 4.8504" N	103° 56' 54.8736" E	4013.63	Certified	Nil	2009	20-Apr-22	Yes	Nil	JPB completed the disposal of its Indonesia operation in August 2023	Nil

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		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 its 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 its 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 its Indonesia operation in August 2023	Nil
		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 its Indonesia operation in August 2023	Nil

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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 its Indonesia operation in August 2023	Nil
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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 zero (0) Critical; two (2) Minor nonconformities and three (4) Opportunity For Improvement raised. The Johor Plantations Group Berhad - Pasir Panjang 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 #	2435292-202312-N1	Issued Date	14/12/2023
Due Date	13/01/2024	Closure Date	"Open"
Indicator & Category (Critical / Minor)	1.1.2 (Minor)		
Statement of Nonconformity:	1. Contracts issued to contractors were prepared in English; which is not a language that all contractors are proficient in. 2. Meeting held with stakeholders were not minute and not made accessible to the stakeholders.		
Requirement Reference:	Information is provided in appropriate languages and accessible to relevant stakeholders.		
Objective Evidence:	All Estate: 1. Contracts were all issued in English, which is not an appropriate language for some contractors who are not proficient in the language. Some of the sampled contractors could not understand important contents of the contracts such as clauses related to termination, obligations, safety requirements, etc. The sampled contractors included canteen operator, CPO and an EFB transporter. 2. At Bukit Kelompok Estate, a meeting held with neighbouring smallholders on the subject of road access was not minute and therefore were not accessible to those who attended the said meeting.		
Corrections:	Estate management to Conduct stakeholder meeting to ensure they are understanding on the contract's content.		
Root Cause Analysis:	Estate management is a failure to identify and address the language proficiency of contractors during the contracting process.		
Corrective Actions:	<ul style="list-style-type: none"> - Discussion with Supply chain department on Translate contracts into their narrative languages. - Estate management to yearly conducted stakeholder meeting to explain clauses related to termination, obligations, safety requirements, etc. 		
Assessment Conclusion:	CAP has been accepted. Evidence verification of CAP effectiveness to be conducted during next assessment.		

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Non-conformity			
NCR Ref #	2435292-202312-N2	Issued Date	14/12/2023
Due Date	13/01/2024	Closure Date	"Open"
Indicator & Category (Critical / Minor)	6.7.2 (Minor)		
Statement of Nonconformity:	Emergency procedures in place was insufficiently implemented.		
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:	<p>Bukit Kelompok Estate:</p> <p>During visit to spraying operation in field #P1005, consultation with the spraying operation mandore found that the circle spraying substance used i.e. a mixture chemicals that include G-Met 20% Metsulfuron Methyl Ester. It was stated in its Safety Data Sheet (SDS) under Section 4: First Aid Measures - Eye contact: Immediately flush eyes with plenty of water or eyewash solution. However, the emergency eye wash was not available on-site during the visit.</p> <p>Pasir Logok Estate:</p> <p>During visit to diesel engine house it was found that a field staff was supervising a diesel skid tank refilling activity from a diesel tanker where the location of the skid tank in front of the engine house require the use of personal hearing protection (PHP) as per signages. However, PHP was not worn on-site during the visit.</p>		
Corrections:	Estate management to conduct refresher training to all mandore and Sprayer.		
Root Cause Analysis:	Inadequate awareness program to person in-charge of spraying operation on the field and SDS.		
Corrective Actions:	<ul style="list-style-type: none"> - Field staff inspected the mandore before heading to the field through the checklist - The record will be verified by the manager. - Yearly refresher training will be conducted for all respective mandore and workers. 		
Assessment Conclusion:	CAP has been accepted. Evidence verification of CAP effectiveness to be conducted during next assessment.		

Opportunity for Improvements	
OFI #	Description
OFI 1	2435292-202312-I1 <u>Indicator 3.6.1</u>

	The recommended action from Noise Risk Assessment for remaining noise emitting sources conducted in Tunjuk Laut Estate, Siang Estate, Bukit Kelompok Estate and Pasir Logok Estate could be obtain first as reference of implemented control action while awaiting its complete documented report.
OFI 2	2435292-202312-I2 <u>Indicator 4.1.1</u> Siang Estate & Pasir Logok Estate: Migrant workers who work at the estate are allowed to freely leave the estate on their off-days and/or weekends for recreation or to run their own personal errands. To facilitate this, and to ensure that the workers are not harassed or intimidated by unscrupulous people, the Estate issues each of them with a letter titled "Pelepasan Keluar". This letter can be further improved if the real reason for its issuance is stated clearly.
OFI 3	2435292-202312-I3 <u>Indicator 6.2.4</u> Siang Estate : Housing inspections are carried out on a week basis as required under Section 23 of the Employees Minimum Standards of Housing, Accommodation and Amenities Act 1990 (the Act). Housing inspections are recorded and filed as required under Section 23(3) of the Act. The records can be further improved if they are consistently maintained.
OFI 4	2435292-202312-I4 <u>Indicator 7.8.2</u> Siang Estate : Although visit to the field found no evidence of buffer zone and riparian reserve encroachment/chemical spraying/manuring application, the management could consider further training for knowledge and understanding on the requirement of the BMPs for the management and rehabilitation of riparian reserves (April 2017): 2.1.5 ARTIFICIAL DRAINAGE CHANNELS so it could be enhanced further among the employees.

Positive Findings	
PF #	Description
PF 1	Good positive relationship maintained and highlighted by internal and external stakeholders.
PF 2	Good implementation of best agricultural practices.

3.3.1 Status of Nonconformities Previously Identified and Opportunity for Improvement

Previous Audit Critical (Major) Non-conformity			
NCR Ref #	2286196-202212-M1	Issued Date	08/12/2022
Due Date	07/03/2023	Closure Date	08/02/2023
Indicator & Category (Critical / Minor)	3.6.2 (Critical)		
Statement of Nonconformity:	The effectiveness of the Safety Plans was not monitored adequately.		

Requirement Reference:	The effectiveness of the H&S plan to address health and safety risks to people is monitored.
Objective Evidence:	<p>Siang Estate:</p> <ol style="list-style-type: none"> 1. The Staff and Premix Attendant entered the chemical store without using appropriate PPE such as respirator. This was against the procedures placed in front the stores which require any personals entering the chemical store to wear appropriate PPEs. 2. First Aid Box at the workshop did not have sufficient items such as yellow lotion. The Box also did not have the list of required items. It was verified that the "Campuran Iodin" and "Yellow Lotion" was not equipped in the box as stated in the Panduan Kerja Selamat; Doc Number: Kulim/PKS/OSH-1; Arahan Untuk Mengurus Peti Pertolongan Cemas. 3. The Acetylene Tank used for welding works were not equipped with flashback arrestor. the HIRARC was verified and seen to have not identified the risks and hazards associated to gas leakages while operating oxygen and acetylene tanks. 4. mineral water bottle was stored with hydraulic oil and placed on the tractor without any relabelling. It was not in line with OSH (USECHH) Regulations 2000, Part VI Labelling & Relabelling; 21, (2) When the labels mentioned in sub regulation (1) are removed, defaced, modified or altered while the chemical hazardous to health is being used at the place of work, the employer shall re-label the chemical. 5. During site visit at Siang Estate, Harvesting Gang, Field P06/01, it was found that 2 harvesters was not wearing safety helmet while harvesting the FFB. It was not in line with Prosedur Kerja Selamat (1) Memotong Buah Sawit dated 01/03/2021 Reference No: KULIM/PKS/OSH-1 Section 1.1.4 Peralatan Perlindungan Keselamatan Peribadi(PPE) Topi Keselamatan, Kasut Getah, Sarung Tangan Bersesuaian Dan Cermin Mata Keselamatan. 6. During site visit at Siang Estate, Harvesting Gang, Field P06/01, it was found that Mechanical Buffalo Driver was wearing rubber shoes. It was not in line with Prosedur Kerja Selamat (6) Pemanduan Badang/Mechanical Buffalo (MB) dated 01/03/2021 Reference No: KULIM/PKS/OSH-1 Section 6.1.4 Peralatan Perlindungan Keselamatan Peribadi (PPE) Topi Keselamatan, Kasut Keselamatan, Baju Pantul Cahaya Dan Cermin Mata Keselamatan.
Corrections:	<ol style="list-style-type: none"> 1. Training has been conducted to all personnel on appropriate PPE, Panduan Kerja Selamat (i. Arahan Untuk Mengurus Peti Pertolongan Cemas, ii. Memotong Buah Sawit), risk of identification and Hazard in HIRARC and relabelling under OSH (USECHH) Regulations 2000, Part VI Labelling & Relabelling; 21, (2) When the labels mentioned in sub-regulation (1) on 11.12.2022. 2. Immediate Enforcement at the workplace with regards to compliance with OSH requirements through the checklist by the OSH committee team i.e. First Aid box, Flashback Arrestor at workshop and OSH (USECHH) Regulations 2000, Part VI Labelling & Relabeling; 21, (2) When the labels mentioned in sub regulation (1).
Root Cause Analysis:	<p>Insufficient monitoring of the safety management plan due to estate management:</p> <ol style="list-style-type: none"> 1. Inadequate understanding of PPE use at chemical store 2. EHA was not aware of the required item in First Aid Box 3. Implementation of Flashback Arrestor at the workshop was not monitored effectively

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	<p>4. Lack of understanding of OSH (USECHH) Regulations 2000, Part VI Labelling & Relabelling; 21, (2) When the labels mentioned in sub-regulation (1)</p> <p>5. Inadequate enforcement on harvesters PPE usage by estate management</p>
Corrective Actions:	<p>1. Refresher training will be conducted regularly for all personnel at the respective workplace as per training plan with training evaluation.</p> <p>2. Quarterly monitoring at the workplace (Workplace Inspection) with regard to compliance with OSH requirements by OSH committee and Safety Officer/Assistant Safety Officer.</p>
Assessment Conclusion:	<p>Major NC Close Out</p> <p>1. Refresher training has been conducted: Detail of training as per below:</p> <ul style="list-style-type: none"> • Training on Chemical Handling inclusive of PPE, Handling of chemicals, Ventilator at Store, Issuance of chemical based on SOP, Upkeep of chemical store conducted on 12/12/2022 to Store Keeper. Sighted Training evaluation has been documented. • Training on Safe Tractor Driver (Tractors and Mechanical Buffalo) has been conducted on 13/12/2022 to all drivers. Sighted evidence of Training materials, attendance and photos. Sighted Training evaluation has been documented. • Training at Workshop has been conducted related to PPE, Acetylene and Oxygen Tank dated 15/12/2022. . Sighted evidence of Training materials, attendance and photos. Sighted Training evaluation has been documented. • Training on PPE for harvesting has been conducted on 11/12/2022 to harvesters. Sighted evidence of Training materials, attendance and photos. Sighted Training evaluation has been documented. • First Aid Training has been conducted on 13/12/2022 to all first aiders. Training was given by EHA. Sighted evidence of Training materials, attendance and photos. Sighted Training evaluation has been documented. • Training on USECHH Regulation on Relabelling of chemical containers has been conducted on 23/12/2022. Sighted evidence of Training materials, attendance and photos. Sighted Training evaluation has been documented. <p>2. Quarterly monitoring at the workplace with regard to compliance with OSH requirements by OSH committee and Safety Officer/ Assistant Safety Officer has been conducted. Refer Sample of Workplace Inspection at Workshop for the month of January 2023 for the 1st Quarter. Verified document of workplace inspection for Clinics, First Aid Box, Harvesting Operation and Chemical Store.</p> <p>3. Interview has been conducted to sample workers at Harvesting Operation, Foreman at Workshop, Chemical Store Person In charge, First Aiders and Field Supervisor found they have good understanding on the training given and show good awareness on safety at respective area.</p> <p>4. Site visit at estate (Harvesting Area P10/3, Clinics, Workshop and Chemical Store) found all correction and corrective action has been implemented.</p> <p>Based on the above evidence, the major Non-Conformity is closed effectively on 08/02/2023. Continuous implementation will be further verified in the next assessment.</p>
Effectiveness Closure (for previous audit closed Critical NC):	<p>Annual H&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"> Knowledge and skills needed to do their work safely and avoid creating hazards that could place themselves or others at risk. Awareness and understanding of workplace hazards and how to identify, report, and control them. Specialized training, when their work involves unique hazards. <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"> Internal Audit conducted by the Johor Plantation Berhad office Sustainability Palm Oil Department; Workplace inspection by site OSH Committee; Direct involvement of supervisor and rounds by Asst Manager; Safety occurrence reporting; Health / medical surveillance; Chemical exposure monitoring, and <p>The results of monitoring are discussed at meetings and informed to employees, and where applicable, appropriate corrective actions are taken as per sample verified as following:</p> <p>Siang Estate:</p> <ul style="list-style-type: none"> Hazard Identification, Risk Assessment and Risk Control (HIRARC) Form; Review Date: 22/09/2023 HIRARC date: 23/09/2023 <p>Pasir Panjang POM:</p> <ul style="list-style-type: none"> Hazard Identification, Risk Assessment and Risk Control (HIRARC) Form; Review Date: 22/09/2023 Pasir Panjang POM Chemical Health Risk Assessment Report; Report Ref. # HQ/14/ASS/00/350-2021/099; Assessor: Yew Liang Ming; DOSH Reg. # HQ/14/ASS/00/350; Assessment date: 15/09/2021; Submission date: 29/10/2021 <p>No recurrence of issue, hence Major NC remained closed.</p>
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Previous Audit Minor Non-conformity			
NCR Ref #	2286196-202212-N1	Issued Date	08/12/2022
Due Date	14/12/2023	Closure Date	14/12/2023
Indicator & Category (Critical / Minor)	2.2.2 (Minor)		
Statement of Nonconformity:	The contractor engaged by Siang Estate to provide harvesting services had failed to comply with legal labour requirements related to monthly contributions and deductions under the SOCSO, EPF and EIS Acts. There was also no evidence of legal due diligence carried out by the unit of certification.		

Requirement Reference:	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 (licensed/ accredited) for migrant workers, service providers and labour contractors, is available.
Objective Evidence:	<p>Hoh Builder (M) Sdn Bhd, a company contracted by Siang Estate to provide harvesting services from 01/08/2022 to 31/12/2022, had failed to comply with the requirements under Employment Insurance System Act 2017, Employees Provident Fund Act 1991 and Employees' Social Security Act 1969. The unit of certification also could not demonstrate that legal due diligence was carried out on the said contractors. Workers' payslips showed that:</p> <ol style="list-style-type: none"> 1. Monthly EPF deductions for August and September 2022 (from employee & employer) were not made. 2. Monthly EIS deductions for August, September and October 2022 (from employee & employer) were not made. 3. Monthly SOCSO deductions for August and September 2022 (from employee & employer) were wrongly calculated. <p>The affected workers were as follows:</p> <ol style="list-style-type: none"> 1. Worker IC No: xxxxxx-xx-5249 2. Worker IC No: xxxxxx-xx-5873 3. Worker IC No: xxxxxx-xx-5717 4. Worker IC No: xxxxxx-xx-6885 5. Worker IC No: xxxxxx-xx-5639 6. Worker IC No: xxxxxx-xx-1881 7. Worker IC No: xxxxxx-xx-6853
Corrections:	Estate to collect all related documents to comply with legal and labour requirements related to monthly contributions and deductions under the SOCSO, EPF and EIS Acts from the contractor.
Root Cause Analysis:	Lack of monitoring by estate management on compliance with the requirements under Employment Insurance System Act 2017, Employees Provident Fund Act 1991 Employees' Social Security Act 1969 due to inadequate information. Estate management was not established monthly monitoring for contract workers payslips.
Corrective Actions:	<ol style="list-style-type: none"> 1. Estate management to conduct periodic training or briefing to contractor on the document related to complying with the requirements under Employment Insurance System Act 2017, Employees Provident Fund Act 1991 and Employees Social Security Act 1969. 2. Monthly checking on all contractor's workers documents i.e., payslips should be carried out for monitoring purposes to ensure full compliance by the contractor.
Assessment Conclusion:	<p>It was verified that based on payslips for March, June and Oct 2023 sampled below, the workers were paid according to the prescribed EPF, SOCSO and EIS schedules.</p> <p>Ladang Tunjuk Laut - MZHO Transport: Lorry driver (IC 9602xx-xx-xxxx).</p>

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	<p>- RKP Enterprise: Lorry driver (IC 9602xx-xx-xxxx); harvester (Passport No. EG0083xxx)</p> <p>At Siang Estate</p> <p>- Sg Rezeki Sdn Bhd: Harvesters (Passport No C8178xxx and C0818xxx)</p> <p>At Bukit Kelompok Estate</p> <p>- Perniagaan Sri Mahtai: Harvesters (Passport No. C8188xxx and C9584xxx)</p> <p>It was further verified that training/briefing was given to the contractors at Siang Estate on 18/5/2023 which was attended by estate management, and contractor representatives. The content of the briefing covered topics such as minimum wage, payment for work on rest day & public holidays, payments of EPF, SOCSO and EIS contributions and how the percentage rates are calculated.</p> <p>Therefore, it was verified during the surveillance audit that the Corrective Actions have been consistently implemented.</p> <p>Hence, Minor NC was closed on 14/12/2023.</p>
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Previous Audit Minor Non-conformity			
NCR Ref #	2286196-202212-N2	Issued Date	08/12/2022
Due Date	14/12/2023	Closure Date	14/12/2023
Indicator & Category (Critical / Minor)	7.3.2 (Minor)		
Statement of Nonconformity:	The disposal of waste was not conducted in responsible manner.		
Requirement Reference:	Proper disposal of waste material, according to procedures that are fully understood by workers and managers, is demonstrated.		
Objective Evidence:	Found during linesite inspection at Ladang Pasir Panjang, a car skeletal frame half covered with Mucuna Bracteata sp left abandoned next to House No.LPP 59 for at least the past 7 months.		
Corrections:	<ol style="list-style-type: none"> The owner has arranged scrap iron collector to collect the car's skeletal frame immediately and clean up the area. Estate management will issue reminder letter to respective workers. 		
Root Cause Analysis:	The LPP management team had discussed several times with the owner of the car's skeletal frame to remove it immediately. However, due to financial problems, the car's skeletal frame was left over for almost 2 months in the reported area. Ineffectiveness of communication to the workers due to lack of understanding on proper disposal of waste material, according to procedures.		
Corrective Actions:	<ol style="list-style-type: none"> Estate will thoroughly check from line site inspection and continuously follow up with the owner if this kind of problem occurs in future. 		

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	2. Estate management thoroughly checks and continuously communicates and briefs the workers during stakeholder meeting and training on the proper disposal of waste material, according to procedures.																																																						
Assessment Conclusion:	<p>The line site inspection are made as schedule i.e., weekly by estates MA/HA and fortnightly by the Visiting Medical Officer. During the period of review there was no observation and inspection that highlighted a similar occurrence and issues.</p> <p>Workers are being consistently educated through muster briefing and ad-hoc training sessions. Among others as shown below;</p> <table><tr><td></td><td>Estate - Subject</td><td>T Laut</td><td>Siang</td><td>P Logok</td><td>Bkt Kmpok</td></tr><tr><td>1</td><td>Compound hygiene & disease</td><td>28/08/23</td><td>23/11/23</td><td>08/05/23</td><td>14/09/23</td></tr><tr><td>2</td><td>Company Policies</td><td>10/01/23</td><td>10/05/23</td><td>09/09/23</td><td>11/03/23</td></tr><tr><td>3</td><td>Recycling Environment - Fire</td><td>16/05/23</td><td>08/11/23</td><td>25/07/23</td><td>14/09/23</td></tr><tr><td>4</td><td>RSPO / MSPO awareness</td><td>18/10/23</td><td>15/05/23</td><td>20/09/23</td><td>20/05/23</td></tr><tr><td>5</td><td>Policies - RSPO & MSPO</td><td>30/08/23</td><td>15/05/23</td><td>28/08/23</td><td>20/05/23</td></tr><tr><td>6</td><td>Fire - ERP - Zero Burning</td><td>25/10/23</td><td>02/07/23</td><td>15/11/23</td><td>05/12/23</td></tr><tr><td>7</td><td>Landfill Management / SOP</td><td>16/02/23</td><td>13/02/23</td><td>08/05/23</td><td>18/05/23</td></tr><tr><td>8</td><td>Induction Program</td><td>30/06/23</td><td>06/06/23</td><td>16/05/23</td><td>-</td></tr></table> <p>Hence, Minor NC was closed on 14/12/2023.</p>		Estate - Subject	T Laut	Siang	P Logok	Bkt Kmpok	1	Compound hygiene & disease	28/08/23	23/11/23	08/05/23	14/09/23	2	Company Policies	10/01/23	10/05/23	09/09/23	11/03/23	3	Recycling Environment - Fire	16/05/23	08/11/23	25/07/23	14/09/23	4	RSPO / MSPO awareness	18/10/23	15/05/23	20/09/23	20/05/23	5	Policies - RSPO & MSPO	30/08/23	15/05/23	28/08/23	20/05/23	6	Fire - ERP - Zero Burning	25/10/23	02/07/23	15/11/23	05/12/23	7	Landfill Management / SOP	16/02/23	13/02/23	08/05/23	18/05/23	8	Induction Program	30/06/23	06/06/23	16/05/23	-
	Estate - Subject	T Laut	Siang	P Logok	Bkt Kmpok																																																		
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8	Induction Program	30/06/23	06/06/23	16/05/23	-																																																		

Previous Audit Opportunity for Improvement	
OFI#	Description
OFI 1	<p>OFI Statement:</p> <p><u>Indicator 1.2.1</u></p> <p>All contractors sign agreements with Kulim Plantations Berhad to regulate the business affairs and to make both parties aware of their rights and obligations under the contract. It would enhance the contractors understanding of all terms and conditions in the contract if the documents are prepared in bi-lingual.</p> <p>Verification / Follow-up actions:</p> <p>Renewal contract between Johor Plantations Group Berhad and Semai Setia Transport commenced from 1/6/2023 until 30/6/2024. This renewal contract was prepared in English and not understood by the Vendor, as admitted by the Manager during audit interview. Among others, the Manager did not understand the meaning of the word "Termination", the paragraph on "Safety and Security Regulations" and clause 16.8 on compliance with applicable laws and prohibition of child labour, forced and trafficked labour because the of the English language which he is not conversant in.</p> <p>A Minor Non-Compliance is therefore issued in this surveillance audit under Indicator 1.1.2.</p>
OFI 2	<p>OFI Statement:</p> <p><u>Indicator 6.5.1</u></p> <p>Briefings to workers were given during daily morning musters. The effectiveness of the muster briefings would be enhanced if all contract workers are also made to attend the daily muster briefings.</p> <p>Verification / Follow-up actions:</p>

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	<p>It was verified during this surveillance audit that contract workers are required to attend morning muster only when there are socialisation of policies, procedures or any awareness briefings. If the muster is just to allocate work for the day (with no socialisation of any policies or procedures, or any awareness briefings), then the attendance of the contract workers is not required because their areas of work have already been pre-determined with their employers.</p> <p>Based on the above, the auditor is satisfied that the practice has been clearly explained by the estate management.</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)
2286196-202212-M1	Critical	3.6.2	08/12/2022	Close out on 08/02/2023
2286196-202212-N1	Minor	2.2.2	08/12/2022	Closed out on
2286196-202212-N1	Minor	7.3.2	08/12/2022	Closed out on
2435292-202312-N1	Minor	1.1.2	14/12/2023	"Open"
2435292-202312-N2	Minor	6.7.2	14/12/2023	"Open"

3.4 Stakeholders and previous land owner / user consultation

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

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

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

Stakeholders contacted		
Type of Stakeholder (e.g. Internal, Union, Contractor, Governmental Department, NGO, External, Communities)	Stakeholder name / organization	Means of communication (e.g. face to face interview, email, phone interview, comment from public notice)
Neighbouring entity	PH Palm Express Sdn Bhd	Face to face
	Kumpulan Melayu Johor Sdn Bhd	
	Aliran Semangat, Ladang Kembang	
	YPJ Sawit Sdn Bhd	
Service provider	JPG Terra Solution Sdn Bhd	Face to face

	Kedai Makan CT Zan	
Contractor	Semai Setia Transport	Face to face By telephone
	Pengangkutan Olimpik Sdn Bhd	
	RKP Enterprise	Face to face
	Jeevandran Enterprise	
	T. Tunjuk Laut Resources	
	Perniagaan Sri Mahtai	
	Chahyono Contractor	
	Q Mercu Teguh	
	Semai Alam Sdn Bhd	
	Tegar Abadi Sdn Bhd	
	Soko SK Enterprise	
	MZHO Transport Sdn Bhd	
Government agency	Faiznur Sham, Labour Office Officer, Johor Baharu	By telephone
School	Sekolah Kebangsaan Tunjuk Laut	Face to face

Stakeholders comment

1	<p>Feedbacks: Neighbouring entities</p> <p>PH Palm Express Sdn Bhd runs an oil palm mill (60 m/t per hour capacity) located next to Siang Estate. The mill purchases only outside crop. Confirmed being invited for stakeholder consultations. The mill shares the same access road, but its transport lorries are being diverted to another route also located on Johor Plantation Berhad's land. No issue with access. Would like to improve existing land application using furrow system in Siang Estate field. No issues with Ladang Siang and relationship is good.</p> <p>Kumpulan Melayu Johor, YPJ Sawit Sdn Bhd and Aliran Semangat (Ladang Kembau) are a neighbouring oil palm estates that shares the same boundaries with Tunjuk Laut Estate and Bukit Kelompok Estate. Both confirmed that the boundary markers are clear (trenches, boundary markers) and there are no cases of over planting of fruit thefts. Relationship is good. YPJ Sawit Sdn Bhd shares information with Bukit Kelompok Estate on elephant sightings and possible encroachments, and collaborate on river deepening to avoid floods. Utilises access road and security services provided by Bukit Kelompok Estate.</p>
	<p>Audit Team verification and response:</p> <p>No further issue.</p>
2	<p>Feedbacks: Contractors and service providers</p> <p>The contractors and service providers confirmed that they have no issues in carrying out their obligations under their respective contracts. They also confirmed that payments received were accurate and made on time. They also confirmed that they understood the anti-bribery and anti-corruption policy. There has never been any offer of bribery. The Company also does due diligence prior to renewal of contract by looking at their performances. The Company's policies and grievance procedures were briefed during stakeholder meetings to which they were invited.</p>

	<p>However, two contractors and one service provider informed that they could not understand the contracts issued because the contracts were issued in English, a language which they are not proficient in. They would prefer a contract prepared in Bahasa Malaysia instead.</p> <p>Audit Team verification and response: Verified that the contracts issued out to the contractors and service providers were in English, and three of them they could not understand simple meaning of words such as "Termination" and other obligations in the contract. This has been led to minor NC against 1.1.2.</p>
3	<p>Feedbacks: JTK - clarified on issue of overtime. The Mill has been granted 117 hours of overtime per month for each worker. The officer clarified that overtime on rest day (which exceeds normal working hours) does not go towards 117 maximum allowable overtime per month.</p> <p>Audit Team verification and response: Noted. No further issues.</p>
4	<p>Feedbacks: School Two teachers from SK Tunjuk Laut informed that pupils in the school are made up mainly of Johor Plantation Berhad's employees' children. The school has been receiving good cooperation and assistance from the estates and this include repairs, grass-cutting, and donations. The Head of PTA is the Manager of Bukit Kelompok Estate. There are no disciplinary issues.</p> <p>Audit Team verification and response: No further issues.</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
This operating unit already 2 cycles of certification					

Previous land owner / user comment	
	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.

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Formal Signing-off of Assessment Conclusion and Recommendation

<p>The audit objectives have been achieved and the certificate scope is appropriate. Based on the results of this audit, it is concluded that Johor Plantations Berhad - Pasir Panjang 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 - Pasir Panjang Palm Oil Mill is certified.</p>	
Report prepared by	Acceptance of Assessment Conclusion
Name: Hafriazhar Mohd. Mokhtar	Name: Wan Adlin Wan Mahmood
Company Name: BSI Services Malaysia Sdn. Bhd.	Company Name: Johor Plantations Group Berhad
Title: Client Manager	Title: General Manager
Signature: 	Signature: <i>(I the undersigned, being the most senior relevant management representative of the operation seeking or holding certification, agree with the contents of this report and accept the liability in execution of the procedure in the report.)</i> 
Date: 09/02/2024	Date: 09/02/2024

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Appendix A: Summary of Findings

Criterion / Indicator		Assessment Findings	Compliance
Principle 1: Behave ethically and transparently			
Criterion 1.1: The unit of certification provides adequate information to relevant stakeholders on environmental, social and legal issues relevant to RSPO Criteria, in appropriate languages and forms to allow for effective participation in decision making.			
1.1.1	(C) Documents that are specified in the RSPO P&C are made available to the public. - Critical (Major) compliance -	The documents available to the public at Pasir Panjang POM and its supply base are: <ul style="list-style-type: none"> • Land titles (Criterion 4.4) • Occupational health and safety plans (Criterion 3.6) • Social and environmental impact reports and action plans (Criterion 3.4) • HCV documentation (Criterion 7.12) • Pollution prevention and reduction plans (Criterion 7.10) • Details of complaints and grievances (Criterion 4.2) • Continuous improvement plans (Criterion 3.2) • RSPO and MSPO certification assessment reports • Human Rights Policy (Criterion 4.1) • Records of contributions to community development (criterion 4.3) In addition, reference can also be made to the following website: https://johorplantations.com/sustainability/ .	Complied
1.1.2	Information is provided in appropriate languages and accessible to relevant stakeholders. - Minor compliance -	The information provided to the stakeholders are in both English and Bahasa Malaysia, both languages are widely used among its stakeholders. Responses given for Indicator 1.1.2 was given in Bahasa Malaysia.	Non-compliance

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		<p>However, the following were found during the surveillance audit:</p> <ol style="list-style-type: none"> 1. Contracts issued to contractors were prepared in English; which is not a language that all contractors are proficient in. Contracts were all issued in English, which is not an appropriate language for some contractors who are not proficient in the language. Some of the sampled contractors could not understand important contents of the contracts such as clauses related to termination, obligations, safety requirements, etc. The sampled contractors included canteen operator, CPO and an EFB transporter. 2. At Bukit Kelompok Estate, a meeting held with neighboring smallholders on the subject of road access was not minute and therefore were not accessible to those who attended the said meeting. <p>Therefore, a Minor Non-Compliance is raised.</p>	
1.1.3	<p>(C) Records of requests for information and responses are maintained.</p> <p>- Critical (Major) compliance -</p>	<p>Sighted during the audit were the following record of requests from the Department of Environment (Pengerang branch) to the Pasir Panjang POM:</p> <ul style="list-style-type: none"> • Dated 21/6/2023 Ref No. JAS.JPG.006-3/1/15(17) which was responded to on 16/7/2023. • Field citation dated 20/7/2023 requesting images of effluent ponds, furrow and nearby stream. The Mill responded on 27/7/2023. 	Complied
1.1.4	<p>(C) Consultation and communication procedures are documented, disclosed, implemented, made available, and explained to all relevant stakeholders by nominated representative.</p> <p>- Critical (Major) compliance -</p>	<p>The documented procedure is in the process of being updated and revised in view of the change of name from Kulim Malaysia Berhad to Johor Plantation Berhad. During this transition period, the procedure used is still 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</p>	Complied

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		consultations between the Company and its internal and external stakeholders.	
1.1.5	There is a current list of contact and details of stakeholders and their nominated representatives. - Minor compliance -	Each unit within Pasir Panjang POM and its supply base has its own current list of contact and details of stakeholders. The lists have been updated as follows: <ul style="list-style-type: none"> - Bukit Kelompok Estate on 5/12/2023, - Pasir Panjang Mill on 1/9/2023 - Siang Estate in 1/11/2023 - Pasir Logok Estate on 1/7/2023 The names, contact persons, and nominated representatives, are available. The stakeholders include local communities, relevant government agencies, NGOs, relevant business operators, embassies, neighboring estates and mills, etc.	Complied
Criterion 1.2: The unit of certification commits to ethical conduct in all business operations and transactions.			
1.2.1	A policy for ethical conduct is in place and implemented in all business operations and transactions, including recruitment and contracts. - Minor compliance -	A Policy for ethical exists under Ethics Policy signed by the Managing Director and updated on 7/12/2021. Implementation of the Policy was verified during interview with workers and contractors, who understood the need to respect fair business conducts, with strictly no forms of corruption, bribery and fraudulent use of funds and resources.	Complied
1.2.2	A system is in place to monitor compliance and the implementation of the policy and overall ethical business practice. - Minor compliance -	A system placed to monitor compliance includes the requirement for employees to sign Borang Aku Janji Integrity Pekerja (Workers' Integrity Undertaking form). Contractors were also required to sign Vendor's Letter of Declaration on Anti-Bribery and Corruption. Sighted during the audit were the undertaking forms signed by the workers at both Pasir Panjang POM and Estates. Also sighted were the forms signed by the following contractors: <ul style="list-style-type: none"> - Semai Setia Transport 	Complied

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		<ul style="list-style-type: none">- Pengangkutan Olimpik Sdn Bhd- MZHO Transport- RKP Enterprise- Sg Rezki Sdn Bhd <p>In addition, internal audits were also conducted to ensure compliance of the operations. The internal audits conducted were as follows:</p> <ul style="list-style-type: none">- Pasir Panjang POM on 25/7/2023- Siang Estate on 16/7/2023- Tunjuk Laut Estate on 29/8/2023- Pasir Logok Estate on 20/7/2023- Bukit Kelompok Estate on 24/8/2023																
Principle 2: Operate legally and respect rights																		
Criterion 2.1: There is compliance with all applicable local, national and ratified international laws and regulations.																		
2.1.1	<p>(C) The Unit of Certification complies with legal requirements</p> <p>- Critical (Major) compliance -</p>	<p>Southern Region CU continued to comply with the legal requirements. Compliance to each applicable law and regulation is monitored by the operating units and Sustainability & Innovation Department personnel. The estates and mill had obtained and renewed license and permits as required by the law. Among others the licenses/permit viewed were;</p> <table><tr><td></td><td>Tunjuk Laut Estate - Permit/license</td><td>Validity</td></tr><tr><td>1</td><td>License Air receiver, JH PMT 44413</td><td>11/01/2025</td></tr><tr><td>2</td><td>MPOB license no 50147710-2000</td><td>30/09/2024</td></tr><tr><td>3</td><td>JTK - Wages deduction - NUPW fees TK/NJ-U21</td><td>Eff 02/02/17</td></tr><tr><td>4</td><td>JTK - Penggajian Pekerja Asing ref AG15/2018</td><td>Eff 01/6/18</td></tr></table>		Tunjuk Laut Estate - Permit/license	Validity	1	License Air receiver, JH PMT 44413	11/01/2025	2	MPOB license no 50147710-2000	30/09/2024	3	JTK - Wages deduction - NUPW fees TK/NJ-U21	Eff 02/02/17	4	JTK - Penggajian Pekerja Asing ref AG15/2018	Eff 01/6/18	Complied
	Tunjuk Laut Estate - Permit/license	Validity																
1	License Air receiver, JH PMT 44413	11/01/2025																
2	MPOB license no 50147710-2000	30/09/2024																
3	JTK - Wages deduction - NUPW fees TK/NJ-U21	Eff 02/02/17																
4	JTK - Penggajian Pekerja Asing ref AG15/2018	Eff 01/6/18																

