

# RSPO PRINCIPLE AND CRITERIA PUBLIC SUMMARY REPORT

☑ Annual Surveillance Assessment (3 1)

☐ Recertification Assessment (Choose an item.)

□ Extension of Scope

# Client Company Name / Parent Company: Johor Corporation

Client Company / Parent Company Address:

Level 11, Menara Komtar, Johor Bahru City Centre, 80000 Johor Bahru, Johor Darul Takzim

**Certification Unit:** 

Johor Plantations Group Berhad - Palong Cocoa Palm Oil Mill

Location of Certification Unit:

KM 8.5, Off Lebuhraya Tun Razak, 85000, Segamat, Johor, Malaysia

Date of Final Report:

11/12/2024



**TABLE of CONTENTS** Page No 1. 2. 3. Other Certifications .......4 4. Location(s) of Mill & Supply Bases ......4 5. Description of Supply Base ......4 6. 7. Summary of Certified Tonnage of FFB (Own Certified Scope) ......5 8. Summary of Certified Tonnage of FFB (from other certified unit(s))......6 9. Summary of Non-Certified Tonnage of FFB (outside supplier – excluded from certificate)......6 10. 11. Summary of Actual Volume sold ......8 12. 13. 2.1 2.2 2.3 3.1 Progress of scheme smallholders and/or outgrowers......19 3.2 3.3 Details of Nonconformities 23 3.3.1 3.3.2 3.4 3.5 Appendix D: Estate Field Map......180 



## **Section 1: Scope of the Assessment**

1. Company Details						
Parent Company	Johor Corporation	Johor Corporation				
RSPO Membership Number	1-0080-09-000-00	1-0080-09-000-00 <b>Membership Approval Date</b> 15/06/2009				
Address	Level 11, Menara Komtar, Johor Bahru City Centre, 80000 Johor Bahru, Johor Darul Takzim, Malaysia					
Palm Oil Mill / Group Manager / Estate (Certification Unit)	Johor Plantations Group Berhad (formerly known as Johor Plan	-		antations Sdn Bhd)		
Location / Address	KM 8.5, Off Lebuhraya Tun Raz	zak, 85000, Sega	amat, Johor, Mala	ysia		
Website	http://www.jcorp.com.my					
<b>Management Representative</b>	Wan Adlin Wan Mahmood	Wan Adlin Wan Mahmood <b>E-mail</b> <u>wanadlin@johorplantations.com</u>				
Telephone	+607 363 2000	Facsimile	+607 863 1084			

2. Certification Informat	ion				
Certificate Number	RSPO 613087	Certificat	te Start Date	23/01/2024	
Date of First Certification	23/01/2009	Certificat	te Expiry Date	22/01/2029	
Scope of Certification	Production of Sustainable Cru	ıde Palm Oi	I (CPO) and Palm K	ernel (PK)	
Visit Objectives	<ul> <li>Determination of the conformity of the client's management system, or parts of it, with audit criteria.</li> <li>Evaluation of the ability of the management system to ensure the client organization meets applicable statutory, regulatory and contractual requirements.</li> </ul>				
Assessment Cycle	<ul> <li>□ Pre Assessment (Choose an item.)</li> <li>□ Initial Assessment</li> <li>☑ Annual Surveillance Assessment (ASA 3_1)</li> <li>□ Recertification Assessment (Choose an item.)</li> <li>□ Scope Extension</li> </ul>				
Applicable Standards / Normative Reference	RSPO Certification System for P&C and RSPO ISH 2020  ☑ Malaysia National Interpretation 2019 of the RSPO P&C 2018				
Supply Chain Module	☑ Identity Preserved; ☐ Mass Balance <b>Mill Capacity</b> 40 mt/hr				
ISH certification Phase	☐ Eligibility ☐ Milestone A ☐ Milestone B ☒ Not Applicable				
Is this a remote audit or on-site audit	☑ On-site audit (Option AI)	□ On-site	audit (Option AII)	☐ Remote audit (Option B)	



3. Other Certification	s		
Certificate Number	Standard(s)	Certificate Issued by	<b>Expiry Date</b>
EU-ISCC-Cert-DE119- 60246780	ISCC EU	ASG Cert	17/05/2025
ISCC-PLUS-Cert-DE119- 60246780	ISCC PLUS	ASG Cert	17/05/2025
MSPO 698011	MSPO MS 2530-3:2013 General Principles for Oil Palm Plantations and Organized Smallholders	BSI Services Malaysia Sdn Bhd	31/03/2029
MSPO 698010	MSPO MS 2530-4:2013 – General Principles for Palm Oil Mills	BSI Services Malaysia Sdn Bhd	31/03/2029
BVC-MSPO/SC-0031	MSPO Supply Chain Certification Standard 2018	BV Certification (Malaysia) Sdn Bhd	10/03/2025
HALAL A199300	MS 1500:2009	JAKIM	30/06/2025
ABMS 00204	ISO 37001:2016	SIRIM QAS	03/06/2027

4. Location(s) of Mill & Supply Bases					
Name	Location	GPS Co	ordinates		
(Mill / Supply Base / Group Manager / Smallholders)		Latitude	Longitude		
Palong Cocoa POM	KM 8.5, Off Lebuhraya Tun Razak 85000 Segamat, Johor, Malaysia.	2° 42' 23.09" N	102° 47' 6.04" E		
Palong Estate	Mukim Buloh Kasap, Segamat, Johor, Malaysia.	2°44' 55.89" N	102° 44' 55.53" E		
Mungka Estate	Mukim Buloh Kasap, Segamat, Johor, Malaysia.	2° 41' 15.44" N	102° 47' 8.35" E		
UMAC Estate	Mukim Keratong, Daerah Rompin, Bandar Tun Razak, Pahang, Malaysia.	2° 53' 3.31" N	102° 48' 23.94" E		
Labis Bahru Estate	Mukim Pogoh, Segamat, Johor, Malaysia.	2° 25' 49.29" N	102° 52' 27.92" E		

5. Description of Supply Base					
New Planting Development	⊠ No		□ Yes		
Estate / Smallholders	Total Planted (Mature + Immature) (ha)	HCV (ha)	Infrastructure & Other (ha)	Total Area (ha)	% of Planted
Palong Estate	3,494.73	20.74	186.45	3,701.92	94.40

...making excellence a habit.™



Mungka Estate	2,646.42	80.79	171.06	2,898.27	91.31
UMAC Estate	**1,555.98	0.84	**59.51	1,616.33	96.27
Labis Bahru Estate	*1,956.86	14.53	136.77	2,108.16	92.82
Total	9,653.99	116.90	553.79	10,324.68	93.50

### Note:

- 1. Labis Bahru Estate increased by 9.62 hectares due to the resurvey area.
- 2. Umac Estate decreased by 0.08 hectares due to a resurvey of the area.

6. Plantings & Cycle						
Estate / Smallholders Age (Years) - ha				Mature	Immature	
	0 - 3	4 - 14	15 - 25	>25		
Palong Estate	163.72	2,374.34	956.67	0.00	3,331.01	163.72
Mungka Estate	114.04	1,063.13	1,469.25	0.00	2,532.38	114.04
UMAC Estate	28.85	173.89	1,353.24	0.00	1,527.13	28.85
Labis Bahru Estate	460.63	519.08	977.15	0.00	1,496.23	460.63
Total (ha)	767.24	4,130.44	4,756.31	0.00	8,886.75	767.24

Note: Only Mature area is considered as production area

7. Summary of Certified Tonnage of FFB (Own Certified Scope)					
Estate /	Tonnage (MT) / year				
Smallholders	Estimated last year (Jan 24- Dec 24)	Act (Oct 23 -	Forecast (Jan 25- Dec 25)		
		Previous license period (Oct 23 – Dec 23)	Current license period (Jan 24 – Sept 24)		
Palong Estate	74,147.00	18,624.48	59,628.29	76,868.00	
Mungka Estate	50,483.00	10,603.39	38,721.56	50,483.00	
UMAC Estate	36,587.00	7,953.75	20,037.35	33,634.00	
Labis Bharu Estate	36,631.00	10,503.90	29,165.11	34,244.00	
Total	197,848.00	195,237.83 195,229.			

**Note:** Additional volume extension approved on 24/10/2024 with the extension of extra 60,000 mt of FFB, 3,500.00 mt of CSPK and additional 12,500 mt of CSPO. This is due to the extra FFB supplied to mill from other certified unit, and higher FFB Production compared to forecast.



Estate /	Tonnage (MT) / year				
Smallholders	Estimated last year (Jan 24- Dec 24)	Act (Oct 23 -	Forecast (Jan 25- Dec 25)		
		Previous license period (Oct 23 – Dec 23)	Current license period (Jan 24 – Sept 24)		
Rengam Estate		-	944.86		
Total		944.86			

9. Summary of Non-Certified Tonnage of FFB (outside supplier — excluded from certificate)				
Out growers /	Tonnage (MT) / year			
smallholders	Estimated last year (Jan 24- Dec 24)	Actual (Oct 23 – Sep 24)		Forecast (Jan 25- Dec 25)
		Previous license period (Oct 23 – Dec 23)	Current license period (Jan 24 – Sept 24)	
N/A	N/A	N/A	N/A	N/A
Total	N/A	N/A N/A		

9A. I	9A. Monthly Records of Certified and Uncertified FFB Received since the last audit					
No.	Month - Year	Volume of FFB from certified supply base (mt)	Volume of FFB from uncertified supply base (mt)	Total FFB/Month (mt)		
1	October 23	17,507.00	-	17,507.00		
2	November 23	15,560.51		15,560.51		
3	December 23	14,618.01	•	14,618.01		
4	January 24	13,566.30	-	13,566.30		
5	February 24	12,499.45	-	12,499.45		
6	March 24	12,878.38	-	12,878.38		
7	April 24	14,268.51	-	14,268.51		
8	May 24	16,706.45	-	16,706.45		
9	June 24	16,296.09	-	16,296.09		
10	July 24	20,502.66	-	20,502.66		

<sup>...</sup>making excellence a habit.™



	TOTAL	196,182.69	-	196,182.69
12	September 24	21,115.62	-	21,115.62
11	August 24	20,663.71	•	20,663.71

Estimated last year (Jan 24- Dec 24)			tual – Sep 24)	Forecast (Jan 25- Dec 25)
	Previous license (Oct 23 – Dec	•	Current license period (Jan 24 – Sept 24)	
FFB		F	FFB	
197,848.00 mt	47,685.52 mt		148,497.17 mt	195,229.00 mt
	TOTAL		196,182.69 mt	
CPO (OER: 21.25 %)	C	CPO (OER: 20.31 %)		CPO (OER: 20.93 %)
42,042.70 mt	9,822.25	mt	30,030.47 mt	40,864.00 mt
	TOTAL		39,852.72 mt	]
PK (KER: 5.55 %)		PK (KER: 5.16 %)		PK (KER: 5.34 %)
10,980.56 mt	2,537.98 ו	mt	7,586.70 mt	10,432.00 mt
	TOTAL		10,124.68 mt	

**Note:** Additional volume extension approved on 24/10/2024 with the extension of extra 60,000 mt of FFB, 3,500.00 mt of CSPK and additional 12,500 mt of CSPO. This is due to the extra FFB supplied to mill from other certified unit, and higher FFB Production compared to forecast.

10A.	<b>Monthly Records of Certified</b>	CPO & PK since the last audit	
No.	Month - Year	Certified CPO (MT)	Certified PK (MT)
1	October 23	3,535.12	939.11
2	November 23	3,194.15	859.38
3	December 23	3,092.98	739.49
4	January 24	2,715.86	696.75
5	February 24	2,634.29	663.50
6	March 24	2,643.26	703.76
7	April 24	2,875.64	724.10
8	May 24	3,350.13	843.97
9	June 24	3,350.02	710.45
10	July 24	4,121.09	923.74

<sup>...</sup>making excellence a habit."



12	September 24	4,226.95	1,217.58
	TOTAL	39,852.72	10,124.68

11. Summary of Actual Volume sold								
Current License period (Jan 24 – Sep 24)								
	DCDO Contified	Other Schemes Certified		Conventional	Tatal			
	RSPO Certified	ISCC	Others	Conventional	Total			
CPO (MT)	28,458.29	-	-	-	28,458.29			
PK (MT)	6,947.61	-	-	123.95	7,071.56			
Credits	-	-	-	-	-			
Previous Lic	ense period (Oct 23 – D	ec 23)						
CPO (MT)	9,788.40	-	-	-	9,788.40			
PK (MT)	2,672.51	-	-	-	2,672.51			
Credits	-	-	-	-	-			
Note: Conventional is RSPO certified material but sold as non-RSPO.								

11A. R	ecords of Certified CPO & PK Se	old under PalmTrace si	nce the last audit (if any	y)
No.	Buyers Name	PalmTrace Trading License Number	Certified CPO Sold (MT)	Certified PK Sold (MT)
1	Cargill Palm Products Sdn Bhd	CB159169	7,308.04	0.00
2	Evyap Sabun Malaysia Sdn Bhd	CB159169	1,669.92	0.00
3	FGV IFFCO Sdn Bhd	CB159169	465.43	0.00
4	Intercontinental Specialty Fats Sdn Bhd	CB159169	12,178.06	0.00
5	Mewah Oils Sdn Bhd	CB159169	1,734.19	0.00
6	Ngo Chew Hong Oils & Fats (M) Sdn Bhd	CB159169	3,515.76	0.00
7	Palmaju Edible Oil Sdn Bhd	CB159169	3,554.22	2,969.16
8	PGEO Edible Oils SDN BHD	CB159169	4,730.20	2,672.51
9	Vance Bioenergy Sdn Bhd	CB159169	633.33	0.00
10	Wilmar Palm Products Sdn Bhd	CB159169	2,457.54	0.00
11	Jin Lee (Oil Mills) Sdn Bhd	CB159169	0.00	3,978.45

...making excellence a habit.™



тот	. 38,246.69	9,620.12
-----	-------------	----------

11B. Re	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 (MT)							
1	N/A	N/A	N/A	N/A			
		TOTAL	N/A	N/A			

11C. Re	11C. Records of CPO & PK Sold as conventional since the last audit (if any)					
No.	Buyers Name	CPO Sold (MT)	PK Sold (MT)			
1	ABC	0.00	123.95			
	TOTAL 0.00 123.95					

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

12. Independent Smallholders Certified Tonnage (MT) / Volume									
	Estimated last year (Not Applicable)		Actual (Not Applicable)		Forecast (Not Applicable)				
Phase	Eligibility	MS A	MS B	Eligibility	MS A	MS B	Eligibility	MS A	MS B
Pilase	40%	<b>70</b> %	100%	40%	70%	100%	40%	70%	100%
FFB			N/A			N/A			N/A
IS-CSPO	N/A	N/A		N/A	N/A		N/A	N/A	
IS-CSPKO	N/A	N/A		N/A	N/A		N/A	N/A	
IS-CSPKE	N/A	N/A		N/A	N/A		N/A	N/A	
CSPK	N/A	N/A		N/A	N/A		N/A	N/A	

<sup>...</sup>making excellence a habit.™



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

13. Independent Smallholders Actual Sold Tonnage / Volume								
	FFB	FFB Conventional	FFB Other schemes	IS-CSPO	CSPK	IS-CSPKO	IS-CSPKE	
Current License period (Not Applicable)								
Credits				N/A	N/A	N/A	N/A	
Physical	N/A	N/A	N/A					
Previous I	Previous License period (Not Applicable)							
Credits				N/A	N/A	N/A	N/A	
Physical	N/A	N/A	N/A			•		

13A.	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)	CPO Sold	Certified PK Sold (MT/credit)	PKO Sold	Certified PKE Sold (MT/credit)	
1	N/A	N/A	N/A	N/A	N/A	N/A	N/A	
	TOTAL N/A N/A N/A N/A N/A						N/A	

...making excellence a habit.™



## **Section 2: Assessment Process**

## **Certification Body:**

BSI Services Malaysia Sdn. Bhd. (ASI Accreditation Number: ASI-ACC-067) Suite 29.01 Level 29, The Gardens North Tower, Mid Valley City, Lingkaran Syed Putra, 59200 Kuala Lumpur, Malaysia.

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

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

Website: www.bsigroup.com

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

## 2.1 Assessment Methodology, Programme, Site Visits

The on-site assessment was conducted on **20/10/2024 - 24/10/2024**. The audit programme is included as Section 2.3.

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

The Critical NC close out on-site assessment was conducted on **28/11/2024**. The audit programs are included in Section 2.3.

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

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

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.

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 ASA 3_1	Year 3 ASA 3_2	Year 4 ASA 3_3	Year 5 ASA 3_4			
Palong Cocoa POM	✓	<b>√</b>	<b>√</b>	<b>√</b>	<b>√</b>			
Palong Estate	✓	<b>√</b>	<b>√</b>	<b>√</b>	✓			
Mungka Estate	✓	<b>√</b>	<b>√</b>	<b>√</b>	✓			
UMAC Estate	✓	✓	<b>√</b>	<b>√</b>	✓			
Labis Baru Estate	✓	✓	<b>√</b>	<b>√</b>	✓			

Tentative Date of Next Visit: October 20, 2025 - October 24, 2025

**Total Number of Mandays: 15** 

#### 2.2 BSI Assessment Team

Name	Role	Competency
Ahmad Rufi bin Abu Talib Khan	Team Leader	<b>Education:</b> Bachelor Degree In Mechanical Engineering from Universiti Teknologi MARA Shah Alam, graduated in 2015
(ARK)		<b>Work Experience:</b> He started his career as Assistant Mill Manager, managing the day-to-day mill operations. In his five years' experience, he has experience handling the certification of ISO 9001, OHSAS 18001, ISO 14001 as well as Malaysia Sustainable Palm Oil (MSPO). He is a qualified Lead Auditor for MS 2530:2013 and has accumulated more than 300 audit days throughout his current career as the auditor for multiple disciplines covering all over Malaysia
		<b>Training attended:</b> He has completed CQI – IRCA approved ISO 9001, ISO 14001 and ISO 45001 Lead Auditor Course, MSPO 2530:2013 Lead Auditor Course, Endorsed RSPO Lead Auditor and RSPO SCC Auditor course.
		<b>Language proficiency:</b> Fluent in in both verbal/written Bahasa Malaysia and English
		Aspect covered in this audit:

...making excellence a habit."



		☐ Good Agriculture Practice ☑ Health and Safety ☒ Supply chain requirements ☐ Social ☐ Environmental ☒ Market Communication and claim requirements ☐ ISH context (ICS, internal audit, policy, business planning and trading
Mohd Razaleigh	Team Member	system)  Education: Holds a Bachelor Degree in Plantation Management and
bin Mohamed (MRM)		Agrotechnology, University Technology Mara (UiTM).  Work Experience: He has 5 years' experience in Oil Palm Estate Management with Tradewinds Plantation Berhad. The last position held was Senior Assistant Manager. He has more than 4 years of experience in Third Party Certification Audit with Control Union (M) Sdn Bhd for RSPO P&C, MSPO P&C and GLOBALG.A.P. IFA Fruits and Vegetables. Qualified as RSPO Lead Auditor and approved to conduct Environmental and Social elements.
		<b>Training attended:</b> He has completed ISO 9001-2015 Lead Auditor Course, ISO14001- 2015 Lead Auditor Course, ISO45001-2018 Lead Auditor Course, Endorsed RSPO P&C Lead Auditor Course, Endorsed MSPO P&C Lead Auditor Course, Social Accountability SA8000 Auditor Course, RSPO Independent Smallholder (IHS) Auditor Training and Endorsed RSPO Refresher Trainings (P&C and SCCS).
		Language proficiency: Fluent in English and Bahasa Malaysia
		Aspect covered in this audit:
		☐ Good Agriculture Practice ☐ Health and Safety ☐ Supply chain requirements
		☑ Social ☐ Environmental ☐ Market Communication and claim requirements
		$\hfill\Box$ ISH context (ICS, internal audit, policy, business planning and trading system)
Amir Bin Bahari (ABB)	Team Member	<b>Education:</b> Holds a Bachelor of Science (Hons) in Chemistry, University Science Malaysia & a Diploma in Palm Oil Milling Tech/Management, Malaysian Palm Oil Board.
		<b>Work Experience:</b> He has more than 30 years of plantation experience including managing rubber factories, palm oil mills and estates. Since 2014 he has started auditing professionally for varies scheme including RSPO and MSPO for varies accredited certification body.
		<b>Training attended:</b> 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.
		<b>Language proficiency:</b> He is fluent in both verbal/written in Bahasa Malaysia and English
		Aspect covered in this audit:
		☑ Good Agriculture Practice ☐ Health and Safety ☐ Supply chain requirements
		☐ Social ☑ Environmental ☐ Market Communication and claim requirements
		☐ ISH context (ICS, internal audit, policy, business planning and trading system)



## **Accompanying Persons:**

Name	Role
N/A	N/A

## 2.3 Assessment Plan

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

Date	Time	Subjects	ARK	MRM	ABB
Saturday, 19/10/2024	PM	Audit team travel to Segamat, Johor, Malaysia	<b>&gt;</b>	√	<b>√</b>
Sunday, 20/10/2024 Day 1	9:00 AM – 9:30 AM	Opening meeting @ Labis Bahru Estate  Opening presentation by audit team leader  Confirmation of assessment scope and finalize audit plan	√	√	√
Labis Bahru Estate	9:30 AM – 12:30 PM	Labis Bahru 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, workers housing, clinic, landfill, etc.	<b>√</b>	<b>~</b>	>
	10:30 AM – 12:30 PM	Meeting with stakeholders (Government, village representatives, smallholders, employee union representatives, vendor etc.)	ı	1	<b>~</b>
	12:30 PM - 1:30 PM	Lunch Break	√	√	√
	1:30 PM – 4:30 PM  Document Assessment P1 – P7: General Documentation e.g. Legal, Manual and Procedure, production & monitoring records, IPM, HCV records, SEIA documents & records, OSH records, assessment on pay documents, records of communication with stakeholder/workers representatives, new planting, CIP and implementation & etc.)		√	√	√
	4:30 PM – 5:00 PM	<ul><li>Auditors' discussion</li><li>Day 1 Interim Closing Briefing</li></ul>	√	√	√

<sup>...</sup>making excellence a habit.™



Date	Time	Subjects	ARK	MRM	ABB
Monday, 21/10/2024 Day 2 UMAC Estate	9:00 AM – 12:30 PM	UMAC 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, workers housing, clinic, landfill, etc.	√	√	√
	10:30 AM – 12:30 PM	Meeting with stakeholders (Government, village representatives, smallholders, employee union representatives, vendor etc.)	1	_	√
	12:30 PM - 1:30 PM	Lunch Break	√	<b>\</b>	<b>\</b>
	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.)	V	√	√
	4:30 PM – 5:00 PM	<ul><li>Auditors' discussion</li><li>Day 2 Interim Closing Briefing</li></ul>	√	√	√
Tuesday, 22/10/2024 Day 3 <b>Mungka</b> <b>Estate</b>	9:00 AM – 12:30 PM	Mungka 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, workers housing, clinic, landfill, etc.	<b>√</b>	<b>~</b>	<
	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	√	√	<b>√</b>
	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.)	√	√	<b>✓</b>

<sup>...</sup>making excellence a habit."