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	5	JTK - Wages Deduction - Electric ref 11123/30	Eff 01/6/96
	6	KPDNHEP Permit diesel 20000L ref 046PD	04/11/2024
	7	KPDNHEP Permit Petrol 200L ref 0731PD	24/01/2024
	8	Metrology Corporation W/B A ref ATK103453	21/09/2024
	9	SPAN - Ref 800-4/1/4/15 Div 1	02/01/2026
	10	SPAN - Ref 800-4/1/4/15 Div 2	02/01/2026
	11	BAKAJ - Ref 334/430/05/08/07/20	31/12/2023
	12	BAKAJ - Ref 334/430/2/8/1/1	31/12/2023
	13	Lesen Perpasangan Persendirian Gen-set Div 1	07/11/2024
	14	Lesen Perpasangan Persendirian Gen-set Div 2	07/11/2024
		Pasir Logok Estate - Permit/license	Validity
	1	Energy Commission License 2022/02569	28/08/2024
	2	MPOB License 620145002000	31/03/2024
	3	KPDNHEP Diesel Permit - 15000 L ref MSG175-22	25/06/2024
	3	KPDNHEP Petrol Permit - 100L/day J-00411	01/09/2024
	4	BAKAJ Mengabstrak Air Sg 07/A/KT/009	31/12/2023
	5	SPAN EKS/(PT) /800- 4(2)/6/15	12/12/2025
	6	Air Compressor - ref no JH PMT 221969	01/11/2025
	7	Skim Khairat Keluarga PJ RM5/mth & premium paid RM 37.50 mth/worker ref no TK(NJ)U-21	Eff 31/3/19
	8	Pendaftaran Akta Levi 1998 Ref J31-2008-102	Eff 07/08/08

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			Bukit Kelompok Estate - Permit/license	Validity	
		1	Energy Commission 2 Gensets ref 2023/03459/80	22/12/2024	
		2	MPOB License 620166002000	31/03/2024	
		3	Air Compressor JH PMT 22733	11/01/2025	
		4	KPDNHEP Diesel Permit - 20000L ref no J 00321	04/11/2024	
		5	KPDNHEP Petrol Permit - 100L/day ref no J 00486	18/04/2024	
		6	BAKAJ Mengabstrak Air Sg 334/300/05/08/07/19	31/12/2023	
		7	BAKAJ Mengabstrak Air Sg 334/300/05/08/07/18	31/12/2023	
		8	SPAN - /EKS/(PT) LK/3/22/02320	12/12/2025	
		8	SPAN - /EKS/(PT) LK/3/23/01332	02/01/2026	
		9	Skim Khairat Keluarga PJ RM5/mth & premium paid RM 37.50 mth/worker ref no TK(NJ)U-21	Eff 31/3/19	
		10	Pendaftaran Akta Levi 1998 Ref 09/20/01/93	Eff 07/08/08	
		11	JTK - Wages deduction - NUPW fees TK/NJ-U21	Eff 02/05/19	
			Siang Estate - Permit/license	Validity	
		1	Energy Commission Gen-Set ref 2023/01295	26/05/2024	
		2	Energy Commission Gen-Set ref 2023/01294	26/05/2024	
		3	MPOB - License 57578300-2000	31/08/2024	
		4	DOSH Air Compressor JH PMT 22699	11/10/2025	
		5	DOSH Air Compressor JH PMT 22700	11/10/2025	
		6	KPDNHEP Diesel Permit - 10800L ref no J 00063	26/03/2024	
		7	KPDNHEP Petrol Permit - 100L/day ref no J 00464	18/04/2024	

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		8	BAKAJ Mengabstrak Air Sg 334/300/05/08/08/14	31/12/2023
		9	BAKAJ Mengabstrak Air Sg 334/300/05/08/07/17	31/12/2023
		10	JTK - Wages deduction ref TK/NJ/U-21	Eff 09/07/20
		11	SPAN - LK/3/23/01111	03/10/2026
		12	SPAN - LK/3/23/01112	03/10/2026
		13	Metrology Corp. w/bridge 1 ref A 031238	25/7/2024
		14	Metrology Corp. w/bridge 1 ref A 005929	03/12/2024
			Pasir Panjang Palm Oil Mill - Permit/license	Validity
		1	MPOB License no 59230-200-4000	31/12/2023
		2	DOE – Jadual Pematuhan Ref 004649	30/06/2024
		3	LHDN - Tax Registration 9134635802	Eff 12/1/2016
		4	Energy Commission Gen-Set ref 2023/01440	05/07/2024
		5	SPAN LK/3/22/01510	13/07/2025
		6	Lesen Mengabstrak Air Sg 334/300/05/08/08/17	31/12/2023
		7	KPDNHEP - ref J 000406 - 20000L diesel	19/06/2024
		8	Fire Certificate ref JBPM JH/7/610/2023	19/11/2024
		9	Persijilan HALAL JAIJ - ref no 087-11/2022	28/02/2025
		10	Majlis Daerah Kota Tinggi ref LP199-52	31/12/2023
		11	JTK - Wages deduction ref TK/NJ/U-21	Eff 31/3/2019
		12	JTK - O/T working hours	Eff 9/11/2023
		13	Metrology Corp. w/bridge 1 ref B 2151500	Eff 04/8/2023
		14	Metrology Corp. w/bridge 1 ref A 005929	Under repair
		15	Sterilizer no 1 JH PMT 25364	12/11/2024
		16	Sterilizer no 2 JH PMT 25365	12/11/2024
		17	Sterilizer no 3 JH PMT 25366	12/11/2024
		18	Boiler no 1 JH PMD 80248	07/08/2024
		19	Boiler no 1 JH PMD 1712	Maintenance

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20	Back Pressure Receiver JH PMT 83952	12/11/2024
21	Air Receiver Tank JH PMT 80950	07/08/2024
22	Air Receiver Tank JH PMT 80951	07/08/2024
23	Air Receiver Tank JH PMT 25368	12/11/2024
24	Air Receiver Tank JH PMT 24785	12/11/2024
25	Air receiver Tank JH PMT 24786	12/11/2024

All documents were including the DOSH report were sighted and verified. Written notification to DOE for the installation of gen-sets since June 2016 made by all estates accordingly.

Factory and Machinery Act 1967 – The following competency requirements for the MPOM were verified:

	Competency	Ref no	Registration Date
1	Steam Engineer G 2	1 - ref 170/2016	07/11/2016
2	Steam Engineer G 2	1 - ref JS02/294	05/06/2023
3	Engine Driver G1	2 Persons	2013 & 2019
3	Engine Driver G2	3 Persons	2005/2015
4	Chargeman A4	0467-2016	09/08/2016
5	Chargeman AO	0378-2008	25/09/2008
6	AGT	2 Persons	2023
7	AESP	6 Persons	2023
8	BOFA	4 Persons	2022
9	CEPSWAM	2 Persons	2018 & 2019
10	CEPPOME	1 Person 00152	26/03/2020
11	FFB Grabber	2 Persons	2013 & 2017

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		<p>Air Monitoring</p> <p>Dust Particulate – Stack sampling was carried out twice annually. Noted that monitoring was conducted on (at 12.0%) CO₂. The stack sampling was carried out by Mareff Management Sdn Bhd.</p> <table border="1"> <thead> <tr> <th>Boiler ref</th><th>Date</th><th>Dust concentration</th><th>EQA std</th></tr> </thead> <tbody> <tr> <td>JH PMD 80248</td><td>08/06/2023</td><td>75 mg/m³</td><td>150 mg/m³</td></tr> </tbody> </table> <p>The ESP installation already started since June 2023 and planned to be commissioned in Jan 2024.</p> <p>MPOB license approved for 300000 mt of FFB vs 295900.46 mt /year hence verified compliance to the mill license.</p>	Boiler ref	Date	Dust concentration	EQA std	JH PMD 80248	08/06/2023	75 mg/m ³	150 mg/m ³	
Boiler ref	Date	Dust concentration	EQA std								
JH PMD 80248	08/06/2023	75 mg/m ³	150 mg/m ³								
2.1.2	<p>A documented system for ensuring legal compliance is in place. This system has a means to track changes to the laws and regulations.</p> <p>- Minor compliance -</p>	<p>The CU continued to implement and maintain the established documented system for identifying, accessing, tracking and monitoring of compliance with the legal requirements that were applicable to them.</p> <ul style="list-style-type: none"> a) Each estate/mill had its own Legal and Other Requirements Register (LORR) and were being evaluated individually annually for compliance. The legal registers were updated by the person in-charge and approved by the respective managers. b) The SID Department is responsible to track changes and the information was disseminated to all its plantations and Mill department. Among the applicable legal and included in the legal register are <ul style="list-style-type: none"> - Pesticides Act 1974 and Regulations, - Environmental Quality Act 1974 and Regulations, 	Complied								

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		<ul style="list-style-type: none">- Factories and Machinery Act 1967 and Regulations,- Occupational Safety and Health Act 1994,- Employment Act 1955,- Labour Act 1955- Children & Young Person (Employment) Act 2010- Industrial Relations Act 1967,- Children and Young Persons (Employment) Act 1966- MPOB Regulations (Licensing) 2005.- Min retirement age Act 2012- Passport Act 1996- Uniform Building By-Laws 1984 <p>The latest revision on the LORR was made dated 01/09/2023 on the following changes to date for the year.</p> <p>a) 01/01/2023 - Employment Act 2022</p> <p>b) 01/06/2023 - KWSP Amendment of 3rd Schedule Order 2023</p> <p>c) 01/10/2023 - Peraturan Kawalan Penyakit - Perlanjutan Kuat Kuasa 2023</p>													
2.1.3	Legal or authorised boundaries are clearly demarcated and visibly maintained, and there is no planting beyond these legal or authorised boundaries. - Minor compliance -	<p>All the estates have maps showing the locations of boundary stones that have been physically located and marked. Inspection of boundary stones/markers/trenching at the 4 estates, during the field inspection confirmed that they were clearly marked and maintained.</p> <table><tr><td></td><td>Estate</td><td>Field</td><td>Boundary</td><td>Field</td><td>Boundary</td></tr><tr><td>1</td><td>T Laut</td><td>P16A</td><td>Ldg Kelompok Melayu</td><td>P16A</td><td>Reserve Forest</td></tr></table>		Estate	Field	Boundary	Field	Boundary	1	T Laut	P16A	Ldg Kelompok Melayu	P16A	Reserve Forest	Complied
	Estate	Field	Boundary	Field	Boundary										
1	T Laut	P16A	Ldg Kelompok Melayu	P16A	Reserve Forest										

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				2	T Laut	P15B	Ldg Kelapa	P13	YPJ Kambau	
				3	Siang	P10/4	Desaru Farm	P10/6	Bio Desaru	
				4	Siang	P03/2	FELDA Sg Mas	P03A	MADOS Sg Tgh	
				5	B Kmpok	P10/1	Pasir Logok Estate	P03/4	P Panjang	
				6	B Kmpok	P05/1	Pasir Logok Estate	P06/3	F Tenggaraoh	
				7	P Logok	P10/1	Bkt Kelompok Estate	P11/3	Ldg P Kerajaan	
				8	P Logok	P05/1	Bkt Kelompok Estate	P20/3	TBC Tiger Camp	
Criterion 2.2: All contractors providing operational services and supplying labour, and Fresh Fruit Bunch (FFB) suppliers, comply with legal requirements.										
2.2.1	A list of contracted parties is maintained. - Minor compliance -			Pasir Panjang POM and its supply base has its own list of contracted parties. This list is as per each unit's own stakeholder lists. The list is updated accordingly; details of which are contained under Indicator 1.1.5 above.						Complied
2.2.2	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 (licensed/ accredited) for migrant workers, service providers and labour contractors, is available. - Minor compliance -			It was verified during the surveillance audit that all contracts entered into between Johor Plantations Group Berhad with its contractors, transporters, etc contain specific clauses on meeting applicable legal requirements. This is contained under Clause 16.8 of their contracts which states that the Vendor represents and warrants to comply with applicable labour and employment laws and prohibit any form of child labour, forced and trafficked labour. Any eligible young labour will be employed only in accordance with Children and Young Person (Employment) Act 1966. This can be demonstrated by the sampled contractors based on records performance reviews at the end of every contract period, as well as their workers contracts and monthly payslips. Sampled were the following contracts: 1. MZ Ho Enterprise with Johor Plantations Group Berhad Contract No. ROC/LTL 33/2023/02 effective from 1/6/2023						Complied

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		<p>– 30/6/2023. For loading and transporting of EFB from Pasir Panjang POM to Ladang Tunjuk Laut.</p> <ol style="list-style-type: none"> 2. Chan Choo with Johor Plantations Group Berhad contract No. ROC/LTL/2023/02 effective from 1/4/2023 – 30/6/2024 for transporting FFB for Tunjuk Laut from Field P13 & P14 to ramp. 3. Kenny Resources with Johor Plantations Group Berhad Contract No. MPSB/LTL5/179/2020 for harvesting of FFB in Fields P13 (267.17 ha) and P15 (110.43 ha) at Tunjuk Laut Estate. 4. Sg Rezki Sdn Bhd with Johor Plantations Group Berhad for harvesting of FFB at Siang Estate in field P05, P06 & P08. Contract no JPB/SIANG/98/1/2023 (NFH) for 2 years from 1/8/2023 to 31/7/2025. 5. Semai Setia Transport with Johor Plantations Group Berhad contract No. JPB/CTD/73/29/2023/1(NFH) for transportation for crude palm oil from the mill to various refineries. Valid from 1/6/2023 to 30/6/2024 Semai Setia Transport. 6. Pengangkutan Olimpik Sdn Bhd with Johor Plantations Group Berhad contract No. JPB/CTD/73/29/2023/1/(NFH) valid from 1/6/2023 to 30/6/2024 transportation of CPO from Mills to various refineries. <p>Due diligence was done prior to renewal of contract, where details were sought about the contractors such as background, directors, key personnel, machinery vehicles major equipment, certificates, licences, bankers, company turnover, job history, copies of certificates, etc. and the contracts would only be renewed if the Company is satisfied with the contractors performances. This was confirmed by the sampled contractors during audit interviews.</p>	
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2.2.3	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. - Minor compliance -	All sampled contracts contain a clause where the contractors and vendors represent and warrant to comply with applicable labour and employment laws and prohibit any form of child labour, forced and trafficked labour. This is contained clause 16.8 of the contracts sampled. Among the sampled contracts were those detailed out in Indicator 2.2.2 above.	Complied																		
Criterion 2.3: All FFB supplies from outside the unit of certification are from legal sources.																					
2.3.1	(C) For all directly sourced FFB, the mill requires: <ul style="list-style-type: none">Information on geo-location of FFB originsEvidence of the ownership status or the right/claim to the land, or valid use of land by the grower/smallholderOne or more supporting documents for claimsValid MPOB license - Critical (Major) compliance -	<p>Pasir Panjang POM 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>- Geo locations are as following:</p> <table><tr><th>Estate</th><th>Latitude</th><th>Longitude</th></tr><tr><td>Pasir Panjang Estate</td><td>02° 00' 34.76" N</td><td>103° 57' 15.93" E</td></tr><tr><td>Tunjuk Laut Estate</td><td>01° 57' 41.69" N</td><td>103° 59' 09.52" E</td></tr><tr><td>Siang Estate</td><td>01° 39' 10.15" N</td><td>104° 12' 40.23" E</td></tr><tr><td>Bukit Kelompok Estate</td><td>02° 00' 24.31" N</td><td>103° 59' 54.39" E</td></tr><tr><td>Pasir Logok Estate</td><td>02° 01' 53.38" N</td><td>104° 02' 20.35" E</td></tr></table> <p>- All FFB from the supply base estates was supported by the delivery documents and weighbridge tickets.</p> <p>- Valid land title with ownership status (refer indicator 4.4.1)</p> <p>- Valid MPOB licence</p>	Estate	Latitude	Longitude	Pasir Panjang Estate	02° 00' 34.76" N	103° 57' 15.93" E	Tunjuk Laut Estate	01° 57' 41.69" N	103° 59' 09.52" E	Siang Estate	01° 39' 10.15" N	104° 12' 40.23" E	Bukit Kelompok Estate	02° 00' 24.31" N	103° 59' 54.39" E	Pasir Logok Estate	02° 01' 53.38" N	104° 02' 20.35" E	Complied
Estate	Latitude	Longitude																			
Pasir Panjang Estate	02° 00' 34.76" N	103° 57' 15.93" E																			
Tunjuk Laut Estate	01° 57' 41.69" N	103° 59' 09.52" E																			
Siang Estate	01° 39' 10.15" N	104° 12' 40.23" E																			
Bukit Kelompok Estate	02° 00' 24.31" N	103° 59' 54.39" E																			
Pasir Logok Estate	02° 01' 53.38" N	104° 02' 20.35" E																			

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2.3.2	For all indirectly sourced FFB, the unit of certification obtains from the collection centres, agents or other intermediaries, the evidence as listed in Indicator2.3.1. - Minor compliance -	Based on the FFB received records showed there is no indirect sourced FFB in Pasir Panjang Palm Oil Mill. All FFB supplied are from Johor Plantation Berhad own estates only.	Complied																																																
Principle 3: Optimise productivity, efficiency, positive impacts and resilience																																																			
Criterion 3.1: There is an implemented management plan that aims to achieve long-term economic and financial viability.																																																			
3.1.1	(C) A business or management plan (minimum three years) is documented that includes, where applicable, a jointly developed business case for Scheme Smallholders. - Critical (Major) compliance -	Both the Estates and Mill continued to commit to long term economic and financial viability. The annual budgets for 2024 to 2028 were sighted. The budget covers activities for upkeep, cultivation, harvesting & evacuation, welfare, capital expenditure, RSPO compliance etc. The budget also included projections on yield/ha, and total cost of production per m ton, per ha and CAPEX - capital expenditure mainly for buildings, furniture and others asset related expenses. The estates adopted the following format for the annual budget. <table><tr><td>Tunjuk Laut</td><td>2024</td><td>2025</td><td>2026</td><td>2027</td><td>2028</td></tr><tr><td>Mature Ha</td><td>2657.35</td><td>2657.35</td><td>2657.35</td><td>2657.35</td><td>2657.35</td></tr><tr><td>Immature Ha</td><td>0.00</td><td>0.00</td><td>0.00</td><td>0.00</td><td>0.00</td></tr><tr><td>Total Ha</td><td>2657.35</td><td>2657.35</td><td>2657.35</td><td>2657.35</td><td>2657.35</td></tr><tr><td>FFB Tons</td><td>63555</td><td>67066</td><td>67913</td><td>66052</td><td>67591</td></tr><tr><td>Yld/Ha</td><td>23.92</td><td>25.00</td><td>26.00</td><td>25.00</td><td>25.00</td></tr></table> <table><tr><td>Siang Estate</td><td>2024</td><td>2025</td><td>2026</td><td>2027</td><td>2028</td></tr><tr><td>Mature Ha</td><td>3006.11</td><td>3006.11</td><td>3006.11</td><td>3204.69</td><td>3204.69</td></tr></table>	Tunjuk Laut	2024	2025	2026	2027	2028	Mature Ha	2657.35	2657.35	2657.35	2657.35	2657.35	Immature Ha	0.00	0.00	0.00	0.00	0.00	Total Ha	2657.35	2657.35	2657.35	2657.35	2657.35	FFB Tons	63555	67066	67913	66052	67591	Yld/Ha	23.92	25.00	26.00	25.00	25.00	Siang Estate	2024	2025	2026	2027	2028	Mature Ha	3006.11	3006.11	3006.11	3204.69	3204.69	Complied
Tunjuk Laut	2024	2025	2026	2027	2028																																														
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Immature Ha	198.58	198.58	198.58	0.00	0.00
Total Ha	3204.69	3204.69	3204.69	3204.69	3204.69
FFB Tons	75891	78439	77451	77186	73179
Yld/Ha	23.68	26.00	26.00	24.00	23.00

Pasir Logok	2024	2025	2026	2027	2028
Mature Ha	1992.68	1894.22	1894.22	1894.22	1992.68
Immature Ha	0.00	98.46	98.46	98.46	98.46
Total Ha	1992.68	1992.68	1992.68	1992.68	1992.68
FFB Tons	47420	50304	47992	49674	48652
Yld/Ha	23.80	27.00	25.00	25.00	24.00

B Kelompok	2024	2025	2026	2027	2028
Mature Ha	2437.75	2437.75	2437.75	2437.75	2437.75
Immature Ha	0.00	0.00	0.00	0.00	0.00
Total Ha	2437.75	2437.75	2437.75	2437.75	2437.75
FFB Tons	63444	63517	62982	61038.	60220
Yld/Ha	26.00	26.00	26.00	25.00	25.00

RM/mt FFB	x	x	x	x	x
RM/ha	x	x	x	x	x

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		<p>Similarly, the mill has a business plan prepared annually in the form of year budget and the projection for 5 years prepared as guidance for future planning. The business plan among others contains;</p> <p>a) FFB Processing & CPO/CPK production forecast b) Extraction Ratios – OER / KER c) Cost of production - administration / labour overhead - processing cost labour, maintenance, consumables - depreciation and head office charges- - EVIT running accounts - CAPEX - capital expenditure.</p> <table><tr><td>Year</td><td>2024</td><td>2025</td><td>2026</td><td>2027</td><td>2028</td></tr><tr><td>FFB processed</td><td>307997</td><td>257362</td><td>251447</td><td>251265</td><td>247463</td></tr><tr><td>OER</td><td>21.39</td><td>21.36</td><td>21.28</td><td>21.11</td><td>20.96</td></tr><tr><td>KER</td><td>5.47</td><td>5.49</td><td>5.49</td><td>5.48</td><td>5.47</td></tr><tr><td>Administration</td><td>x</td><td>x</td><td>x</td><td>x</td><td>x</td></tr><tr><td>Processing cost</td><td>x</td><td>x</td><td>x</td><td>x</td><td>x</td></tr><tr><td>Depreciation</td><td>x</td><td>x</td><td>x</td><td>x</td><td>x</td></tr><tr><td>H Q charges</td><td>x</td><td>x</td><td>x</td><td>x</td><td>x</td></tr><tr><td>RM/mt FFB</td><td>x</td><td>x</td><td>x</td><td>x</td><td>x</td></tr><tr><td>RM/mt CPO</td><td>x</td><td>x</td><td>x</td><td>x</td><td>x</td></tr></table>	Year	2024	2025	2026	2027	2028	FFB processed	307997	257362	251447	251265	247463	OER	21.39	21.36	21.28	21.11	20.96	KER	5.47	5.49	5.49	5.48	5.47	Administration	x	x	x	x	x	Processing cost	x	x	x	x	x	Depreciation	x	x	x	x	x	H Q charges	x	x	x	x	x	RM/mt FFB	x	x	x	x	x	RM/mt CPO	x	x	x	x	x	
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3.1.2	An annual replanting programme projected for a minimum of five years with yearly review, is available.	The long-range replanting programs (LRRP) until 2028 were sighted on all the Estates. The program is reviewed annually and	Complied																																																												

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	- Minor compliance -	incorporated into their annual financial budget. The program sighted for the next 5 years in hectares was as follows: <table><tr><td>Estate</td><td>2024</td><td>2025</td><td>2026</td><td>2027</td><td>2028</td></tr><tr><td>T Laut</td><td>0.00</td><td>0.00</td><td>0.00</td><td>0.00</td><td>0.00</td></tr><tr><td>Siang</td><td>198.58</td><td>0.00</td><td>0.00</td><td>0.00</td><td>261.77</td></tr><tr><td>B Kelompok</td><td>0.00</td><td>0.00</td><td>0.00</td><td>0.00</td><td>0.00</td></tr><tr><td>Pasir Logok</td><td>0.00</td><td>0.00</td><td>0.00</td><td>0.00</td><td>161.93</td></tr></table>	Estate	2024	2025	2026	2027	2028	T Laut	0.00	0.00	0.00	0.00	0.00	Siang	198.58	0.00	0.00	0.00	261.77	B Kelompok	0.00	0.00	0.00	0.00	0.00	Pasir Logok	0.00	0.00	0.00	0.00	161.93							
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3.1.3	The unit of certification holds management reviews at planned intervals appropriate to the scale and nature of the activities undertake. - Minor compliance -	The management of Johor Plantations Group Berhad has established internal procedure for management review and has been documented in the document number SID/SMS/3.1 dated 01/08/2020 titled "Management Review". The procedure therein among others mentioned that management review is to be held once annually. <table><tr><td></td><td>Estate</td><td>Date</td><td>Attendee</td><td>Date</td><td>Attendee</td></tr><tr><td>1</td><td>Pasir Logok</td><td>24/07/23</td><td>17</td><td>15/08/22</td><td>11</td></tr><tr><td>2</td><td>Siang Estate</td><td>23/07/23</td><td>14</td><td>28/08/22</td><td>17</td></tr><tr><td>3</td><td>Bkt Kelompok</td><td>14/09/23</td><td>14</td><td>30/08/22</td><td>14</td></tr><tr><td>4</td><td>Tunjuk Laut</td><td>11/09/23</td><td>14</td><td>12/08/22</td><td>15</td></tr><tr><td>5</td><td>P Panjang POM</td><td>05/11/23</td><td>15</td><td>14/11/22</td><td>14</td></tr></table> <p>Members discussed issues relating to the RSPO preparation among others;</p> <ul style="list-style-type: none">a) Internal audit findingsb) Process Performancec) Customer Feedbackd) Audits Resultse) Changes That Could Affect Management System		Estate	Date	Attendee	Date	Attendee	1	Pasir Logok	24/07/23	17	15/08/22	11	2	Siang Estate	23/07/23	14	28/08/22	17	3	Bkt Kelompok	14/09/23	14	30/08/22	14	4	Tunjuk Laut	11/09/23	14	12/08/22	15	5	P Panjang POM	05/11/23	15	14/11/22	14	Complied
	Estate	Date	Attendee	Date	Attendee																																		
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		<div>f) Complaints and grievance g) Continual Improvement Plan</div> <div>The meeting made a conclusive statement on the suitability, effectiveness of the RSPO implementation and present management system.</div>																								
Criterion 3.2: The unit of Certification regularly monitors and reviews their economic, social and environmental performance and develops and implements action plans that allow demonstrable Continuous improvement in key operations.																										
3.2.1	<div>(C) The action plan for continuous improvement is implemented, based on consideration of the main social and environmental impacts and opportunities of the unit of certification. - Critical (Major) compliance -</div>	<div>All the 4 estates have established continual improvement plan revised dated 30/04/2022 upon consideration of the social, operations and environmental impacts. Among other efforts are;</div> <table><tr><td></td><td>Program</td><td>Action /Initiatives</td></tr><tr><td rowspan="5">1</td><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">2</td><td rowspan="2">Waste reduction</td><td>Awareness among employees</td></tr><tr><td>Enhancement of waste segregation.</td></tr><tr><td rowspan="4">3</td><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>4</td><td>Labour ratio</td><td>Expansion of in-field FFB collection- grabber</td></tr></table>		Program	Action /Initiatives	1	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.	2	Waste reduction	Awareness among employees	Enhancement of waste segregation.	3	Employment condition	Enhancement of workers quarters	Schedule repair and painting	Conducive environment	Housing roofing / ceiling upgrading	4	Labour ratio	Expansion of in-field FFB collection- grabber	Complied
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			Expand mechanization in manuring	
	5	Environmental	Desilting field drain for maintenance	
	<p>Details of expenditure are provided in respective estates under both CAPEX/OPEX. Inclusive are projects for improvement as described below among others;</p>			
		Sections	Description - Pasir Logok Estate	
	1	Facilities	Refurbishment of workers Qrts 34 units - RM1.1M	
	2	Facilities	Probase road extension 3km - RM378K	
	3	Facilities	Solar Street Lights RM10K	
	4	Facilities	TNB supply installation - RM1.4M	
	5	Facilities	SAJ water supply Installation - RM1M	
	6	Operation	Fertilizer spreader 1unit RM26K	
		Sections	Description - Tunjuk Laut Estate	
	1	Facilities	Refurbishment of workers quarters RM628K	
	2	Operation	Installation of new Barn Owl Boxes 48K	
	3	Operation	New Tractor MB RM73K	
	4	Operation	15 units fire extinguishers RM2250	
		Sections	Description - Bkt Kelompok Estate	
	1	Facilities	Refurbishment workers quarters - RM563K	
	2	Facilities	SAJ - Installation Water Supply RM300K	

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		3	Operation	IPM - New Barn Owl Boxes RM9.8K	
		4	Operation	3 units Palm Raker April 2023 - RM2.3K	
		5	Operation	1unit Mid Mounted Grader - Jan 23 RM200K	
		6	Facilities	6 units Solar streetlights RM4.8K	
			Sections	Description - Siang Estate	
		1	Facilities	Refurbishment workers quarters - Mac 24 - RM700K	
		2	Operation	New Barn Owl Boxes - RM8.8K	
		3	Operation	3 units Palm Raker April 2023 - RM2.3K	
		4	Operation	1unit Mid Mounted Grader - Jan 23 RM200K	
		5	Facilities	TNB Installation Estate Complex - Dec 23 RM1.4M	
		6	Facilities	SAJ Water Supply Installation - Dec 23 RM562K	
			Sections	Description - Pasir Panjang Palm Oil Mill	
		1	Facilities	Asbestos ceiling Change 4 workers qrts units RM86K	
		2	Operation	Roofing at EFB storage RM430K	
		3	Facilities	ATM Machine/Building - RM50K	
		4	Operation	New Pollution Control Device - RM40K	
		5	Operation	CPO washing system RM1.5M	
		6	Operation	Replace Air Pollution Control System RM3.5M	
		7	Operation	Resurfacing FFB loading ramp area RM80K	

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		Reviewed and verified during the surveillance audit were the continuous improvement action plan. Sampled were the following: Tunjuk Laut Estate: the clean-up of Sg Temubor Kiri & Sg Gemerih, and areas near Field P13 & P16B, near YPJ Ladang Kambau & Ladang Integrasi Bukit Gemerih. Pasir Logok Estate: replacement of monsoon drain, ongoing refurbishment of workers' housing, and painting of open hall.	
3.2.2	<p>As part of the monitoring and continuous improvement process, annual reports are submitted to the RSPO Secretariat using the [RSPO metrics template].</p> <p>PROCEDURAL NOTE: The RSPO metrics template is awaiting decision/agreement by RSPO and the issue is still being discussed. Until such metrics is agreed and developed, companies will carry on with existing reporting e.g. PalmGHG, Annual Communication of Progress (ACOP) reporting, and information provided to Certification Body and feedback via RSPO Secretariat is required.</p> <p>- Minor Compliance -</p>	<p>Pasir Panjang 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"> - SAP accounting system - Land titles - Complaints & grievance records - Dept. of Safety & Health's JKPP8 form 	Complied
Criterion 3.3: Operating procedures are Appropriately documented, consistently implemented and monitored.			
3.3.1	<p>(C) Standard Operating Procedures (SOPs) for the unit of certification are in place.</p> <p>- Critical (Major) compliance -</p>	<p>Both the Estates and the mill in the CU continued to use the documents established by Johor Plantations Group Berhad among others as follows;</p> <ul style="list-style-type: none"> a) Kulim Agricultural Manual 2011 revised in schedule. b) Plantations / Mill Quality Management System (PQMS / MQMS) Manual c) PQMS/MQMS Standard Operating Manual & Procedures (SOP) d) Palm Oil Mill Lab Process Control Procedure / Oil Mill Lab operations & Test Method Guidelines 	Complied

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		<ul style="list-style-type: none"> e) Sustainable Plantation Management System (SPMS) Manual f) RSPO Supply Chain Manual g) ESH Management System Manual - 01/7/2012 h) Pictorial Safety Standards dated 17/3/2008 i) Security Guidelines <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 from;</p> <ul style="list-style-type: none"> a) seedlings in nursery to planting of young palms. b) plantation upkeep to mill FFB receipt, grading, processing. c) quality analysis and dispatch of CPO & PK. d) security in the SOU. <p>Contents of the Manual were disseminated to the workers through;</p> <ul style="list-style-type: none"> a) morning muster b) mill weekly briefings c) training as ad hoc and programmed basis. <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</p>	
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		and interview with workers confirmed that the SOP had been implemented and they understood the requirements of the SOP.	
3.3.2	A mechanism to check consistent implementation of procedures is in place. - Minor Compliance -	<p>Both estates and the mill had an established mechanism to perform checking to ensure consistent implementation of procedures:</p> <p>Estates Operations</p> <p>The monitoring of the SOP implementation is made by all levels of the supervisory personnel with records maintained and checked. Among others the records maintained are;</p> <ul style="list-style-type: none"> a) Daily production/work records for the core activities at the estates b) field cost book / chemical consumption record c) mature/immature field work program <ul style="list-style-type: none"> - fertilizer application, - herbicide spraying, / rat baiting, - Harvesting and collection of FFB - Water management action plan in relation to bund management / tide gate management / desilting program <p>All the above records were kept for a minimum period of 12 months. In addition, the management adopted the following check and balances through visit of the following dept /superiors</p> <ul style="list-style-type: none"> a) Agronomic advisory report and fertilizer recommendation minimum 2x/year to monitor matters relating to; <ul style="list-style-type: none"> - nutrient deficiency, fertilizer program - pest & disease ganoderma infection, rat and RB attack - EFB mulching program for the year etc b) Plantation Inspectorate visit producing "Estate Visit Report" at frequency of 2x/year performing assessment relating to; <ul style="list-style-type: none"> - land use, capital expenditure, general charges 	Complied

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- oil palm (mature & immature area) field condition
- crop performance and cost
- vehicles & equipment, amenities
- labour and security etc
- Replanting activities at PR22/23
- Replanting activities by Contractors are monitored to ensure compliance against the JPB and industry standards

Visits by Agronomist and Plantation Inspectorate to the estates in the Region as recorded below;

	Estate	Agronomy Visit	PI Visit
1	Siang Estate	08/09/2023	21-22/08/2023
2	Tunjuk Laut Estate	19/10/2023	29-30/10/2023
3	Pasir Logok Estate	09/04/2023	16/10/2023
4	Bkt Kelompok	05/09/2023	16/11/2023

Internal audit by the Sustainability Unit) scheduled 2x/year for each unit. The exercise is to inspect and monitor compliance on ISCC/MSPO/RSPO standard requirement. Results from assessment of which are tabled and discussed during the Management Review.

The mechanisms as established have been implemented. This is verified via the records maintained in all units daily, monthly and annually. Estates are monitored to ensure compliance against the SOP standard and factors relating to ESH.