Date	Time	Subjects	ARK	MRM	ABB
	4:30 PM – 5:00 PM	<ul><li>Auditors' discussion</li><li>Day 3 Interim Closing Briefing</li></ul>	√	√	√
Wednesday, 23/10/2024 Day 4 Palong Cocoa Palm Oil Mill	9:00 AM – 12:30 PM	Palong Cocoa Palm Oil Mill  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.		√	<b>√</b>
	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	Auditors' discussion     Day 4 Interim Closing Briefing	√	√	√
Thursday, 24/10/2024 Day 5 Palong Estate	9:00 AM – 12:30 PM	Palong 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, workers housing, clinic, landfill, etc.	√	√	√
	10:30 AM – 12:30 PM	Meeting with stakeholders (Government, village representatives, smallholders, employee union representatives, vendor etc.)	_	_	√
	12:30 PM – 1:30 PM	Lunch Break	√	√	√



Date	Time	Subjects	ARK	MRM	ABB
	1:30 PM -	Document Assessment P1 – P7:	√	√	√
	3:30 PM	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.)			
	3:30 PM – 4:00 PM	Auditors' discussion	√	√	√
	4:00 PM – 4:30 PM	Interim Meeting and Closing Meeting Preparation	√	√	√
	4:30 PM – 5:00 PM	Closing Meeting	√	√	√
Friday, 25/10/2024		Travelling back	√	√	√

## Major NC Closure Assessment Plan

Date	Time	Subjects	ARK
28/11/2024	9:00 AM - 9:30 AM	Opening meeting At Palong Cocoa Palm Oil Mill  Opening presentation by audit team leader  Confirmation of assessment scope and finalize audit plan	✓
	9:30 AM – 12:30 PM	Verification on Major NC closure evidence. Document review, site observation, workers/stakeholder interview (individual and group session) for:  1. 2566559-202410-M1	✓
	12:30 PM	Closing Meeting	-



## **Section 3: Assessment Findings**

## 3.1 Multiple Management Units and Time Bound Plan

Requirement	Assessment	Compliance
Does the time bound plan include all current subsidiaries, estates and mills that is under the control and/or minor shareholding of the holding company?	Yes, the plan includes all current subsidiaries, estates and mills that is under management control.	Complied
Have all the estates and mills certified within five (5) years after obtaining RSPO membership?  If no, has RSPO Secretariat approval obtained? Was the submission according to the template as announced by the RSPO Secretariat on 21/12/2021	Yes, all the estates and mills certified within 5 years after obtaining RSPO membership. The Indonesian units, PT RAJ & PT TPR were disposed on 6th July 2023.	Complied
Have there been any new acquisitions? If yes, the new acquisitions shall be certified within three (3) years from the date of acquisition. Certification plan for the new acquisition shall be available.  If no, has RSPO Secretariat approval obtained? Was the submission according to the template as announced by the RSPO Secretariat on 21/12/2021.	No. There have not been any new acquisitions.	Complied
Any deviations from the maximum periods requires approval by the RSPO Secretariat.	No. There have no any deviations from the maximum periods requires approval by the RSPO Secretariat.	Complied
Have there been any changes to the time-bound plan since the last audit (both new acquisition and existing)? If yes, justification is required.  Is this consistent with the ACOP reporting?	No. There has no any changes to the time-bound plan since the last audit.	Complied
Have there been any isolated lapses in implementation of the plan? If yes a <b>Minor</b> non-compliance shall be raised	No. There is no isolated lapse in Time Bound Plan	Complied
Have there been any fundamental failure (e.g. unable to justify delay in planning the assessments) to proceed with implementation of the plan? If yes a <b>Major</b> non-compliance shall be raised	There is no any fundamental failure to proceed with implementation of the plan	Complied
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.	No uncertified units of holdings Johor Plantations Group Berhad. Thus, this requirement is not applicable.	Not Applicable
Any new plantings since January 1 <sup>st</sup> 2010 shall comply with the RSPO New Plantings Procedure.	No uncertified units of holdings Johor Plantations Group Berhad. Thus, this requirement is not applicable.	Not Applicable
Any Land conflicts are being resolved through a mutually agreed process, such as RSPO Complaints System or Dispute Settlement Facility, in accordance	No uncertified units of holdings Johor Plantations Group Berhad. Thus, this requirement is not applicable.	Not Applicable



with RSPO P&C criteria 4.4, 4.5, 4.6, 4.7 and 4.8.		
Any Labor disputes are being resolved through a mutually agreed process, in accordance with RSPO P&C criterion 4.2	No uncertified units of holdings Johor Plantations Group Berhad. Thus, this requirement is not applicable.	Not Applicable
Any Legal non- compliance is being addressed through measures consistent with the requirements of RSPO P&C criteria 2.1	No uncertified units of holdings Johor Plantations Group Berhad. Thus, this requirement is not applicable.	Not Applicable
Did the company conduct internal audit for those uncertified estates against the uncertified management units requirement and covering the RSPO P&C criterion 2.1 4.2, 4.4, 4.5, 4.6, 4.7, 4.8 and 7.12? If yes, a positive assurance statement shall be available and justified.	No uncertified units of holdings Johor Plantations Group Berhad. Thus, this requirement is not applicable.	Not Applicable
Are there any Critical (Major) non-compliance raised against any of the RSPO P&C criterion 2.1 4.2, 4.4, 4.5, 4.6, 4.7, 4.8 and 7.12 during the last internal audit of the uncertified estates? If yes is the NC(s) actively addressed with RSPO?	No uncertified units of holdings Johor Plantations Group Berhad. Thus, this requirement is not applicable.	Not Applicable
Have there been any stakeholder (including NGO) consultation conducted?	No uncertified units of holdings Johor Plantations Group Berhad. Thus, this requirement is not applicable.	Not Applicable

## 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?	Not applicable as there are no smallholder scheme or out-growers under this certification unit.	Not Applicable					
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.							



## **Approved Time Bound Plan**

							Date of	REVISION OF THE TBP (Only applicable when revision is made)			
Name of the Unit of Certificatio n (UoC)	Country	Name of the Mills and Supply Bases	Total Managed Area (Ha)	Certificatio n Status (Certified / Not certified)	Plan Year for Certificat ion	Actual Certific ation Year	Last TBP Verified and Approved by CB	Any revision from the last approved TBP? (Yes / No)	New Proposed Year for Certificatio n	Justification of changes for each UoC	Date of approval from RSPO
Sedenak Palm Oil Mill	Malaysia	Sedenak Estate	2808	Certified	Nil	2009	20-Apr-22	No	Nil	We completed the disposal of our Indonesia operation in August 2023	Nil
		Kuala Kabong Estate	1718	Certified	Nil	2009	20-Apr-22	No	Nil	We completed the disposal of our Indonesia operation in August 2023	Nil
Sindora Palm Oil Mill	Malaysia	Sindora Estate	3,919.06	Certified	Nil	2009	20-Apr-22	No	Nil	We completed the disposal of our Indonesia operation in August 2023	Nil
		Basir Ismail Estate	3594.4	Certified	Nil	2009	20-Apr-22	No	Nil	We completed the disposal of our Indonesia operation in August 2023	Nil
		REM Estate	2898.9	Certified	Nil	2009	20-Apr-22	No	Nil	We completed the disposal of our Indonesia operation in August 2023	Nil
		Sungai Papan Estate	2,995.85	Certified	Nil	2009	20-Apr-22	No	Nil	We completed the disposal of our Indonesia operation in August 2023	Nil
Tereh Palm Oil Mill	Malaysia	Tereh Utara Estate	3087.4	Certified	Nil	2009	20-Apr-22	No	Nil	We completed the disposal of our Indonesia operation in August 2023	Nil
		Tereh Selatan Estate	2707.2	Certified	Nil	2009	20-Apr-22	No	Nil	We completed the disposal of our Indonesia operation in August 2023	Nil

...making excellence a habit."



		Selai Estate	3535.1	Certified	Nil	2009	20-Apr-22	No	Nil	We completed the disposal of our Indonesia operation in August 2023	Nil
		Mutiara Estate	3695.1	Certified	Nil	2009	20-Apr-22	No	Nil	We completed the disposal of our Indonesia operation in August 2023	Nil
		Sungai Tawing Estate	2225.8	Certified	Nil	2009	20-Apr-22	No	Nil	We completed the disposal of our Indonesia operation in August 2023	Nil
		Wawasan Estate	362.30	Certified	Nil	2009	20-Apr-22	No	Nil	We completed the disposal of our Indonesia operation in August 2023	Nil
		Felda Paloh Estate	1331.8	Certified	Nil	2009	20-Apr-22	No	Nil	We completed the disposal of our Indonesia operation in August 2023	Nil
		Rengam Estate	2418.2	Certified	Nil	2009	20-Apr-22	No	Nil	We completed the disposal of our Indonesia operation in August 2023	Nil
Palong Palm Oil Mill	Malaysia	Palong Estate	3701.9	Certified	Nil	2009	20-Apr-22	No	Nil	We completed the disposal of our Indonesia operation in August 2023	Nil
		Mungka Estate	2898.3	Certified	Nil	2009	20-Apr-22	No	Nil	We completed the disposal of our Indonesia operation in August 2023	Nil
		UMAC Estate	1616.3	Certified	Nil	2009	20-Apr-22	No	Nil	We completed the disposal of our Indonesia operation in August 2023	Nil
		Labis Bahru Estate	2108.2	Certified	Nil	2009	20-Apr-22	No	Nil	We completed the disposal of our Indonesia operation in August 2023	Nil
Pasir Panjang Palm Oil Mill	Malaysia	Pasir Panjang Estate	4013.6	Certified	Nil	2009	20-Apr-22	No	Nil	We completed the disposal of our Indonesia operation in August 2023	Nil
		Tunjuk Laut Estate	2867.8	Certified	Nil	2009	20-Apr-22	No	Nil	We completed the disposal of our Indonesia operation in August 2023	Nil
		Siang Estate	3443.1	Certified	Nil	2009	20-Apr-22	No	Nil	We completed the disposal of our Indonesia operation in August 2023	Nil

...making excellence a habit."



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



### 3.3 Details of Nonconformities

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

During this Assessment there were one (1) Critical; two (2) Minor nonconformities and zero (0) Opportunity For Improvement raised. The Johor Plantations Group Berhad - Palong Cocoa 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 #	2566559	9-202410-M1	Issued Date	24/10/2024		
Due Date	22/01/2	025	Closure Date	28/11/2024		
Indicator & Category (Critical / Minor)	3.6.1 –	Critical				
Statement of Nonconformity:	The pro	cess of implementa	tion of identified risk H&S issu	ues is not fully effective.		
Requirement Reference:	(C) All operations are risk assessed to identify H&S issues. Mitigation plans and procedures are documented and implemented.					
Objective Evidence:	2.	During a site visit a it was found that S during the operation Chemical Health Rioperations, which is Employers must erareas where hazard Palong Cocoa Palm At Palong Cocoa Palm At Palong Cocoa Palm (FFB) from Sepang notices. This does a Assessment (NRA), notices to field grade Hearing Protectors Mill operation site of During a site visit to was observed wall Personal Hearing P in Chapter 8.8 of the must provide and experience.	Manuring and Spraying Ope of the Manuring and Spraying Ope of the Manuring and Spraying Ope on. This is not in line with the sk Assessment (CHRA) for both of the state that "SDS must be easily insure that the SDS is kept up dous chemicals are stored and oil Mill – Observation:  alm Oil Mill – Observation:  alm Oil Mill, a tractor transpour of Division was observed with the recommental which require management the ses cutters and tractor drivers (PHP) must be worn when operating the Kernel Plant:  To the Kernel Plant during mill king through the mill without rotector (PHP). This contraver we not see Risk Assessment, which inforce the use of personal head areas, especially during activations.	peration at UMAC Estate, e not available at the site recommendations in the ch spraying and manuring accessible to employees. To date and available in dused."  Tring Fresh Fruit Bunches ithout prominent warning ndations in the Noise Risk oraffix prominent warning, indicating that Personal perating these machines.  Operations, an employee at wearing an approved hes the recommendations ch state that management aring protectors in hearing		



	4. Verification of SDS copies at mill's lab and store:
	During the verification of SDS copies at the mill's lab and store, it was confirmed that SDS copies for hexane, isopropyl alcohol (IPA), vibrating screen grease, and welding rod were available. However, the SDS copies were only in English, which is not in compliance with the CHRA recommendations that require all SDS to be in both Malay and English.
	Thus, the Non Conformance is raised .
Corrections:	<ol> <li>Training has been conducted to all personnel on importance of safety data sheet "SDS" during manuring and spraying operation.</li> </ol>
	<ol> <li>Training has been conducted to all personnel on the safety requirement for employees including the importance of warning notices, Personal Hearing Protectors (PHP).</li> </ol>
	<ol> <li>Enforce disciplinary action for workers' non-compliance, including issuing warning letters.</li> </ol>
	<ol> <li>Mill management has immediately requested the vendor to provide the bilingual SDS for all chemicals.</li> </ol>
Root Cause Analysis:	<ol> <li>Inadequate Monitoring by Estate Management on OSHA Requirements specifically the availability of Safety Data Sheets (SDS) during manuring and spraying operation.</li> </ol>
	<ol> <li>Lack of monitoring by mill management on compliance with the requirements of the safety practices for FFB transportation in mill premises.</li> </ol>
	<ol> <li>Inadequate enforcement of the safety requirement for employees to wear Personal Hearing Protectors (PHP) in designated hearing protection zones, as specified in Chapter 8.8 of the Noise Risk Assessment (NRA).</li> </ol>
	<ol> <li>Lack of awareness within estate management regarding the requirement for Safety Data Sheets (SDS) to be available in both Malay and English, as per Chemical Health Risk Assessment (CHRA) guidelines</li> </ol>
Corrective Actions:	Estate and mill management will issue a memo to workers addressing non-compliance, ensuring all workers are provided with the required warning notices before entering the mill premises.
	<ol> <li>Periodic audits will be incorporated into the daily PPE checklist, monitored by field supervisors, and verified by the Assistant Manager. This includes ensuring that Safety Data Sheets (SDS) are available in both languages and that Personal Hearing Protector (PHP) requirements are met.</li> </ol>
	<ol> <li>Conduct quarterly training for workers and supervisors on the proper use and compliance of SDS, PHP requirements, and awareness of noise hazards</li> </ol>
Assessment Conclusion:	UMAC Estate
	<ol> <li>The UMAC Estate Management has conducted the training to brief the workers on 23/10/2024, and the management has conducted daily</li> </ol>



	inspection as per sample taken from 22/10/2024 until 30/10/2024, which the management has improved the checklist by including SDS monitoring. The checklist previously details the list of PPE applicable for the spraying and manuring operation that include the apron, face mask, hand glove rubber boots, soap, clean water and goggles. The checklist is prepared by the field staff and verified by the assistant manager.
	<ol><li>Site visit conducted found that the SDS is available during the activity ir both Bahasa Malaysia and English.</li></ol>
Pa	ong Cocoa Palm Oil Mill
	1. The mill management has issued memo to all the workers dated 25/10/2024 to remind the workers on the usage of PPE that include Personal Hearing Protection (PHP), safety helmet, and safety boots wher inside the mill operation site.
	2. Memo to all estate has been submitted on the same day to Estate Managers, that the estate to make sure all the tractor driver must use PHF when driving the tractor in the mill. If the driver does not use PHP, the mill management will not allow the tractor to enter the mill.
	3. Memo to the mill security is sighted, recorded on the 25/10/2024 mentioning that the mill security to make sure any external personne entering the mill is to be equipped with PPE, without the PPE, the mill security have to stop them from entering the mill.
	4. The mill has conducted the training on the usage of PPE, PHP and high noise areas dated $07/11/2024$ , records of training is available for review.
	5. Training for SDS has been conducted on 08/11/2024. Training conducted has included the briefing on SDS, type of chemical, safety precautions and safety and cleanliness of the mill.
	6. Site visit at the mill store, and mill laboratory found that all available SDS is in both Bahasa Malaysia and English.
	7. Site visit in the mill operation site, Workshop, Kernel Plant found that all workers were equipped with PPE and proper PHP
Ba	ed on this, the Major NC was effectively closed on 28/11/2024

Non-conformity						
NCR Ref #	2566559-202410-N1	Issued Date	24/10/2024			
Due Date	Next Assessment Visit	Closure Date	"Open"			
Indicator & Category (Critical / Minor)	3.3.2 – Minor					
Statement of Nonconformity:	The process of to check the constant implementation of procedure is not fully effective					
Requirement Reference:	A mechanism to check consistent implementation of procedures is in place.					
<b>Objective Evidence:</b>	Procedure for line site inspection					



		The procedure for line site inspections is documented in Document No: SQD/WI/10, dated 01/01/2020. Clause 2.3.2 of the procedure states that line site inspection records should be verified by the Assistant Manager or Manager on a weekly basis.
		For Mungka Estate, the line site inspection records were verified for the periods 01/10/2024 to 07/10/2024 and 08/10/2024 to 14/10/2024. However, these records were not verified by management, and the actual condition does not reflect what is required. This has been confirmed through both the line site inspection records and a site visit.
		2. Buffer zones at Sungai Keratong, UMAC Estate
		Buffer zones have been established along Sungai Keratong within the UMAC Estate, adjacent to Field No. P06/B4. The river's width is estimated at 57.49 meters; however, the buffer zones on each side have only been demarcated at a width of one palm from the riverbank. This contradicts the requirement for equal-width buffer zones on both sides of the watercourse, as stated in Procedure – Sustainability Management System 6.15, HCV and High Carbon Stock Management Buffer Zones, Document No: JPG/PRO/OPR/R&DAS/0-01-00, dated 01/03/2024.
		3. Lack of signage in HCV areas
		There are no signboards displaying the appropriate signage to prohibit hunting in the High Conservation Value (HCV) area or to prevent forest cutting and related activities at the identified Steep Area (HCV 2) adjacent to Field No. P07/B3, UMAC Estate. This is not in compliance with the Procedure – Sustainability Management System 6.15, HCV and High Carbon Stock Management, Clause 6.15.1, Procedure Details, Item xii.
Corrections:	1.	Estate management had immediately monitor the grass cutting progress and recorded the actual condition in the linesite inspection record.
	2.	Estate will immediately remark the buffer zone along Sungai Keratong to clearly define and protect the area from further erosion.
	3.	Estate has installed clear signage in the HCV areas to prohibit trespassing, hunting, killing, and poaching of wild animals, as well as the cutting, destroying, or removal of forest produce.
Root Cause Analysis:	1.	Ineffective linesite monitoring and linesite inspection by Estate management.
	2.	The lack of proper monitoring and maintenance, compounded by ongoing soil erosion, has caused the river's width to increase over time.
	3.	Inadequate understanding of the importance of prevention and conservation signage that should be placed in High Conservation Value (HCV) areas.
Corrective Actions:	1.	The estate will improve its checklist and schedule to include grass cutting, buffer zones, HCV areas, and conservation activities. Inspection records will be submitted weekly and verified by the Assistant Manager (AM) and Manager.
	2.	Provide training to all relevant personnel on proper linesite monitoring, riverbank preservation, and HCV area management, focusing on requirements and best practices.



	3. Review and update the buffer zone and HCV management plan to include specific measures for mitigating soil erosion along the river and guidelines for installing appropriate signage in all HCV areas.
Assessment Conclusion:	The CAP was accepted, further verification will be conducted in the next assessment

Non-conformity							
NCR Ref #	2566559-202410-N2	Issued Date	24/10/2024				
Due Date	Next Assessment Visit	Closure Date	"Open"				
Indicator & Category (Critical / Minor)	3.4.2 – Minor						
Statement of Nonconformity:	Social issues identified has	not been included in the soci	al management plan.				
Requirement Reference:		n, a SEIA is available and s ng plans have been develop					
Objective Evidence:	All Operating Unit						
	issues with work permit rea	uditor at the operating units, newal due to the management ntations Group Berhad. Renew :.	nt decided to change the				
	workers in cash since the	nagement need to pay the sabank unable to open saving a has been confirmed throug	account for those workers				
	Mungka Estate						
	An interview with the crèche attendant was conducted by the auditor. During the interview, the attendant stated that she had requested a job change. However, her request was not approved as the management could not find a qualified replacement due to her specific qualifications from the <i>Kursus Asuhan PERMATA</i> conducted by <i>Jabatan Kebajikan Masyarakat</i> . The management acknowledged the issue and confirmed that they are in the process of establishing a management plan to address it.						
	Despite this, it was noted that the highlighted issues have not been incorporated into the social management plan through participatory methods.						
Corrections:	Expedite the work permit renewal process by coordinating closely with the Immigration Department to resolve any pending issues related to the company name change.						