	Estates	
	Areas	Action/Activities
1	Daily	Supervision by field staff/Assist/Manager
		Report of daily activities/costings/variation
		WA group - digital supervision

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		<table><tr><td rowspan="7">2</td><td rowspan="7">Schedule</td><td>Quarterly ESH meeting</td></tr><tr><td>Head Plantations visits on estates operation</td></tr><tr><td>Internal audits by GCAD/SID</td></tr><tr><td>Annual EPMC</td></tr><tr><td>External audit RSPO /MSPO</td></tr><tr><td>HQ visits / Agronomist visits</td></tr><tr><td>Region Head / Regional Controller visits</td></tr><tr><td rowspan="2">3</td><td rowspan="2">Medical /health</td><td>Visits by KKM</td></tr><tr><td>Annual medical surveillance</td></tr></table> <table><tr><td></td><td colspan="2">Pasir Panjang Palm Oil Mill</td></tr><tr><td></td><td>Areas</td><td>Action/Activities</td></tr><tr><td rowspan="2">1</td><td rowspan="2">Daily</td><td>Supervision by staff/Assist/Manager</td></tr><tr><td>Report of daily activities/costings/variation</td></tr><tr><td rowspan="5">2</td><td rowspan="5">Schedule</td><td>Quarterly ESH meeting</td></tr><tr><td>Internal audits by GCAD / SHO</td></tr><tr><td>Region SHO 2x/year visits</td></tr><tr><td>External audit RSPO /MSPO</td></tr><tr><td>Region Head / Regional Controller visit</td></tr><tr><td rowspan="2">3</td><td rowspan="2">Annual</td><td>Annual EPMC</td></tr><tr><td>Medical surveillance</td></tr></table>	2	Schedule	Quarterly ESH meeting	Head Plantations visits on estates operation	Internal audits by GCAD/SID	Annual EPMC	External audit RSPO /MSPO	HQ visits / Agronomist visits	Region Head / Regional Controller visits	3	Medical /health	Visits by KKM	Annual medical surveillance		Pasir Panjang Palm Oil Mill			Areas	Action/Activities	1	Daily	Supervision by staff/Assist/Manager	Report of daily activities/costings/variation	2	Schedule	Quarterly ESH meeting	Internal audits by GCAD / SHO	Region SHO 2x/year visits	External audit RSPO /MSPO	Region Head / Regional Controller visit	3	Annual	Annual EPMC	Medical surveillance	
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3	Annual	Annual EPMC																																			
		Medical surveillance																																			
3.3.3	Records of monitoring and any actions taken are maintained and available. - Minor Compliance -	The implementation of SOP is monitored on a daily basis by the field staffs and assistant managers with overall overview by the managers. The monitoring is made via supervision and records	Complied																																		

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		<p>maintenance. The estates among others maintained the following records.</p> <ul style="list-style-type: none"> a) Work program / Field cost books b) Bin cards, Harvesting Intervals c) Monthly Estate Report and Account d) Monthly Operations, monthly rainfall e) Pest and diseases monthly return f) Agrochemical monthly consumption g) Harvesting details i.e., daily inspection report - yield improvement program h) Summary of machinery running hours i) Harvesting records detailing the number of bunches harvested j) Quantity of loose fruit collected by each harvesters. k) Monthly FFB production, etc <p>Similarly for the mill, the monitoring records maintained among others were related to;</p> <ul style="list-style-type: none"> a) Monitoring of effluent / black smoke b) Processing & produce parameters c) Dispatches / scheduled wastes etc d) Monitoring consistent implementation of procedures through internal audit e) Daily shift report for the process performance f) There was a flow chart showing method for monitoring compliance of requirements including legal requirements g) Internal audits are performed once a year minimum <p>Activities carried out by contractors are being monitored via the following among others;</p>	
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		<ul style="list-style-type: none"> a) To obtain work permit for confined spaces or work at height in the mill b) Evidence of competency for specialized work/job c) The mill supervisors and engineers will be onsite to monitor the work d) The estates monitor to ensure that no contractors bring along their family members to work in the field e) The estates ensure that the contractors are providing PPE, suitable working equipment and machinery 	
Records of follow up action, if any, are retained where necessary.			
Criterion 3.4: A comprehensive Social and Environmental Impact Assessment (SEIA) is undertaken prior to new plantings or operations, and a social and environmental management and monitoring plan is implemented and regularly updated in ongoing operations.			
3.4.1	<p>(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.</p> <p>- Critical (Major) compliance -</p>	<p>The mill had established Environmental Impact Assessment (EIA) procedure and has been documented as per Pasir Panjang POM Environmental Aspect and Impact Identification PPPOM - EIA rev. 01/08/2023 All significant impacts have been determined and mitigation plan was developed thereafter as per document PPPOM Environmental Improvement Plan/Pollution Prevention Plan reviewed annually. The EIA was reviewed on 01/08/2023 with no major changes recorded in the operations /activities. The EIA covers the following operations/activities among others;</p> <ul style="list-style-type: none"> a) Reception / Sterilisation /Clarification b) Nut/Kernel / CPO Product Storage /Despatch c) Raw & Treated Effluent d) Boiler House / Powerhouse e) Raw Water Treatment Plant f) Laboratory System / Store System / Cafeteria g) Bio Compost Plant / Workshop h) Construction Site 	Complied

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		<p>Similarly for the estates the EAI and EIE was available for each activity reviewed dated reviewed in 01/08/2023. This aspect and impact include activities among others</p> <ul style="list-style-type: none"> a) Construction / building maintenance b) power station / workshop activity c) Harvesting / spraying d) Fertilizer / Compost application e) Replanting <p>The Estates have established Environmental Management Plan 2023 with identification to the mitigation plan for negative impacts, time plan and the PIC stated therein. All sites and the reports were visited and sighted respectively by the auditors in presence of the Sustainability & Innovation Department, estates and mill personnel. There are no new plantings or operations within Southern Zone estates. However, there were plans and impact assessments relating to</p> <ul style="list-style-type: none"> a) Environmental impacts based on Environmental Aspect Identification Evaluation Procedure, Register File no KMB/5.2.EAI b) Environmental Impact Evaluation Procedure, Register File no EAI/203/1-04 <p>There is no change of current practices required to mitigate negative effects based on identified impacts for both the mill and estates. However, the mill and estates have conducted periodical review on the aspects and impacts identified and evaluated as registered.</p> <p>The mill and estates have continuously implemented its annual programs that were established as part of its individual Pollution</p>	
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		<p>Prevention Plan. Managers and Assistant Managers of mill and estates were identified as the PIC. The programs relating to operations, environmental and social enhancement were planned by the management as summarized 3.2.1 above.</p> <p>There are no new plantings or new operations within Pasir Panjang 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.</p>	
3.4.2	<p>For the unit of certification, a SEIA is available and social and environmental management and monitoring plans have been developed with participation of affected stakeholders.</p> <p>- Minor Compliance -</p>	<p>The development of both Social and Environmental Management Plan 2023 activities involved discussion with the following parties among others;</p> <ul style="list-style-type: none"> a) JCC Meeting held respectively b) Workers and staff as the internal stakeholders c) WOW (Women Onward) Meeting dated 22/04/2023 d) External stakeholders' consultation meeting dated 20/09/2023 e) Management meetings identifying issues in relation to social and environmental f) Observation on sites and surrounding g) The assessment in aspect of boundary control, water resources (if any), protection of river (if any), soil erosion and sedimentation of silt, planning of replanting program, protection of sensitive area, waste (oil, toxic soil and biomass) and air quality control. <p>Social Impact Assessment (SIA) as well as the Social Management and Monitoring Plans for Pasir Panjang POM and its supply base were documented and available.</p>	Complied

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		<p>Evidence was also available that these Plans were developed with participation of affected stakeholders via stakeholder meetings, interviews and feedback. As seen from records of meetings, among the stakeholders who participated were external stakeholders, workers (harvesters, mandores, sprayers) WOW members (gender committee), NUPW, canteen and grocery store operators. During the discussions positive and negative impacts were identified and how the negative ones were to be addressed.</p> <p>Based on these discussions and consultations, the social management and monitoring plans were developed. These were updated on 11/11/2023 and duly verified.</p>	
3.4.3	<p>(C) 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 and Environmental Management Plan 2023 available for each unit were available having information i.e. issues, management plan, PIC and time frame. The input is gathered from the meeting minutes similar to the session as described in 3.4.2 above.</p> <p>The activities involved discussion with the estate management, sighting the documentation, observation on sites and surrounding, and interview with stakeholders adjacent to the conversion areas.</p> <p>The assessment covered the aspect of boundary control, water resources (if any), protection of river (if any), soil erosion and sedimentation of silt, planning of replanting program, protection of sensitive area, waste (oil, toxic soil and biomass) and air quality control. Feedback was obtained through questionnaire with stakeholders.</p> <p>Pasir Panjang POM and its supply base were able to demonstrate that the monitoring and action plans were reviewed on an annual basis. The previous reviews were held in November and December</p>	Complied

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		2022, and in during this surveillance audit, the reviews were completed on 11/11/2023.	
Criterion 3.5: A system for managing human resources is in place.			
3.5.1	Employment procedures for recruitment, selection, hiring, promotion, retirement and termination are documented and made available to the workers and their representatives where applicable. - Minor Compliance -	<p>Documentation of employment procedures used by Johor Plantations Group Berhad were available under the following SOPs:</p> <ul style="list-style-type: none"> Recruitment of New Foreign Workers Rev. No. 1 Issue No. 1 dated 1 Jan 2019; and 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. <p>These SOPs are documented and kept at the office premises and available to all workers and their representatives, where applicable.</p>	Complied
3.5.2	Employment procedures are implemented, and records are maintained. - Minor Compliance -	<p>Pasir Panjang Mill and its supply base were able to demonstrate the implementation of its own employment procedures, including recruitment. Records were also maintained showing the implementation of the recruitment employment procedures. Sighted during the audit were the following recruitment records comprising job applications, records of interviews, medical examination, and letters of offer issued:</p> <ul style="list-style-type: none"> A. Tunjuk Laut Estate: Worker IC No xxxx-xx-6773 B. Siang Estate: Workers No. E910000010 & E910001622 C. Pasir Panjang POM Workers No. 440000024 & E44000026 D. Bukit Kelompok Estate: Workers No. E770011741 & E770000819 	Complied
Criterion 3.6: An occupational health and safety (H&S) plan is documented, effectively communicated and implemented.			

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3.6.1	<p>(C) All operations are risk assessed to identify H&S issues. Mitigation plans and procedures are documented and implemented.</p> <p>- Critical (Major) compliance -</p>	<p>HIRARC was 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.</p> <p>Tunjuk Laut Estate:</p> <ul style="list-style-type: none"> - Baseline Noise Risk Assessment Report; Tunjuk Laut Estate: JH/06/04/2048; Noise Risk Assessor: Mr. Lee Kean Heng of JPG Terra Solution; JKKP Registration # HQ/18/PEB/00/00014; Date of Assessment: 14/12/2021; Report # HQ/18/PEB/00/00014-2021/010 - Audiometric Report for Audiometric Screening at Tunjuk Laut; 09/01/2022 - Audiometric Report for Audiometric Screening at Tunjuk Laut; 05/01/2023 - Review Noise Risk Assessment Report; Tunjuk Laut Estate: JH/06/04/2048; Noise Risk Assessor: Mr. Lee Kean Heng of JPG Terra Solution; JKKP Registration # HQ/18/PEB/00/00014; Date of Assessment: 23/11/2022; Report # HQ/18/PEB/00/00014-2022/064 - Training report: Occupational Safety & Health on exposure of noise from machinery and equipment used in estate; training date: 19/11/2023 <p>Siang Estate:</p> <ul style="list-style-type: none"> - Chemical Health Risk Assessment was conducted to assess the use of hazardous chemicals in the estate. The CHRA 	OFI
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		<p>Assessment was conducted on 27/02/2018 – 13/08/2018 by QMSPro Sdn. Bhd. The CHRA Report (JKKP HQ/03/ASS/00/154-2018/031) was available for verification.</p> <ul style="list-style-type: none"> - Noise Risk Assessment was conducted in compliance with Occupational Safety and Health (Noise Exposure) Regulations 2019. The assessment was conducted by Mr. Lee Kean Heng (JKKP Registration Number: HQ/18/PEB/00/00014) on 01/12/2021. The NRA Report (Report Number: HQ/18/PEB/00/00014 – 2021/032) was available for verification. - Audiometric Screening was conducted for selected Siang Estate workers in compliance with the recommendations in the NRA <p>Pasir Panjang POM:</p> <ul style="list-style-type: none"> - Pasir Panjang POM; DOSH Reg. # JHK 5772; Noise Risk Assessment Report; Assessor: Dr. Syed Abdul Hamid Bin Syed Hassan; DOSH Reg. # JKKP HIE 127/5/3-1 (# 169); Assessment date: 04/02/2020; Report # JKKP HIE 127/5/3-1 (# 169) – 2020/002 by Kulim Safety Training and Services Sdn. Bhd. - Audiometric Testing Report; Workplace: Pasir Panjang POM; Test Date: 13/07/2023; Report ref. # PAC/AMT/230707; By: JPG Terrasolutions Sdn. Bhd. in collaboration with PAC Testing & Consulting Sdn. Bhd.; Reviewed by: Dr. Mohd. Rizal Bin Abd Azis; OSH Reg. # HQ/15/DOC00/395; Total tested: 34; Temporary STS: 6 (Required to be retest within 3 months); NIHL: 12; Hearing Impairment: 7 (NIHL & HI-Required to undergo a medical examination by OHD within 30 days) - Pasir Panjang POM Medical Surveillance 2023; By: Dr. Rosman Surie; OHD Reg. # HQ/15/DOC/00/437; Date: 14/08/2023 	
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		Notwithstanding, the recommended action from Noise Risk Assessment for remaining noise emitting sources conducted in Tunjuk Laut Estate, Siang Estate, Bukit Kelompok Estate and Pasir Logok Estate could be obtain first as reference of implemented control action while awaiting its complete documented report. Hence, an OFI has been raised on the matter.	
3.6.2	<p>(C) The effectiveness of the H&S plan to address health and safety risks to people is monitored.</p> <p>- Critical (Major) compliance -</p>	<p>Annual H&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"> ▪ Knowledge and skills needed to do their work safely and avoid creating hazards that could place themselves or others at risk. ▪ Awareness and understanding of workplace hazards and how to identify, report, and control them. ▪ Specialized training, when their work involves unique hazards. <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"> • Internal Audit conducted by the Johor Plantation Berhad office Sustainability Palm Oil Department; • Workplace inspection by site OSH Committee; • Direct involvement of supervisor and rounds by Asst Manager; • Safety occurrence reporting; • Health / medical surveillance; • Chemical exposure monitoring, and 	Complied

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		<p>The results of monitoring are discussed at meetings and informed to employees, and where applicable, appropriate corrective actions are taken as per sample verified as following:</p> <p>Siang Estate:</p> <ul style="list-style-type: none">- Hazard Identification, Risk Assessment and Risk Control (HIRARC) Form; Review Date: 22/09/2023- HIRARC date: 23/09/2023 <p>Pasir Panjang POM:</p> <ul style="list-style-type: none">- Hazard Identification, Risk Assessment and Risk Control (HIRARC) Form; Review Date: 22/09/2023- Pasir Panjang POM Chemical Health Risk Assessment Report; Report Ref. # HQ/14/ASS/00/350-2021/099; Assessor: Yew Liang Ming; DOSH Reg. # HQ/14/ASS/00/350; Assessment date: 15/09/2021; Submission date: 29/10/2021																															
Criterion 3.7: All staff, workers, Scheme Smallholders, out-growers, and contract workers are appropriately trained.																																	
3.7.1	<p>(C) A documented programme that provides training is in place, which is accessible to all staff, workers, Scheme Smallholders and out-growers, taking into account gender-specific needs, and which covers applicable aspects of the RSPOP&C, in a form they understand, and which includes assessments of training.</p> <p>- Critical (Major) compliance -</p>	<p>Formal training programs for 2023 that covered aspects of the RSPO with regular assessments of training needs were available for all the audited sites. Training Plan was for each operating unit were established. A training need identification matrix has been established with target dates for the training identified. The training program among others includes the following subjects:</p> <table><tr><th></th><th>Subjects</th><th colspan="3">Month</th></tr><tr><th></th><th></th><th>1-4</th><th>5-8</th><th>9-12</th></tr><tr><td>1</td><td>ESH Legal & Other requirements</td><td>/</td><td></td><td></td></tr><tr><td>2</td><td>Use & Standard Exposure of Chemical Hazardous to Health (USECHH) 2000</td><td>/</td><td></td><td></td></tr><tr><td>3</td><td>Accident Investigation Techniques</td><td>/</td><td></td><td></td></tr><tr><td>4</td><td>ER Plan (Chemical spill/flood /poisoning/Fire)</td><td>/</td><td></td><td>/</td></tr></table>		Subjects	Month					1-4	5-8	9-12	1	ESH Legal & Other requirements	/			2	Use & Standard Exposure of Chemical Hazardous to Health (USECHH) 2000	/			3	Accident Investigation Techniques	/			4	ER Plan (Chemical spill/flood /poisoning/Fire)	/		/	Complied
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		<table><tr><td>5</td><td>First Aid Training</td><td>/</td><td></td><td>/</td></tr><tr><td>6</td><td>Scheduled waste management</td><td>/</td><td>/</td><td></td></tr><tr><td>7</td><td>Safe Work Procedure for All Stations</td><td>/</td><td></td><td>/</td></tr><tr><td>8</td><td>Confined Space Training</td><td></td><td>/</td><td></td></tr><tr><td>9</td><td>Policy Training</td><td>/</td><td></td><td>/</td></tr><tr><td>10</td><td>Effective workplace inspection</td><td></td><td>/</td><td>/</td></tr><tr><td>11</td><td>GAP training / SW</td><td>/</td><td>/</td><td>/</td></tr><tr><td>12</td><td>RSPO & Management Training</td><td>/</td><td></td><td>/</td></tr><tr><td>13</td><td>RSPO Human Right Training</td><td>/</td><td></td><td>/</td></tr><tr><td>14</td><td>Briefing on Johor Plantations Group Berhad Policies</td><td>/</td><td></td><td>/</td></tr><tr><td>15</td><td>Maintenance of spraying equipment</td><td>/</td><td>/</td><td>/</td></tr><tr><td>16</td><td>HCV Training for Region</td><td></td><td>/</td><td>/</td></tr><tr><td>17</td><td>Safe handling of Electrical Equipment</td><td>/</td><td></td><td>/</td></tr><tr><td>18</td><td>MSDS/CSDS</td><td>/</td><td></td><td>/</td></tr><tr><td>19</td><td>5 S Housekeeping</td><td>/</td><td>/</td><td></td></tr><tr><td>20</td><td>PPE adherence</td><td>/</td><td>/</td><td></td></tr><tr><td>21</td><td>Estate Activities / Mill Work stations</td><td>/</td><td>/</td><td>/</td></tr><tr><td>22</td><td>Triple rinsing</td><td>/</td><td>/</td><td></td></tr><tr><td>23</td><td>Effective work place inspection</td><td></td><td>/</td><td>/</td></tr><tr><td>24</td><td>HIRARC</td><td>/</td><td></td><td>/</td></tr><tr><td>25</td><td>Safe driving techniques</td><td>/</td><td></td><td>/</td></tr></table>	5	First Aid Training	/		/	6	Scheduled waste management	/	/		7	Safe Work Procedure for All Stations	/		/	8	Confined Space Training		/		9	Policy Training	/		/	10	Effective workplace inspection		/	/	11	GAP training / SW	/	/	/	12	RSPO & Management Training	/		/	13	RSPO Human Right Training	/		/	14	Briefing on Johor Plantations Group Berhad Policies	/		/	15	Maintenance of spraying equipment	/	/	/	16	HCV Training for Region		/	/	17	Safe handling of Electrical Equipment	/		/	18	MSDS/CSDS	/		/	19	5 S Housekeeping	/	/		20	PPE adherence	/	/		21	Estate Activities / Mill Work stations	/	/	/	22	Triple rinsing	/	/		23	Effective work place inspection		/	/	24	HIRARC	/		/	25	Safe driving techniques	/		/	
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3.7.2	Records of training are maintained. - Minor Compliance -	<p>Training was provided during musters and also in session held in the estate community hall. The following training made for the employees were recorded as follows. Subjects extracted were mainly related to ESH, SOP, and pesticide handling etc.</p> <table><tr><td></td><td>Estate - Subject</td><td>T Laut</td><td>Siang</td><td>P Logok</td></tr><tr><td>1</td><td>CPR/ERP procedure</td><td>04/12/23</td><td>16/04/23</td><td>12/01/23</td></tr><tr><td>2</td><td>Compound hygiene & disease</td><td>28/08/23</td><td>23/11/23</td><td>08/05/23</td></tr><tr><td>3</td><td>Company Policies</td><td>10/01/23</td><td>10/05/23</td><td>09/09/23</td></tr></table>		Estate - Subject	T Laut	Siang	P Logok	1	CPR/ERP procedure	04/12/23	16/04/23	12/01/23	2	Compound hygiene & disease	28/08/23	23/11/23	08/05/23	3	Company Policies	10/01/23	10/05/23	09/09/23	Complied																																																																																					
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		4	FFB Grading Guidelines	30/03/23	06/02/23	03/04/23	
		5	Recycling Environment - Fire	16/05/23	08/11/23	25/07/23	
		6	RSPO / MSPO awareness	18/10/23	15/05/23	20/09/23	
		7	Fertilizer - calibration	17/03/23	06/04/23	08/03/23	
		8	Buffer Region maintenance	08/02/23	03/01/23	15/07/23	
		9	Oil trap- maintenance	23/02/23	11/01/23	08/05/23	
		10	Sch Waste inventory /disposal	11/07/23	13/04/23	11/09/23	
		11	Triple rinsing – guidelines	20/01/23	24/05/23	12/01/23	
		12	Pay Slip Employment Contract	02/01/23	24/11/23	01/01/23	
		13	Fertilizer application - Riparian	10/01/23	02/05/23	08/03/23	
		14	Rat baiting - SOP	12/02/23	23/02/23	09/07/23	
		15	Harvesting FFB - Contract	21/01/23	20/06/23	03/04/23	
		16	Harvesting FFB - Checkroll	10/02/23	06/02/23	21/02/23	
		17	Fogging Operations	-	02/05/23	07/09/23	
		18	PPE adherence	20/01/23	05/04/23	14/08/23	
		19	Pesticide's handling - SOP	08/02/23	03/01/23	11/01/23	
		20	Harvesting SOP - MB	10/11/23	22/02/23	03/04/23	
		21	Noise Risk/Workshop Activities	19/04/23	12/01/23	15/03/23	
		22	Tractor / Vehicles safe driving	02/11/23	05/07/23	04/11/23	
		23	Lorry drivers safe driving	02/11/23	08/05/23	22/06/23	
		24	Spraying guidelines	08/02/23	30/05/23	25/07/23	
		25	Policies - RSPO & MSPO	30/08/23	15/05/23	28/08/23	
		26	Fire - ERP - Zero Burning	25/10/23	02/07/23	15/11/23	
		27	IPM management	25/08/23	12/01/23	27/02/23	
		28	RTE /HCV /Buffer Region	25/01/23	21/03/23	10/08/23	
		29	Work ethics & conduct/Gender	09/02/23	17/08/23	26/06/23	
		30	Basic Life Support/First Aid	11/03/23	06/02/23	29/05/23	
		31	First Aid Management - PPE	18/04/23	30/05/23	29/05/23	
		32	W/bridge Operations - Gen Set	20/02/23	11/01/23	18/04/23	
		33	Complaint Procedure	05/04/23	09/03/23	03/02/23	
		34	Sexual Harassment / Channel	15/02/23	20/03/23	21/02/23	
		35	Landfill Management / SOP	16/02/23	13/02/23	08/05/23	
		36	WTP / Chemical Management	07/04/23	03/04/23	10/10/23	

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		37	Working at height SOP	-	11/07/23	02/06/23
		38	Induction Program	30/06/23	06/06/23	16/05/23
			Estate /Mill - Subject	B Kmpok	PPPOM	-
		1	CPR/ERP procedure	04/12/23	01/10/23	
		2	Compound hygiene & disease	14/09/23	26/11/23	
		3	Company Policies	11/3/23	06/08/23	
		4	FFB Grading Guidelines	13/06/23	31/01/23	
		5	Recycling Environment - Fire	14/09/23	07/05/23	
		6	RSPO / MSPO awareness	20/05/23	06/08/23	
		7	Fertilizer - calibration	20/02/23	-	
		8	Buffer Region maintenance	10/05/23	02/04/23	
		9	Oil trap- maintenance	11/07/23	19/02/23	
		10	Sch Waste inventory /disposal	11/05/23	19/02/23	
		11	Triple rinsing – guidelines	04/04/23	07/05/23	
		12	Pay Slip Employment Contract	15/07/23	07/06/23	
		13	Fertilizer application - Riparian	06/05/23	-	
		14	Rat baiting - SOP	15/01/23	-	
		15	Harvesting FFB - Contract	13/06/23	-	
		16	Harvesting FFB - Checkroll	15/01/23	-	
		17	Fogging Operations	15/11/23	-	
		18	PPE adherence	10/09/23	19/02/23	
		19	Pesticide's handling - SOP	18/07/23	07/05/23	
		20	Harvesting SOP - MB	15/06/23	-	
		21	Noise Risk/Workshop Activities	16/06/23	29/10/23	
		22	Tractor / Vehicles safe driving	04/11/23	15/03/23	
		23	Lorry drivers safe driving	10/10/23		
		24	Spraying/Chemical guidelines	18/07/23	07/05/23	
		25	Fire - ERP - Zero Burning	05/12/23	01/10/23	
		26	IPM management	03/08/23	-	
		27	RTE /HCV /Buffer Region	10/05/23	02/04/23	
		28	Work ethics & conduct/Gender	07/01/23	20/06/23	
		29	Basic Life Support/First Aid	04/11/23	29/10/23	

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		<table> <tr><td>30</td><td>First Aid Management - PPE</td><td>10/09/23</td><td>01/10/23</td></tr> <tr><td>31</td><td>W/bridge Operations - Gen Set</td><td>10/02/23</td><td>06/06/23</td></tr> <tr><td>32</td><td>Complaint Procedure</td><td>11/08/23</td><td>20/06/23</td></tr> <tr><td>33</td><td>Sexual Harassment / Channel</td><td>20/06/23</td><td>20/06/23</td></tr> <tr><td>34</td><td>Landfill Management / SOP</td><td>18/05/23</td><td>05/11/23</td></tr> <tr><td>35</td><td>WTP / Chemical Management</td><td>09/02/23</td><td>14/05/23</td></tr> <tr><td>36</td><td>Working at height SOP</td><td>18/08/23</td><td>31/01/23</td></tr> <tr><td>37</td><td>Effluent Treatment Plant</td><td>-</td><td>14/05/23</td></tr> </table>	30	First Aid Management - PPE	10/09/23	01/10/23	31	W/bridge Operations - Gen Set	10/02/23	06/06/23	32	Complaint Procedure	11/08/23	20/06/23	33	Sexual Harassment / Channel	20/06/23	20/06/23	34	Landfill Management / SOP	18/05/23	05/11/23	35	WTP / Chemical Management	09/02/23	14/05/23	36	Working at height SOP	18/08/23	31/01/23	37	Effluent Treatment Plant	-	14/05/23	
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3.7.3	<p>Appropriate training is provided for personnel carrying out the tasks critical to the effective implementation of the Supply Chain Certification Standard (SCCS). Training is specific and relevant to the task(s) performed.</p> <p>- Minor Compliance -</p>	<p>Supply chain training carried out for personnel carrying out the tasks critical to the effective implementation of the Supply Chain Certification Standard (SCCS).</p> <p>Latest training was conducted on 04/04/2023 for all SCCS personnel in Pasir Panjang POM. SCCS training also given to relevant estate personnel as per sample conducted on 20/07/2023 in Bukit Kelompok Estate.</p>	Complied																																
<p>Criterion 3.8: Supply chain requirement for mills</p> <p>(note: All supply chain requirements are considered as Critical (C). However, it will not contribute to suspension if there is more than 5 non-compliance within a principle)</p>																																			
3.8.1	<p>Identity Preserved Module</p> <p>A mill is deemed to be Identity Preserved (IP) if the FFB processed by the mill are sourced from plantations/estates that are certified against the RSPO Principles and Criteria (RSPO P&C), or against the Group Certification scheme.</p> <p>Certification for CPO mills is necessary to verify the volumes and sources of certified FFB entering the mill, the implementation of any processing controls (for example, if physical separation is used), and volume sales of RSPO certified products. If a mill process certified and uncertified FFB without physically separating them, then only Mass Balance Module is applicable.</p>	<p>Pasir Panjang Palm Oil Mill only receives certified FFB from its own certified supply base and certified supply base of sister mill. Therefore, Pasir Panjang 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.</p>	Complied																																

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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>	<p>Pasir Panjang 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.</p>	Not Applicable										
3.8.3	<p>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.</p>	<p>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.</p>	Complied										
3.8.4	<p>The mill shall also meet all registration and reporting requirements for the appropriate supply chain through the RSPO IT platform.</p>	<p>The 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 following:</p> <table><tr><td>License ID</td><td>CB144711 (Active)</td></tr><tr><td>Member name</td><td>Johor Plantations Group Berhad - Pasir Panjang Palm Oil Mill</td></tr><tr><td>Member ID</td><td>RSPO_PO1000005256</td></tr><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></table>	License ID	CB144711 (Active)	Member name	Johor Plantations Group Berhad - Pasir Panjang Palm Oil Mill	Member ID	RSPO_PO1000005256	RSPO Membership No	1-0080-09-000-00 (Johor Corporation)	Issued by	BSI Services Malaysia Sdn Bhd.	Complied
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		Start date	18-03-2023	
		End date	08-05-2024	
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> <p>a) Complete and up to date procedures covering the implementation of all the elements of the supply chain model requirements.</p> <p>b) Complete and up to date records and reports that demonstrate compliance with the supply chain model requirements (including training records).</p> <p>c) Identification of the role of the person having overall responsibility for and authority over the implementation of these requirements and compliance with all applicable requirements. This person shall be able to demonstrate awareness of the mill’s procedures for the implementation of this standard.</p> <p>d) The mill shall have documented procedures for receiving and processing certified and non-certified FFBs including ensuring no contamination in the IP mill.</p>	<p>a) The mill has a complete and up to date procedures covering the implementation of all the elements of the supply chain model requirements documented procedures for SCCS Operations as following:</p> <ul style="list-style-type: none">o Mahamurni Plantations Sdn Bhd; Procedure Title: CSPO & CSPK Supply Chain; Procedure No: MKTG 04; Document Date: January 2021; Revision; 02.o Sustainable Management system – Traceability; Document Number: SQD/SMS/2.1; Document Date: 17/02/2022; Issue No: 01; Rev Number; 06. <p>b) Complete and up to date records and reports that demonstrate compliance with the supply chain model requirements were seen including Weighbridge tickets, Training records, Internal audit report, Invoice and contracts, Delivery and storage records and Daily Production Report. Training records for RSPO Supply Chain & Stamping was sighted where the training was conducted on 04/04/2023 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.</p> <p>c) Identified person implementing SCCS consist of Head of each operating unit whom were 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.</p>	Complied	

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		d) Based on the Sustainable Management System Procedure Title: Traceability; Doc. # SQD/SMS/2.1; Rev. # 06; Date: 17/02/2022, Pasir Panjang POM described the process of incoming of FFB and ensuring no contamination in the IP mill.	
3.8.6	<p>Internal Audit</p> <p>i) The mill shall have a written procedure to conduct annual internal audit to determine whether the mill:</p> <p>a. Conforms to the requirements in the RSPO Supply Chain Certification Standard and the RSPO Market Communications and Claims Documents.</p> <p>b. Effectively implements and maintains the standard requirements within its organisation.</p> <p>ii) Any non-conformities found as part of the internal audit shall be issued corrective action. The outcomes of the internal audits and all actions taken to correct non-conformities shall be subject to management review at least annually. The mill shall maintain the internal audit records and reports.</p>	<p>i) The SCCS Internal Audit Based was conducted based on the developed Internal Audit Procedure, Doc. # SQD/SMS/3.2; Issue # 1; Rev. # 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>ii) The latest internal audit was conducted on 25/07/2023 by HQ Sustainability Team. Based on the Internal Audit Report, no non-conformance related to SCCS was raised by the internal auditor. All the clauses in RSPO SCCS and RSPO Market Communications and Claims were covered in the internal audit. Outcome of the audit were discussed in the Pasir Panjang POM Management review meeting dated on 05/11/2023.</p>	Complied
3.8.7	<p>Purchasing and Goods In</p> <p>i) The mill shall verify and document the tonnage and sources of certified and the tonnage of non-certified FFBs received.</p> <p>ii) The mill shall inform the CB immediately if there is a projected overproduction of certified tonnage.</p> <p>iii) The mill shall have a mechanism in place for handling non-conforming FFB and/or documents.</p>	<p>i) Although no non-certified FFB purchase made, Pasir Panjang POM still verified all certified FFB purchased tickets as per sample as following:</p> <p>a. FFB supplier: Bukit Kelompok Estate; Field # 4; Ticket # 157424; Date: 30/11/2023; DO # 58026; Net weight: 20,050 kg; RSPO Cert. # RSPO 657192</p> <p>b. FFB supplier: Pasir Logok Estate; Field # P04, P08, P10, P11; Ticket # 157425; Date: 30/11/2023; DO # 38856; Net weight: 26,290 kg; RSPO Cert. # RSPO 657192</p>	Complied

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		<p>ii) No projected overproduction of certified tonnage by Pasir Panjang POM</p> <p>iii) Pasir Panjang have mechanism for handling of non-conforming FFB and/or documents as described in the Sustainable Management System Procedure Title: Traceability; Doc. # SQD/SMS/2.1; Rev. # 06; Date: 17/02/2022.</p>	
3.8.8	<p>Sales and Goods Out</p> <p>The supplying mill shall ensure that the following minimum information for RSPO certified products is made available in document form. The information shall be complete and can be presented either on a single document or across a range of documents issued for RSPO certified oil palm products (for example, delivery notes, shipping documents and specification documentation):</p> <ol style="list-style-type: none"> The name and address of the buyer; The name and address of the seller; The loading or shipment / delivery date; The date on which the documents were issued; RSPO certificate number; A description of the product, including the applicable supply chain model (Identity Preserved or Mass Balance or the approved abbreviations); The quantity of the products delivered; Any related transport documentation; A unique identification number. 	<p>Pasir Panjang POM ensured that the minimum information for RSPO certified products is made available in document form in the delivery documents as per sample despatch tickets as following:</p> <ul style="list-style-type: none"> - CSPO: Buyer: Palmaju Edible Oil Sdn. Bhd.; Address: PLO 223, Jalan Tembaga 4, Pasir Gudang, 81700, Johor; Seller: Pasir Panjang Oil Palm; Address: KB 537, 81909 Kota Tinggi, Johor; Ticket # C12208; Date: 29/11/2023; Contract # CPOIP-M22077; Net weight: 42,590 kg; RSPO Cert. # RSPO 657192; Product: CSPO (IP) - CSPO: Buyer: PGEO Edible Oils Sdn. Bhd.; Address: Lorong Pukal Dua, Kawasan Lembaga Pelabuhan Johor, Pasir Gudang, 81700, Johor; Seller: Pasir Panjang Oil Palm; Address: KB 537, 81909 Kota Tinggi, Johor; Ticket # C12207; Date: 29/11/2023; Contract # CPOIP-23028; Net weight: 40,620 kg; RSPO Cert. # RSPO 657192; Product: CSPO (IP) - CSPK: Buyer: Palmaju Edible Oil Sdn. Bhd.; Delivery Address: Jin Lee (Oil Mills) Sdn. Bhd., PLO 239, Jalan Timah Dia Kawasan Perindustrian Pasir Gudang, 81700, Johor; Seller: Pasir Panjang Oil Palm; Address: KB 537, 81909 Kota Tinggi, Johor; Ticket # K02903; Date: 23/11/2023; Contract # MPOK-22601P; Net weight: 42,170 kg; RSPO Cert. # RSPO 657192; Product: CSPK (IP) - CSPK: Buyer: Palmaju Edible Oil Sdn. Bhd.; Delivery Address: Jin Lee (Oil Mills) Sdn. Bhd., PLO 239, Jalan Timah Dia Kawasan 	Complied

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		Perindustrian Pasir Gudang, 81700, Johor; Seller: Pasir Panjang Oil Palm; Address: KB 537, 81909 Kota Tinggi, Johor; Ticket # K02902; Date: 22/11/2023; Contract # MPOK-22601P; Net weight: 40,080 kg; RSPO Cert. # RSPO 657192; Product: CSPK (IP)	
3.8.9	<p>Outsourcing Activities</p> <p>i) The mill shall not outsource its milling activities. In cases where he mill outsources activities to independent third parties (e.g. subcontractors for storage, transport or other outsourced activities), the mill holding the certificate shall ensure that the independent third party complies with relevant requirements of this RSPO Supply Chain Certification</p> <p>ii) The mill shall ensure the following:</p> <p>a) The mill has legal ownership of all input material to be included in outsourced processes</p> <p>b) The mill has an agreement or contract covering the outsourced process with each contractor through a signed and enforceable agreement with the contractor. The onus is on the mill to ensure that certification body (CB) has access to the outsourcing contractor or operation if an audit is deemed necessary.</p> <p>c) The mill has a documented control system with explicit procedures for the outsourced process which is communicated to the relevant contractor.</p> <p>d) The mill shall furthermore ensure (e.g. through contractual arrangements) that independent third parties engaged provide relevant access for duly accredited CBs to their respective operations, systems, and all information, when this is announced in advance.</p>	<p>i) No outsourcing in mill processing and CSPO/CSPK product storage/bulking facilities by Pasir Panjang POM. Outsourcing only involved CSPO delivery since CSPK collected by buyer.</p> <p>ii) Pasir Panjang ensured all CSPO transporters complied with RSPO SCCS requirements via written agreements as per sample as following:</p> <ul style="list-style-type: none"> o Semai Setia Transport with Johor Plantations Group Berhad contract No. JPB/CTD/73/29/2023/1(NFH) for transportation for crude palm oil from the mill to various refineries. Valid from 1/6/2023 to 30/6/2024 Semai Setia Transport. o Pengangkutan Olimpik Sdn Bhd with Johor Plantations Group Berhad contract No. JPB/CTD/73/29/2023/1/(NFH) valid from 1/6/2023 to 30/6/2024 transportation of CPO from Mills to various refineries. <p>The agreement included with addendum with a statement regarding the "Contractor shall comply with all Kulim's relevant business policies and all certification program standard requirement related to the execution of this contract." These include that certification body (CB) has access to the outsourcing contractor or operation if an audit is deemed necessary and the transporters provide relevant access for duly accredited CBs to their respective operations, systems, and all information, when this is announced in advance.</p>	Complied

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3.8.10	The mill shall record the names and contact details of all contractors used for the physical handling of RSPO certified oil palm products.	Names and contact details of all contractors used for the physical handling of CSPO listed under stakeholders' registers 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 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>iii) For Identity Preserved Module, the mill shall record and balance all receipts of RSPO certified FFB and deliveries of RSPO certified CPO and PK on a real-time basis.</p> <p>iv) For Mass Balance Module, the mill:</p> <p>a) Shall record and balance all receipts of RSPO certified FFB and deliveries of RSPO certified CPO and PK on a real-time basis and / or three-monthly basis.</p> <p>b) All volumes of certified CPO and PK that are delivered are deducted from the material accounting system according to conversion ratios stated by RSPO.</p> <p>c) The mill can only deliver Mass Balance sales from a positive stock. Positive stock can include product ordered for delivery within three</p>	<p>i) Pasir Panjang POM maintained 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"> - Dispatch of CPO/PK delivery order - Daily Production Report - FFB Dispatch Report from supplying estate - Training records - FFB Transaction records <p>ii) Based on the Traceability Procedure; Doc. # SQD/SMS/1.2; Issue # 1; Rev. # 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>iii) 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 as per sample records of Daily CPO & Kernel Production, Despatches and Stocks for the month of December 2023; To-date: 11/12/2023; To-date FFB processed: 8,797.69 mt; To-date OER: 21.01%; To-date KER: 5.38%</p>	Complied

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	(3) months. However, a mill is allowed to sell short (i.e. product can be sold before it is in stock.						
3.8.13	Extraction Rate 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.	Conversion factor of CPO and PK production is depending on the actual OER and KER. Based on latest monthly production report, for December to-date FFB processed: 8,797.69 mt; To-date OER: 21.01%; To-date KER: 5.38%.	Complied				
3.8.14	Extraction rates shall be updated periodically to ensure accuracy against actual performance or industry average if appropriate.	The mill is using the actual extraction rate and therefore updating of rates is not necessary.	Complied				
3.8.15	Processing 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.	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				
3.8.16	Registration of Transactions i) Shipping Announcement in the RSPO IT platform shall be carried out by the mills when RSPO certified products are sold as certified to refineries, crushers, and traders not more than three months after dispatch with the dispatch date being the Bill of Lading or the dispatch documentation date. ii) Remove: RSPO certified volumes sold under different scheme or as conventional, or in case of underproduction, loss or damage shall be removed in the RSPO IT platform.	<div>i) Shipping announcement in the RSPO IT platform carried out by the mills when RSPO certified products are sold as certified to refineries. Details of transaction summarized under table 10A. Total of registered transaction from December 2022 to November 2023:<table><tr><td>CPO</td><td>PK</td></tr><tr><td>51,197.01</td><td>13,069.37</td></tr></table></div> <div>ii) No removal required since announced volume within certified limit.</div>	CPO	PK	51,197.01	13,069.37	Complied
CPO	PK						
51,197.01	13,069.37						
3.8.17	Claims	No claim made by Pasir Panjang POM. Notwithstanding, the parent company Johor Corporation hold RSPO Trademark License # 1-	Complied				

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	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.	0080-09-100-01 as listed via RSPO website https://rspo.org/as-an-organisation/our-trademark/trademark-licenses/ .	
General corporate communications			
4.1	A corporate communication is one made by any RSPO member that highlights its RSPO membership and/or its commitment to the objectives and principles of RSPO. Corporate communication is a "non-product related" claim.	<p>The parent company Johor Plantation Berhad website link: https://johorplantations.com/sustainability/) specified under title Certification and Conservation of the following:</p> <ul style="list-style-type: none"> - 100% of own plantations area is RSPO-certified, an assurance that we comply with sustainability requirements of the RSPO standards - 75.22% CSPO sold as RSPO certified (CSPO) - 61.23% CSPK sold as RSPO certified (CSPK) - 1,311.10 ha HCV area - 276.25 ha Conservation areas <p>As part of the highlight of its RSPO membership and commitments.</p>	Complied
4.2	<p>In corporate communications, a member is allowed to:</p> <ul style="list-style-type: none"> A. display its RSPO membership status B. display the RSPO web address (www.rspo.org) C. state that the member supports the work of RSPO D. state the member's history with regard to RSPO E. use the RSPO Trademark (as shown below) with a valid trademark licence number to promote its RSPO membership 	Based on review of the same website link, the parent company Johor Plantation Berhad has use the RSPO Trademark with a valid trademark licence number 1-0080-09-000-00 (Johor Corporation) to promote its RSPO membership. The membership status and supports displayed via statements as per indicator 4.1 above.	Complied
4.3	Members are not allowed to use the RSPO corporate logo as shown below. This is for the sole use of the RSPO Secretariat.	Based on review of the same website link, the parent company Johor Plantation Berhad has not use the RSPO corporate logo.	Complied
4.4	In corporate communications, RSPO members must not make any statement that may lead consumers to believe that RSPO membership by itself implies the selling of RSPO certified palm oil products.	Based on review of the same website link, the parent company Johor Plantation Berhad has not mislead consumers on their selling of RSPO certified palm oil products.	Complied

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4.5	<p>Additionally, RSPO certified members are allowed to make statements that highlight their RSPO certification status and product-related claims in their corporate communication tools. Some permitted examples include:</p> <ul style="list-style-type: none"> • “We have been sourcing RSPO certified palm oil since (YEAR).” • “We have used (X) tonnes of RSPO certified palm oil for our products manufactured in the last year.” • “We have been RSPO certified since (YEAR).” • “We have (X NUMBER OF PRODUCTS) produced using RSPO certified MB/SG palm oil.” • “In (YEAR), our company sourced (X%) of palm oil derivative volumes that was used across our products manufactured as MB certified.” • “Our company covered (X%) of palm oil derivative volumes used across all our products manufactured in (YEAR) with smallholder credits.” • “We are RSPO certified. Ask us for our RSPO certified products.” 	<p>Based on review of the same website link, the parent company Johor Plantation Berhad has highlight its membership status and supports displayed via statements as per indicator 4.1 above.</p>	Complied
4.6	<p>RSPO non-certified members are allowed to make product-related claims in their corporate communication tools by doing the following:</p> <p>A. Use the RSPO Trademark with a valid trademark licence number to promote its membership of RSPO. It is sufficient for non-certified members to indicate this only once in their communication.</p> <p>B. Claim statements are limited to the following examples:</p> <ol style="list-style-type: none"> i. “The rate of RSPO-certified palm oil procurement was (X%). We aim to achieve (X%) sustainable procurement by fiscal year (YEAR).” ii. X% of palm oil sourced by our organisation are certified through the Roundtable on Sustainable Palm Oil (RSPO) supply chains as (a) Identity Preserved, (b) Segregated, (c) Mass Balance, or (d) Book and Claim. <p>C. In cases wherein an organisation/member would like to indicate their commitment to sourcing RSPO certified volumes, the statement shall be accompanied with a disclaimer: “This reported figure is not audited through RSPO Certification”.</p>	<p>Based on review of the same website link, the parent company Johor Plantation Berhad has highlight its membership status and supports displayed via statements as per indicator 4.1 above.</p>	Complied

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Product-specific communications			
5.1 General			
5.1.1	Product-specific communications refer to any public statement about an individual product that contains RSPO certified sustainable palm oil. These product-specific communications can be made on pack and/or off pack such as shipping documents, advertisements, flyers, brochures, posters, displays, newsletters, websites, emails, letters, offerings, invoices, (annual) reports, or media interviews.	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. No labelling and/or packings of products use since both CSPO and CSPK delivered in bulk to buyers.	Complied
5.1.2	Product-specific communications are voluntary.	No labelling and/or packings of products use since both CSPO and CSPK delivered in bulk to buyers.	Complied
5.1.3	Wherever the RSPO Label is displayed for product-specific communications, the applicable trademark licence number must be shown immediately under or next to the RSPO Label or the statement itself.	No labelling and/or packings of products use since both CSPO and CSPK delivered in bulk to buyers.	Complied
5.1.4	Use of any other trademark or label to highlight the presence of RSPO certified sustainable palm oil products is an unauthorised product-specific communication.	No labelling and/or packings of products use since both CSPO and CSPK delivered in bulk to buyers.	Complied
5.1.5	If any organisation, which does not further modify end products or does not need to undergo Supply Chain Certification such as retailers, traders or distributors, enters into any agreement whereby the RSPO certified supplier labels products with the retailers/traders/distributors RSPO Trademark licence number, the following conditions shall be met as shown below	No labelling and/or packings of products use since both CSPO and CSPK delivered in bulk to buyers.	Complied

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	<ul style="list-style-type: none"> • RSPO members should be registered on the RSPO IT Platform and complete the information under 'description of products' field. • Both parties shall inform their certification body in writing about the agreement. • The RSPO certified supplier is responsible for ensuring that the buyer's RSPO Trademark licence number is used only on products that are supplied to that buyer. 		
5.1.6	Organisations that do not further modify end products or that do not need to undergo Supply Chain Certification such as retailers, traders, or distributors who intend to use the RSPO Label with their own RSPO Trademark licence number in any of their product-specific communications, can do so by undergoing a remote audit. A remote audit shall be conducted by an RSPO-accredited certification body (CB) prior to the use of the RSPO Label whereby the organisation will need to demonstrate that the use is in compliance with the rules contained within this document and that the claim itself can be supported through a certified supply chain	No labelling and/or packings of products use since both CSPO and CSPK delivered in bulk to buyers.	Complied
5.2 Off pack claims			
5.2.1	Off pack claims are product-specific communications regarding the certified sustainable palm oil contained within the product(s) made on any communication materials such as shipping documents, advertisements, flyers, brochures, posters, displays, newsletters, websites, emails, letters, offerings, invoices, (annual) reports, or media interviews. The RSPO Label should be used together with the valid trademark licence number wherever an off pack claim is made.	Off-pack claims on specified in business-to-business communication within the supply chain via the exchange of information 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. No labelling and/or packings of products use since both CSPO and CSPK delivered in bulk to buyers.	Complied

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5.2.2	When confirming the sale of certified palm oil products, members must adhere to the requirements of the RSPO SCCS. This includes stating the supply chain model and certificate number under which the claim is being made.	Confirming of sales made by buyers upon announcement made from Pasir Panjang POM deliveries.	Complied
5.2.3	<p>Where a distributor or wholesaler takes title to products containing certified sustainable palm oil products, the requirements of the RSPO SCCS can follow either one of these two options:</p> <ul style="list-style-type: none"> • If the distributor or wholesaler holds only a distributor licence, it may only communicate RSPO certified palm oil products by linking the product to the manufacturer using the manufacturer's SCCS certificate number. This covers both brand and own brand products. However, in the case of own brand products, it is essential that customers are aware that the products have been made on behalf of the distributor or wholesaler, with specific evidence either through on pack claims or documentation. • If the distributor or wholesaler is supply chain certified, they should follow the requirements outlined in section 5.2.2. 	Pasir Panjang POM is neither distributor nor wholesaler. Hence, this is not applicable.	Not Applicable
5.3 On pack claims			
5.3.1	Only RSPO members who have supply chain certification and members who have undergone remote audit as per 5.1.6 are allowed to make on pack claims about the certified sustainable palm oil contained within the product(s) as per Module A, B, C and E. RSPO members who have purchased RSPO Credits are entitled to claim their support for the production of certified sustainable palm oil as per Module D.	No on pack claims made since no labelling and/or packings of products use since both CSPO and CSPK delivered in bulk to buyers.	Complied
5.3.2	In case of limited space, RSPO allows flexibility to use a one-line arrangement claim together with a valid trademark licence number for on pack communications as below without having to use any RSPO Label. The licence number has to measure at least 4pt (1.4mm) in size and the font must be Calibri. The following options shall be considered:	No on pack claims made since no labelling and/or packings of products use since both CSPO and CSPK delivered in bulk to buyers.	Complied

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	<p>A) For Identity Preserved (IP)/ Segregated (SG) Certified Products:</p> <ul style="list-style-type: none"> • RSPO IP/SG CERTIFIED* • Contains RSPO IP/SG palm oil* • Contains RSPO certified palm oil (IP/SG)* <p>*Add RSPO TM Licence Number below or next to the claim.</p>		
	<p>B) or Mass Balance (MB) Certified Products:</p> <ul style="list-style-type: none"> • RSPO MIXED* • Contributes to the production of RSPO certified palm oil* • Contains RSPO certified palm oil (MB)* <p>*Add RSPO TM Licence Number below or next to the claim.</p>	No on pack claims made since no labelling and/or packings of products use since both CSPO and CSPK delivered in bulk to buyers.	Complied
	<p>C) For Partially Certified Products:</p> <ul style="list-style-type: none"> • RSPO 50% MIXED* • Contains at least 50% RSPO certified palm oil* <p>*Add RSPO TM Licence Number below or next to the claim.</p>	No on pack claims made since no labelling and/or packings of products use since both CSPO and CSPK delivered in bulk to buyers.	Complied
	<p>D) For Products covered with Book and Claim (B&C):</p> <ul style="list-style-type: none"> • RSPO CREDITS* • Supports the production of RSPO certified palm oil* • Contains palm oil covered by the purchase of RSPO Credits* <p>*Add RSPO TM Licence Number below or next to the claim.</p>	No on pack claims made since no labelling and/or packings of products use since both CSPO and CSPK delivered in bulk to buyers.	Complied
5.3.3	On pack claims shall not include information about the claimant's RSPO membership status.	No on pack claims made since no labelling and/or packings of products use since both CSPO and CSPK delivered in bulk to buyers.	Complied
5.3.4	Members shall not communicate to consumers information about their suppliers' RSPO membership status.	No on pack claims made since no labelling and/or packings of products use since both CSPO and CSPK delivered in bulk to buyers.	Complied

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5.3.5	Use of the RSPO Label is restricted to claims about RSPO certified sustainable palm oil contained in products and is not authorised for use in relation to any other ingredient.	No on pack claims made since no labelling and/or packings of products use since both CSPO and CSPK delivered in bulk to buyers.	Complied
5.3.6	All members making on pack claims are encouraged to submit the information and images of their end products that carry the RSPO Label via the MyRSPO portal.	No on pack claims made since no labelling and/or packings of products use since both CSPO and CSPK delivered in bulk to buyers.	Complied
MODULE A – IDENTITY PRESERVED			
	95% of the palm oil content must be RSPO IP certified.	Pasir Panjang POM's oil palm content is 100% CPO and claimed as RSPO IP-certified.	Complied
	If 100% of RSPO IP certified palm oil content cannot be sourced, a maximum of 5% volume from other non-certified sources is allowed and the reason for this must be fully justified. The volume of the non-certified palm oil content shall be covered by the purchase of RSPO Credits of equivalent volume.	Oil palm content is 100% CPO and claim as RSPO IP-certified. All infed material (FFB) is RSPO certified.	Complied
Messaging			
	<p>Messaging ALLOWED for storytelling in product-specific communications may include any of the following elements:</p> <ul style="list-style-type: none"> The palm oil products contained in this product have been certified to come from RSPO sources. www.rspo.org By choosing this product, you are sure that it contains RSPO certified palm oil. For more information: www.rspo.org RSPO certified sustainable palm oil products were kept apart from other palm oil products throughout the supply chain. www.rspo.org Certified sustainable palm oil products can be traced back to RSPO certified mills and plantations. www.rspo.org The entire supply chain is monitored by independent, RSPO-accredited auditors. www.rspo.org 	Storytelling only involved off-pack claims on specified business-to-business communication within the supply chain via the exchange of information 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. No labelling and/or packings of products use since both CSPO and CSPK delivered in bulk to buyers.	Complied

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	<ul style="list-style-type: none"> RSPO certified sustainable palm oil has been produced according to stringent environmental and social criteria. www.rspo.org 		
Product-Specific Communications Labelling			
	<p>Members are allowed to use the RSPO Label in one of the following ways:</p> <ul style="list-style-type: none"> RSPO Trademark that includes the tag "CERTIFIED"; or RSPO Trademark that includes the tag "This product contains certified sustainable palm oil". 	No labelling and/or packings of products use since both CSPO and CSPK delivered in bulk to buyers.	Complied
Principle 4: Respect community and human rights and deliver benefits			
Criterion 4.1: The unit of Certification respects human rights, which includes respecting the rights of Human Rights Defenders.			
4.1.1	<p>(C) A policy to respect human rights, including prohibiting retaliation against Human Rights Defenders (HRD), is documented and communicated to all levels of the workforce, operations, FFB suppliers and local communities and prohibits intimidation and harassment by the unit of certification and contracted services, including contracted security forces.</p> <p>- Critical (Major) compliance -</p>	<p>The documentation of the policy to respect human rights exists in the Company's Sustainable Oil Palm Policy dated 1/10/2021 signed by its Executive Director. The Policy contains the 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. Communication of this Policy was done during annual stakeholder consultation held on 20/9/2023 at Kulim Training Centre, Kota Tinggi which was attended by 86 pax. Trainings were also conducted at Tunjuk Laut Estate (24/5/2023 & 12/9/2023), Siang Estate (28/8/2023), Bukit Kelompok Estate (Pasir Logok Estate (3/2/2023).</p> <p>Migrant workers who work at the estate are allowed to freely leave the estate on their off-days and/or weekends for recreation or to run their own personal errands. To facilitate this, and to ensure that the workers are not harassed or intimidated by unscrupulous people, the Estate issues each of them with a letter titled "Pelepasan</p>	OFI

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		Keluar.” This letter can be further improved if the real reason for its issuance is stated clearly.	
4.1.2	The unit of certification does not instigate violence or use any form of harassment in their operations. - Minor compliance -	Based on observations conducted, interviews held with own and contract workers (clerks, mandore, harvesters, manurers), staff, and external stakeholders (comprising contractors, suppliers, canteen operators and neighbouring entities), there was no evidence that Pasir Panjang POM and its supply base uses any form of harassment, or instigates violence in their operations.	Complied
Criterion 4.2: There is a mutually agreed and documented system for dealing with complaints and grievances, which is implemented and accepted by all affected parties			
4.2.1	(C) The mutually agreed system, open to all affected parties, resolves disputes in an effective, timely and appropriate manner, ensuring anonymity of complainants, HRD, community spokespersons and whistleblowers, where requested, without risk of reprisal or intimidation and follows the RSPO policy on respect for HRD. - Critical (Major) compliance -	The mutually agreed system which is applicable to all affected parties is available under Grievance Procedure Doc No. SQD/SMS/4.1 dated 1 August 2020. It deals with complaints and grievances, and clause 5.8 of this document assures that complainants’ anonymity would be respected and protected if requested. In addition, the Company’s Group Sustainable Oil Palm Policy dated 1/10/2021 signed by its Executive Director 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.	Complied
4.2.2	Procedures are in place to ensure that the system is understood by the affected parties, including by illiterate parties. - Minor compliance -	To ensure that the system is understood by affected parties, explanation was given to external stakeholders during stakeholder meeting held on 20/9/2023 at Kulim Training Centre, Kota Tinggi. For internal stakeholders, briefings were given during muster as follows: Tunjuk Laut Estate: 29/8/2023 Siang Estate: 24/5/2023 & 28/8/2023	Complied

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		<p>Pasir Panjang POM: 20/6/2023 Bukit Kelompok Estate: 11/8/2023 Pasir Logok Estate: 3/2/2023</p> <p>These briefings were given verbally so that any illiterate parties can understand. Should there be foreign workers who are not conversant in the national language, translations are provided by the worker representatives as confirmed by the workers.</p>	
4.2.3	<p>The unit of certification keeps parties to a grievance informed of its progress, including against agreed timeframe and the outcome is available and communicated to relevant stakeholders.</p> <p>- Minor compliance -</p>	<p>The types of grievances found during the audit involved house defects at the workers housing which required repairs. Complainants would fill up a form detailing out the defects. The records contain date complaint was made, date it was attended to, and the outcome was available, communicated to the complainant and duly acknowledged. Housing repairs usually are completed within 1-5 days of the complaint lodged, depending on availability of repair materials.</p>	Complied
4.2.4	<p>The conflict resolution mechanism includes the option of access to independent legal and technical advice, the ability for complainants to choose individuals or groups to support them and/or act as observers, as well as the option of a third-party mediator.</p> <p>- Minor compliance -</p>	<p>The conflict resolution mechanism does include the option to access to independent legal and technical advice. It can be found under Clause 5.5 Grievance Mechanism Doc. No. SQD/SMS/4.1 Issue No. 1 dated 1/8/2020. It states that parties have the option to engage independent legal, technical advice and third-party mediator.</p>	Complied
Criterion 4.3: The unit of Certification contributes to local sustainable development as agreed by local communities.			
4.3.1	<p>Contributions to community development that are based on the results of consultation with local communities are demonstrated.</p> <p>- Minor compliance -</p>	<p>Among the contributions to community development include providing job opportunities to suitable local communities. For example:</p> <ul style="list-style-type: none"> Approximately 80% of Pasir Panjang Mill's employees are from the nearby areas. Tunjuk Laut Estate also allows road access to neighbouring plantations. 	Complied

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		<ul style="list-style-type: none">Pasir Logok Estate provides a school van to transport workers' children to SK Felda Tenggara Selatan. SK Tunjuk Laut and Sekolah Agama Tunjuk Laut receive in-kind benefits from Pasir Panjang Estate.																				
Criterion 4.4: Use of the land for oil palm does not diminish the legal, customary or user rights of other users without their free, prior and informed consent.																						
4.4.1	<p>(C) Documents showing legal ownership or lease, or authorised use of customary land authorised by customary landowners through a Free, Prior and Informed Consent (FPIC) process. Documents Related to the history of land tenure and the actual legal or customary use of the land are available.</p> <p>- Critical (Major) compliance -</p>	<p>It was verified that there are no overlapping claims by the local community or Indigenous peoples. Sampled were the following copies of land titles which show ownership/right to use were sighted and verified as follows:</p> <table><tr><th>Estate/ Mill</th><th>HSD & PTD No:</th><th>Hectarage (ha)</th><th>Lease duration</th><th>Issued to</th></tr><tr><td>Pasir Panjang Estate</td><td>HSD 32182 No Lot PTD 401</td><td>1,609.869</td><td>99-years from 17/09/2013 to 16/09/2112</td><td>Johor Corporation</td></tr><tr><td rowspan="2">Bukit Kelompok Estate</td><td>HSD 32183 No PT PTD 402</td><td>1,055.629</td><td>60-years from 1/04/2010 to 31/03/2070</td><td>Johor Corporation</td></tr><tr><td>HSD 32184 No PTD 403</td><td>144.2 ha</td><td>60-years from 1/04/2010 to 31/03/2070</td><td>Johor Corporation</td></tr></table>	Estate/ Mill	HSD & PTD No:	Hectarage (ha)	Lease duration	Issued to	Pasir Panjang Estate	HSD 32182 No Lot PTD 401	1,609.869	99-years from 17/09/2013 to 16/09/2112	Johor Corporation	Bukit Kelompok Estate	HSD 32183 No PT PTD 402	1,055.629	60-years from 1/04/2010 to 31/03/2070	Johor Corporation	HSD 32184 No PTD 403	144.2 ha	60-years from 1/04/2010 to 31/03/2070	Johor Corporation	Complied
Estate/ Mill	HSD & PTD No:	Hectarage (ha)	Lease duration	Issued to																		
Pasir Panjang Estate	HSD 32182 No Lot PTD 401	1,609.869	99-years from 17/09/2013 to 16/09/2112	Johor Corporation																		
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	HSD 32184 No PTD 403	144.2 ha	60-years from 1/04/2010 to 31/03/2070	Johor Corporation																		

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		<table><tr><td>Siang Estate</td><td>HS(D) 33258 No. PTD 532</td><td>3413.98</td><td>99-year lease from 24/01/1988 to 23/01/2087</td><td>Mahamurni Plantations Sdn Bhd</td></tr><tr><td>Pasir Panjang Estate</td><td>H.S.(D): 35107 No. PTD 558</td><td>1609.869 ha</td><td>99-year lease from 17/09/2013 to 16/09/2112</td><td>Mahamurni Plantations Sdn Bhd.</td></tr><tr><td>Pasir Panjang Mill</td><td colspan="4">13 ha on Pasir Panjang land</td></tr></table>	Siang Estate	HS(D) 33258 No. PTD 532	3413.98	99-year lease from 24/01/1988 to 23/01/2087	Mahamurni Plantations Sdn Bhd	Pasir Panjang Estate	H.S.(D): 35107 No. PTD 558	1609.869 ha	99-year lease from 17/09/2013 to 16/09/2112	Mahamurni Plantations Sdn Bhd.	Pasir Panjang Mill	13 ha on Pasir Panjang land				
Siang Estate	HS(D) 33258 No. PTD 532	3413.98	99-year lease from 24/01/1988 to 23/01/2087	Mahamurni Plantations Sdn Bhd														
Pasir Panjang Estate	H.S.(D): 35107 No. PTD 558	1609.869 ha	99-year lease from 17/09/2013 to 16/09/2112	Mahamurni Plantations Sdn Bhd.														
Pasir Panjang Mill	13 ha on Pasir Panjang land																	
4.4.2	Copies of documents evidencing agreement-making processes and negotiated agreements detailing the FPIC process are available and include:	As following indicators.			Complied													
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 -	Based on documents sighted and interviews conducted with stakeholders, there was no evidence of any dispute or overlapping land claim with any previous owner, occupants or affected communities. 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 -	Based on documents sighted and interviews conducted with stakeholders, there was no evidence of any dispute or overlapping land claim with any previous owner, occupants or affected communities. Therefore, this indicator is not applicable.			Not Applicable													

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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 -	Based on documents sighted and interviews conducted with stakeholders, there was no evidence of any dispute or overlapping land claim with any previous owner, occupants or affected communities. Therefore, this indicator is not applicable.	Not Applicable
4.4.3	(C) Maps of an appropriate scale showing the extent of recognised legal, customary or user rights are developed through participatory mapping involving affected parties (including neighbouring communities where applicable, and relevant authorities). - Critical (Major) compliance -	Based on documents sighted and interviews conducted with stakeholders, there was no evidence of any dispute or overlapping land claim with any previous owner, occupants or affected communities. Therefore, this indicator is not applicable.	Not Applicable
4.4.4	All relevant information is available in appropriate forms and languages, including assessments of impacts, proposed benefit sharing, and legal arrangements. - Minor compliance -	Based on documents sighted and interviews conducted with stakeholders, there was no evidence of any dispute or overlapping land claim with any previous owner, occupants or affected communities. Therefore, this indicator is not applicable.	Not Applicable
4.4.5	(C) Evidence is available to show that communities are represented through institutions or representatives of their own choosing, including by legal counsel if they so choose. - Critical (Major) compliance -	Based on documents sighted and interviews conducted with stakeholders, there was no evidence of any dispute or overlapping land claim with any previous owner, occupants or affected communities. 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 -	Based on documents sighted and interviews conducted with stakeholders, there was no evidence of any dispute or overlapping land claim with any previous owner, occupants or affected communities. Therefore, this indicator is not applicable.	Not Applicable
Criterion 4.5: No new plantings are established on local peoples' land where it can be demonstrated that there are legal, customary or user rights, without their FPIC. This is dealt with through a documented system that enables these and other stakeholders to express their views through their own representative institutions.			
4.5.1	(C) Documents showing identification and assessment of demonstrable legal, customary and user rights are available.	There is no new planting within Bukit Kelompok, Pasir Logok, Siang, and Tunjuk Laut Estates. Evidence of rightful and legal land	Not Applicable

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	- Critical (Major) compliance -	ownership are as per Indicator 4.4.1 above. There is no evidence of other legal, customary or user rights. Therefore, this indicator is not applicable.	
4.5.2	<p>(C) FPIC is obtained for all oil palm development through a comprehensive process, including in particular, full respect for their legal and customary rights to the territories, lands and resources via local communities' own representative institutions, with all the relevant information and documents made available, with option of resourced access to independent advice through a documented, long-term and two-way process of consultation and negotiation.</p> <p>- Critical (Major) compliance -</p>	There is no new planting within Bukit Kelompok, Pasir Logok, Siang, and Tunjuk Laut Estates. Evidence of rightful and legal land ownership are as per Indicator 4.4.1 above. There is no evidence of other legal, customary or user rights. 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>	There is no new planting within Bukit Kelompok, Pasir Logok, Siang, and Tunjuk Laut Estates. Evidence of rightful and legal land ownership are as per Indicator 4.4.1 above. There is no evidence of other legal, customary or user rights. 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>	There is no new planting within Bukit Kelompok, Pasir Logok, Siang, and Tunjuk Laut Estates. Evidence of rightful and legal land ownership are as per Indicator 4.4.1 above. There is no evidence of other legal, customary or user rights. 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>	There is no new planting within Bukit Kelompok, Pasir Logok, Siang, and Tunjuk Laut Estates. Evidence of rightful and legal land ownership are as per Indicator 4.4.1 above. There is no evidence of other legal, customary or user rights. Therefore, this indicator is not applicable.	Not Applicable

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	- Minor compliance -		
4.5.6	Evidence is available that the communities (or their representatives) gave consent to the initial planning phases of the operations prior to the issuance of a new concession or land title to the operator. - Minor compliance -	There is no new planting within Bukit Kelompok, Pasir Logok, Siang, and Tunjuk Laut Estates. Evidence of rightful and legal land ownership are as per Indicator 4.4.1 above. There is no evidence of other legal, customary or user rights. Therefore, this indicator is not applicable.	Not Applicable
4.5.7	New lands are not acquired for plantations and mills after 15 November 2018 as a result of recent (2005 or later) expropriations without consent under the right of eminent domain of the federal and state land acquisition legislations. - Minor compliance -	There is no evidence that new lands were acquired for Bukit Kelompok, Pasir Logok, Siang, and Tunjuk Laut Estates after 15 November 2018 as a result of expropriations without consent.	Complied
4.5.8	(C) New lands are not acquired in areas inhabited by communities in voluntary isolation. - Critical (Major) compliance -	There is no evidence that new lands were acquired for Bukit Kelompok, Pasir Logok, Siang, and Tunjuk Laut Estates acquired in areas inhabited by communities in voluntary isolation.	Complied
Criterion 4.6: Any negotiations Concerning compensation for loss of legal, customary or user rights are dealt with through a documented system that enables indigenous peoples, local communities and other stakeholders to express their views through their own representative institutions.			
4.6.1	(C) 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 the SPO Negotiations Concerning Compensation Program dated 4 September 2007. This procedure is to ensure any negotiation with regards to compensation for loss of local rights are dealt with fairly.	Complied
4.6.2	(C) A mutually agreed procedure for calculating and distributing fair compensation (monetary or otherwise) is established and implemented, monitored and evaluated in a participatory way, and corrective actions taken as a result of this evaluation. - Critical (Major) compliance -	An SOP known as Negotiations Concerning Compensation Program dated 4 September 2007 was established by Johor Plantations Group Berhad to identify legal and customary rights as well as people entitled to compensation as per procedure in place and is contained in the SPO Negotiations Concerning Compensation Program dated 4 September 2007. The procedure is to ensure any	Complied

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		negotiation with regards to compensation for loss of local rights are dealt with fairly.	
4.6.3	Evidence is available that equal opportunities are provided to both men and women to hold land titles for scheme small holdings. - Minor compliance -	Pasir Panjang POM does not have any arrangements for scheme smallholdings. Therefore, this indicator is not applicable.	Not Applicable
4.6.4	The process and outcomes of any negotiated agreements, compensation and payments are documented, with evidence of the participation of affected parties, and made publicly available to them. - Minor compliance -	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
Criterion 4.7: Where it can be demonstrated that local peoples have legal, customary or user rights, they are compensated for any agreed land acquisitions and relinquishment of rights, subject to their FPIC and negotiated agreements.			
4.7.1	(C) A mutually agreed 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 the SPO Negotiations Concerning Compensation Program dated 4 September 2007. This procedure is to ensure any negotiation with regards to compensation for loss of local rights are dealt with fairly.	Complied
4.7.2	(C) A mutually agreed procedure for calculating and distributing fair and gender-equal compensation (monetary or otherwise) is established and implemented, monitored and evaluated in a participatory way, and corrective actions taken as a result of this evaluation. - Critical (Major) compliance -	An SOP known as Negotiations Concerning Compensation Program dated 4 September 2007 was established by Johor Plantations Group Berhad to identify legal and customary rights as well as people entitled to compensation as per procedure in place and is contained in the SPO Negotiations Concerning Compensation Program dated 4 September 2007. The procedure is to ensure any negotiation with regards to compensation for loss of local rights are dealt with fairly, and briefed to stakeholder on 7 October 2020.	Complied
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.	Based on documents sighted and interviews conducted with stakeholders, there was no evidence of any dispute with any previous owner or occupants. However, Pasir Panjang Mill and its	Complied