	<ol> <li>Estate management will explain to the worker a clear process for addressing employee concerns and job requests will be implemented, with regular feedback mechanisms and management approval timelines.</li> </ol>		
Root Cause Analysis:	<ol> <li>The management's decision to change the company name to Johor Plantations Group Berhad has caused complications in the work permit renewal process, leading to expired permits for some workers.</li> <li>Lack of effective communication and inclusion in the social management planning process by estate management.</li> </ol>		
Corrective Actions:	<ol> <li>Conduct monthly checks and follow-ups on all work permit renewals to ensure any issues are addressed proactively.</li> <li>Communicate regularly with workers to keep them informed about the status of their work permits, salary payments, and job change requests.</li> <li>Update the SIA register to reflect issues such as delayed work permit renewals, temporary payments, and employee requests for job changes, as discussed with management.</li> </ol>		
Assessment Conclusion:	The CAP was accepted, further verification will be conducted in the next assessment		

Opportunity for Improvements			
OFI#	Description		
OFI 1	N/A		

Positive Findings			
PF#	Description		
PF 1	Good filing system, advanced multi skill workers in conducted the work, proper knowledge in estate management team in term of RSPO requirements		

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

Previous Audit Critical (Major) Non-conformity				
NCR Ref #	2399846-202310-M1	Issued Date	19/10/2023	
Due Date	17/01/2024 Closure Date 16/01/2024			
Indicator & Category (Critical / Minor)	3.8.16 – Critical			
Statement of Nonconformity:	Removal of certified stock in the RSPO PalmTrace was not made for volumes sold as conventional.			
Requirement Reference:	Registration of Transactions			



	<ul> <li>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.</li> <li>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.</li> </ul>	
Objective Evidence:	In the previous license period (23/05/2022 to 22/02/2023), there were 4,623.29 mt of certified CPO sold as conventional. However, there was no removal of certified stock made in the RSPO PalmTrace.	
Corrections:	To ensure the certified volume under the current license which sold as conventional is removed after monthly volume reconciliation.	
Root Cause Analysis:	The removal of certified stock in PalmTrace was not adequately described in the JPGB 's SC procedure.	
<b>Corrective Actions:</b>	To update the JPGB procedure RSPO Supply Chain guideline.	
Assessment Conclusion:	JPGB has established a new procedure entitled Guideline RSPO Supply Chain (doc. no.: JPB/GP/OPR/CTD/03, issue 0, rev. 0, dated 01/12/2023) for their Commodities Trading to use, which included the requirement to remove RSPO certified products in the PalmTrace under Clause 6.2.4 of the procedure.  Ever since the closing meeting of this assessment, there has been no certified products sold under different scheme, as conventional made. Thus, no actual removal of volume in the PalmTrace. This can be evident through verification of PalmTrace transaction records and the mill's Mass Balance records.  The evidence of correction and corrective action plan were found to be sufficient to	
	close the NCR. Continuous effective implementation of the corrective action shall be verified in the next assessment visit.	
Effectiveness Closure (for previous audit closed Critical NC):	Verification made to the mass balance sheet and records of the production of CPO and PK as well as sales records of both products. In the current license period found that there are downgraded PK sold as conventional. Verification of transaction records is available for review in the PalmTrace transaction. Verification of transaction no: ST-TR-470b20e5-d5f3 and ST-TR-c4b3fd07-7101 verified the total removal of certified PK stocks.	
	The management has included the removal process in the Traceability Procedure with Effective Date 01/12/2023 with Doc No: JPB/GP/OPR/CTD/03. Thus the Major Non Conformities remain closed.	

Previous Audit Minor Non-conformity				
NCR Ref #	2399846-202310-N1	Issued Date	19/10/2023	
Due Date	18/11/2023 <b>Closure Date</b> 24/10/2024			
Indicator & Category (Critical / Minor)	1.2.2 – Minor			
Statement of Nonconformity:	System to monitor compliance and the implementation of the policy and overall ethical business practice was not effectively demonstrated.			



Requirement Reference:	A system is in place to monitor compliance and the implementation of the policy and overall ethical business practice				
Objective Evidence:	Based on interview with stakeholders, there was a concern raised by one (1) of the contractors (Le Engineering and Construction) with regards to uncleared invoices during the transition period from Johor Foods Sdn Bhd to Mahamurni Plantation Sdn Bhd in 2012. Further verification with the certification unit (CU) was then made to evaluate the validity of the claim. However, the CU was not able to confirm whether or not the claim is valid.				
Corrections:	1) Account department from HQ has contacted Palong Mill's CC to conduct a thorough reconciliation of transactions related to Johor Food.				
	<ol> <li>Mill Management team will obtain the Statement of Account (SOA) from LE Engineering specifically for pending transactions with Johor Food, ensuring no mix-up with MPSB.</li> </ol>				
	3) To get all the cheque returned images from Johor Food Bank Account (Maybank)				
	To arrange a meeting with Johor Food Head Office how to settle the dues to LE Engineering together with representatives				
Root Cause Analysis:	Lack of monitoring by Mill Management in the payment process to Le Engineering and Construction.				
<b>Corrective Actions:</b>	Mill management will conduct monthly reconciliation on a monthly basis.				
Assessment Conclusion:	The correction and corrective action plans are accepted. Evidence of implementation shall be verified in the next assessment visit.				
Consultation with LE Engineering has been conducted to discuss on 27/03/2024 and has been attended by representative from LE Eng Sustainability, Palong Cocoa POM representative. During meeting, rementioned that JPG unable to trace back all the transaction that more and the management requested LE engineering to provide further do Payment has been made to LE Engineering & Construction on 31/03/2 voucher no; 200000xxxxxxx and 2 <sup>nd</sup> payment has been made on 15/07/2 voucher 2000xxxxxxx					
	Interview with LE Engineering confirmed that payment has been made by JPG management.				
	Sample of monthly reconciliation verified for month June, July and August 2024.				
	All the evidence provided verified and satisfied, hence Minor Non-conformities closed.				

Previous Audit Minor Non-conformity				
NCR Ref #	2399846-202310-N2	Issued Date	19/10/2023	
Due Date	18/11/2023	Closure Date	24/10/2024	
Indicator & Category (Critical / Minor)	7.8.1 – Minor			
Statement of Nonconformity:	Water Management Plan to ensure continuous availability of water sources and access to clean water was found to be not adequately established.			



Requirement Reference:	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:				
	a) The unit of certification does not restrict access to clean water or contribute to pollution of water used by communities.				
	b) Workers have adequate access to clean water.				
Objective Evidence:	The water management plan, dated 01/08/2023, for UMAC Estate was not adequately established to consider addressing the following issues:				
	<ol> <li>Feedback from stakeholders' consultation regarding to continuous disruption of water supply in UMAC Estate which has affected the workers and canteen operator.</li> </ol>				
	2) Since UMAC Estate location is isolated and far from other JPGB's estates, the action to get water supply from those other estates during water disruption as part of the water management plan seems to be irrelevant.				
	Only the unavailability of water during draught season is captured and included the Water Management Plan. The current condition i.e., water disruption from the public domain was not considered.				
Corrections:	Estate Management to review the Water management plan with include water disruption by Pengurusan Air Pahang as and when necessary.				
	Estate management have provided additional water tank for standby or every house in the estate for additional water storage in case the water from outside was cut off.				
Root Cause Analysis:	Ineffective Social Impact Assessment which had caused the water management plan in less effective in addressing water supply disruptions caused by Pengurusan Air Pahang.				
Corrective Actions:	i) Estate management to conduct Social Impact Assessment to identify potential vulnerabilities in the water management system. Also, to analyze historical data to understand patterns of disruptions caused by Pengurusan Air Pahang.				
	ii) Estate management to consult with Pengurusan Air Pahang about water issues.				
	Estate management establish a culture of continuous improvement in water management practices and water quality control. i.e. Notice Board or poster				
Assessment Conclusion:	The correction and corrective action plans are accepted. Evidence of implementation shall be verified in the next assessment visit.				
	Audit Verification;				
	The following was implemented having the following details				
	<ul> <li>i. Estate management to conduct Social Impact Assessment to identify potential vulnerabilities in the water management system. Also, to analyze historical data to understand patterns of disruptions caused by Pengurusan Air Pahang. Verification:</li> </ul>				
	An SIA was updated dated 20/09/2024 item LU22 among others discussing disruption of water supply due to pipe damages / river pollution. The estate has resolved the issues as there was no more disruption disputes since. A new tank 20000 litres has been added for the domestic use effective Sept 2023. This has added up to a total capacity of 40000 gallons storage sustaining a 3-day period in event of no water supply.  ii. Estate management to consult with Pengurusan Air Pahang about water				
	issues.				



Previous Audit Opportunity for Improvement				
OFI#	Description			
OFI 1	OFI Statement:			
	2399846-202310-I1			
	Indicator 3.6.1			
	The hazard identification of the estates can be further improved by taking the potential hazard of being hit by fallen Ganoderma infected palms into consideration in all operations namely harvesting and evacuation, manuring, spraying, etc.			
	Verification / Follow-up actions:			
	Verification of the HIRARC document found that the management has included in the risk assessment from the fallen tree. The action taken is to train workers to be aware of surrounding and be careful when winds are strong.			
OFI 2	OFI Statement:			
	2399846-202310-I2			
	Indicator 7.3.1			
	Waste Management Plan on use of chemicals (fertilizer) contaminated empty bags that sensitive to aquatic live and water quality to be further considered and strengthened.			
	Verification / Follow-up actions:			
	The Estates and mill have revised the Waste and Pollution Management Plan 2024 dated 01/08/2024. Therein among others management of empty fertilizer bags disposal is to recycle either for sand, soil bagging with the inner plastic liner removed and disposed as scheduled waste.			



## 3.3.2 Summary of the Nonconformities and Status

CAR Ref.	Category (Critical / Minor)		Issued Date	Status & Date (Closure)
2399846-202310-M1	Major	3.8.16	19/10/2023	Closed out on 16/01/2024
2399846-202310-N1	Minor	1.2.2	19/10/2023	Closed out on 24/10/2024
2399846-202310-N2	Minor	7.8.1	19/10/2023	Closed out on 24/10/2024
2566559-202410-M1	Critical	3.6.1	24/10/2024	Closed out on 28/11/2024
2566559-202410-N1	Minor	3.3.2	24/10/2024	"Open"
2566559-202410-N2	Minor	3.4.2	24/10/2024	"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 - Palong Cocoa 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)				
Local communities	Awang Kechik bin Sikang; Tok Batin RPS Bukit Serak	Face to face				
Contractor	BhoratyRaj; GP Subramaniam Enterprise	Face to face				
Neighbouring Estate	Amirzan bin Ahmad, Manager, FELCRA Bukit Serok	Face to face				
Government agencies	Rohani bt Yassin; SK Bukit Serok.	Face to face				
Contractor	Cher Guan Heng, Tong Woon Trading	Face to face				
Contractor	Muhammad Faiz, Darul Prospek Sdn Bhd	Face to face				
Government agencies	Kamarul Rizal, Jabatan Tenaga Kerja	Face to face				



Internal	NUPW representative	Face to face
Internal	Local and foreign workers	Face to face
Internal	Gender committee	Face to face

takeh	olders comment				
1	Feedbacks: Awang Kechik bin Sikang; Tok Batin RPS Bukit Serak				
•	Good cooperation given by estate management team. The management will help whenever they requested for help. Estate under Johor Plantation Group Berhad is known for offering job opportunity to the villager No land encroachment from Johor Plantation Group Berhad estates. Demarcation of boundaries by the trenches, fencing and boundary stone were available. Estate provides access to the villagers using their roads for emergency cases.				
	Audit Team verification and response: No further action required				
2	<b>Feedbacks:</b> BhoratyRaj; GP Subramaniam Enterprise, Cher Guan Heng, Tong Woon Trading, Muhammad Faiz, Darul Prospek Sdn Bhd				
	The contractor has a good relationship with the company where they have been providing the service for many years. The contractor also mentioned that the award of contract was done through fair and unbiased tendering process. Payments were always made on timely manner. The management and staff of the operating units have also been very accommodating should there be any issues of concern. The operating units also actively provide trainings on RSPO especially with regards to legal, OHS, best practices and employees' welfare. Although a few challenges were faced in implementing the requirements due to limited knowledge and resources, the contractors have stated that they will do their best to comply. They informed that they do not employ any child labour.				
	The company has also always invited the contractor's representative to attend the stakeholder meetings as a channel to discuss any social issues. They were also made to understand the mechanism to lodge complaint or grievance should there be any. No issue with the management at this moment				
	Audit Team verification and response: No further action required				
3	Feedbacks: Rohani bt Yassin; SK Bukit Serok.				
	The representatives informed that the management from the estates and mill are very attentive and supportive. The management will assist whenever they requested for any assistance from the management. They have good relationship with the management. They also informed that no child labour was sighted in the estates. The management consistently contributes to school activities such as providing routes and facilities within the estate area for sports events. The teachers mentions that the estates operations do no disrupt learning or activity in the school.				
	Audit Team verification and response: No further action required				
4	Feedbacks: Amirzan bin Ahmad, Manager, FELCRA Bukit Serok				
	There are no issues with the management at the moment. He mentioned their plantations is located near the estate and has clearly demarcated boundaries, distinguished from the estate by trenches. There has been no encroachment on his land. Estate management given him permission to use the estate road for transport his harvested crops. The estate management also invited him to the annual stakeholder meeting				
	Audit Team verification and response: No further action required				
5	Feedbacks: Kamarul Rizal, Jabatan Tenaga Kerja				



There is JTK and often invited for stakeholder meeting and communication has been done regularly. no issues related to employment has been raised related to all operating unit under Palong Cocoa POM. He mentioned that the management provide cooperations with JTK for any information request.