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	- Minor compliance -	supply base offer job opportunities to local communities living within its vicinity.	
Criterion 4.8: The right to use the land is demonstrated and is not legitimately contested by local people who can demonstrate that they have legal, customary, or user rights.			
4.8.1	Where there are or have been disputes, proof of legal acquisition of title and evidence that mutually agreed compensation has been made to all people who held legal, customary, or user rights at the time of acquisition is available and provided to parties to a dispute, and that any compensation was accepted following a documented process of FPIC. - Minor compliance -	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
4.8.2	(C) Land conflict is not present in the area of the unit of certification. Where land conflict exists, acceptable conflict resolution processes (see Criteria 4.2 and 4.6) are implemented and accepted by the parties involved. In the case of newly acquired plantations, the unit of certification addresses any unresolved conflict through appropriate conflict resolution mechanisms. - Critical (Major) compliance -	Based on documents sighted and interviews conducted with stakeholders, there was no evidence of any dispute with any previous owner or occupants. Pasir Panjang POM and its supply base were not newly acquired units. 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 and interviews conducted with stakeholders, there was no evidence of any acquisition through dispossession or forced abandonment of customary and user rights prior to the current operations. Therefore, this indicator is not applicable.	Not Applicable
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 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

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Principle 5: Support smallholder inclusion			
Criterion 5.1: The unit of certification deals fairly and transparently with all smallholders (Independent and Scheme) and other local businesses.			
5.1.1	Current and previous period prices paid for FFB are publicly available and accessible by smallholders. - Minor compliance -	Current and previous period prices paid for FFB are publicly available via display in front of weighbridge counter of the mill. Notwithstanding, only own certified estates supplying FFB to Pasir Panjang POM.	Complied
5.1.2	(C) Evidence is available that the unit of certification explains the FFB pricing to smallholders on request from individual smallholders (at least once a year or upon request). - Critical (Major) compliance -	No request received by the mill since only own certified estates supplying FFB to Pasir Panjang POM.	Complied
5.1.3	(C) Fair pricing, calculated as a portion of the international CPO price less costs is provided to smallholders in the supply base and documented. - Critical (Major) compliance -	Not applicable since the mill received only own certified estates supplying FFB to Pasir Panjang POM.	Not Applicable
5.1.4	(C) Evidence is available that all parties, including women and independent representative organisations assisting smallholders where requested, are involved in decision-making processes and understand the contracts. These include those involving finance, loans/credits, and repayments through FFB price reductions for replanting and or other support mechanisms where applicable. - Critical (Major) compliance -	Not applicable since the mill received only own certified estates supplying FFB to Pasir Panjang POM.	Not Applicable
5.1.5	Contracts are fair, legal and transparent and have an agreed timeframe. - Minor compliance -	Not applicable since the mill received only own certified estates supplying FFB to Pasir Panjang POM.	Not Applicable
5.1.6	(C) Agreed payments are made in a timely manner and receipts specifying price, weight, deductions and amount paid are given. - Critical (Major) compliance -	Not applicable since the mill received only own certified estates supplying FFB to Pasir Panjang POM.	Not Applicable

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5.1.7	<p>Weighbridges used for determining payment to smallholders are verified by an independent third party on a regular basis (this can be government).</p> <p>- Minor compliance -</p>	<p>Weighbridges used for determining payment to smallholders were verified by the De Metrology Sdn. Bhd. under the KPDN license as following:</p> <ul style="list-style-type: none"> - Weighbridge 1: Avery Serial # T11510075 - 80,000 kg; Stamping Date: 27/03/2023; Ref. # 18005711 - Weighbridge 2: Avery Serial # 2105038BC1 - 80,000 kg; Stamping Date: 31/07/2023; Ref. # 18005710 	Complied
5.1.8	<p>The unit of certification supports Independent Smallholders with certification, where applicable, ensuring mutual agreements between the unit of certification and the smallholders on who runs the internal control system (ICS), who holds the certificates, and who holds and sells the certified material.</p> <p>- Minor compliance -</p>	Not applicable since the mill received only own certified estates supplying FFB to Pasir Panjang POM.	Not Applicable
5.1.9	<p>(C) The unit of certification has a grievance mechanism for smallholders and all grievances raised are dealt with in a timely manner.</p> <p>- Critical (Major) compliance -</p>	Not applicable since the mill received only own certified estates supplying FFB to Pasir Panjang POM. Notwithstanding, the mill has a Grievance Procedure Doc No. SQD/SMS/4.1 dated 1 August 2020. It deals with complaints and grievances in a timely manner.	Not Applicable
Criterion 5.2: The unit of certification supports improved livelihoods of smallholders and their inclusion in sustainable palm oil value chains.			
5.2.1	<p>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.</p> <p>- Minor compliance -</p>	There are no smallholders within the Unit of Certification. However, based on the minutes of external stakeholder meeting held on 20/9/2023, a briefing was given on independent smallholder certification and traceability.	Not Applicable
5.2.2	<p>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).</p>	There are no smallholders within the Unit of Certification. However, based on the minutes of external stakeholder meeting held on 20/9/2023, a briefing was given on independent smallholder certification and traceability.	Complied

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	- Minor compliance -		
5.2.3	Where applicable, the unit of certification provides support to smallholders to promote legality of FFB production. - Minor compliance -	There are no smallholders within the Unit of Certification. However, based on the minutes of external stakeholder meeting held on 20/9/2023, a briefing was given on independent smallholder certification and traceability.	Complied
5.2.4	(C) Evidence exists that the unit of certification trains Scheme Smallholders on pesticide handling. - Critical (Major) compliance -	There are no smallholders within the Unit of Certification. However, based on the minutes of external stakeholder meeting held on 20/9/2023, a briefing was given on independent smallholder certification and traceability.	Complied
5.2.5	The unit of certification regularly reviews and publicly reports on the progress of the Smallholder support programme. - Minor compliance -	There are no smallholders within the Unit of Certification. However, based on the minutes of external stakeholder meeting held on 20/9/2023, a briefing was given on independent smallholder certification and traceability.	Complied
Principle 6: Respect workers' rights and conditions			
Criterion 6.1: Any form of discrimination is prohibited.			
6.1.1	(C) A publicly available non-discrimination and equal opportunity policy is implemented in such a way to prevent discrimination based on ethnic origin, caste, national origin, religion, disability, gender, sexual orientation, gender identity, union membership, political affiliation or age. - Critical (Major) compliance -	The Company has developed its Business Policy, Core Labour Standard Policy and People Policy. 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 ethnic origin, caste, national origin, religion, disability, gender, sexual orientation, gender identity, union membership, political affiliation or age. 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 equal treatment irrespective of background and origin, and everyone was accorded equal opportunities.	Complied

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6.1.2	<p>(C) Evidence is provided that workers and groups including local communities, women, and migrant workers have not been discriminated against including charging of recruitment fees for foreign workers.</p> <p>- Critical (Major) compliance -</p>	<p>Pasir Panjang POM and its supply base was able to demonstrate that there is no form of discrimination against all groups of stakeholders. All sampled stakeholders and workers interviewed confirmed that they have not faced any form of discrimination in any manner.</p> <p>Migrant workers engaged through agents who were sampled during the audit also confirmed that they paid no recruitment fees to their agents or any other parties. This is in consonant with the Company's 'Zero Cost Policy' where no recruitment fees are imposed on any of the foreign workers.</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>Pasir Panjang POM and its supply base was able to demonstrate the process of recruitment, selection and hiring are based on skills, capabilities, qualities and medical fitness. This was evidenced when reviewing the files and recruitment records of the following workers:</p> <p>Tunjuk Laut Estate: xxxxxx-xx-6773, xxxxxx-xx-1878</p> <p>Siang Estate: E910002708, E910001670</p> <p>Pasir Panjang POM: 951939, E440000139</p> <p>Bukit Kelompok Estate: E770000819, E770011741</p> <p>Pasir Logok Estate: E190xxxx, EG022xxxx</p>	Complied
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 records, interviews with members of the gender committee (WoW), Estate Medical Assistants and Health Assistants, there was no evidence that pregnancy tests were conducted, unless requested by the female workers themselves.</p>	Complied
6.1.5	<p>(C) A gender committee is in place specifically to raise awareness, identify and address issues of concern, as well as opportunities and improvements for women.</p> <p>- Critical (Major) compliance -</p>	<p>A gender committee known as Women OnWards (WOW) is in place at all the units within Pasir Panjang Mill and its supply base. Its membership is open to all female employees including employees' wives and female family members. WOW was set up to promote gender equality and empower women's knowledge and skills.</p>	Complied

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		<p>During meetings, issues of concern among members were discussed such as issues related to work, needs of new mothers, sexual harassment, domestic violence, neglect abandonment by spouse and how to make complaints if there was a case, and reproductive rights. Members were also informed that they could also directly complain to Deputy Manager of Human Resources Department (Industrial Relations Unit). Briefings on Company policies were also given.</p> <p>In addition, a series of roadshows were also held by Human Resources and Sustainability Departments on sexual harassment, grievances and sustainability issues. The roadshow for the Southern Region (comprising Tunjuk Laut Estate, Pasir Panjang POM, Pasir Logok Estate, Bukit Kelompok and Siang Estate) was held on 11/10/2023. Among the topics discussed included RSPO & MSPO requirements, company policies, types of sexual harassment, sexual harassment under the Penal Code, grievance mechanism, as well as information on Talian Kasih WhatsApp number under Kementerian Pembangunan Wanita Keluarga & Masyarakat.</p> <p>Interviews conducted with WoW members confirmed their understanding of these issues discussed. Sampled were the following WoW meetings minutes:</p> <p>Tunjuk Laut Estate on 20/9/2023 Pasir Panjang Mill on 29/6/2023 Siang Estate on 15/1/2023 & 24/7/2023</p>	
6.1.6	<p>There is evidence of equal pay for the same work scope.</p> <p>- Minor compliance -</p>	<p>Evidence of equal pay for the same scope of work was verified at all units within Pasir Panjang Mill and its supply base. A review of employment contracts/letters of job offer and three months' payslips (March, June & October) were sampled for the following workers:</p>	Complied

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		<p>a) Pasir Logok Estate: Harvester (male, Indonesian) & Harvester (male, Bangladeshi)</p> <p>b) Bukit Kelompok Estate: General worker (female, Malaysian) & general worker (male, Indonesian)</p> <p>c) Pasir Panjang POM: Workshop (male, Malaysian) & workshop (male, Indonesian)</p> <p>d) Siang Estate: Harvester (male, Malaysian) & harvester (male, Indonesian).</p> <p>e) Tunjuk Laut Estate: Sprayer (male, Indonesian) & Sprayer (male, Indonesian).</p>	
Criterion 6.2: Pay and conditions for staff and workers and for contract workers always meet at least legal or industry minimum standards and are sufficient to provide decent living wages (DLW).			
6.2.1	<p>(C) Applicable labour laws, union and/or other collective agreements and documentation of pay and conditions are available to the workers in national languages (English or Bahasa Malaysia) and explained to them in language they understand.</p> <p>- Critical (Major) compliance -</p>	<p>Being a member of the Malaysian Agricultural Producers Association (MAPA), the Company is therefore subjected to the agreement between MAPA and the National Union of Plantation Workers (NUPW). However, this agreement has not been finalised yet.</p> <p>All conditions related to duration of contract, hours of work, overtime, annual/medical leave, public holiday, mutual termination, salary deductions, maternity entitlement, etc are contained in workers' employment contracts. Sampled were employment contracts for Malaysian, Bangladeshi and Indonesian workers. These contracts have been prepared in dual language appropriate to the individual nationality. For example, Bangladeshi workers signed a contract that was in English and Bengali.</p> <p>Workers interviewed confirmed that a briefing was given and that they understood the provisions in the employment contract. They further confirmed that a copy was given for their safekeeping as seen on the acknowledged copies.</p>	Complied

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6.2.2	<p>(C) Employment contracts and related documents detailing payments and conditions of employment (e.g. regular working hours, deductions, overtime, sick leave, holiday entitlement, maternity leave, reasons for dismissal, period of notice, etc. in compliance with national legal requirements) and payroll documents give accurate information on compensation for all work performed. This includes a form of record for work done by family members.</p> <p>- Critical (Major) compliance -</p>	<p>Sampled during the audit were employment contracts and monthly payslips of checkroll as well as contract workers. The contracts sampled were valid, duly signed and are still in force. The employment contracts contain details of employment terms such as contract duration, hours of work, overtime, annual/medical leave, public holiday, mutual termination, salary deductions, maternity entitlement, etc.</p> <p>The sampled payslips also gave accurate information on compensation for work done. Salary deductions and overtime were calculated in accordance with relevant laws (SOCISO, EPF, EIS) and Labour Office permits.</p> <p>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, which were March, June and October 2023. The number of sampling is calculated based on $n = \sqrt{x}$ (0.8) The details are as follows:</p> <p>1. Bukit Kelompok Estate</p> <ul style="list-style-type: none"> • Checkroll Workers: <ul style="list-style-type: none"> ○ No. E770000819, E770007677, E770011741, E770001547, E770001550, E770006618, E770008692, E770008725, E770011735, E770014784. • Contract workers of Sri Mahtai Sdn Bhd <ul style="list-style-type: none"> ○ Workers passport no. C818xxxx, C958xxxx, C818xxxx. 	Complied
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		<p>2. Pasir Logok Estate</p> <ul style="list-style-type: none"> • Checkroll workers: <ul style="list-style-type: none"> ○ Workers passport no. C190xxxx, EG0222xxxx, C915xxxx, E032xxxx, E011xxxx, EG093xxxx, C632xxxx, EG092xxxx, EG094xxxx. • Contract workers of RKP Enterprise <ul style="list-style-type: none"> ○ Workers passport no. EA085xxxx, EJ037xxxx, EH050xxxx, EH031xxxx, EF032xxxx. <p>3. Pasir Panjang Mill</p> <ul style="list-style-type: none"> • Checkroll workers: <ul style="list-style-type: none"> ○ Workers No. E440000151, E440000152, E440000185, E440000226, E440000198, E440000214, E440002338, 951939. <p>4. Siang Estate</p> <ul style="list-style-type: none"> • Checkroll workers: <ul style="list-style-type: none"> ○ Workers No. E910002708, E10002921, E910002935, E910001602, E910001607, E910002747, E910002749, E910002777, E910002785, E910002798, E910002810, E910002840, E910002842, E910000010, E910001622, E910001670. 	
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		<ul style="list-style-type: none"> Contract workers of Sg Rezeki Sdn Bhd <ul style="list-style-type: none"> Workers passport no. C817xxxx, C081xxxx, C817xxxx. <p>5. Tunjuk Laut Estate</p> <ul style="list-style-type: none"> Checkroll workers: <ul style="list-style-type: none"> Workers No. E680001249, E6800018620, E680001374, E680001380, E680000811, E680001576, E680001574, E680001495, E680001544, E680001603 Contract workers of RKP Enterprise: <ul style="list-style-type: none"> Passport No. EG0008xxxx, BY027xxxx, EK093xxxx Contract workers of Kenny Resources: <ul style="list-style-type: none"> EK071xxxx, EH071xxxx. Contract worker of MZHO Transport Sdn Bhd: <ul style="list-style-type: none"> xxxxxx-xx-5143 <p>Based on the above, Pasir Panjang Mill and its supply base were able to demonstrate that:</p>	
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		<p>➤ Contracts and related documents detailing payments and conditions of employment comply with legal requirements; and</p> <p>Payslips give accurate information on compensation for all work performed.</p>	
6.2.3	<p>(C) There is evidence of legal compliance for regular working hours, deductions, overtime, sickness, holiday entitlement, maternity leave, reasons for dismissal, period of notice and other legal labour requirements.</p> <p>- Critical (Major) compliance -</p>	<p>Based on review of workers' sampled punch cards, employment contracts and payslips, evidence was available that Pasir Panjang Mill and its supply base were able to demonstrate compliance with Employment Act 1955 related to regular working hours, overtime, sickness and holiday entitlement, maternity leave, etc. This includes statutory deductions (SOCSSO, EPF, EIS) and non-statutory deductions (e.g. sports and recreation club, surau funds, electricity bills, union membership, etc) in accordance with the relevant laws and Labour Office permits.</p> <p>At Siang Estate, it was verified that two female workers went on maternity leave in March and June 2023, respectively, and based on their payslips, were given 98 days paid maternity leave during the period of confinement.</p> <p>The workers sampled during the audit were the same as per those sampled in Indicator 6.2.2 above.</p> <p>These permits are as detailed out below.</p> <ul style="list-style-type: none"> • Deduction for Tabung Khairat Permit No. TK (NJ) U – 21 dated 31 March 2019 for RM5 per month and not more than RM37.50 per month. • Deduction for Lembaga Tabung Haji Permit No. TK(NK)U-21 dated 15/05/2017 of RM50 per month. • Deduction for medical fees exceeding company subsidy Permit No. TK(NJ)U-21 dated 2/05/2019. 	Complied

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		<ul style="list-style-type: none"> • Deduction for tabung surau No. PP3/29/036/2006 effective 01/06/2006. • Monthly overtime exceeding 104 hours Permit Ref No. BHG. PU/9/134 Jld 34(8) dated 3/12/2020. <p>Therefore, based on detailed review of sampled employment contracts and payslips, Pasir Panjang Mill and its supply base have demonstrated that the terms of the employment contracts are in accordance with local laws such as Employment Act, SOCSO Act, EIS Act and EPF Act, and relevant Labour Office permits.</p>	
6.2.4	<p>(C) The unit of certification provides adequate housing, sanitation facilities, water supplies, medical, educational and welfare amenities to national standards or above, where no such public facilities are available or accessible. National laws, or in their absence the ILO Guidance on 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>Pasir Panjang POM and its supply base were able to demonstrate that all workers are provided with free housing with sanitation facilities, water and electric supplies, surau as places of worship, recreational amenities such as football fields, badminton/takraw courts, canteens, sundry shops, multi-purpose hall and estate clinics.</p> <p>Records show that a Visiting Medical Officer (VMO) Dr Hj Moiz bin Hj Siraj visits the estate clinics on a fortnightly basis, i.e. on 22/10/2023, 6/11/2023, 21/11/2023, and 3/12/2023. Apart from visiting the clinic and attending to patients, the VMO also inspects the cleanliness of the workers' housing, creche and shops.</p> <p>Each house at the linesite has between 2 to 3 bedrooms with between 1 to 6 occupants per house. The areas surrounding the housing area were generally clean and well maintained. Perimeter drains were clean and free-flowing, grass kept reasonably short, and domestic waste bins emptied twice weekly. Houses were generally in good state of repair. Some houses are due for refurbishment. Sighted during the audit were Letters of Award awarded to contractors for the refurbishment of workers' housing:</p> <p>a) Supply and delivery of 122 sets of wooden meat safe to Ladang Siang on 27,28 & 29/11/2023.</p>	OFI

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		<p>b) Supply of 300 steel wardrobe with latch lock to Siang Estate on 1/11/2023.</p> <p>c) Supply of 300 single size steel bed and foam mattresses on 13/11/2023 to Ladang Siang.</p> <p>At all units visited, records show that housing inspections were done every week. Sampled were as follows:</p> <ul style="list-style-type: none"> ➤ Tunjuk Laut Estate: 24/11/2023, 17/11/2023, 10/11/2023, 3/11/2023, 6/12/2023 ➤ Pasir Panjang POM: 4/12/2023, 27/11/2023, 20/11/2023, 13/11/2023, 6/11/2023 ➤ Bukit Kelompok Estate: 17/11/2023, 24/11/2023, 1/12/2023, 5/12/2023 ➤ Pasir Logok Estate housing inspection: 1/11/2023, 7/11/2023, 14/11/2023, 21/11/2023, 28/11/2023 <p>Evidence shows that housing inspections are carried out on a week basis as required under Section 23 of the Employees Minimum Standards of Housing, Accommodation and Amenities Act 1990 (the Act). Housing inspections are recorded and filed as required under Section 23(3) of the Act. The records can be further improved if they are consistently maintained.</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 Pasir Panjang POM and its supply base make efforts to improve workers' access to adequate, sufficient and affordable food.</p> <p>Each estate and mill have their own canteen and sundry shops where daily provisions can be purchased. Prices of items sold are clearly indicated, and are reasonably priced. List of prices dated 11/7/2023 were sighted for Kedai Runcit Ladang Siang, Kedai Makan Zaihazreen, SR Runcit, and Kedai Samci. Price comparison</p>	Complied

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		<p>was also made with other shops nearby, namely Kedai Runcit Tan Bersatu (Kota Tinggi) on 15/11/2023.</p> <p>Additionally, workers are allowed to plant vegetables near the workers' housing so they could supplement their vitamins intake.</p> <p>Sampled also was canteen operator i.e. Kedai Halimah who also had attended Food Handling Course endorsed by the Ministry of Health, Malaysia and taken anti-typhoid vaccination jab on 23/9/2023 and valid until 23/9/2026.</p> <p>Workers interviewed also confirmed that the canteen and sundry shop prices are reasonable, and well equipped.</p>																					
6.2.6	<p>A DLW is paid to all workers, including piece rate/quotas, for whom the calculation is based on achievable quotas during regular work hours.</p> <p>PROCEDURAL NOTE:</p> <p>STATEMENT FROM THE RSPO STANDARDS STANDING COMMITTEE REGARDING INDICATOR 6.2.6 ON DECENT LIVING WAGE</p> <p>With reference to procedural note of indicator 6.2.6, the RSPO has published a guidance on the DLW calculation in June 2019. The RSPO Secretariat will endeavour to carry out DLW country benchmarks for palm oil producing countries in which RSPO members operate and for which no Global Living Wage Coalition (GLWC) benchmarks exist (As of September 2019, GLWC has developed national benchmarks in Bangladesh, Belize, Brazil, China, Colombia, Costa Rica, Dominican Republic, Ecuador, Ethiopia, Ghana, Guatemala, India, Kenya, Malawi, Mexico, Nicaragua, Pakistan, South Africa, Sri Lanka, Uganda and Vietnam These benchmarks are developed based on banana, coffee, floriculture, textile, manufacturing, seafood processing and tea industry. The RSPO is in the process of commissioning benchmarks for Malaysia and Indonesia for the palm oil sector and will develop methods to calculate and/or define DLW applicability for all palm oil producing countries in which RSPO members operate).</p> <p><i>Where a GLWC living wage standard (benchmark), or one that fulfils the basic requirements of the RSPO-endorsed living wage methodology, has been established in the country or region of operation, the same should be used as benchmarks.</i></p> <p>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</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> <p>Pasir Panjang Mill and its supply base have also carried out the calculation of prevailing wages and in-kind benefits. The calculation took into account housing, electricity, water, creche facilities, sports and recreation facilities, education, transport, clothing, food, and healthcare. Below is the breakdown of the prevailing wage calculation:</p> <table border="1"> <thead> <tr> <th>Mill/Estate</th><th>In-kind benefits (RM)</th><th>Average take-home pay (RM)</th><th>Prevailing wage (RM)</th></tr> </thead> <tbody> <tr> <td>Pasir Panjang Mill</td><td>2,072.25</td><td>2,875.15</td><td>4,947.40</td></tr> <tr> <td>Tunjuk Laut</td><td>1,259.62</td><td>2,016.69</td><td>3,276.31</td></tr> <tr> <td>Bukit Kelompok</td><td>1,502.59</td><td>1,599.67</td><td>3,102.27</td></tr> <tr> <td>Siang</td><td>488.81</td><td>1,973.46</td><td>2,462.27</td></tr> </tbody> </table>	Mill/Estate	In-kind benefits (RM)	Average take-home pay (RM)	Prevailing wage (RM)	Pasir Panjang Mill	2,072.25	2,875.15	4,947.40	Tunjuk Laut	1,259.62	2,016.69	3,276.31	Bukit Kelompok	1,502.59	1,599.67	3,102.27	Siang	488.81	1,973.46	2,462.27	Complied
Mill/Estate	In-kind benefits (RM)	Average take-home pay (RM)	Prevailing wage (RM)																				
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	<p>region in accordance to the RSPO endorsed method for determining a DLW. Local applicability for benchmarks is important and it may differ based on the needs of each locality or country). These benchmarks will be developed in collaboration and consultation with relevant stakeholders such as palm oil industry members, workers' union, authorities and/or relevant organisations.</p> <p><i>For countries where no living wage standard is established, until such time that an RSPO endorsed benchmark for the country is in place, national minimum wages shall be paid to all workers. In addition to the payment of minimum wages, the Unit of Certification (UoC) shall conduct an assessment of the prevailing wages and in-kind benefits provided to workers in the Unit of Certification aligned with the RSPO Guidance for Implementing a Decent Living Wage (RSPO Guidance for Implementing a Decent Living Wage. The RSPO will also develop further guidance and tools to calculate DLW in line with the RSPO endorsed methodology which may include independent studies by local experts in their respective region or country).</i></p> <p>Once these benchmarks are available, this procedural note is no longer applicable. UoC shall have an implementation plan towards the payment of a DLW with specific targets, and a phased implementation process including:</p> <ul style="list-style-type: none"> • Updated assessment on prevailing wages and in-kind benefits • There is annual progress on the implementation of living wages • Where a minimum wage, based on equivalent of baskets of goods, is stipulated in Collective Bargaining Agreements (CBAs), this should be used as the foundation for the gradual implementation of the living wage payment • The UoC may choose to implement the living wage payment in a specific section as a pilot project; the pilot will then be evaluated and adapted before eventual scale up of the living wage implementation. <p>- Minor compliance -</p>	<table border="1"> <tr> <td>Pasir Logok</td><td>1,114.35</td><td>2,215.12</td><td>3,329.47</td></tr> </table>	Pasir Logok	1,114.35	2,215.12	3,329.47	<p>Based on the above, the prevailing wages reasonably calculated.</p>
Pasir Logok	1,114.35	2,215.12	3,329.47				
6.2.7	<p>Permanent, full-time employment including contractors' workers and contracted workers is used for all core work performed by the unit of certification. Casual, temporary and day labour is limited to jobs that are temporary or seasonal</p> <p>- Minor compliance -</p>	<p>Based on the documents reviewed, interviews conducted, and observations made, all core work performed are carried out by permanent, full-time employees.</p>	<p>Complied</p>				

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Criterion 6.3: The unit of Certification respects the rights of all personnel to form and join trade unions of their choice and to bargain collectively. Where the right to freedom of association and collective bargaining are restricted under law, the employer facilitates parallel means of independent and free association and bargaining for all such personnel.			
6.3.1	<p>(C) A published statement recognising freedom of association and right to collective bargaining in national languages (English and/or Bahasa Malaysia) is available and is explained to all workers, in language that they understand, and is demonstrably implemented.</p> <p>- Critical (Major) compliance -</p>	<p>The right to collective bargaining and freedom of association is published in Bahasa Malaysia and English, and displayed and displayed at the main notice boards within the Pasir Panjang Mill and its supply base. Also sighted were:</p> <ul style="list-style-type: none"> ➤ Paragraph 2 of the Employees' Guide Book which confirms and respects workers' rights to join a union recognized by the Johor Plantations Group Berhad. ➤ Core Labour Standards on Rights of Employees which 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. <p>Briefings on freedom of association were given to the workers as follows:</p> <p>Tunjuk Laut Estate: 1/9/2023 Siang Estate: 6/6/2023 Pasir Panjang Mill: 6/8/2023 Bukit Kelompok Estate: 11/3/2023 Pasir Logok Estate: 23/6/2023</p> <p>Freedom of association is demonstrably implemented with workers (both local and migrants) are members of the trade union NUPW duly verified from the membership fees paid.</p>	Complied
6.3.2	<p>Minutes of meetings between the unit of certification with trade unions or workers representatives, who are freely elected, are documented in national languages (English and/or Bahasa Malaysia) and made available upon request.</p>	<p>Reviewed and verified during the surveillance audit, the minutes of meeting of trade union representatives and management team of each unit of certification. The minutes were prepared in Bahasa Malaysia and are available upon request.</p>	Complied

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	- Minor compliance -	<p>The NUPW representatives comprise the Chairperson, Secretary and ExcOs who were selected by the workers themselves. The meetings discussed issues such as encouragement for workers to join a union, presence of stray dogs, mosquito fogging, passport and work permits, refurbishment of houses and ILO training for management team. The sampled meetings were held as follows:</p> <p>Tunjuk Laut Estate: 8/8/2023 Pasir Panjang POM: 21/6/2023. Pasir Logok Estate: 5/5/2023</p>	
6.3.3	<p>Management does not interfere with the formation or operation of registered unions/ labour organisations or associations, or other freely elected representatives for all workers including migrant and contract workers.</p> <p>- Minor compliance -</p>	<p>Based on interviews held with NUPW representatives, review of minutes of meeting between NUPW representatives, evidence was available that management does not interfere with the formation of operation of the NUPW. Workers' representatives were chosen from among the workers as confirmed by the workers during interview. Contract workers were also allowed to choose their own representatives, as confirmed during audit interview. Any issues that the contract workers have would be relayed to their representative for further discussion with management.</p>	Complied
Criterion 6.4: Children are not employed or exploited.			
6.4.1	<p>A formal policy for the protection of children, including prohibition of child labour and remediation is in place, and included into service contracts and supplier agreements.</p> <p>- Minor compliance -</p>	<p>The formal Policy for the protection of children exists under the Company's Core Labour Standard Policy dated 1 May 2018. This Policy states that the Company will 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. The minimum age of workers to recruit is 18 years old. This requirement is also included in all agreements with its contractors. Clause 16.8 of the contracts states that the Vendor represents and warrants to comply with applicable labour and employment laws and prohibit any form of child labour, forced and trafficked labour.</p>	Complied

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		<p>Among the contracts sampled were:</p> <ul style="list-style-type: none"> ➤ MZ Ho Enterprise with Johor Plantations Group Berhad for loading and transporting of EFB from Pasir Panjang POM to Ladang Tunjuk Laut; ➤ Chan Choo with Johor Plantations Group Berhad for transporting FFB for Tunjuk Laut from Field P13 & P14 to ramp. ➤ Kenny Resources with Johor Plantations Group Berhad for harvesting of FFB in Fields P13 (267.17 ha) and P15 (110.43 ha) at Tunjuk Laut Estate. ➤ Sg Rezki Sdn Bhd with Johor Plantations Group Berhad for harvesting of FFB at Siang Estate in field P05, P06 & P08. ➤ Semai Setia Transport with Johor Plantations Group Berhad contract No. JPB/CTD/73/29/2023/1(NFH) for transportation of crude palm oil from the mill to various refineries. ➤ Pengangkutan Olimpik Sdn Bhd with Johor Plantations Group Berhad for the transportation of CPO from Mills to various refineries. 	
6.4.2	<p>(C) There is evidence that minimum age requirements are met. Personnel files show that all workers are above the national minimum age or above company policy minimum age, whichever is higher. There is a documented age screening verification procedure.</p> <p>- Critical (Major) compliance -</p>	<p>Pasir Panjang POM and its supply base are able to demonstrate 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. Observations made in the field also confirmed that the minimum age requirements were met.</p>	Complied
6.4.3	<p>(C) Young persons may be employed only for non- hazardous work, with protective restrictions in place for that work.</p>	<p>Based on the workers list of all units under Pasir Panjang Mill and its supply base, interviews conducted and observations made, there</p>	Complied

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	- Critical (Major) compliance -	is no evidence that young persons are being employed either for non-hazardous work or otherwise.	
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 has established its Core Labour Standard Policy dated 1 May 2018 where they are not engaged 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 is displayed on main notice boards.</p> <p>This Policy was also communicated during stakeholder meeting held on 20/9/2023, and displayed at all main notice boards. Interviews held with contractors and suppliers also confirmed their understanding of this obligation.</p> <p>All members of management team, supervisors, mandores, and workers have a clear understanding of this no child labour policy as evidenced throughout the surveillance audit.</p>	Complied
Criterion 6.5: There is no harassment or abuse in the workplace, and reproductive rights are protected.			
6.5.1	<p>(C) A policy to prevent sexual and all other forms of harassment and violence is implemented and communicated to all levels of the workforce.</p> <p>- Critical (Major) compliance -</p>	<p>A Policy to prevent sexual and other forms of harassment are available in Sexual Harassment Policy dated 7/12/2023 signed by the Managing Director. This Policy has been communicated to external stakeholders on 20/9/2023 and to all levels of workforce during muster briefings as follows:</p> <p>Pasir Logok Estate: 14/4/2023</p> <p>Tunjuk Laut Estate: 15/2/2023</p> <p>Siang Estate: 20/3/2023 and 21/6/2023.</p> <p>Pasir Panjang POM: 20/6/2023</p> <p>Bukit Kelompok Estate: 20/6/2023</p> <p>Interviews with sampled workers (checkroll and contract) confirmed that they understood what sexual harassment and harassment at workplace is.</p>	Complied

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6.5.2	<p>(C) A policy to protect the reproductive rights of all, especially of women, is implemented and communicated to all levels of the workforce.</p> <p>- Critical (Major) compliance -</p>	<p>The Company's Core Labour Policy dated 01/10/2021 signed by its Managing Director specifies that the Company recognizes the rights of employees to reproduction and reproductive health, including the right to make decision on reproduction. This Policy were communicated during WoW meetings held as follows:</p> <p>Tunjuk Laut Estate on 20/9/2023</p> <p>Pasir Panjang Mill on 29/6/2023</p> <p>Siang Estate on 15/1/2023 & 24/7/2023</p> <p>This was further supplemented by roadshow conducted by Human Resources Dept from HQ. The roadshow for the Southern Region (comprising Tunjuk Laut Estate, Pasir Panjang POM, Pasir Logok Estate, Bukit Kelompok and Siang Estate) was held on 11/10/2023. Interviews conducted with WoW members confirmed their understanding of these issues discussed.</p> <p>Implementation of the Policy was verified at Siang Estate where two female workers gave birth and were entitled to 98 days paid maternity leave.</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>Sampled and verified during the surveillance audit were assessment of new mothers (also referred to as New Mother Census) held on two new mothers at Siang Estate on 17/4/2023 & 16/7/2023, and at Pasir Panjang Mill on 5/12/2023. The assessments included needs for creche, childcare, vaccination, postpartum issues, etc.</p>	Complied
6.5.4	<p>A grievance mechanism, which respects anonymity and protects complainants where requested, is established, implemented and communicated to all levels of the workforce.</p> <p>- Minor compliance -</p>	<p>The Company's grievance mechanism is available and documented under Grievance Mechanism Doc. No. SQD/SMS/4.1 Issue No. 1 dated 1 Aug 2020. The scope covers all those who deal with Johor Plantations Group Berhad 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</p>	Complied

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		<p>complainants will be respected and protected if requested. This mechanism was briefed during external stakeholder meeting held on 20/9/2023, and during muster briefings as follows:</p> <p>Pasir Logok Estate: 3/2/2023 Tunjuk Laut Estate: 29/8/2023 Siang Estate: 24/5/2023 Pasir Panjang POM: 20/6/2023 Bukit Kelompok Estate: 11/8/2023</p> <p>Implementation of the Policy could not be verified during this surveillance audit because the complaints received were only related to house repairs. However, audit interviews conducted confirmed that workers and external stakeholders understood the mechanism.</p>	
Criterion 6.6: No forms of forced or trafficked labour are used.			
6.6.1	<p>(C) All workers have entered into employment voluntarily and the following are prohibited:</p> <ul style="list-style-type: none"> • Retention of identity documents or passports (except for administration purposes including legalisation and renewal processes) • Charging the workers for recruitment fees. • Contract substitution • Involuntary overtime • Lack of freedom of workers to resign • Penalty for termination of employment • Debt bondage • Withholding of wages <p>- Critical (Major) compliance -</p>	<p>All units within Pasir Panjang 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>Passports: All foreign workers now keep their passports, and are only given to estate/mill management for purposes of passport/work permit renewals.</p> <p>Recruitment fees:</p>	Complied

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		<p>No recruitment fees are imposed on any of the foreign workers. This was further confirmed in interviews held with newly arrived workers from Indonesia, and a review of their payslips.</p> <p>Contract substitution: Interviews held with the workers from Indonesia and Bangladesh confirmed that no contract substitution has occurred. They were all aware of the types of work they would be doing in Malaysia before they left their home countries.</p> <p>Involuntary overtime: Based on documents signed by workers on overtime, and interviews conducted, there is no evidence of involuntary overtime within any Pasir Panjang Mill and its supply base. Workers were given the option to either accept or reject overtime work.</p> <p>Lack of freedom of workers to resign & penalty for termination of employment: 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>Debt bondage & withholding of wages: 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>(C) Where temporary or migrant workers are employed, a specific labour policy and/or procedures are established and implemented.</p> <p>- Critical (Major) compliance -</p>	<p>A special labour policy and procedures have been established under the Johor Plantations Group Berhad Core Labour Standard signed by Managing Director dated 1/10/2021. This Policy:</p> <ul style="list-style-type: none"> - 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 - workers' entitlement to housing and basic amenities which are at par with statutory requirements - free of discrimination, coercion or violence - rights of employees to join trade unions - accessibility to grievance procedure - entitled to one day off per week <p>A review of the pay slips, employment contracts, punch cards and interviews conducted with sampled workers, Pasir Panjang Mill and its supply base were able to demonstrate the implementation of this Policy.</p>	Complied
Criterion 6.7: The unit of certification ensures that the working environment under its control is safe and without undue risk to health.			
6.7.1	<p>(C) The responsible person(s) for H&S is identified. There are records of regular meetings between the responsible person(s) and workers. Concerns of all parties about health, safety and welfare are discussed at these meetings, and any issues raised are recorded.</p> <p>- Critical (Major) compliance -</p>	<p>All Head of Operating Units are appointed as the Chairman for Safety and Health Committee in Pasir Panjang POM and estates as stated in the appointment letter dated 15/09/2021 undersigned by the Chairman, ESG Committee Occupational Safety and Health Main Committee Kulim (M) Berhad. Regular committee meetings conducted on quarterly basis as per sample sighted as following:</p> <ul style="list-style-type: none"> - Siang Estate: OSH Meeting # 04/2023; Date: 03/12/2023; OSH Meeting # 03/2023; Date: 05/09/2023; OSH Meeting # 	Complied

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		<p>02/2023; Date: 05/06/2023 & OSH Meeting # 01/2023; Date: 06/03/2023</p> <ul style="list-style-type: none"> - Pasir Panjang POM: OSH Meeting # 03/2023; Date: 25/09/2023; OSH Meeting # 02/2023; Date: 26/06/2023 & OSH Meeting # 01/2023; Date: 22/03/2023; OSH Meeting # 04/2022; Date: 29/12/2022 - Bukit Kelompok Estate: OSH Meeting # 03/2023; Date: 11/10/2023; OSH Meeting # 02/2023; Date: 15/06/2023; OSH Meeting # 01/2023; Date: 20/03/2023 & OSH Meeting # 04/2022; Date: 26/12/2022 	
6.7.2	<p>Accident and emergency procedures are in place and instructions are clearly understood by all workers. Accident procedures are available in national languages (English and/or Bahasa Malaysia) and explained in the language understandable to the workforce. Assigned operatives trained in first aid are present in both field and other operations, and first aid equipment is available at worksites. Records of all accidents are kept and periodically reviewed.</p> <p>- Minor compliance -</p>	<p>Accident and emergency procedures are in place as per JPG Terra Solutions Flowchart Procedure for Action on Minor Accident (<3 days MC) & Flowchart Procedure for Action on Major Accident (>4 days MC).</p> <p>The mill head of departments and estate mandores are trained to handle and equipped with first aid equipment in all work sites.</p> <p>Records of accidents are kept with latest verified as following:</p> <ul style="list-style-type: none"> - Tunjuk Laut Estate: JKPP 6 report date: 17/03/2023; Accident date: 12/03/2023; Revised HIRARC date: 21/09/2023 - Siang Estate: JKPP 6 report date: 01/09/2023; Accident date: 05/09/2023; Revised HIRARC date: 21/09/2023 <p>Notwithstanding there were lapses found as following:</p> <p>Bukit Kelompok Estate:</p> <p>During visit to spraying operation in field # P1005, consultation with the spraying operation mandore found that the circle spraying substance used i.e. a mixture chemicals that include G-Met 20% Metsulfuron Methyl Ester. It was stated in its Safety Data Sheet (SDS) under Section 4: First Aid Measures - Eye contact: Immediately flush eyes with plenty of water or eyewash solution.</p>	Non-compliance

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		<p>However, the emergency eye wash was not available on-site during the visit.</p> <p>Pasir Logok Estate:</p> <p>During visit to diesel engine house it was found that a field staff was supervising a diesel skid tank refilling activity from a diesel tanker where the location of the skid tank in front of the engine house require the use of personal hearing protection (PHP) as per signages. However, PHP was not worn on-site during the visit.</p> <p>This indicated that the emergency procedures in place was insufficiently implemented. Hence, a Minor NC has been raised.</p>	
6.7.3	<p>(C) Workers use appropriate personal protective equipment (PPE), which is provided free of charge to all workers at the place of work to cover all potentially hazardous operations, such as pesticide application, machine operations, land preparation, and harvesting. Sanitation facilities for those applying pesticides are available, so that workers can change out of PPE, wash and put on their personal clothing.</p> <p>- Critical (Major) compliance -</p>	<p>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> <p>Additionally, regular safety training provided as per sample latest conducted as per sample as following:</p> <ul style="list-style-type: none"> - Siang Estate: Emergency Respond Plan: Fire Drill, Fire Fighting & Emergency Evacuation Training; Date: 02/07/2023 - Siang Estate: Spraying Calibration; Date: 30/05/2023 - Siang Estate: Chemical Handling & Triple Rinsing; Date: 24/05/2023 	Complied

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		<ul style="list-style-type: none">- Bukit Kelompok Estate: Emergency Response Plan Training Kulim Training Centre (Hall 1); Date: 04-05/12/2023- Pasir Logok Estate: Spraying Calibration & Handling; Date: 11/01/2023- Pasir Logok Estate: Chemical Handling, Mixing and Triple Rinsing Training; Date: 12/01/2023- Pasir Logok Estate: PPE Usage Training; Date: 24/01/2023- Bukit Kelompok Estate: Chemical Handling SOP Training; Date: 11/08/2023				
6.7.4	<p>All workers are provided with medical care and covered by accident insurance. Costs incurred from work- related incidents leading to injury or sickness are covered in accordance with Malaysian law.</p> <p>- Minor compliance -</p>	<p>Both local workers and foreign workers were covered under SOCSO scheme. Verified the records of SOCSO contribution form (8A) for the month of September 2023, October 2023 and November 2023 for both the mill and estates workers. Visit to estate clinic and review of records together with interview conducted with estate health assistant confirm that all workers including their dependents were provided with free medical care.</p>	Complied			
6.7.5	<p>Occupational injuries are recorded using Lost Time Accident (LTA) metrics.</p> <p>- Minor compliance -</p>	<p>LTA metrics records available as per sample as following:</p> <p>Tunjuk Laut Estate:</p> <p>Akuan Penerimaan Pendaftaran JKPP 8; Company: Tunjuk Laut Estate; Ref. # JKPP 8/92465/2022; Acceptance date: 14/01/2023; JKPP 8 Calendar year: 2022; Industry Classification: 01117; Industry Size: S:</p> <p>Accident case: 1</p> <p>Occupational disease case: 2</p> <p>Total manhours 2022: 309,600</p> <p>Average workers # 129</p> <table><tr><td></td><td>Accident case</td><td>Occ. Disease case</td></tr></table>		Accident case	Occ. Disease case	Complied
	Accident case	Occ. Disease case				

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		<table><tr><td>Fatal rate</td><td>0</td><td>0</td></tr><tr><td>Occurrence rate</td><td>7.75</td><td>15.50</td></tr><tr><td>Frequency rate</td><td>3.23</td><td>6.46</td></tr><tr><td>Severity rate</td><td>35.53</td><td>0</td></tr></table>	Fatal rate	0	0	Occurrence rate	7.75	15.50	Frequency rate	3.23	6.46	Severity rate	35.53	0	
		Fatal rate	0	0											
		Occurrence rate	7.75	15.50											
		Frequency rate	3.23	6.46											
		Severity rate	35.53	0											
		Siang Estate:													
		Akuan Penerimaan Pendaftaran JKPP 8; Company: Siang Estate; Ref. # JKPP 8/125893/2022; Acceptance date: 26/01/2023; JKPP 8 Calendar year: 2022; Industry Classification: 01117; Industry Size: B:													
		Accident case: 3													
		Occupational disease case: 0													
		Total manhours 2022: 482,400													
Average workers # 201															
<table><tr><td></td><td>Accident case</td><td>Occ. Disease case</td></tr><tr><td>Fatal rate</td><td>0</td><td>0</td></tr><tr><td>Occurrence rate</td><td>14.93</td><td>0</td></tr><tr><td>Frequency rate</td><td>6.22</td><td>0</td></tr><tr><td>Severity rate</td><td>0</td><td>0</td></tr></table>		Accident case	Occ. Disease case	Fatal rate	0	0	Occurrence rate	14.93	0	Frequency rate	6.22	0	Severity rate	0	0
	Accident case	Occ. Disease case													
Fatal rate	0	0													
Occurrence rate	14.93	0													
Frequency rate	6.22	0													
Severity rate	0	0													
Pasir Panjang POM:															
Akuan Penerimaan Pendaftaran JKPP 8; Company: Pasir Panjang POM; Ref. # JKPP 8/129168/2022; Acceptance date: 17/01/2023;															

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		<div>JKKP 8 Calendar year: 2022; Industry Classification: 01117; Industry Size: B: Accident case: 1 Lost day work: 65 Occupational disease case: 5 Total manhours 2022: 285,936 Average workers # 111</div> <table><tr><td></td><td>Accident case</td><td>Occ. Disease case</td></tr><tr><td>Fatal rate</td><td>0</td><td>0</td></tr><tr><td>Occurrence rate</td><td>9.01</td><td>45.05</td></tr><tr><td>Frequency rate</td><td>3.50</td><td>17.49</td></tr><tr><td>Severity rate</td><td>227.32</td><td>0</td></tr></table>		Accident case	Occ. Disease case	Fatal rate	0	0	Occurrence rate	9.01	45.05	Frequency rate	3.50	17.49	Severity rate	227.32	0	
	Accident case	Occ. Disease case																
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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.																		
7.1.1	<div>(C) IPM plans are implemented and monitored to ensure effective pest control. - Critical (Major) compliance -</div>	<div>The Southern Region Estates continued to monitor the Implementation of Integrated Pest Management (IPM) plans. a) The estates had in place documented the IPM plan which covered monitoring of pest, control of pest population levels at below threshold levels by using cultural, biological, physical/mechanical and use of pesticides. The plan was guided by SOP ref A 08.08 dated July 2019. b) In order to minimize use of insecticides on leaf-eating pest, the estates planted beneficial plants such as Turnera subulata, Cassia cobanensis, Antigonon leptopus, along the roadsides and designated points in the fields and also within the nursery perimeter. To develop beneficial plant nursery</div>	Complied															

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		<p>comprised of the beneficial plant.</p> <p>c) The plan also advocated single layer EFB mulching in order to prevent the breeding of rhinoceros beetles. Monthly detection and observation of leaf eating pests, mammalian pests and diseases had been continued. These monthly detection and observations were carried by staff.</p> <p>d) All the estates carried census on rat damage and diseases like Ganoderma. Rat baiting was by calendar baiting at 2 campaigns per year where recommended by the PC /Agronomist. Baiting is continued until bait acceptance threshold level.</p>	
7.1.2	<p>Species referenced in the Global Invasive Species Database and CABI.org are not to be used in managed areas, unless plans to prevent and monitor their spread are implemented.</p> <p>- Minor compliance -</p>	<p>This is not practiced in the 4 estates visited. None of species were referenced in the Global Invasive Species Database and CABI.org are used in the management of IPM.</p>	Complied
7.1.3	<p>There is no use of fire for pest control unless in exceptional circumstances such as plantation sanitation, i.e. where no other effective methods exist, and with prior approval of government authorities.</p> <p>- Minor compliance -</p>	<p>There was no land preparation in Southern Region Mill and Estates by burning ever since Johor Plantations Group Berhad practiced zero burning as per the policy in:</p> <p>a) KMB Agricultural Manual SOP Section A04 dated 01/07/2013 - Under felling/clearing & land preparation</p> <p>b) Environmental Policy - dated 01/10/2021</p> <p>c) Sustainability Policy - 01/10/2021</p> <p>Johor Plantations Group 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, windrowed and left to decompose. There was no evidence that fire had been used to prepare land for replanting in the estate No fire was used for waste disposal.</p>	Complied
Criterion 7.2: Pesticides are used in ways that do not endanger health of workers, families, communities or the environment.			

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7.2.1	<p>(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.</p> <p>- Critical (Major) compliance -</p>	Justification of all agrochemicals demonstrated in the documented 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	<p>(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.</p> <p>- Critical (Major) compliance -</p>	<p>Records of Pesticide/Agrochemicals used in the estate were recorded and monitored on monthly basis and available for to-date 2023 as per sample as following:</p> <table><tr><td>Agrochemical LD50, Rat (mg/kg)</td><td>A.I./ha</td></tr><tr><td>G-Met 20% Metsulfuron Methyl Ester</td><td>0.01108</td></tr><tr><td>Glyphosate 41% Glyphosate isopropylamine</td><td>-</td></tr><tr><td>Foxil/Ranger 32.1% Triclopyr butaxyl ethylester</td><td>-</td></tr><tr><td>BM Cergas 20% Metsulforon Methyl</td><td>-</td></tr><tr><td>Allion 19.05% Indaziflam</td><td>0.00312</td></tr><tr><td>Garlon 32.1% Triclopyr butaxyl ethylester</td><td>0.06044</td></tr><tr><td>Miracle 75% Polyether Modified Trisiloxane</td><td>0.00646</td></tr><tr><td>Kenlly 20% Metsulfuron Methyl</td><td>0.00229</td></tr><tr><td>Ratgone 0.003% Bradifacoum</td><td>0.00023</td></tr><tr><td>Roundup 48.7% potassium salt of glyphosate</td><td>0.25611</td></tr><tr><td>BM Tricalon 43% Triclopyr butoxyl</td><td>0.02822</td></tr><tr><td>Triester 32% Triclopyr butoxyl</td><td>0.10449</td></tr><tr><td>Acephate 97% Acephate</td><td>0.00079</td></tr></table>	Agrochemical LD50, Rat (mg/kg)	A.I./ha	G-Met 20% Metsulfuron Methyl Ester	0.01108	Glyphosate 41% Glyphosate isopropylamine	-	Foxil/Ranger 32.1% Triclopyr butaxyl ethylester	-	BM Cergas 20% Metsulforon Methyl	-	Allion 19.05% Indaziflam	0.00312	Garlon 32.1% Triclopyr butaxyl ethylester	0.06044	Miracle 75% Polyether Modified Trisiloxane	0.00646	Kenlly 20% Metsulfuron Methyl	0.00229	Ratgone 0.003% Bradifacoum	0.00023	Roundup 48.7% potassium salt of glyphosate	0.25611	BM Tricalon 43% Triclopyr butoxyl	0.02822	Triester 32% Triclopyr butoxyl	0.10449	Acephate 97% Acephate	0.00079	Complied
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7.2.3	<p>(C) Any use of pesticides is minimised as part of a plan, eliminated where possible, in accordance with IPM plans.</p> <p>- Critical (Major) compliance -</p>	<p>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.</p> <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>	Complied
7.2.4	<p>There is no prophylactic use of pesticides, unless in exceptional circumstances, as identified in national best practice guidelines.</p> <p>- Minor compliance -</p>	There is no prophylactic use of pesticides in all estates visited.	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"> Judgment of the threat and verify why this is a major threat Why there is no other alternative which can be used Which process was applied to verify why there is no other less hazardous alternative What is the process to limit the negative impacts of the application 	<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 & 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</p>	Complied

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	<p>e) Estimation of the timescale of the application and steps taken to limit application to the specific outbreak.</p> <p>- Minor compliance -</p>	<p>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 also increased the planting of beneficial plants at the bagworm prone areas.</p>	
7.2.6	<p>(C) Pesticides are only handled, used or applied by persons who have completed the necessary training and are always applied in accordance with the product label. All precautions attached to the products are properly observed, applied, and understood by workers (see Criteria 3.6). Personnel applying pesticides must show evidence of regular updates on the knowledge about the activity they carry out.</p> <p>- Critical (Major) compliance -</p>	<p>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 following:</p> <ul style="list-style-type: none"> - Siang Estate: Spraying Calibration; Date: 30/05/2023 - Siang Estate: Chemical Handling & Triple Rinsing; Date: 24/05/2023 - Pasir Logok Estate: Spraying Calibration & Handling; Date: 11/01/2023 - Pasir Logok Estate: Chemical Handling, Mixing and Triple Rinsing Training; Date: 12/01/2023 - Pasir Logok Estate: PPE Usage Training; Date: 24/01/2023 - Bukit Kelompok Estate: Chemical Handling SOP Training; Date: 11/08/2023 	Complied
7.2.7	<p>(C) Storage of all pesticides is in accordance with recognised best practices.</p> <p>- Critical (Major) compliance -</p>	<p>Pesticides were found stored in the mill and all estate's Chemical Store in accordance with the Occupational Safety and Health Act 1994 (Act 514) and Pesticides Act 1974 (Act 149) and their Regulations. The stores were at all times locked and at the time of visit the storekeeper was seen to unlock the 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</p>	Complied

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		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.	
7.2.8	All pesticide containers are triple rinsed and punctured before being disposed of and/or handled responsibly if used for other purposes. - Minor compliance -	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. Verified the disposal records for sample as following: - Siang Estate; Date: 17/10/2023 - Tunjuk Laut Estate; Date: 29/11/2023 - Pasir Logok Estate; Date: 12/12/2023 - Bukit Kelompok Estate; Date: 1/12/2023	Complied
7.2.9	(C) Aerial spraying of pesticides is prohibited, unless in exceptional circumstances where no other viable alternatives are available. This requires prior government authority approval. All relevant information is provided to affected local communities at least 48 hours prior to application of aerial spraying. - Critical (Major) compliance -	No aerial spraying for pesticide were done in all the estates.	Complied
7.2.10	(C) 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	Complied

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		<p>conditions regularly based on CHRA recommendations as per sample as following:</p> <p>Tunjuk Laut Estate; DOSH Reg. # JH/06/04/2048:</p> <ul style="list-style-type: none"> - Chemical Health Risk Assessment Report (Ref. # HQ/16/ASS/00/35 – 2023/39); Assessor name: Dr. Syed Abdul Hamid B. Syed Hassan of TSM Training and Consultancy Services; DOSH Reg. # HQ/16/ASS/00/35; Assessment date: 25/06/2023 - Medical Surveillance 2023; JPB Tunjuk Laut Estate by Dr. Rosman Surie of JPG Terrasolutions Sdn. Bhd.; DOSH OHD Reg. # HQ/15/DOC/00/437; Assessment date: 15/08/2023 <p>Siang Estate; DOSH Reg. # JH/06/04/2048:</p> <ul style="list-style-type: none"> - Chemical Health Risk Assessment Report (Ref. # HQ/16/ASS/00/35 – 2023/22); Assessor name: Dr. Syed Abdul Hamid B. Syed Hassan of TSM Training and Consultancy Services; DOSH Reg. # HQ/16/ASS/00/35; Assessment date: 28/05/2023 - Medical Surveillance 2023; JPB Siang Estate by Dr. Rosman Surie of JPG Terrasolutions Sdn. Bhd.; DOSH OHD Reg. # HQ/15/DOC/00/437; Assessment date: 11/09/2023 	
7.2.11	<p>(C) No work with pesticides is undertaken by persons under the age of 18, pregnant or breastfeeding women or other people that have medical restrictions and they are offered alternative equivalent work.</p> <p>- Critical (Major) compliance -</p>	<p>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 and the SOP for Agrochemical Management under Sustainable Management System; Doc Number: SQD/SMS/6.1; Doc Date: 01.08.2020 (Issue 01) stated that <i>"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."</i></p>	Complied
Criterion 7.3: Waste is reduced, recycled, reused and disposed of in an environmentally and socially responsible manner.			

7.3.1	<p>A waste management plan which includes reduction, recycling, reusing, and disposal based on toxicity and hazardous characteristics, is documented and implemented.</p> <p>- Minor compliance -</p>	<p>Pasir Panjang Mill and all the 4 estates had identified all wastes and sources of pollution. The Waste Management Action Plan 2023 were established to mitigate and control the identified wastes and source of pollution. The common significant environmental receptors for the estates and mill operations among others as summarized below;</p> <ul style="list-style-type: none"> a) Air - Sources from boiler stack (smoke and particulate), vehicle & generator (smoke and gases), anaerobic processes (ETP, EFB dumping)- GHG b) Water - Cleaning water/run-off/process station waters (hydro-cyclone /sterilizer condensate/clarification waste) & boiler quenching water and blow down c) Land - Scheduled waste, domestic waste and industrial/process waste. <p>All waste and pollution are identified and documented in the Waste Management Plan and Pollution Prevention Plan Financial Year 2023 reviewed annually. The waste generated from the mill/estates operations as shown below:</p> <ul style="list-style-type: none"> a) Scheduled waste - Spent IPA, hexane, filter, lubricants, hydraulic oil, grease, used batteries b) Domestic waste - rubbish from the mill/estate complex and employees' quarters c) Industrial waste - Fiber, palm kernel shell, boiler ash, scrap iron d) Sewage - Sewage from housing/office complex <p>The pollution identified from the mill/estate activities:</p> <ul style="list-style-type: none"> a) Black smoke - Emission from Boilers/vehicles/engines b) Odor & gases - Activities from the effluent treatment c) Leakage of lubricant - Storage & vehicle maintenance 	Complied
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7.3.2	<p>Proper disposal of waste material, according to procedures that are fully understood by workers and managers, is demonstrated.</p> <p>- Minor compliance -</p>	<p>In Pasir Panjang POM and the estates in the CU, procedure SPO/W1/06-10 Scheduled Wastes (Hazardous Waste) Management has been established.</p> <p>a) Management and disposal of wastewater 2023 has been established compiled by Assistant Engineer/Assistants/Staff.</p> <p>b) Waste Management Plan 2020 has been established prepared by SID and verified by the Assistant Engineer/Assistants/Manager.</p> <p>c) Interview with staffs and workers i.e. storekeepers and chemical mixer were trained and they had understood the hazards involved and how the chemicals should be used and disposed in a safe manner.</p> <p>d) Among the identified wastes include empty chemical containers including pesticides containers. Empty pesticides containers were washed at washing station prior to disposal.</p> <p>e) Inventory and consignment documents verified for confirmation of proper management and disposal. The CU scheduled waste is disposed to Kualiti Alam Sdn Bhd regn no 003876 dated 30/04/2024 and 5E Resources Sdn Bhd Johor Bahru Regn no. 004651 dated 30/04/2024 (Bkt Kelompok Estate and Pasir Logok Estate) both registered with DOE. Recent records of disposal as shown</p> <table><tr><td></td><td>Date</td><td>SW 409</td><td>SW 408</td><td>SW 410</td><td>SW 305</td><td>SW 429</td><td>SW 110</td><td>SW 306</td></tr><tr><td>PPOM</td><td>28/11/23</td><td>0.086</td><td>0.032</td><td>0.065</td><td>0.610</td><td>0.090</td><td>0.003</td><td>0.208</td></tr><tr><td>PPOM</td><td>20/07/23</td><td>0.036</td><td>-</td><td>0.052</td><td>0.200</td><td>0.126</td><td>0.005</td><td>-</td></tr></table> <table><tr><td>Estate</td><td>Date</td><td>SW 102</td><td>SW 409</td><td>SW 307</td><td>SW 305</td><td>SW 408</td><td>SW 410</td><td>SW 306</td></tr></table>		Date	SW 409	SW 408	SW 410	SW 305	SW 429	SW 110	SW 306	PPOM	28/11/23	0.086	0.032	0.065	0.610	0.090	0.003	0.208	PPOM	20/07/23	0.036	-	0.052	0.200	0.126	0.005	-	Estate	Date	SW 102	SW 409	SW 307	SW 305	SW 408	SW 410	SW 306	Complied
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Estate	Date	SW 102	SW 409	SW 307	SW 305	SW 408	SW 410	SW 306																															

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		T Laut	29/11/23	0.140	0.369	0.275	0.110	0.051	0.385	-
		T Laut	04/09/23	-	0.726	-	-	-	-	-
		T Laut	19/08/23	-	-	0.200	0.157	0.038	0.035	0.070
				SW 110	SW 409	SW 307	SW 305	SW 408	SW 410	SW 306
		Siang	17/10/23	0.010	0.123	0.097	0.790	0.051	0.035	0.216
		Siang	25/05/23	-	-	0.062	0.904	-	-	0.311
		Siang	08/05/23	0.027	0.170	-	-	0.046	0.064	-
				SW 110	SW 409	SW 307	SW 305	SW 408	SW 410	SW 306
		PLE	12/12/23	-	0.100	0.020	0.030	0.050	0.050	0.030
		PLE	17/07/23	-	0.230	0.003	0.600	-	0.132	-
				SW 110	SW 409	SW 307	SW 305	SW 408	SW 410	SW 306
		BKE	01/12/23	-	0.035	0.070	0.105	0.005	0.004	0.040
		BKE	29/09/23	-	0.018	0.030	0.120	0.007	0.004	0.138
		SW 404 - Clinical Waste								
			Date	Quantity /mt		Date	Quantity /mt			
		T Laut	21/11/2023	0.0017		20/06/2023	0.0027			

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Siang	21/11/2023	0.0030	25/05/2023	0.0023
PLE	13/12/2023	0.0026	-	-
BKE	21/11/2023	0.0008	20/06/2023	0.0016

Domestic waste for the operating units in Melewar Production Unit were disposed as follows. Collections are made 2/3 x week

- a) Bkt Kelompok Estate - internal landfill P05/B1
- b) Siang Estate - internal landfill located at P07/B2
- c) Tunjuk Laut Estate - internal landfill located at P09/B2
- d) Pasir Logok Estate - internal landfill located at P04/B2
- e) P Panjang POM - internal landfill of Pasir Panjang Estate P14

All landfill sites were visited and verified for compliance.

There are procedures and guidelines in the disposal of wastes and pollutants guided by SID Head Office level to minimize pollution on the routine operation.

Training in relation to environment as shown below;

	Estate - Subject	T Laut	Siang	P Logok
1	CPR/ERP procedure	04/12/23	16/04/23	12/01/23
2	Compound hygiene & disease	28/08/23	23/11/23	08/05/23
3	Company Policies	10/01/23	10/05/23	09/09/23
4	Recycling Environment - Fire	16/05/23	08/11/23	25/07/23
5	RSPO / MSPO awareness	18/10/23	15/05/23	20/09/23
6	Buffer Region maintenance	08/02/23	03/01/23	15/07/23
7	Oil trap- maintenance	23/02/23	11/01/23	08/05/23
8	Sch Waste inventory /disposal	11/07/23	13/04/23	11/09/23
9	Fire - ERP - Zero Burning	25/10/23	02/07/23	15/11/23

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		<table><tr><td>10</td><td>RTE /HCV /Buffer Region</td><td>25/01/23</td><td>21/03/23</td><td>10/08/23</td></tr><tr><td>11</td><td>Landfill Management / SOP</td><td>16/02/23</td><td>13/02/23</td><td>08/05/23</td></tr><tr><td>12</td><td>WTP / Chemical Management</td><td>07/04/23</td><td>03/04/23</td><td>10/10/23</td></tr></table> <table><tr><td></td><td>Estate /Mill - Subject</td><td>B Kmpok</td><td>PPPOM</td><td></td></tr><tr><td>1</td><td>CPR/ERP procedure</td><td>04/12/23</td><td>01/10/23</td><td></td></tr><tr><td>2</td><td>Compound hygiene & disease</td><td>14/09/23</td><td>26/11/23</td><td></td></tr><tr><td>3</td><td>Company Policies</td><td>11/3/23</td><td>06/08/23</td><td></td></tr><tr><td>4</td><td>Recycling Environment - Fire</td><td>14/09/23</td><td>07/05/23</td><td></td></tr><tr><td>5</td><td>RSPO / MSPO awareness</td><td>20/05/23</td><td>06/08/23</td><td></td></tr><tr><td>6</td><td>Buffer Region maintenance</td><td>10/05/23</td><td>02/04/23</td><td></td></tr><tr><td>7</td><td>Oil trap- maintenance</td><td>11/07/23</td><td>19/02/23</td><td></td></tr><tr><td>8</td><td>Sch Waste inventory /disposal</td><td>11/05/23</td><td>19/02/23</td><td></td></tr><tr><td>9</td><td>Triple rinsing – guidelines</td><td>04/04/23</td><td>07/05/23</td><td></td></tr><tr><td>10</td><td>Fertilizer application - Riparian</td><td>06/05/23</td><td>-</td><td></td></tr><tr><td>11</td><td>Noise Risk/Workshop Activities</td><td>16/06/23</td><td>29/10/23</td><td></td></tr><tr><td>12</td><td>Fire - ERP - Zero Burning</td><td>05/12/23</td><td>01/10/23</td><td></td></tr><tr><td>13</td><td>RTE /HCV /Buffer Region</td><td>10/05/23</td><td>02/04/23</td><td></td></tr><tr><td>14</td><td>Landfill Management / SOP</td><td>18/05/23</td><td>05/11/23</td><td></td></tr><tr><td>15</td><td>WTP / Chemical Management</td><td>09/02/23</td><td>14/05/23</td><td></td></tr><tr><td>16</td><td>Effluent Treatment Plant</td><td>-</td><td>14/05/23</td><td></td></tr></table> <p>The mill waste produced from the processing operations as listed below;</p> <p>a) POME - Application at designated field specified by Agronomist.</p> <p>b) EFB - Application at designated field specified by Agronomist.</p> <p>c) Fiber/Shell - Utilization as fuel in the boiler.</p> <p>d) Surplus fibre used in compost production & shell sold externally</p> <p>e) Boiler Ash - Placed in area far from water source to prevent water pollution.</p>	10	RTE /HCV /Buffer Region	25/01/23	21/03/23	10/08/23	11	Landfill Management / SOP	16/02/23	13/02/23	08/05/23	12	WTP / Chemical Management	07/04/23	03/04/23	10/10/23		Estate /Mill - Subject	B Kmpok	PPPOM		1	CPR/ERP procedure	04/12/23	01/10/23		2	Compound hygiene & disease	14/09/23	26/11/23		3	Company Policies	11/3/23	06/08/23		4	Recycling Environment - Fire	14/09/23	07/05/23		5	RSPO / MSPO awareness	20/05/23	06/08/23		6	Buffer Region maintenance	10/05/23	02/04/23		7	Oil trap- maintenance	11/07/23	19/02/23		8	Sch Waste inventory /disposal	11/05/23	19/02/23		9	Triple rinsing – guidelines	04/04/23	07/05/23		10	Fertilizer application - Riparian	06/05/23	-		11	Noise Risk/Workshop Activities	16/06/23	29/10/23		12	Fire - ERP - Zero Burning	05/12/23	01/10/23		13	RTE /HCV /Buffer Region	10/05/23	02/04/23		14	Landfill Management / SOP	18/05/23	05/11/23		15	WTP / Chemical Management	09/02/23	14/05/23		16	Effluent Treatment Plant	-	14/05/23		
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7.3.3	The unit of certification does not use open fire for waste disposal. - Minor compliance -	Johor Plantations Group Berhad practices of “Zero open burning” is enforced and elaborated in the Sustainability Policy. a) 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	Complied																																																																																																				

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		<p>the estates. All the estates had replanting program spanned over the forthcoming years as shown in 3.1.2.</p> <p>b) There was no evidence that fire had been used to prepare land for replanting in the estate No fire was used for waste disposal.</p>	
Criterion 7.4: Practices maintain soil fertility at, or where possible improve soil fertility to, a level that ensures optimal and sustained yield.			
7.4.1	<p>Good agriculture practices, as contained in SOPs, are followed to manage soil fertility to optimise yield and minimise environmental impacts.</p> <p>- Minor compliance -</p>	<p>The estates in the CU continued to use and implement SOP for each of the processes. Brief version of the SOP was displayed at the appropriate locations. Copies of the documented SOP were presented to the audit team. It was observed that activities being implemented which involved safety, health, environmental, quality, employees, etc. had followed the established SOP.</p> <p>a) Kulim Agricultural Manual established in 2011</p> <p>b) Guidelines On Natural Water Course SOP no A17 01/07/2013</p> <p>c) Pictorial Safety Standards and Security Guidelines (PSS)</p> <p>d) Laboratory Process Control Manual</p> <p>e) Security Guidelines SOP No E07 dated 01/07/2013</p> <p>f) Manuring SOP no D01 - D04 dated 01/07/2013</p> <p>All the estates and mill operations were guided through the manuals and SOP. The procedures as documented in the manual and SOP were disseminated to the staff/workers through morning briefings and training. The Manuals are kept in the main office for references of employees particularly for the supervisory personnel. The SOP included all operations in the estates from seedlings in nursery to planting of young palms and plantation upkeep to mill FFB receipt, grading, processing, quality analysis and security. Site inspection and interview with workers confirmed that the SOP had been implemented and they understood the requirements of the SOP, the</p>	Complied

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		bottom-line of which is Good Agricultural Practice and the care for their safety and health and the environment.																																					
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 -	<p>Periodic tissue and soil sampling were carried out in the Estates to monitor changes in nutrient status and its results formed the basis for the fertilizers input recommendation. The soil analysis provided the indication of soil health and monitors the changes in the organic carbon and total nitrogen. The agronomic assessment and fertilizer recommendation was conducted by AAD (Agronomy and Advisory Dept of Head Office to formulate the FY2024 manuring programme and to suggest relevant agronomic practices for oil palm yield and growth improvement. Annual foliar sampling for Ash, N, P, K, Mg, Ca & B had been carried out in all estates. The latest being:</p> <table><tr><td></td><td></td><td colspan="2">Soil Analysis</td><td colspan="2">Foliar Analysis</td></tr><tr><td></td><td>Estate</td><td>Report Date</td><td>Report No</td><td>Report Date</td><td>Report No</td></tr><tr><td>1</td><td>T Laut</td><td>01/10/2023</td><td>S1/10/123</td><td>19/10/2023</td><td>L1/10/334</td></tr><tr><td>2</td><td>Siang</td><td>15/11/2022</td><td>S1/11/168</td><td>08/11/2022</td><td>L1//11/86</td></tr><tr><td>3</td><td>B Kpok</td><td>11/08/2023</td><td>S1/08/101</td><td>05/09/2023</td><td>L1/09/271</td></tr><tr><td>4</td><td>P Logok</td><td>29/05/2023</td><td>S1/05/62</td><td>11/05/2023</td><td>L1/05/62</td></tr></table> <p>Soil analysis for PH, Org C, Total N, Total P, Avail P, Exch K, Exch Ca & Exch Mg was carried out on a 5-year cycle basis. All foliar and soil sampling & analysis was conducted by Central Analytical Laboratory of Johor Plantation Bhd. Reports were sighted and verified.</p>			Soil Analysis		Foliar Analysis			Estate	Report Date	Report No	Report Date	Report No	1	T Laut	01/10/2023	S1/10/123	19/10/2023	L1/10/334	2	Siang	15/11/2022	S1/11/168	08/11/2022	L1//11/86	3	B Kpok	11/08/2023	S1/08/101	05/09/2023	L1/09/271	4	P Logok	29/05/2023	S1/05/62	11/05/2023	L1/05/62	Complied
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7.4.3	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. - Minor compliance -	<p>All the estates visited had a nutrient recycling strategy in place which included stacking pruned fronds in the respective fields to decompose, grass cutting harvesters paths and letting the cut mass to decompose in the field, EFB mulching and application of compost. In addition, during replanting, palms were felled, chipped,</p>	Complied																																				