### Audit Team verification and response: No further action required

### **Feedbacks:** NUPW representative

They informed that there are no outstanding issues with the estate and mill management. Regular meetings between the management and workers representative are conducted to address any matter arising from the workers. Worker's welfare including housing, salary payment and benefit are well taken care of by the estate and mill management. They also informed that the management did not involve in the selection of workers representatives. All representatives are elected by workers. Management provides a place for election process.

## Audit Team verification and response: No further action required

### **7 Feedback:** Local and foreign workers

Employment contract and payslip were provided, and the salaries deposited into workers bank account. Wages are paid according to Minimum Wages Order 2022. PPE is provided at no cost and can be replaced by making a request to the estate management. Foreign workers retain possession of their passports. Workers are aware of the complaint and grievance channels available to them. The management has been very accommodative to the workers in term of welfare. With regards to welfare, housing facilities, water & electricity supply were always maintained in good conditions. There has been no issue with regards to delivering the terms & conditions stipulated in the employment contract. Regular training on company's SOP, policies, safety and health, environmental and social aspects were conducted by operating unit. All issues has been resolved and they also channel their complaints to the workers representatives.

## Audit Team verification and response: No further action required

### **8 Feedback:** Gender committee

They informed that no sexual harassment and violence cases reported since the last audit. Female workers understand the function of Gender Committee and aware the complaint mechanism if there are any issues occurred. They were treated equally without any discrimination by the management. The committee is tasked with planning annual activities for female workers to ensure a conducive living environment in the estate and during these activities they also can also know each other better, making easier to share any problems or thoughts. The management has also been very supportive with the programmes in term of financial, facilities and other resources. They were also informed that they are treated equally and given same opportunity as the male such as promotion as mandore in the estate.

They were briefed on the new mother's requirements for specific needs and consultation have been conducted by the management. They informed that those who handle chemical found pregnant will be transferred to other job stations that do not hazard to the worker. They allow to go back for breastfeeding during working hour in case they need

Audit Team verification and response: No further action required

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		

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



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

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

## Previous land owner / user comment

**Feedbacks:** Not applicable as the estates have undergone 2nd cycle of replanting.

**Audit Team verification and response:** Not applicable as the estates have undergone 2nd cycle of replanting.

## 3.5 Impartiality and conflict of interest

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

## **Formal Signing-off of Assessment Conclusion and Recommendation**

The audit objectives have been achieved and the certificate scope is appropriate. Based on the results of this audit, it is concluded that Johor Plantations Group Berhad - Palong Cocoa 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 Group Berhad - Palong Cocoa Palm Oil Mill is remain certified.

Bernad Talong Good Faint On Film 15 Fernant Certained.			
Report prepared by	Acceptance of Assessment Conclusion		
Name: AHMAD RUFI BIN ABU TALIB KHAN	Name: RASHID BASIRAN		
Company Name: BSI SERVICES MALAYSIA SDN BHD	Company Name: JOHOR PLANTATIONS GROUP BERHAD		
Title: CLIENT MANAGER	Title: HEAD, SUSTAINABILITY DEPARTMENT		
Signature:	Signature:  (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.)		
Date: 30/11/2024	Date: 30/11/2024		



#### **Appendix A: Summary of Findings**

Criterio	on / Indicator	Assessment Findings	Compliance		
Princip	Principle 1: Behave ethically and transparently				
	on 1.1: The unit of certification provides adequate information to relevant rate languages and forms to allow for effective participation in decision makes		RSPO Criteria, in		
1.1.1	(C) Documents that are specified in the RSPO P&C are made available to the public Critical (Major) compliance -	Document that publicly available listed in the procedure sustainable management system document number JPG/PRO/SID/SMS issuance number 00 revision No 00 effective date 14/11/2024 clause 6.1. Interview with sample stakeholders, confirmed that there are document that publicly available can be requested by stakeholders.	Complied		
1.1.2	Information is provided in appropriate languages and accessible to relevant stakeholders.  - Minor compliance -	All the document/information has been established in both Bahasa Malaysia and English. As per conversation with the management, if there is any request from the stakeholder who need explanation, the management of each operating unit is responsible to explain the information to the stakeholders.	Complied		
1.1.3	(C) Records of requests for information and responses are maintained Critical (Major) compliance -	All records of request for information have been maintained in the Enquiry register record and has been responded by the management in line with the consultation and communication procedure.  There is no information request has been received since last audit by the management which has been confirmed through records and interview with sample stakeholders.	Complied		
1.1.4	(C) Consultation and communication procedures are documented, disclosed, implemented, made available, and explained to all relevant stakeholders by nominated representative.  - Critical (Major) compliance -		Complied		

...making excellence a habit."



communication for internal and external through various method such as email, face to face, letter, meeting, telephone, or social media.

The procedure has been communicated to stakeholders during the stakeholder's consultation meeting conducted on 30/09/2024 for Northen region. As per interview with sample stakeholders and workers, there is evidence that demonstrate their understanding on the process for consultation and communications.

There is evidence that the procedure has been implemented which has been verified based on the records and interview with sample stakeholders.

#### Labis Bharu Estate

There is request for assistance that has been received by the management and has been responded. Details as per below

- 1. Request for Maulidur Rasul celebration donation from Surau Kampung Melayu Bukit Siput dated 16/10/2024.
- 2. Request for Maulidur Rasul celebration donation from Masjid Jamek Naemah Kampung Melayu dated 16/10/2024.
- 3. Request by Kuil Sri Maha Mariamman on 24/07/2024 to used estate roads.

#### **UMAC Estate**

1. Request by PIBG Sekolah Kebangsaan Bukit Serok dated 17/10/2024.

		2. Donation of hamper to Sekolah Kebangsaan (FELDA) Keratong 02 dated 08/08/2024.	
		3. Request to borrow fertilizers spreader by Ladang Palong dated 12/09/2024.	
		Mungka Estate	
		Request of donations from Sekolah Agama Kemedak to purchase fan for classroom.	
		Request for donation from Sekolah Kebangsaan Kemedak for school sport day.	
		Request for donations from SK Kebangsaan Buloh Kasap to upgrade PPKI classroom.	
		Palong Estate	
		Request for van assistance to transport school kids.	
		Request to used estate van to attended International Women Day celebrations.	
1.1.5	There is a current list of contact and details of stakeholders and their nominated representatives.  - Minor compliance -	List of stakeholders for year 2024 for each operating units has been updated and verified by auditor. Stakeholders has been classified into different category government department, association/union/corporation, contractors, suppliers, school and local communities.	Complied
		<u>Labis Bharu Estate</u>	
		List of stakeholders has been updated on 01/10/2024. The management has listed 4 local communities which are Kampung Genuang, Kampung Sri Dagang, Ladang New Pogoh, Kampung Paya	

		<u>UMAC Estate</u> List stakeholder updated for 2024. Total 4 contractors has been recruited by the management which are GP Subramaniam Enterprise (harvesting), Sungai Rezeki Enterprise (FFB loading and transport), Roslan Muhammad Enterprise, Agensi Ar-Raihan (Transporting school kids) and listed in the stakeholder list.	
		Mungka Estate List of stakeholders has been updated on February 2024. Listed total 3 educational institution which are Sekolah Kebangsaan Kemdak, Tadika KEMAS and Semengah Buloh Kasap.	
		Palong Estate There are 4 local communities has been identified which for Palong Estate which are Kampung Mensudut Lama, Kampung Balai Badang, Kampung Padang Kiambang.	
Criterio	n 1.2: The unit of certification commits to ethical conduct in all business o	perations 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 -	Documented in the Due Diligence Policy dated 28/05/2023 document number JPG/DD/GOV/IAID/004. This included recruitment and contracts.	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 -	Awareness on anti-bribery and ethical conducted has been conducted to all operating units by the Integrity and compliance department to all workers, staff and the management.  1. Palong Estate: 06/10/2024  2. Mungka Estate/Palong POM: 07/10/2024	Complied



		Tendering process verified by auditor, found out the been done at headquarters level. The process in tender, quotation submission, and contact award. Whistle blowing policy is one the mechanism established such as whistle blowing workers, stakeholder of the policy that any individual, workers, stakeholder of unethical conduct. Several channel established such as whistle blowing email, whistle written report, telephone or face to face communication.	blished to ensure Stated in the in olders can raise nels have been blowing e-form,	
Princip	le 2: Operate legally and respect rights			
Criterio	on 2.1: There is compliance with all applicable local, national and ratific	ed international laws and regulations.		
2.1.1	1 <b>(C)</b> The Unit of Certification complies with legal requirements - Critical (Major) compliance -  The Northern Region CU continued to comply with the legal requirements. Compliance to each applicable law and regulation monitored by the operating units and Sustainability Departments personnel. The estates and mill had obtained and renewed license and permits as required by the law. Among others the licenses/permit viewed were;		and regulation is bility Department renewed license	Complied
		Palong Estate - Permit/license	Validity	
		License Air receiver, JH PMT 21524	07/11/2025	
		MPOB license no 57058500-2000	31/03/2025	
		MPOB license no 62266611-1000	31/03/2025	
		JTK - Wages deduction Cooperative TK/NJ-U24	Eff 17/08/20	
		JTK - Wages Deduction Insurance 7/2/35/68	Eff 16/05/22	
		JTK - Wages Deduction Surau TK/NJ/U/24	Eff 12/08/18	
		KPDNHEP Permit diesel 5460L ref 00509	14/04/2026	

...making excellence a habit."



KPDNHEP Permit diesel 10000L ref 000511	14/04/2026
SPAN - Ref LK/3/23/00481	15/05/2026
BAKAJ - Ref 334/430/2/06/3/2	31/12/2024
Mungka Estate	
MPOB License 57058400-2000	30/01/2026
KPDNHEP Diesel Permit - 7000L ref J00376	31/03/2025
SPAN Ref 800-4/1/2/14	15/05/2026
BAKAJ - Ref 334/430/02/6/3/1	31/12/2024
JTK - Wages Surau Deduction TK/NJ-U24	Eff 28/08/19
JTK - Wages Insurance deduction TK/NJ-U24	Eff 26/06/18
JTK - Wages Zakat Deduction TK/NJ-U24	Eff 26/06/18
JTK - Wages TH Deduction TK/NJ-U24	Eff 26/06/18
Mungka Estate - Sepang Loi Division	
MPOB License 62138400-2000	31/10/2024
KPDNHEP Diesel Permit – 10000L ref J006186	30/11/2025
SPAN Ref 800-4/1/20/09	03/01/2026
BAKAJ - Ref 07/A/SGT/024	31/12/2024
JTK - Wages Surau Deduction PP3/29/028/2010	Eff 01/08/10

JTK - Wages Electricity deduction PP3/29/49/09	Eff 01/11/09
JTK - Wages NUPW fee BSM7/2/35/68	Eff 16/05/02
JTK - Wages TH Deduction ref 600-44/13/4	Eff 19/01/23
Labis Bahru Estate	
MPOB License 62131300-2000	30/09/2025
Air Compressor JH PMT 18012	10/12/2024
KPDNHEP Diesel Permit - 18000L ref no J 6185	30/11/2025
KPDNHEP Petrol Permit - 200L/day ref J 00370	08/06/2025
Metrology Corporation W/B ref CA075907	05/08/2025
Pendaftaran Akta Levi Ref J75-2008-000020	Eff 31/12/08
JTK - Wages Surau Deduction TK/NJ-U24	Eff 02/12/18
JTK - Wages School Bus Deduction TK/NJ-U24	Eff 23/05//18
JTK - Wages Water Deduction TK/NJ-U24	Eff 02/12/18
JTK - Wages TH Deduction TK/NJ-U24	Eff 15/06/20
UMAC Estate	
MPOB License 62129700-2000	30/09/2025
Air Compressor JH PMT 5007	12/09/2025
KPDNHEP Diesel Permit - 15000L ref C02886	17/02/2025

KPDNHEP Petrol Permit – 600L ref C02886	17/02/2025
JTK - Wages Zakat Deduction PHG2/11/3/(29)	Eff 02/04/18
JTK - Wages Water Deduction PP3/21/05/2008	Eff 01/09/08
JTK - Wages TH Deduction PHG.600-2/11/(31)	Eff 02/04/18
JTK - Wages NUPW Deduction PHG2/11/3/(28)	Eff 02/04/18
JTK – Insurance deduction PHG2/11/3/(30)	Eff 02/04/18
Metrology Corporation W/B ref CA079836	05/07/2025
Palong Cocoa Palm Oil Mill	
MPOB License no 57839200-4000	30/11/2024
DOE – Jadual Pematuhan Ref 004720	30/06/2025
Energy Commission Gen-Set ref 2023/03661	27/11/2024
SPAN LK/3/23/00482	31/05/2026
Lesen Mengabstrak Air Sg 334/300/5/6/8/9	31/12/2024
Lesen Mengabstrak Air Sg 334/300/5/6/18	31/12/2024
KPDNHEP - ref J 000773 - 20000L diesel	18/08/2027
Persijilan HALAL JAIJ - ref no 087-11/2022	30/06/2025
Majlis Daerah Segamat ref L0806670	31/12/2024
JTK - O/T working hours ref PU/9/134/77/12	30/11/2025
Metrology Corp. w/bridge 1 ref B 2168694	05/08/2025
Metrology Corp. w/bridge 1 ref B 2169241	01/10/2025
Sterilizer no 1 JH PMT 27041	29/11/2024
Sterilizer no 2 JH PMT 27042	29/11/2024
Sterilizer no 3 JH PMT 27043	29/11/2024
Boiler no 4 JH PMD 1273	29/11/2024

#### RSPO P&C Public Summary Report Revision 16 (Oct 2024)

Back Pressure Receiver PMT 60888	29/11/2024
Air Compressor JH PMT 19028	29/11/2024
Air Compressor JH PMT 2536	29/11/2024
Air Compressor JH PMT 27440	29/11/2024
Air Receiver Tank JH PMT 81139	31/10/2024
Air Receiver Tank JH PMT 154068	23/09/2025
Air Receiver Tank JH PMT 154085	23/09/2025
	=

Occupational Safety Health Act 2022 – Competent Person

The following competency requirements for the Palong Cocoa POM were verified:

Competency	Ref no	Registration Date
Steam Engineer G 2	1 - ref 170/2016	07/11/2016
Steam Engineer G 2	1 - ref JS02/1043	03/09/2024
Engine Driver G1	2 Persons	2013 & 2019
Engine Driver G2	2 Persons	2005/2015
Chargeman A4	1 Person	08/05/2018
Chargeman AO	1 Person	01/04/2020
AGT	5 Persons	2023
AESP	6 Persons	2024
BOFA	4 Persons	2023
CEPSWAM	1 Persons	2018 & 2019
CEPPOME	1 Person	2017
FFB Grabber	1 Persons	2019

## RSPO P&C Public Summary Report Revision 16 (Oct 2024)

_		·	
		<ul> <li>i. Mungka Estate has ceased the usage of an Air Compressor JH PMT 16798 expired on 15/04/2024 upon declined renewal by DOSH. A new unit has been purchased and will follow the certification process by DOSH. The estate in the interim uses the facilities in the PC POM located within the estate vicinity.</li> <li>ii. The mill is in the midst of retubing for Boiler no 3 JH PMD 185 (CF expired 16/10/2023). It is anticipated to commission in Nov 2024 and will undergo DOSH inspection prior commencing operation.</li> <li>iii. The mill had applied for the fire certificate renewal dated 05/05/2024 prior to the expiry on 07/06/2024. The application being processed on completion of certain maintenance and resubmission on 29/09/2024. The mill is awaiting visit by Jabatan BOMBA.</li> <li>iv. The mill made notification to DOE for the installation of gen-sets in 02/06/1989. The letter was sighted and verified.</li> <li>v. The mill has installed an ESP in Sept 2019 and commissioned in Nov in the same year.</li> <li>vi. The DOE has consented agreement on the water sampling point via letter dated 27/07/2024 to comply with the Jadual Pematuhan no 004720. The letter was sighted and verified.</li> <li>vii. MPOB licence approved processing for 230000 mt FFB vs 16,1151.23 mt /year in 2023 hence verified compliance to the mill licence.</li> </ul>	
2.1.2	A documented system for ensuring legal compliance is in place. This system has a means to track changes to the laws and regulations.  - Minor compliance -	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.	Complied
		a) Each estate/mill had its own Legal and Other Requirements Register (LORR) and were being evaluated individually	

...making excellence a habit."



annually for compliance. The legal registers were updated by the person in-charge and approved by the respective Managers.  b) The Sustainability Department SD 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;  - Pesticides Act 1974 and Regulations,
- Environmental Quality Act 1974 and Regulations,
- Occupational Safety and Health (Amendment) Act 2022
- Employment Act 1955,
- Employment 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
- Employees Social Security (Amendment) Act 2024
The latest review was dated 31/08/2024 to include new updates as listed below.  i. 01/06/2024 – Occupational Safety and Health (Amendment) Act 2022

2.1.3	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 -					t Complied f
			hru Estate			
		Field	Boundary	Field	Boundary	
		P07/B3	Johor Veterinary	P08/B3	Kg Melayu Raya	
		P04/B3	Smallholder Ah Chai	P05/B1	Kg Melayu Raya	
		Palong E	state			
		P13/B1	PPNJ Bukit Bujang	P08/B3	Kg Balai Badang	
		P12/B1	PPNJ Bukit Bujang	P12/B6	Ldg Sepang Loi	
		Mungka	Estate			
		P11/B2	Ladang Kemedak	P06/B1	Kg Sepang Loi	

## RSPO P&C Public Summary Report Revision 16 (Oct 2024)

	<u></u>					
		P12/B2	Ladang Kemedak	-	-	
		Sepang	Loi Estate			
		P05/B2	Smallholder PPNJ	P09/B6	Ladang Mungka	
		P00B1	Ladang Makmur	-	-	
				-	-	
		UMAC E	state			
		P08/B1	ACE Plantations	P21B1	Forest Reserve	
		P09/B1	FELCRA Bkt Seruk	P03/B1	Felda Keratong 2	
			1	l l		
Criterio	on 2.2: All contractors providing operational services and supplying labour,	and Fresh	Fruit Bunch (FFB) supp	liers, comply	y with legal requirements	s <b>.</b>
2.2.1	A list of contracted parties is maintained.	List of co	ntracted parties mainta	ined in the I	ist of stakeholders.	Complied
	- Minor compliance -		_			
		Labis Bha	<u>ıru Estate</u>			
					stakeholders list which	
			n Bersatu Enterprise ( nent (replanting)	(harvesting),	, and Darul Prospek	
		Developii	ient (replanting)			
		UMAC Es	<u>tate</u>			
					the management which	
					sting), Sungai Rezeki	
			e (FFB loading and e, Agensi Ar-Raihan (Ti		, Roslan Muhammad school kids).	
	1		'		,	

...making excellence a habit."

		T	
		Palong Estate  Harvesting contractor- Jeevendran Enteprise contract number JPB/NR/218/80/2023 (NFH).  Loading and transporting of fresh fruit bunch (FFB) from field to Palong Cocoa Palm Oil Mill- Perusahaan Juta Cemerlang contract number MPSB/Kemedak/ 5/2017	
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 -	Contract agreement reviewed and verified by auditor which stated in clause 17.0 Law, 17.2; the vendor shall comply with the provisions of the statues, regulations, requirement, and instrument for the time being in force and the requirements of any federal and/or local government and/or any appropriate authorities in respect of undertaking of the contract.  Labis Bharu Estate  Nusa Bersatu Enterprise reference number JGPB/LBE/129/34/2024 (NFH) dated 30/09/2024.  UMAC Estate  1. Sungai Rezeki Sdn Bhd reference number KMB/C1/23/3(2022) dated 31/03/2022.  2. GP Subramaniam Enterprise reference number MPSB/C2/32/30(2021) dated 15/12/2021.  Mungka Estate  1. Sri MK Enterprise reference number MPSB/C1/24/27 (2021) dated 15/12/2021, contract for harvesting.	Complied

		Palong Estate  1. Harvesting contractor- Jeevendran Enterprise contract number JPB/NR/218/80/2023 (NFH).  2. Loading and transporting of fresh fruit bunch (FFB) from field to Palong Cocoa Palm Oil Mill- Perusahaan Juta Cemerlang contract number MPSB/Kemedak/ 5/2017	
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 -	Contract agreement reviewed and verified by auditor which stated in clause 16.8; the vendor represent and warrant that the vendor shall comply with applicable labor and employment laws regarding 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 1996.  Sample of contract agreement that has been sample by auditor as per indicator 2.2.2	Complied
Criterio	<b>n 2.3:</b> All FFB supplies from outside the unit of certification are from legal	<b>'</b>	
2.3.1	<ul> <li>(C) For all directly sourced FFB, the mill requires:</li> <li>Information on geo-location of FFB origins</li> <li>Evidence of the ownership status or the right/claim to the land, or valid use of land by the grower/smallholder</li> <li>One or more supporting documents for claims</li> <li>Valid MPOB license</li> <li>Critical (Major) compliance -</li> </ul>	Addressed in list of direct sourced FFB supply to Palong Cocoa Palm Oil Mill. The Palm Oil Mill management managed to obtain the required information from the directly sourced FFB supplier. The information contains details such as:  - Source of FFB - Address of plantation/dealer - MPOB license and Validity - Coordinate and size of plantation	Complied
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 Indicator 2.3.1.	The Mill processes only FFB from its own estates namely Palong Estate, Mungka Estate, UMAC Estate, Labis Bahru Estates. No	Not Applicable