		<p>windowed and left to decompose. Records showed that the estates had applied EFB at 30-40 mt/ha and records showed that EFB metric ton in 2022/23 were as follows:</p> <table><tr><td></td><td>Estate</td><td>Field no</td><td>Ha</td><td>Mt</td></tr><tr><td>1</td><td>Tunjuk Laut</td><td>P09/1</td><td>47.59</td><td>1,427</td></tr><tr><td>2</td><td>Tunjuk Laut</td><td>P11/1</td><td>57.96</td><td>668.10</td></tr><tr><td>3</td><td>Tunjuk Laut</td><td>P12/4</td><td>72.90</td><td>913.20</td></tr><tr><td>4</td><td>Pasir Logok</td><td>P05/1</td><td>26.71</td><td>801.30</td></tr><tr><td>5</td><td>Pasir Logok</td><td>P07/2</td><td>60.37</td><td>1,811.10</td></tr><tr><td>6</td><td>Siang</td><td>Nil</td><td>Nil</td><td>Nil</td></tr><tr><td>7</td><td>Siang</td><td>Nil</td><td>Nil</td><td>Nil</td></tr><tr><td>8</td><td>B Kelompok</td><td>P08/1</td><td>35.51</td><td>1,065.00</td></tr><tr><td>9</td><td>B Kelompok</td><td>P11</td><td>61.80</td><td>675.00</td></tr></table>		Estate	Field no	Ha	Mt	1	Tunjuk Laut	P09/1	47.59	1,427	2	Tunjuk Laut	P11/1	57.96	668.10	3	Tunjuk Laut	P12/4	72.90	913.20	4	Pasir Logok	P05/1	26.71	801.30	5	Pasir Logok	P07/2	60.37	1,811.10	6	Siang	Nil	Nil	Nil	7	Siang	Nil	Nil	Nil	8	B Kelompok	P08/1	35.51	1,065.00	9	B Kelompok	P11	61.80	675.00	
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7.4.4	Records of fertiliser inputs are maintained. - Minor compliance -	<p>Fertilizer application program was monitored using records like program sheets, bin cards, field cost book, Fertilizer Application monitoring forms, etc. Records of programs and applications of fertilizers were reviewed by auditors. Review of the records revealed that the actual fertilizers applied in 2022/23 was in line with the program. The following fertilizers were applied in Southern Region estates subject to the recommendation by the Agronomist.</p> <table><tr><td></td><td>Fertilizer</td><td>Kg/palm</td><td>application month</td></tr><tr><td>1</td><td>MOP</td><td>2.00</td><td>March / Sept</td></tr><tr><td>2</td><td>A Sulphate</td><td>2.75</td><td>Jan / May</td></tr><tr><td>3</td><td>Mix2 + B</td><td>2.75</td><td>Oct</td></tr></table>		Fertilizer	Kg/palm	application month	1	MOP	2.00	March / Sept	2	A Sulphate	2.75	Jan / May	3	Mix2 + B	2.75	Oct	Complied																																		
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			4	Bayover RP	1.50	June																																																																												
			5	HGFB	0.15	July / Aug																																																																												
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 -	Description of the soil characteristics such as texture, depth, drainage, parent material and key aspect for management was available. The soil series in the estates were classified as follows: <table><tr><td></td><td>Siang</td><td>Pasir Logok</td><td>T Laut</td><td>B Kelompok</td></tr><tr><td>1</td><td>Binjai</td><td>Apek</td><td>Binjai</td><td>Pohoi</td></tr><tr><td>2</td><td>Durian</td><td>Baling</td><td>Bungor</td><td>Bungor</td></tr><tr><td>3</td><td>Marang</td><td>Batu Lapan</td><td>Chat</td><td>Batu Lapan</td></tr><tr><td>4</td><td>Tawi</td><td>Bungor</td><td>Jabil</td><td>Btg Merbau</td></tr><tr><td>5</td><td>Melaka</td><td>Holyrood</td><td>Btg Merbau</td><td>Melaka</td></tr><tr><td>6</td><td>Local Allu</td><td>Jabil</td><td>Local alluv</td><td>Local alluv</td></tr><tr><td>7</td><td>Apek</td><td>Kg Pusu</td><td>Kemuning</td><td>Terap</td></tr><tr><td>8</td><td>Rusila</td><td>Lintang</td><td>Lintang</td><td>Lintang</td></tr><tr><td>9</td><td>Serdang</td><td>Marang</td><td>Masai</td><td>Rengam</td></tr><tr><td>10</td><td>Seremban</td><td>Pelepah</td><td>Rengam</td><td>Tai Tak</td></tr><tr><td>11</td><td>-</td><td>Pohoi</td><td>Sabrang</td><td>Tawar</td></tr><tr><td>12</td><td>-</td><td>Rengam</td><td>Tai Tak</td><td>-</td></tr><tr><td>13</td><td>-</td><td>Tawar</td><td>Tawar</td><td>-</td></tr><tr><td>14</td><td>-</td><td>Telaga</td><td>Tebuk</td><td>-</td></tr></table>						Siang	Pasir Logok	T Laut	B Kelompok	1	Binjai	Apek	Binjai	Pohoi	2	Durian	Baling	Bungor	Bungor	3	Marang	Batu Lapan	Chat	Batu Lapan	4	Tawi	Bungor	Jabil	Btg Merbau	5	Melaka	Holyrood	Btg Merbau	Melaka	6	Local Allu	Jabil	Local alluv	Local alluv	7	Apek	Kg Pusu	Kemuning	Terap	8	Rusila	Lintang	Lintang	Lintang	9	Serdang	Marang	Masai	Rengam	10	Seremban	Pelepah	Rengam	Tai Tak	11	-	Pohoi	Sabrang	Tawar	12	-	Rengam	Tai Tak	-	13	-	Tawar	Tawar	-	14	-	Telaga	Tebuk	-	Complied
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		There were no other problem soils (e.g. podzols and acid sulphate soils) in the 4 estates.																																					
7.5.2	<p>No replanting on steep slopes (above 25 degrees) unless approved by state governments. In case of replanting is permitted, no replanting in contiguous area of steep terrain (greater than 25 degrees) larger than 25 Ha within the Unit of Certification.</p> <p>- Minor compliance -</p>	<p>Like all Johor Plantations Group Berhad Estates, the estates visited in CU 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:</p> <ul style="list-style-type: none">a) Slope & River Protection Policy in Section A17 Johor Plantations Group Berhad Manualb) Buffer Region & 25-degree slope in Section A07 Johor Plantations Group Berhad Manualc) Land Preparation for Terracing in Section A08 Johor Plantations Group Berhad Manual. <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 mucuna bracteata had been planted along crucial slopes by management. Large areas with neprolepis biserrata in the inter rows were sighted during the visit. The slope maps were provided by the AASD (Agronomy Advisory Service Dept) with details as follows:</p> <table><tr><td></td><td>Topography</td><td>T Laut</td><td>Siang</td><td>P Logok</td><td>B Kpok</td></tr><tr><td>1</td><td>0-2</td><td>12.35</td><td>20.46</td><td>7.10</td><td>3.72</td></tr><tr><td>2</td><td>2-6</td><td>11.43</td><td>21.88</td><td>22.99</td><td>14.76</td></tr><tr><td>3</td><td>6-12</td><td>56.61</td><td>29.12</td><td>46.80</td><td>52.23</td></tr><tr><td>4</td><td>12-20</td><td>18.93</td><td>22.54</td><td>23.11</td><td>29.29</td></tr><tr><td>5</td><td>20-25</td><td>0.24</td><td>0.00</td><td>0.00</td><td>0.00</td></tr></table>		Topography	T Laut	Siang	P Logok	B Kpok	1	0-2	12.35	20.46	7.10	3.72	2	2-6	11.43	21.88	22.99	14.76	3	6-12	56.61	29.12	46.80	52.23	4	12-20	18.93	22.54	23.11	29.29	5	20-25	0.24	0.00	0.00	0.00	Complied
	Topography	T Laut	Siang	P Logok	B Kpok																																		
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		<table><tr><td></td><td>>25</td><td>0.44</td><td>0.00</td><td>0.00</td><td>0.00</td></tr><tr><td></td><td>Total</td><td>100.00</td><td>100.00</td><td>100.00</td><td>100.00</td></tr></table>		>25	0.44	0.00	0.00	0.00		Total	100.00	100.00	100.00	100.00	
	>25	0.44	0.00	0.00	0.00										
	Total	100.00	100.00	100.00	100.00										
7.5.3	There is no new planting of oil palm on steep terrain. - Minor compliance -	This compliance being addressed in the Sustainable Policy - "Slope and River Protection" signed by the Managing Director dated 01/10/2021 stating the following among others; "Slope of >25 degree to be excluded from any new plantation development and replanting program. For slope <25 degree the existing crop all vegetative shall be maintained accordingly". Similar commitments are also described in the Environmental Policy - dated 01/10/2021	Complied												
Criterion 7.6: Soil surveys and topographic information are used for site planning in the establishment of new plantings, and the results are incorporated into plans and operations.															
7.6.1	(C) To demonstrate the long-term suitability of land for palm oil cultivation, soil maps or soil surveys identifying marginal and fragile soils, including steep terrain, are taken into account in plans and operations. - Critical (Major) compliance -	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. All estates in the CU had no new planting for the current year and also for the forthcoming 5 years operations.	Complied												
7.6.2	Extensive planting on marginal and fragile soils, is avoided, or, if necessary, done in accordance with the soil management plan for best practices. - Minor compliance -	Johor Plantations Group Berhad Group had no planting on areas of more than 25 degree. Plantings on steep slope are either avoided or minimized.	Complied												
7.6.3	Soil surveys and topographic information guide the planning of drainage and irrigation systems, roads and other infrastructure. - Minor compliance -	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												
Criterion 7.7: No new planting on peat, regardless of depth after 15 November 2018 and all peatlands are managed responsibly.															

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7.7.1	(C) There is no new planting on peat regardless of depth after 15 November 2018 in existing and new development areas. - Critical (Major) compliance -	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	Areas of peat within the managed areas are inventoried, documented and reported (effective from 15 November 2018) to RSPO Secretariat. PROCEDURAL NOTE: 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 -	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
7.7.3	(C) 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. There was also no new planting in the estates	Complied
7.7.4	(C) 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 Group 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 among others the following; a) Monitor the quality of main water inlet/outlet for pollutants from estate's operations. b) Good drainage system to ensure adequate water supply for the palm trees via growth monitoring. c) Construction of roadside pits for a good road drainage. d) Contingency during water shortage. e) Monitoring of water level at low lying fields during the monsoon months for flood mitigation.	Complied
7.7.5	(C) For plantations planted on peat, drainability assessments are conducted following the RSPO Drainability Assessment Procedure, or other RSPO recognised methods, at least five years prior to replanting.	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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	<p>The assessment result is used to set the timeframe for future replanting, as well as for phasing out of oil palm cultivation at least 40 years, or two cycles, whichever is greater, before reaching the natural gravity drainability limit for peat. When oil palm is phased out, it is replaced with crops suitable for a higher water table (paludiculture) or rehabilitated with natural vegetation.</p> <p>This is subject to transitional (5 years: 2019 to 2024) arrangement stated in the Drainability Assessment Procedure.</p> <p>Within 12 months initial implementation period, company could submit other alternate methodologies to be considered by RSPO for recognition.</p> <p>- Critical (Major) compliance -</p>		
7.7.6	<p>(C) All existing plantings on peat are managed according to the 'RSPO Manual on Best Management Practices (BMPs) for existing oil palm cultivation on peat', version 2 (2019) and associated audit guidance.</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
7.7.7	<p>(C) All areas of unplanted and set-aside peatlands in the managed area (regardless of depth) are protected as "peatland conservation areas"; new drainage, road building and power lines by the unit of certification on peat soils is prohibited; peatlands are managed in accordance with the 'RSPO BMPs for Management and Rehabilitation of Natural Vegetation Associated with Oil Palm Cultivation on Peat', version 2 (2019) and associated audit guidance.</p> <p>- Critical (Major) compliance -</p>	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
Criterion 7.8: Practices maintain the quality and availability of surface and groundwater.			
7.8.1	<p>A water management plan is in place and implemented to promote more efficient use and continued availability of water sources and to avoid negative impacts on other users in the catchment. The plan addresses the following:</p>	<p>The Water Management Plan 2023 has been established with the recent review made on respectively by the OU. Among others the plan therein has emphasized;</p> <ul style="list-style-type: none"> a) rainwater harvesting for cleaning purposes b) water from the reservoir/catchment for the mill operations 	Complied

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	<p>a) The unit of certification does not restrict access to clean water or contribute to pollution of water used by communities.</p> <p>b) Workers have adequate access to clean water.</p> <p>- Minor compliance -</p>	<p>c) continual training for workers on water efficiency consumption</p> <p>d) Workers have adequate to clean water. The same water source supplied to the mill and estates are from the same source of supply, own catchment with WTP facilities.</p> <p>e) desilting of water reservoir to retain the reservoir optimal capacity.</p> <p>f) The action plan in event of draught/water pollution.</p> <p>The estates similarly possessed the following water management plan. Among others containing the following initiatives.</p> <table border="1" data-bbox="1160 746 1910 1359"> <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 & 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.	
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	Drain upkeep	Interruption water flow at drainage system.	Periodic desilting Building of sandbags 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.

Water Management Plan review date was sighted and verified with records as follows;

a) Siang Estate - 01/09/2023
b) Tunjuk Laut Estate - 01/09/2023
c) Pasir Logok Estate - 01/08/2023
d) Bkt Kelompok Estate - 01/09/2023
e) Pasir Panjang POM - 15/08/2023

The Mill Identification & Management of Waste Water 2023 among others as summarized below;

Location	Waste water produced	Treatment/containment	Reuse/recycle/disposal
Processing stations	Clarification condensate Sterilizer condensate Hydro cyclone condensate Mill floor cleaning water	Oil recovery/ETP	Recover into system
Boiler	Blow down, cleaning water	Sludge pit, ETP	Monsoon drain

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		<table><tr><td>Process ramp</td><td>Rainfall runoff</td><td>Sedimentation trap</td><td>Monsoon drain</td></tr><tr><td>Engine room</td><td>Steam condensate, turbine cooling water</td><td>Monsoon drain, recycled tank</td><td>Monsoon drain</td></tr><tr><td>Lab</td><td>Cleaning water</td><td>Process drain</td><td>Monsoon drain</td></tr><tr><td>Wash room</td><td>Toilet water, cleaning water</td><td>Septic tank</td><td>Collected by licensed contractor.</td></tr></table> <p>The mill collected water samples for the domestic water consumption collected by SPAN twice a year. All results were sighted and verified, and sample shown above. Analysis made in Decagon Lab & Analytical Testing, Shah Alam Selangor. All parameters are within the limits under Raw Water Quality Standard MOH 2010. Similar analysis is made by the estates for the internal drinking water.</p> <table><tr><td></td><td>23/05/23 Parameter</td><td>Unit</td><td>Result</td><td>Regn raw water</td><td>Std drinking water</td><td>Result</td></tr><tr><td>1</td><td>PH</td><td>-</td><td>5.6</td><td>5.5-9.0</td><td>6.5-9.0</td><td>7.1</td></tr><tr><td>2</td><td>Turbidity</td><td>-</td><td>1.22</td><td>1000</td><td>5</td><td>0.8</td></tr><tr><td>3</td><td>Aluminium</td><td>NTU</td><td>ND</td><td>-</td><td>0.2</td><td>1.2</td></tr><tr><td>4</td><td>Chlorine</td><td>mg/L</td><td>-</td><td>-</td><td>0.2-5</td><td>0.2</td></tr><tr><td>5</td><td>Coli form</td><td>mg/L</td><td>ND</td><td>5000</td><td>Nil</td><td>Nil</td></tr><tr><td>6</td><td>E coli</td><td>MPN/</td><td>ND</td><td>5000</td><td>Nil</td><td>Nil</td></tr></table>	Process ramp	Rainfall runoff	Sedimentation trap	Monsoon drain	Engine room	Steam condensate, turbine cooling water	Monsoon drain, recycled tank	Monsoon drain	Lab	Cleaning water	Process drain	Monsoon drain	Wash room	Toilet water, cleaning water	Septic tank	Collected by licensed contractor.		23/05/23 Parameter	Unit	Result	Regn raw water	Std drinking water	Result	1	PH	-	5.6	5.5-9.0	6.5-9.0	7.1	2	Turbidity	-	1.22	1000	5	0.8	3	Aluminium	NTU	ND	-	0.2	1.2	4	Chlorine	mg/L	-	-	0.2-5	0.2	5	Coli form	mg/L	ND	5000	Nil	Nil	6	E coli	MPN/	ND	5000	Nil	Nil	
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7.8.2	(C) Water courses and wetlands are protected, including maintaining and restoring appropriate riparian and other buffer zones in line with 'RSPO Manual on BMPs for the management and rehabilitation of riparian	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	OFI																																																																	

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.

- Critical (Major) compliance -

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 KMB Agricultural Manual SOP no A17 revised dated 01/07/2013. The buffer Regions established are as follows:

	River width	Buffer Region
1	>40 meters	50 meters
2	20 - 40 meters	40 meters
3	10 - 20 meters	20 meters
4	5 - 10 meters	10 meters
5	< 5 meters	5 meters

Buffer Regions were protected. Areas visited for the estates as tabled below;

- Siang Estate - Water Catchment located at P10/Block 2
- Tunjuk Laut Estate - Water Catchment located at P04/1
- Bkt Kelompok Estate - 2 water Catchment Ponds
- Pasir Panjang POM - Mill water catchment

Water samples from the intake point are taken for phosphate and nitrate analysis for detection of fertilizer application effect to the water courses. Extracted record of the estates with details below;

			Siang Estate		Tunjuk Laut	
	Parameter	unit	09/11/2023		29/11/2023	
			Pt A	Pt B	<0.05	<0.05
1	Phosphate	mg PO4/L	0.13	0.05	0.98	0.58

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		2	N Nitrogen	mg NO3N/L	<0.05	<0.05	<0.05	<0.05
					B Kelompok		Pasir Logok	
			Parameter	unit	22/10/2023		29/11/2023	
					Pt A	Pt B	Pt A	Pt B
		1	Phosphate	mg PO4/L	<0.05	<0.05	<0.05	<0.05
		2	N Nitrogen	mg NO3N/L	0.35	0.94	0.24	0.80
			Pasir Panjang POM 29/10/2023					
			Parameter	unit	Pt A	Pt B	Pt C	Limit
		1	pH	-	6.7	7.1	-	6-9
		2	Hardness	mg/L	24	39	-	-
		3	BOD	mg/L	<10	<10	-	1000
		4	COD	mg/L	12	71	-	-
		5	A Nitrogen	mg/L	1.22	1.29	-	-
		6	N Nitrogen	mg NO3N/L	<0.05	<0.05	-	7.00
		7	Chloride	mg/L	15	13	-	-
		8	Phosphorus	mg P/L	0.27	0.20	-	0.20
		9	D Oxygen	Mg DO/L	7.75	7.92	-	-
		The limit for phosphate and nitrate is 0.2 ppm and 7 ppm, respectively. Variations and action plan were discussed during the quarterly Mesyuarat Alam Sekitar. Prevention is made especially						

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		<p>during the manuring activities. Johor Plantations Group Berhad reviewed the environmental performances during the monthly EPMC Environmental Performance Monitoring Committee. Sighted minutes of meeting PPPOM dated 06/10/20 among others discussing the following;</p> <ul style="list-style-type: none"> a) Effluent treatment and performance b) Scheduled wastes and others waste management c) Clean air monitoring d) Environmental Programs <p>Notwithstanding, although visit to the field in Siang Estate found no evidence of buffer zone and riparian reserve encroachment/chemical spraying/manuring application, the management could consider further training for knowledge and understanding on the requirement of the BMPs for the management and rehabilitation of riparian reserves (April 2017): 2.1.5 ARTIFICIAL DRAINAGE CHANNELS so it could be enhanced further among the employees. Hence, an OFI has been raised.</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 treatment plant was made in accordance and interview with operator in charge revealed that the operation was in accordance with standard operation procedure and legal requirements.</p> <ul style="list-style-type: none"> a) No overflow was observed, and flow meter reading was recorded daily. The mill monitoring the effluent and submits to DOE through 'Borang Penyata Suku Tahunan'. b) Pasir Panjang Mill DOE license no 004649 was for land application requirement of which is BOD less than 1000 mg/l in Pasir Panjang Estate field no P14. c) The results from final discharge were compliance within parameter limit. Record was sighted and verified. 	Complied

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		<table><tr><td>Sample date</td><td>Std</td><td>12/7/23</td><td>04/8/23</td><td>05/9/23</td></tr><tr><td>PH</td><td>-</td><td>8.50</td><td>8.30</td><td>8.30</td></tr><tr><td>BOD</td><td>1000</td><td>96.00</td><td>126.00</td><td>196.00</td></tr><tr><td>COD</td><td>-</td><td>1244</td><td>1465</td><td>1938</td></tr><tr><td>Total solids</td><td>-</td><td>7452</td><td>8124</td><td>8132</td></tr><tr><td>S Solids</td><td>-</td><td>588</td><td>724</td><td>736</td></tr><tr><td>Oil & grease</td><td>-</td><td>9.00</td><td>9.00</td><td>4.00</td></tr><tr><td>A Nitrogen</td><td>-</td><td>229</td><td>211</td><td>434</td></tr><tr><td>Total N</td><td>-</td><td>239</td><td>234</td><td>537</td></tr></table>	Sample date	Std	12/7/23	04/8/23	05/9/23	PH	-	8.50	8.30	8.30	BOD	1000	96.00	126.00	196.00	COD	-	1244	1465	1938	Total solids	-	7452	8124	8132	S Solids	-	588	724	736	Oil & grease	-	9.00	9.00	4.00	A Nitrogen	-	229	211	434	Total N	-	239	234	537																
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7.8.4	Mill water use per tonne of FFB is monitored and recorded. - Minor compliance -	<p>The mill processing water are obtained from the water catchment adjacent to the mill complex. The water usage (processing) monitoring is made on a monthly basis with the latest recording (water usage per mt in 2023 of fresh fruit bunches (FFB) below;</p> <table><tr><td>No</td><td>Month</td><td>Water/Mt</td><td>FFB /mt</td><td>Water /FFB</td></tr><tr><td>1</td><td>Jan</td><td>32471</td><td>23338</td><td>1.39</td></tr><tr><td>2</td><td>Feb</td><td>27314</td><td>17826</td><td>1.53</td></tr><tr><td>3</td><td>Mac</td><td>31105</td><td>24949</td><td>1.25</td></tr><tr><td>4</td><td>Apr</td><td>32434</td><td>24711</td><td>1.31</td></tr><tr><td>5</td><td>May</td><td>27028</td><td>25083</td><td>1.08</td></tr><tr><td>6</td><td>June</td><td>27554</td><td>24776</td><td>1.11</td></tr><tr><td>7</td><td>July</td><td>30507</td><td>26445</td><td>1.15</td></tr><tr><td>8</td><td>Aug</td><td>30922</td><td>25675</td><td>1.20</td></tr><tr><td>9</td><td>Sept</td><td>31175</td><td>27979</td><td>1.11</td></tr><tr><td>10</td><td>Oct</td><td>36064</td><td>28570</td><td>1.26</td></tr><tr><td>11</td><td>Nov</td><td>37120</td><td>28284</td><td>1.31</td></tr></table>	No	Month	Water/Mt	FFB /mt	Water /FFB	1	Jan	32471	23338	1.39	2	Feb	27314	17826	1.53	3	Mac	31105	24949	1.25	4	Apr	32434	24711	1.31	5	May	27028	25083	1.08	6	June	27554	24776	1.11	7	July	30507	26445	1.15	8	Aug	30922	25675	1.20	9	Sept	31175	27979	1.11	10	Oct	36064	28570	1.26	11	Nov	37120	28284	1.31	Complied
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		<table><tr><td>12</td><td>Dec</td><td>26786</td><td>18264</td><td>1.47</td></tr><tr><td></td><td>Total</td><td>370480</td><td>296900</td><td>1.25</td></tr></table> <p>There were variations of performance. Probable factors are linked to rainy days, significant boiler water rinsing/discharging for maintenance etc. The base rate is 1.20.</p>	12	Dec	26786	18264	1.47		Total	370480	296900	1.25			
12	Dec	26786	18264	1.47											
	Total	370480	296900	1.25											
Criterion 7.9: Efficiency of fossil fuel use and the use of renewable energy is optimised															
7.9.1	<p>A plan for efficiency of the use of fossil fuels and to optimise renewable energy is implemented, monitored and documented.</p> <p>- Minor compliance -</p>	<p>A plan for improving the efficiency of the use of fossil fuels is in place and has been incorporated into the Environmental Aspect and Impact activities report for 2023. The Environment Management Plan for efficiency of fossil fuel usage are detailed below:</p> <table><tr><td></td><td>Target</td><td>Objective</td><td>Action plan</td></tr><tr><td>1</td><td>Backhoe , tractor</td><td>To reduce fossil fuel (diesel) consumption from company-owned vehicles and fuel using mobile equipment</td><td>to ensure the vehicle engine is turn off during idle time to record vehicle activity which consume fuel</td></tr><tr><td>2</td><td>Van / Supervisory vehicle</td><td>To reduce fossil fuel (diesel) consumption from company-owned vehicles and fuel using mobile equipment</td><td>to record vehicle activity in order to eliminate waste activity which consume fuel. to turn off vehicle engine during idle time. Scheduled servicing for optimal performance</td></tr></table> <p>The diesel utilization for the mill and estates is provided in the below table. Units in Diesel L/FFB mt for 2022 Total diesel usage in Pasir Panjang POM is 357060 liters.</p>		Target	Objective	Action plan	1	Backhoe , tractor	To reduce fossil fuel (diesel) consumption from company-owned vehicles and fuel using mobile equipment	to ensure the vehicle engine is turn off during idle time to record vehicle activity which consume fuel	2	Van / Supervisory vehicle	To reduce fossil fuel (diesel) consumption from company-owned vehicles and fuel using mobile equipment	to record vehicle activity in order to eliminate waste activity which consume fuel. to turn off vehicle engine during idle time. Scheduled servicing for optimal performance	Complied
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Mth	PPOM	Siang	P Logok	B Kpok	T Laut
Jan	0.83	4.16	6.79	4.07	7.65
Feb	1.30	4.88	10.91	4.95	7.53
Mac	0.65	4.41	9.79	5.26	5.87
April	1.07	4.84	8.19	5.27	5.48
May	1.16	4.1	7.88	4.42	5.30
Jun	1.13	3.87	6.58	3.90	5.28
July	1.09	3.67	7.07	4.98	5.05
Aug	1.50	3.86	6.26	4.12	5.09
Sept	1.33	3.77	7,25	4.38	4.88
Oct	1.56	3.65	7.04	3.15	5.73
Nov	1.46	2.94	7.18	2.96	5.20
Dec	1.33	3.02	7.52	3.18	8.13
Total/L	357060	78265	336006	49422	58596
B/line	1.20	3.83	8.16	4.09	5.76

The estates and mill record and monitor the diesel utilization over the running hours of gen-set and other vehicles running. Performance variation in view of several factors i.e.

- a) Infrastructure of estates,
- b) Community size
- c) No. of vehicles / age of machine.
- d) To reduce reliance on fossil fuel by utilization of methane gas from Biogas Plant to generate electricity.
- e) Weather interference / crop production volume

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		There is no opportunity for the estates to capitalize the utilization of fibre/shell produced from the mill as part of their energy production in replacement of fossil fuel with the current technology limitation.	
Criterion 7.10: Plans to reduce pollution and emissions, including greenhouse gases (GHG), are developed, implemented and monitored and new developments are designed to minimise GHG emissions.			
7.10.1	(C) GHG emissions are identified and assessed for the unit of certification. Plans to reduce or minimise them are implemented, monitored through the Palm GHG calculator and publicly reported. - Critical (Major) compliance -	Pasir Panjang POM and Estates had identified emission of greenhouse gas (GHG) from their operations such as emission from their farm tractor and gen set operation. a) The management from both estates and mill had planned to reduce emission by daily inspection and monitoring for their farm tractor and gen set to prevent any leakage and problem that could adversely impact the environment. b) Fuel Consumption, Peat Oxidation, POME and reported in the Palm GHG Summary Report.	Complied
7.10.2	(C) Starting 2014, the carbon stock of the proposed development area and major potential sources of emissions that may result directly from the development are estimated and a plan to minimise them prepared and implemented (following the RSPO GHG Assessment Procedure for New Development). - Critical (Major) compliance -	Pasir Panjang POM and Estates had 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.	Complied
7.10.3	(C) Other significant pollutants are identified and plans to reduce or minimise them implemented and monitored. - Critical (Major) compliance -	An assessment of all polluting activities has been conducted and monitored. This included the gaseous emissions, particulate / soot emissions and effluent. The CU has continued to maintain its environmental aspects/impacts register associated with their activities. Environmental aspect and impact (EIA) in form doc no KULIM-LS-2023 which covers estates and mill activities / operation. Pollution Identification Environmental Improvement Management	Complied

		<p>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 among others;</p> <ul style="list-style-type: none">a) Monitoring of buffer Region near water courseb) Inlet/outlet water monitoring for nitrate and phosphatec) Cleaning and monitoring on PCDd) Maintenance and inspection of vehiclese) Erosion control program - cover crop and Guatemala grassf) Monitoring of SW disposal/transferg) Triple rinsing empty chemicals <p>Among others the significant environmental receptors for the estates and mill operations are;</p> <ul style="list-style-type: none">a) Air - Sources from boiler stack (smoke and particulate), vehicle & generator (smoke and gases), anaerobic processes (ETP, EFB dumping)- GHGb) Water - Cleaning water/run-off/process station waters (hydro-cyclone /sterilizer condensate/clarification waste) & boiler quenching water and blow downc) Land - Scheduled waste, domestic waste and industrial/process waste. <p>Pasir Panjang POM conducted boiler stack sampling for 1 boiler stack by Mareff Management Sdn Bhd. The mill has made an ESP installation in June 2023 and expected to commission in Jan 2024. Results were within the acceptable limit.</p> <table><tr><th>Boiler ref</th><th>Date</th><th>Dust concentration</th><th>EQA std</th></tr><tr><td></td><td></td><td></td><td></td></tr></table>	Boiler ref	Date	Dust concentration	EQA std					
Boiler ref	Date	Dust concentration	EQA std								

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		<table><tr><td>JH 80248</td><td>PMD</td><td>08/06/2023</td><td>75 mg/m3</td><td>150 mg/m3</td></tr></table> <p>The mill was also 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> <p>An assessment of identified polluting activities is being conducted and monitored, inclusive of gaseous emissions, particulate / soot emissions and effluent. The Waste & Pollution Management Plan 2023 is used to identify the waste products and sources of pollution – is in place and is being reviewed and implemented accordingly. Among of action has been taken by CU were:</p> <p>a) Scheduled wastes – disposed to Kualiti Alam Sdn Bhd and 5E Resources Sdn Bhd. Details as shown in 7.3.2 above.</p> <p>b) Domestic waste is disposed at respective internal landfill.</p> <p>c) Full compliance to zero burning practices.</p>	JH 80248	PMD	08/06/2023	75 mg/m3	150 mg/m3	
JH 80248	PMD	08/06/2023	75 mg/m3	150 mg/m3				
Criterion 7.11: Fire is not used for preparing land and is prevented in the managed area								
7.11.1	(C) Land for new planting or replanting is not prepared by burning. - Critical (Major) compliance -	<p>There was no land preparation of existence or new planting in Southern Region Estates by burning ever since Johor Plantations Group Berhad practiced zero burning as per the content in:</p> <p>a) Under KMB SOP A04-A07 Replanting felling/clearing & land preparation</p> <p>b) Environmental Policy signed by the Managing Director dated 01/10/2021</p> <p>Johor Plantations Group 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</p>	Complied					

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		was no evidence that fire had been used to prepare land for replanting in the estates. No fire was used for waste disposal.																																																																		
7.11.2	The unit of certification establishes fire prevention and control measures for the areas directly managed by the unit of certification. - Minor compliance -	<p>This is established in the ERP procedure. Therein containing:</p> <p>a) Objective b) Activity and prevention. c) Function of Fire and Rescue Team d) Emergency Evacuation Plan / Drill</p> <p>The procedure was formalized by Sustainability & Innovation Department for use in all operating units in Southern Region Estates and Mills. Training related to fire drill /prevention were held respectively all estates and mill. Among others the related session as shown below;</p> <table><tr><td></td><td>Estate - Subject</td><td>T Laut</td><td>Siang</td><td>P Logok</td></tr><tr><td>1</td><td>CPR/ERP procedure</td><td>04/12/23</td><td>16/04/23</td><td>12/01/23</td></tr><tr><td>2</td><td>Company Policies</td><td>10/01/23</td><td>10/05/23</td><td>09/09/23</td></tr><tr><td>3</td><td>Recycling Environment - Fire</td><td>16/05/23</td><td>08/11/23</td><td>25/07/23</td></tr><tr><td>4</td><td>RSPO / MSPO awareness</td><td>18/10/23</td><td>15/05/23</td><td>20/09/23</td></tr><tr><td>5</td><td>Fire - ERP - Zero Burning</td><td>25/10/23</td><td>02/07/23</td><td>15/11/23</td></tr><tr><td></td><td></td><td></td><td></td><td></td></tr><tr><td></td><td>Estate /Mill - Subject</td><td>B Kmpok</td><td>PPPOM</td><td>-</td></tr><tr><td>1</td><td>CPR/ERP procedure</td><td>04/12/23</td><td>01/10/23</td><td>-</td></tr><tr><td>3</td><td>Company Policies</td><td>11/3/23</td><td>06/08/23</td><td>-</td></tr><tr><td>4</td><td>Recycling Environment - Fire</td><td>14/09/23</td><td>07/05/23</td><td>-</td></tr><tr><td>5</td><td>RSPO / MSPO awareness</td><td>20/05/23</td><td>06/08/23</td><td>-</td></tr><tr><td>6</td><td>Fire - ERP - Zero Burning</td><td>05/12/23</td><td>01/10/23</td><td>-</td></tr></table>		Estate - Subject	T Laut	Siang	P Logok	1	CPR/ERP procedure	04/12/23	16/04/23	12/01/23	2	Company Policies	10/01/23	10/05/23	09/09/23	3	Recycling Environment - Fire	16/05/23	08/11/23	25/07/23	4	RSPO / MSPO awareness	18/10/23	15/05/23	20/09/23	5	Fire - ERP - Zero Burning	25/10/23	02/07/23	15/11/23							Estate /Mill - Subject	B Kmpok	PPPOM	-	1	CPR/ERP procedure	04/12/23	01/10/23	-	3	Company Policies	11/3/23	06/08/23	-	4	Recycling Environment - Fire	14/09/23	07/05/23	-	5	RSPO / MSPO awareness	20/05/23	06/08/23	-	6	Fire - ERP - Zero Burning	05/12/23	01/10/23	-	Complied
	Estate - Subject	T Laut	Siang	P Logok																																																																
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7.11.3	The unit of certification engages with adjacent stakeholders on fire prevention and control measures. - Minor compliance -	The entire Region estates and mill held a combined meeting on 20/09/2023 with 86 participants present. Similar meeting was also made on 16/1/2022 having an attendance of 24 participants. Information in slides form in relation to ERP procedure - Program	Complied																																																																	

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		<p>Pencegahan Kebakaran and Fire Prevention and Control Measure were presented. Therein containing:</p> <ul style="list-style-type: none"> a) Objective b) Activity and Fire Prevention. <ul style="list-style-type: none"> i. Avoidance of land clearing using fire ii. No fire to be used in peat soil fields iii. In event of fire occurrence to contact the estate/mill management or Fire Department iv. In event of any fire occurrence in the neighboring properties the estate/mill management to at best level provide assistance with available resources. c) Function of Fire and Rescue Team d) Emergency Evacuation Plan / Drill <p>The meeting also recorded to date there were no report or incidence relating to fire within the complex and surrounding communities.</p>	
Criterion 7.12: Land clearing does not cause deforestation or damage any area required to protect or enhance High Conservation Values (HCVs) or High Carbon Stock (HCS) forest. HCVs and HCS forests in the managed area are identified and protected or enhanced.			
7.12.1	<p>(C) Land clearing since November 2005 has not damaged primary forest or any area required to protect or enhance HCVs. Land clearing since 15 November 2018 has not damaged HCVs or HCS forests.</p> <p>A historic Land Use Change Analysis (LUCA) is conducted prior to any new land clearing, in accordance with the RSPO LUCA guidance document.</p> <p>- Critical (Major) compliance -</p>	<p>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.</p>	Complied
7.12.2	<p>(C) HCVs, HCS forests and other conservation areas are identified as follows:</p>	<p>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</p>	Complied

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<p>a) For existing plantations with an HCV assessment conducted by an RSPO-approved assessor and no new land clearing after 15 November 2018, the current HCV assessment of those plantations remains valid.</p> <p>b) Any new land clearing (in existing plantations or new plantings) after 15 November 2018 is preceded by an HCV-HCS assessment, using the HCSA Toolkit and the HCV-HCSA Assessment Manual. This will include stakeholder consultation and take into account wider landscape-level considerations.</p> <p>PROCEDURAL NOTE:</p> <p>Requirement is further clarified under the Interpretation of Indicator 7.12.2 and Annex 5 (approved by BOG on 12 June 2019).</p> <p>- Critical (Major) compliance -</p>	<p>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;</p> <ul style="list-style-type: none">a) General biodiversity issuesb) Watercourses and drainagec) Habitats natural and man-maded) Wildlifee) Ponds and reservoirsf) Wetlands /watercoursesg) Legal aspectsh) Immediate and long-term effect. <p>The HCV assessment methodologies are through site observation, interviews, stakeholders consultation and desktop review on available secondary data. The assessment among others covers the following areas;</p> <ul style="list-style-type: none">a) Overview of HCV assessment.b) Description of assessment areas.c) Finding and discussion<ul style="list-style-type: none">- landscape context- HCV criteria and application to agricultured) HCV monitoring and management <p>In summary the HCV present within the estates / mill landholdings as summarized below. The respective dates of review are shown in the table.</p> <table><tr><td></td><td>Field</td><td>Siang Estate 21/02/20 - Description</td><td>HCV Category</td><td>Ha</td></tr><tr><td></td><td></td><td></td><td></td><td></td></tr></table>		Field	Siang Estate 21/02/20 - Description	HCV Category	Ha					
	Field	Siang Estate 21/02/20 - Description	HCV Category	Ha							

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		1	P03A/01	MANGROVE (RBA 2)	4	25.06
		2	P08/01	Mill Water Catchment	4	3.68
		3	P08/03	Bkt Cina - Laterite (RBA 5)	4	0.66
		4	P10/01	Reservoir & Infaq 1 Warisan (RBA 4)	4	34.05
		5	P11/02	Abandoned Old Palm (RBA 7)	4	5.43
		6	P12/01	Pond (RBA 8)	4	2.01
		7	P12/01	Balau Water Catchment	4	0.22
				TOTAL		71.11
			Field	Bkt Kelompok Estate 22/04/2019 - Description	HCV Category	Ha
		1	P99/1	Buffer Zone	4	0.26
		2	P05/2	Buffer Zone	4	1.17
		3	P06/4	Buffer Zone	4	1.06
		4	P07/1	Buffer Zone	4	0.87
		5	P07/2	Buffer Zone	4	0.51
		6	P07/3	Buffer Zone	4	0.84
		7	P07/5	Buffer Zone	4	3.61
		8	P08/2	Buffer Zone	4	0.86
		9	P08/3	Buffer Zone	4	0.95
10	P09/1	Buffer Zone	4	1.18		
11	P09/2	Buffer Zone	4	0.5		

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		1	P03/1	Reservoir & Buffer Zone (RBA 2)	4	4.08
		2	P10/1	EX- Sand Mining (RBA 1)	4	11.63
		3	P11/4	Swampy	4	1.69
				TOTAL		17.4
			Field	Tunjuk Laut Estate 04/06/2017- Description	HCV Category	Ha
		1	P06/5	Pond 1	4	0.36
		2	P06/5	Undeveloped (RBA 6)	2	8.84
		3	P07/5	Steep Area (RBA 3)	4	6.08
		4	P08/1	Buffer Zone	4	0.21
		5	P09/2	Buffer Zone	4	2.28
		6	P09/3	Buffer Zone	4	1.50
		7	P09/5	Buffer Zone	4	0.68
		8	P11/1	Swampy	4	0.55
		9	P12/1	Buffer Zone	4	1.93
		10	P12/5	Pond (RBA 1)	4	2.28
		11	P12/5	Buffer Zone	4	0.89
		12	P14/01	Pond (RBA 13)	4	3.42
		13	P14/02	Pond (RBA 13)	4	0.15
		14	P16A/01	Steep Area (RBA 3)	4	0.06
				TOTAL		29.23

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		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>(C) Where HCVs, HCS forests after 15 November 2018, peatland and other conservation areas have been identified, they are protected and/or enhanced. An integrated management plan to protect and/or enhance HCVs, HCS forests, peatland and other conservation areas is developed, implemented and adapted where necessary, and contains monitoring requirements. The integrated management plan is reviewed at least once every five years. The integrated management plan is developed in consultation with relevant stakeholders and includes the directly managed area and any relevant wider landscape level considerations (where these are identified).</p> <p>- Critical (Major) compliance -</p>	<p>The audit findings have confirmed that there is no new HCVs, HCS forests peatland and other conservation areas been identified after 15 Nov 2018 in CU estates.</p> <p>The HCV assessment methodologies are through site observation, interviews, stakeholders consultation and desktop review on available secondary data. The assessment among others covers the following areas;</p> <ul style="list-style-type: none"> e) Overview of HCV assessment f) Description of assessment areas g) Finding and discussion <ul style="list-style-type: none"> i. landscape context ii. HCV criteria and application to agriculture iii. HCV monitoring and management <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 also 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> <p>The entire Region estates and mill held a combined meeting on 20/09/2023 with 86 participants present. Similar meeting was also made on 16/1/2022 having an attendance of 24 participants. Information in slides form in relation to RTE / HCV / Biodiversity</p>	Complied

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		<p>management in the organization were presented. Therein containing the integrated management plan comprises among others covering the following scope.</p> <ul style="list-style-type: none"> a) Biological Diversity b) Management of High Conservation Value Area. <ul style="list-style-type: none"> i. There are 6 categories of HCV in the estates and mill ii. The HCV management using the concept of Access, plan, action and monitoring c) Rare Threatened and Endangered Species <ul style="list-style-type: none"> i. Definition and protection under law ii. Disciplinary action / Punishment / Legality Consequences iii. Continuous monitoring of RTE / HCV iv. Flow chart of RTE Conflict management d) Emergency Evacuation Plan / Drill 	
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 were 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
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>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 CU estates.</p>	Complied

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	- Minor compliance -		
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 PI/RC and also 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
7.12.8	<p>(C) Where there has been land clearing without prior HCV assessment since November 2005, or without prior HCV-HCSA assessment since 15 November 2018, the Remediation and Compensation Procedure (RaCP) applies.</p> <p>- Critical (Major) compliance -</p>	<p>The audit findings have confirmed that there is no new land clearing affecting areas of HCVs, HCS forests peatland and other conservation areas.</p>	Complied

Appendix B: GHG Reporting Executive Summary

The GHG emissions that were produced in **2022** for **Pasir Panjang Palm Oil Mill** and supply base was calculated using the PalmGHG Calculator version 3.0.1. The assessment team had verified the data input in the PalmGHG Calculator against operations records. PalmGHG Calculation Options selected 'Full version' and 'Exclude LUC Emission' calculation option is not applied. The records verified includes:

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

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

Emission per product	tCO ₂ e/tProduct
CPO	0.42
PKO	0.42

Extraction	%
OER	20.65
KER	5.23

Production	t/yr
FFB Process	295,900.46
CPO Produced	61,099.71
PKO Produced	15,468.67

Land Use	Ha
OP Planted Area	16,498.97
OP Planted on peat	0.00
Conservation (forested)	382.20
Conservation (non-forested)	212.78
Total	16,498.97

*Total FFB processed inclusive of diversion form REM Estate & Sungai Papan Estate which is the supply bases of sister mill Sindora POM; RSPO cert. # RSPO 612392

Summary of Field Emission and Sink

	Own Crop*		Group		3 rd Party		Total	
	tCO ₂ e	tCO ₂ e / FFB	tCO ₂ e	tCO ₂ e / FFB	tCO ₂ e	tCO ₂ e / FFB	tCO ₂ e	tCO ₂ e / FFB
Emission								
Land Conversion	127,419.73	0.48	11,921.55	0.38	-	-	139,341.28	0.43
CO ₂ Emission from fertilizer	8,437.58	0.03	1,073.30	0.03	-	-	9,510.88	0.03
NO ₂ Emission	6,100.52	0.02	787.99	0.02	-	-	6,888.51	0.02
Fuel Consumption	5,140.78	0.02	207.92	0.01	-	-	5,348.70	0.02
Peat Oxidation	-	-	-	-	-	-	-	-
Sink								
Crop Sequestration	-120,776.97	-0.46	-11,300.04	-0.36	-	-	-132,077.01	-0.41
Conservation Sequestration	-3,458.11	-0.01	-6.21	-	-	-	-3,464.31	-0.01
Total	22,863.53	0.09	2,684.50	0.08	-	-	25,548.03	0.09

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**Note: Includes both estates and smallholders*

Summary of Mill Emission and Credit

	tCO ₂ e	tCO ₂ e/tFFB
Emission		
POME	6,865.52	0.02
Fuel Consumption	1,114.03	-
Grid Electricity Utilization	- 135.35	-
Credit		
Export of Grid Electricity	- 135.35	-
Sales of PKS	- 1,474.09	-
Sales of EFB	-	-
Total	6,370.11	0.03

Summary of Kernel Crusher Emission and Credit (if applicable)

Emissions	tCO ₂ e
PK from own mill	0.42
PK from other source	-
Fuel Consumptions	-
Total Crusher emissions	-

*This mill has no kernel crusher operation.

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

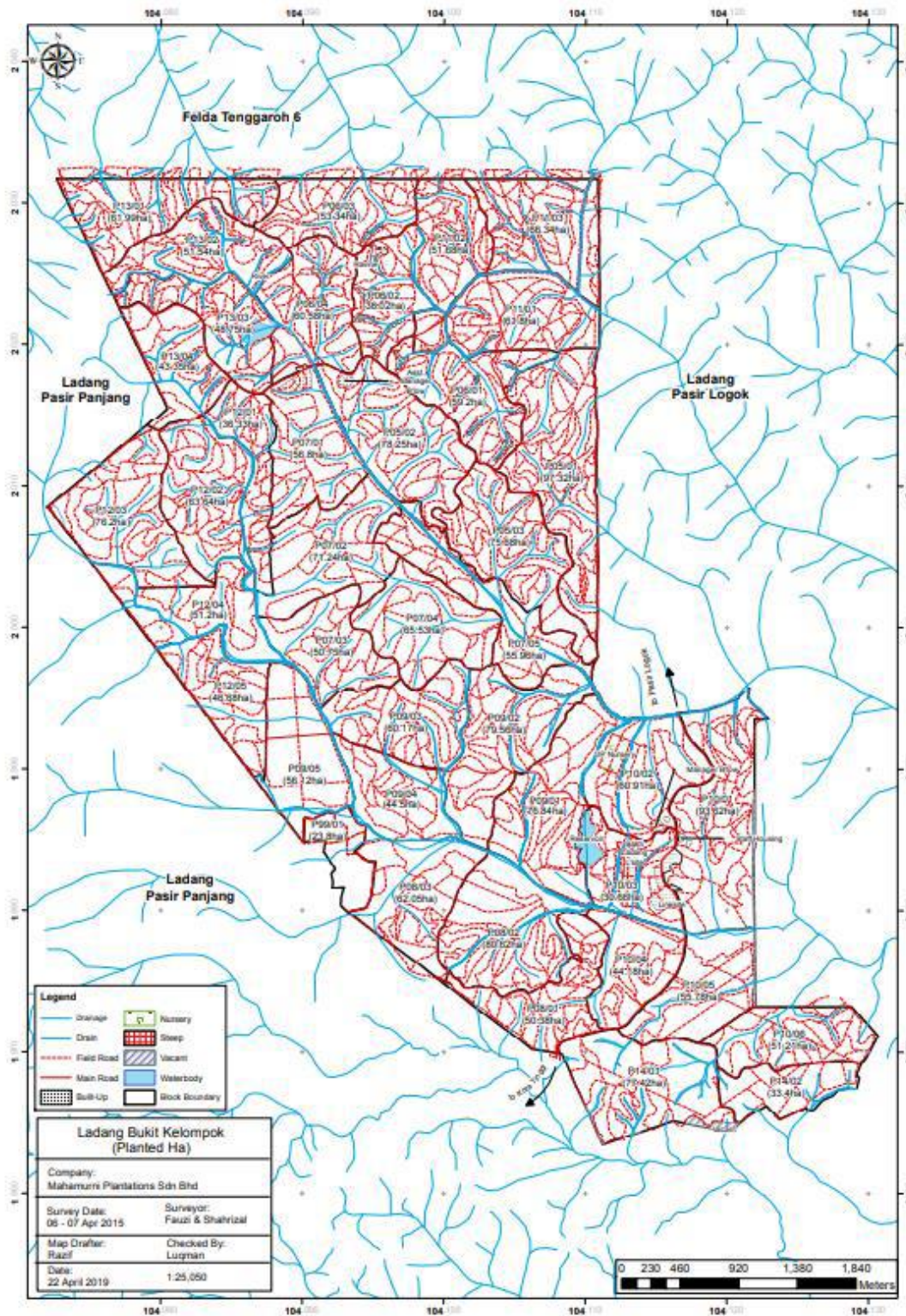
POME Diverted to Anaerobic Digestion:	
Divert to anaerobic pond (%)	100
Divert to methane captured (flaring) (%)	61
Divert to methane captured (energy generation) (%)	39

Appendix C: Location Map of Certification Unit and Supply bases

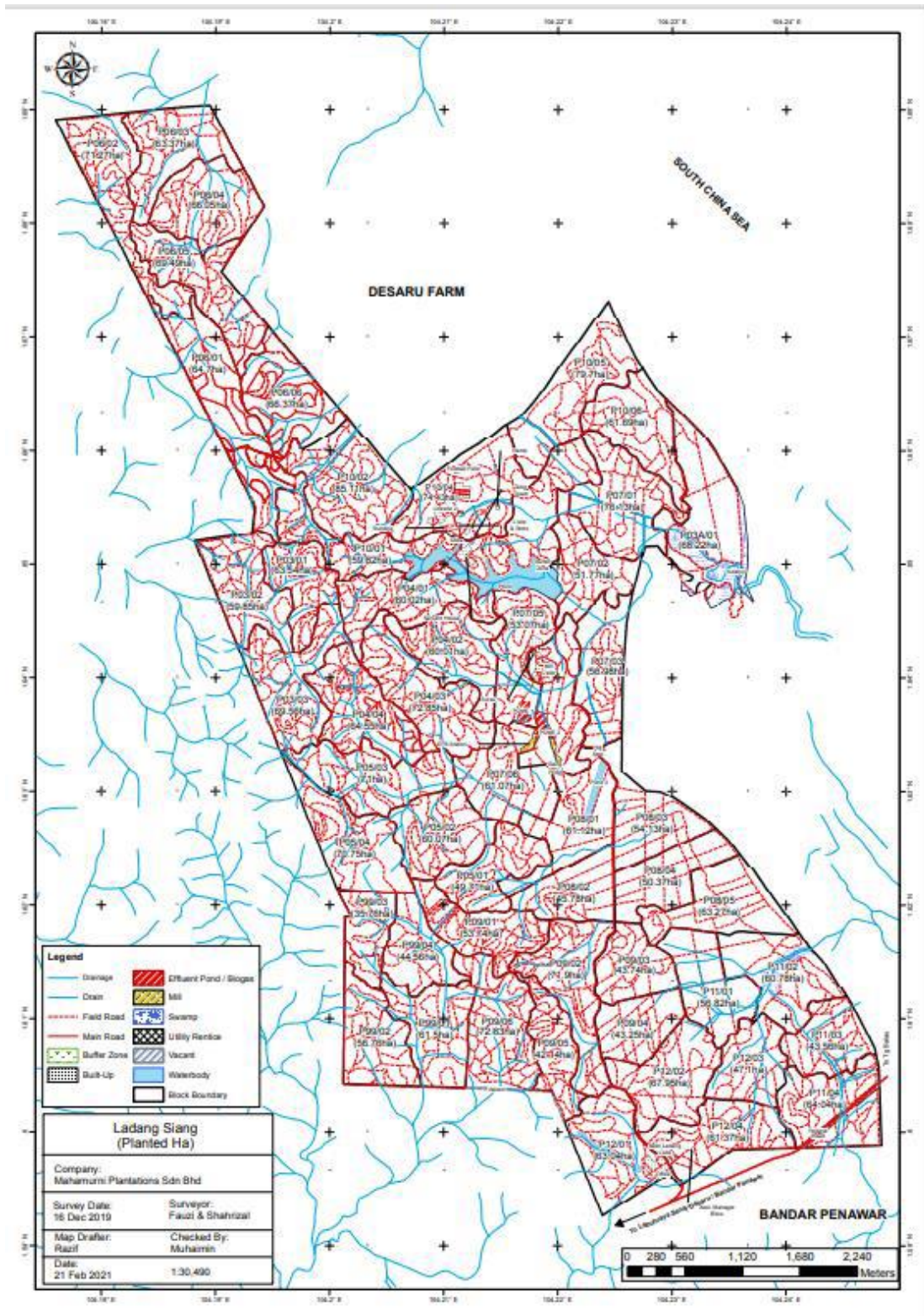


Appendix D: Estate Field Map

Bukit Kelompok Estate

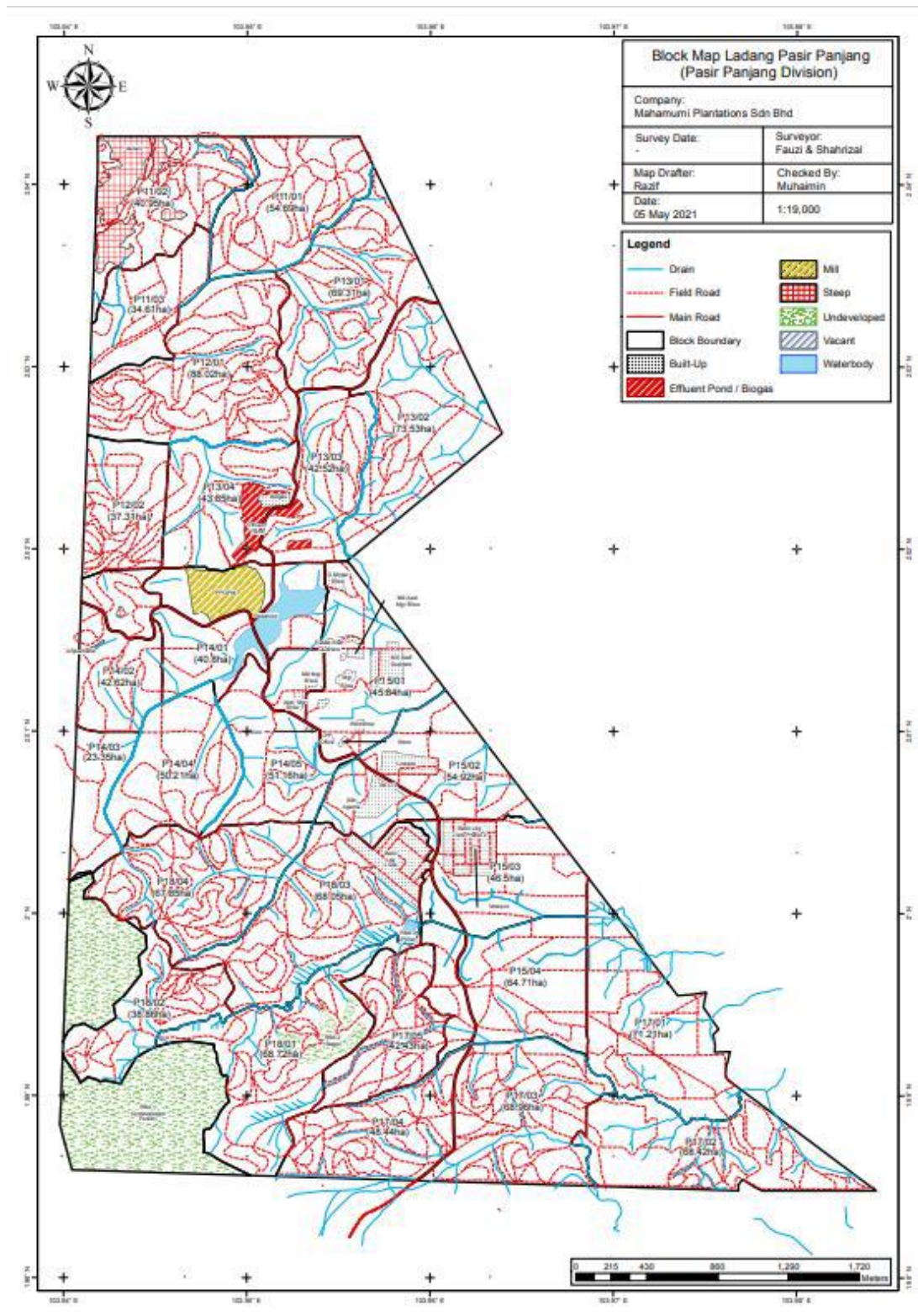


Siang Estate

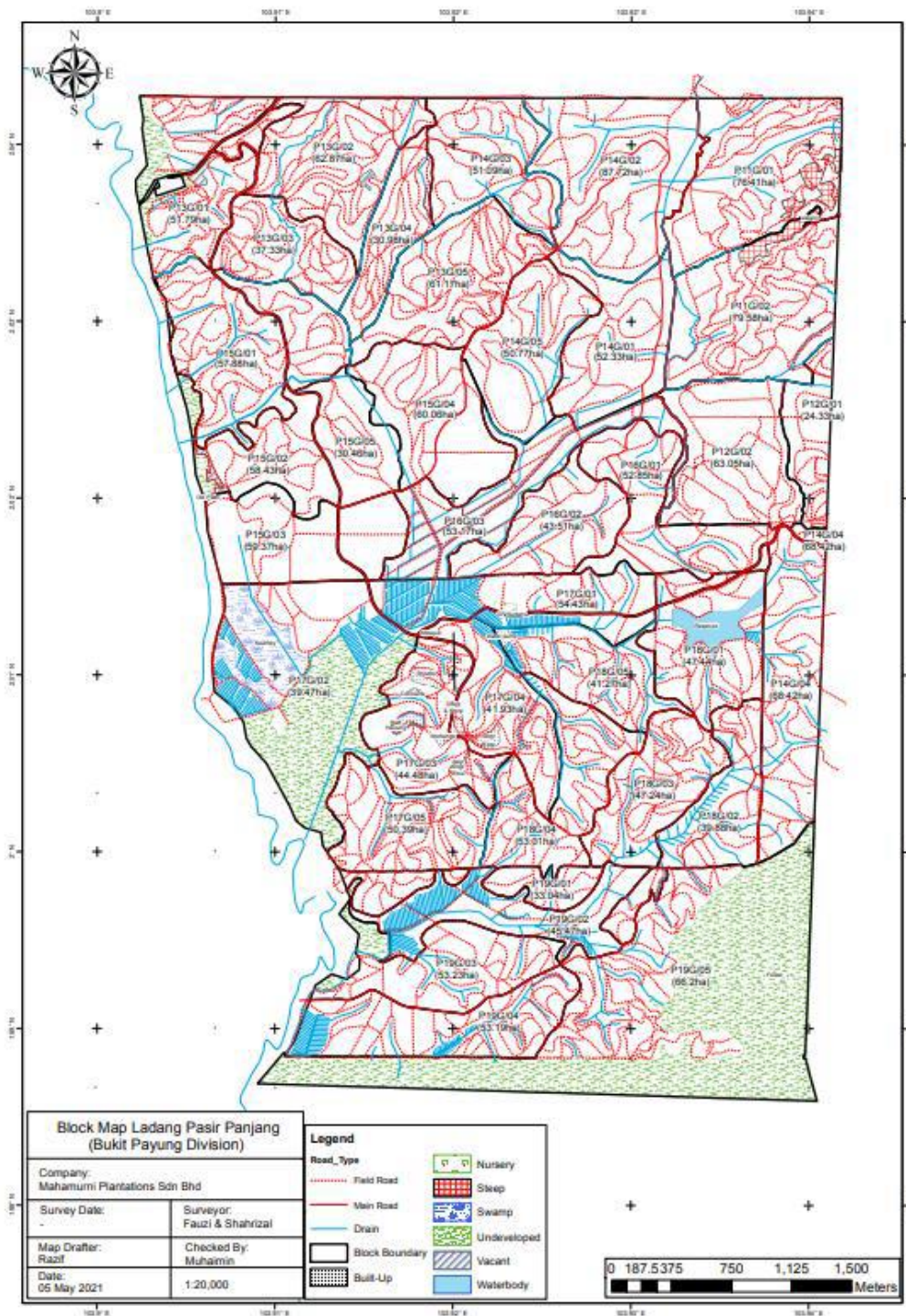


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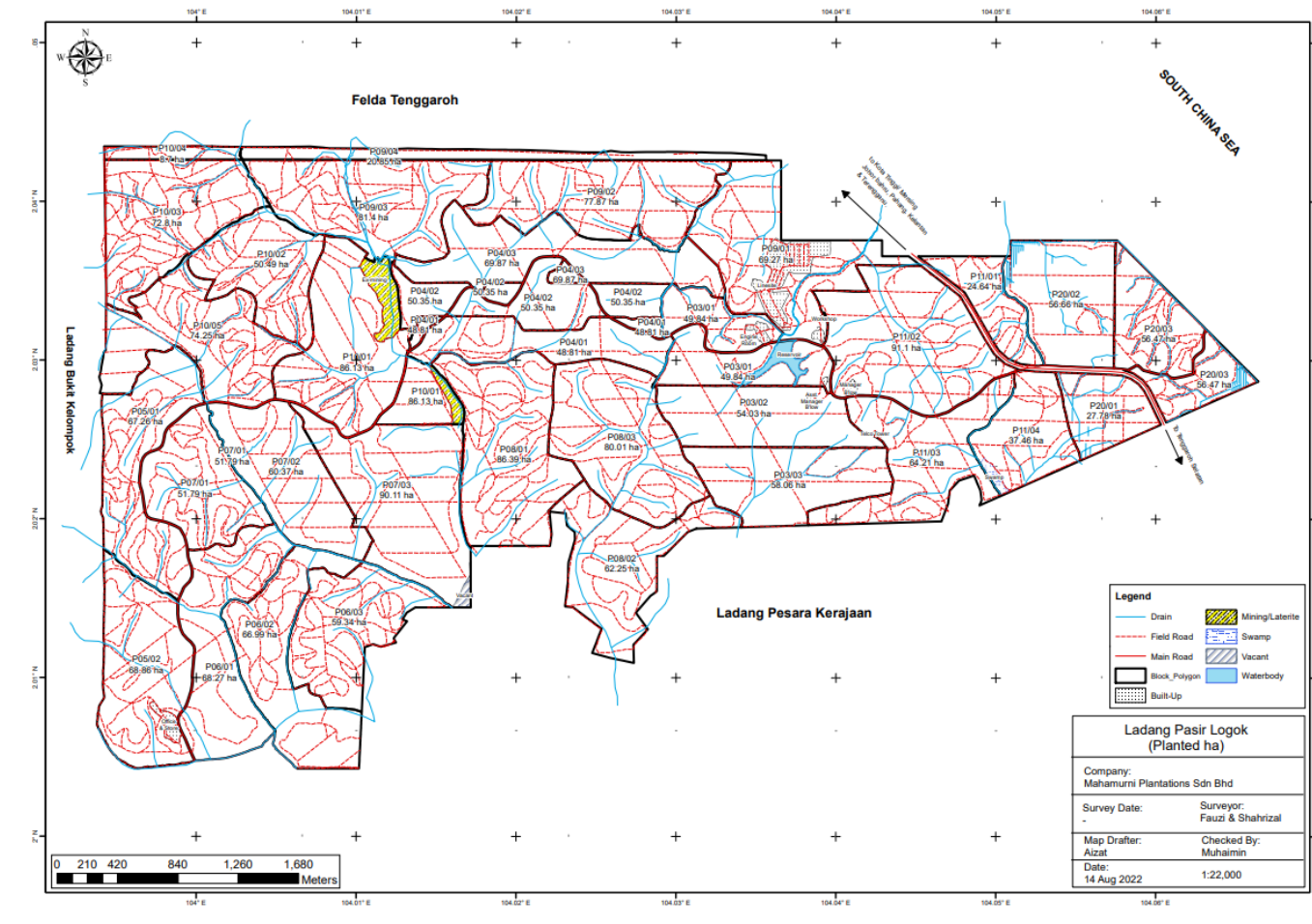


Pasir Panjang Estate (Bukit Payung Division):

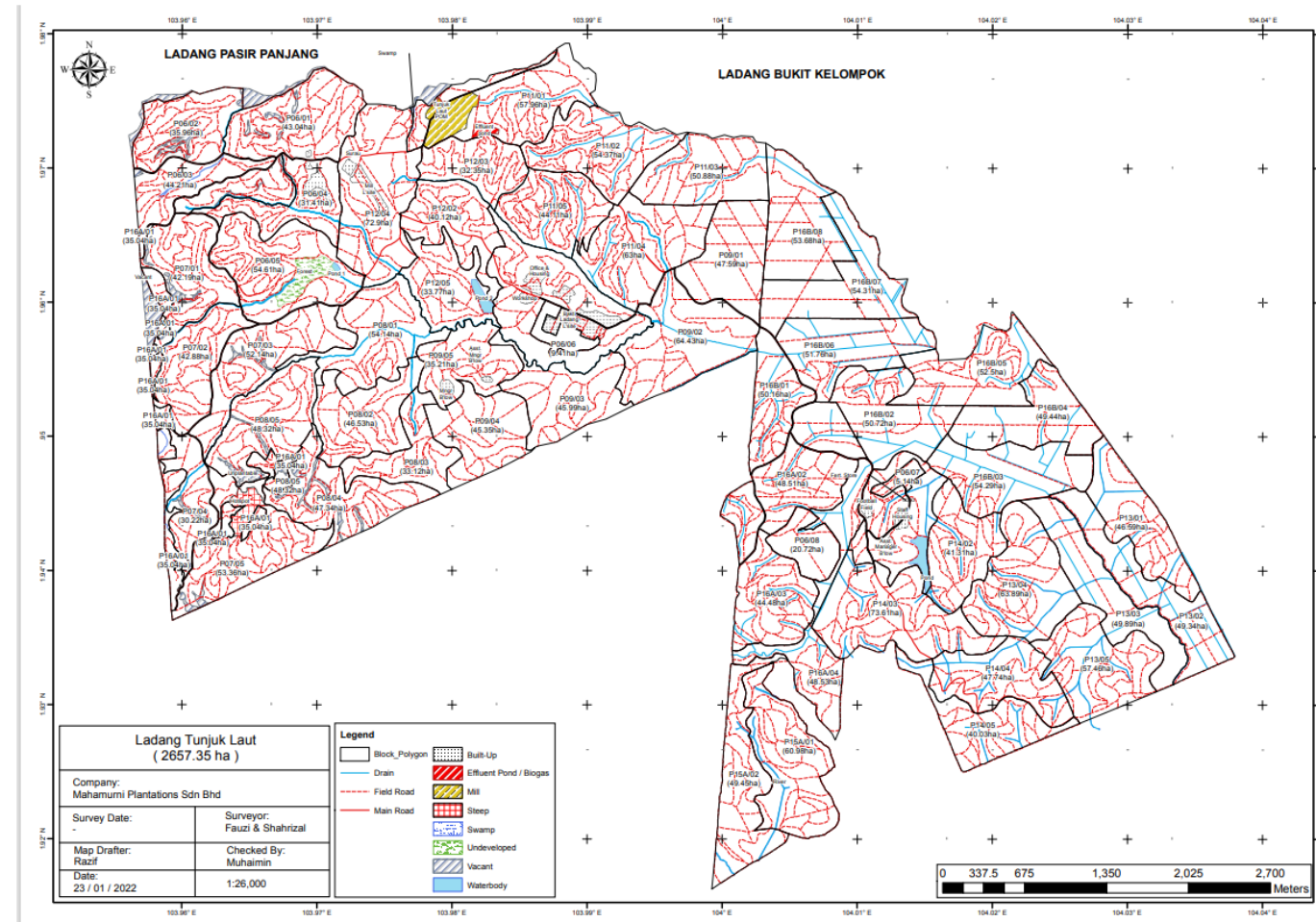


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Pasir Logok Estate



Tunjuk Laut Estate



Appendix E: List of Smallholder Registered and/or sampled

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

No	Name of farmer	Location	GPS Reference		Area Summary (Ha)		Forecasted annual FFB Production (MT)	Date of joining	Smallholder ID
			Latitude (N)	Longitude (E)	Total Certified Area	Planted Area			
Not Applicable									
Total					N/A	N/A	N/A		

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Appendix F: List of Abbreviations

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