	- Minor compliance -		pendent small cator is not app		rop is re	eceived a	nd there	fore this	
Principl	le 3: Optimise productivity, efficiency, positive impacts and resilie	nce							
Criterio	n 3.1: There is an implemented management plan that aims to achieve lor	ng-terr	m economic an	d financia	l 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 -	econ 2028 cultiv RSPO yield - cap relat	the Estates omic and final were sighter vation, harvest compliance /ha, and total obital expenditured expenses. The state of the state	ncial viab d. The b ing & eva etc. The cost of pro- e mainly f he estate 2024 3331.01 163.72 3494.73 73221 21.98	2025 3331.01 163.72 3494.73 76868 23.80	annual but overs action welfare, coalso include over m ton, gs, furnituded the follows and the follows are also included at the follows are also ar	udgets for vities for rapital expled project per ha alore and other wing form 2027 3170.13 324.60 3494.73 77000 24.29 2027 1529.81	2024 to upkeep, penditure, ctions on and CAPEX ners asset at for the 2028 3170.13 324.60 3494.73 76646 24.18 2028 1663.83	Complied
1			Immature Ha	0.00	134.02	134.02	216.69	82.67	



Total Ha	1746.50	1746.50	1746.50	1746.50	1746.50
FFB Tons	33310	32503	33313	34282	34260
Yield /Ha	19.07	20.16	20.66	22.41	20.59
Sep Loi	2024	2025	2026	2027	2028
Mature Ha	899.92	729.11	729.11	729.11	729.11
Immature Ha	0.00	170.81	170.81	170.81	170.81
Total Ha	899.92	899.92	899.92	899.92	899.92
FFB Tons	17173	15321	13358	11744	11681
Yield /Ha	19.08	21.01	18.32	16.11	16.02
	•	•		•	-
Labis Bahru	2024	2025	2026	2027	2028
Mature Ha	1739.38	1490.32	1698.18	1947.24	1947.24
Immature Ha	207.86	456.92	249.06	0.00	0.00
Total Ha	1947.24	1947.24	1947.24	1947.24	1947.24
FFB Tons	33416	34869	36385	40674	41994
Yield /Ha	19.21	23.40	21.43	20.89	21.57
UMAC	2024	2025	2026	2027	2028
Mature Ha	1527.13	1555.98	1555.98	1555.98	1257.09

#### RSPO P&C Public Summary Report Revision 16 (Oct 2024)

Immature Ha	28.85	0.00	0.00	0.00	298.89
Total Ha	1555.98	1555.98	1555.98	1555.98	1555.98
FFB Tons	32193	33634	33499	28806	27253
Yield /Ha	20.69	21.62	21.53	18.51	17.52

RM/mt FFB	Х	Х	Х	Х	Х
RM/ha	Х	Х	Х	Х	Х

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;

- 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.

Year	2024	2025	2026	2027	2028
FFB processed	189313	197993	189044	188486	188030
OER	21.25	21.27	21.15	21.07	21.00

		KER		5.5	5 5.43	3 5.4	15 5.·	43 5.	40	
		Admir	nistration	х	х	х		(	х	
		Proces	ssing cost	t x	х	х		(	х	
		Depre	ciation	Х	Х	х		(	х	
		H Q c	harges	Х	Х	Х		(	х	
		RM/m	t FFB	Х	Х	Х		(	Х	
		RM/m	t CPO	Х	Х	Х		<	х	
3.1.2	An annual replanting programme projected for a minimum of five years with yearly review, is available.  - Minor compliance -	on all tincorporasighted f  Estat  Palor  Mung	gka ing Loi s Bahru	tes. The	e progra annual fi	m is r nancial	eviewed budget.	annually The pr	y and	Complied
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 doc no JPG/PRO/SID/SD/SMS/6.8 dated						Complied		

effectiveness of the RSPO implementation and present management system.	ts action plans
ic, social and charletinental performance and develops and implement	G action plans
Action plan for continuous improvement implemented by individual operating unit within the certification unit and annually reviewed. The plans were developed based on consideration of the social impacts, which in general includes welfare of employees, and	Complied
i	v. Changes That Could Affect Management System vi. Complaints and grievance vii. Continual Improvement Plan  The meeting made a conclusive statement on the suitability, effectiveness of the RSPO implementation and present management system.  ic, social and environmental performance and develops and implemen  Action plan for continuous improvement implemented by individual operating unit within the certification unit and annually reviewed. The plans were developed based on consideration of the social

		relationship between the relevant stakeholders. Based on interview, records review and site visit, the implementation of all the plans were observed to be on track within the set timeframe.	
3.2.2	As part of the monitoring and continuous improvement process, annual reports are submitted to the RSPO Secretariat using the [RSPO metrics template].  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.  - Minor Compliance -	RSPO metric template version 2.1 is used for the reporting of Palong Cocoa POM certification unit's metrics (economic, social and environment). Data reporting period is January to December 2023 for (social and environment metrics) and economic metrics from October 2023 – September 2024 (counting back from audit month). Based on verification with input data, no discrepancies of data reported in the metrics for the period under review for all the operating units	Complied
Criterio	on 3.3: Operating procedures are Appropriately documented, consistently im	plemented and monitored.	
3.3.1	(C) Standard Operating Procedures (SOPs) for the unit of certification are in place Critical (Major) compliance -	Standard Operating Procedure has been developed for the Mill and Estate for guidance in all operation conducted in the site.  The estate SOP for operation is as per below:  1. Safe Working Procedure – Dated 01/03/2021 Ref No: KULIM/PKS/OSH-1  2. Oil Palm Manual Dated 01/03/2024 Ref No: JPG/PRO/OPR/R&DAS/O-01-00  The management has established the Mill Operation Manual dated 01/03/2024 with Ref No: JPG/PRO/OPR/R&DAS/M-01-00 that details the process of milling starting from receiving the FFB until the despatch of CPO and PK.	Complied

		The management established the SOP for all the operations, which was communicated to workers during the morning muster call. Site visit to the estate verified that the activities sampled followed the SOP.	
3.3.2	A mechanism to check consistent implementation of procedures is in place Minor Compliance -	The mechanism to check the consistency of estate and mill implementation of their procedures includes Mill/Plantation Advisor Visit, Agronomist Visit and Internal Audit.	Non- compliance
		The Plantation Inspector has conducted the inspection in the mill and discussion with the mill management has been conducted. Sighted the report of the Plantation Inspector dated 26/09/2024 on the visit conducted on 30/07/2024 and 12/07/2024.	
		The agronomist report for Labis Bahru Estate verified, conducted on 25/06/2024. The report verified contain the visit summary, field observation report and record assessment.	
		The agronomist report for UMAC Estate verified, conducted on 10/07/2024. The report verified contain the visit summary, field observation report and record assessment, as well as recommendation of fertiliser	
		The agronomist report for Mungka Estate verified, conducted on 12/06/2024. The report verified contain the visit summary, field observation report and record assessment, as well as recommendation of fertiliser	
		The agronomist report for Palong Estate verified, conducted on 14/06/2024. The report verified contain the visit summary, field observation report and record assessment, as well as recommendation of fertiliser	
		Procedure for line site inspection	
		The procedure for line site inspections is documented in Document No: SQD/WI/10, dated 01/01/2020. Clause 2.3.2 of	

#### RSPO P&C Public Summary Report Revision 16 (Oct 2024)

the procedure states that line site inspection records should be verified by the Assistant Manager or Manager on a weekly basis.

For Mungka Estate, the line site inspection records were verified for the periods 01/10/2024 to 07/10/2024 and 08/10/2024 to 14/10/2024. However, these records were not verified by management, and the actual condition does not reflect what is required. This has been confirmed through both the line site inspection records and a site visit.

2. Buffer zones at Sungai Keratong, UMAC Estate

Buffer zones have been established along Sungai Keratong within the UMAC Estate, adjacent to Field No. P06/B4. The river's width is estimated at 57.49 meters; however, the buffer zones on each side have only been demarcated at a width of one palm from the riverbank. This contradicts the requirement for equal-width buffer zones on both sides of the watercourse, as stated in Procedure – Sustainability Management System 6.15, HCV and High Carbon Stock Management Buffer Zones, Document No: JPG/PRO/OPR/R&DAS/0-01-00, dated 01/03/2024.

3. Lack of signage in HCV areas

There are no signboards displaying the appropriate signage to prohibit hunting in the High Conservation Value (HCV) area or to prevent forest cutting and related activities at the identified Steep Area (HCV 2) adjacent to Field No. P07/B3, UMAC Estate. This is not in compliance with the Procedure – Sustainability Management System 6.15, HCV and High Carbon Stock Management, Clause 6.15.1, Procedure Details, Item xii.

		Thus, the minor NC raised	
3.3.3	Records of monitoring and any actions taken are maintained and available.  - Minor Compliance -	All operational units have consistently kept records of their monitoring activities, which are readily accessible for review. These records encompass various levels, ranging from field and mill supervisors to top-level executives and managers. The Regional Controller (RC) is responsible for overseeing the estates' adherence to standard operating procedures, budgetary constraints, and productivity targets, among other factors. A sample monitoring report is provided below for reference:	Complied
		Labis Bahru Estate  1. Internal Audit report dated 18/08/2024  UMAC Estate	
		Internal Audit Report dated 19/08/2024     Palong Cocoa POM	
		1. Internal Audit Report dated 22/08/2024  Mungka Estate	
		Internal Audit Report dated 21/08/2024     Palong Estate	
		1. Internal Audit Report dated 20/07/2024	
	on 3.4: A comprehensive Social and Environmental Impact Assessment (SEIA ement and monitoring plan is implemented and regularly updated in ongoing		d environmenta
3.4.1	(C) In new plantings or operations including mills, an independent SEIA, undertaken through a participatory methodology involving the affected	The Social Impact Assessment for the estates were last conducted internally by JPG's SQD. The identification of both positive and negative social impacts was carried out with the participation of	Complied

	stakeholders and including the impacts of any smallholder/out-grower scheme, is documented.  - Critical (Major) compliance -	affected parties, including women and migrant workers. Among the factors considered were access and use rights, economic livelihood & working conditions, subsistence activities, cultural & religious values, and health & education facilities, to name a few. The identified impacts were then registered in "Daftar Impak Social Kulim (Malaysia) Berhad 2020" and reviewed annually. In the register there is information about type of issue, level of severity, recommendation for improvement and person responsible.	
3.4.2	For the unit of certification, a SEIA is available and social and environmental management and monitoring plans have been developed with participation of affected stakeholders.  - Minor Compliance -	Social Impact Assessment (SIA) as well as the Social Management and Monitoring Plans for Palong Cocoa POM and its supply base were documented and available. These Plans were developed with participation of affected stakeholders via stakeholder meetings, interviews and feedback. Among the stakeholders who participated were external stakeholders, WOW (gender committee), NUPW, canteen and grocery store operators.  All Operating Unit  Verification done by the auditor at the operating units, found out there is some issues with work permit renewal due to the management decided to change the company name to Johor Plantations Group Berhad. Renewal process is still pending at Immigration Department.  Due to the issues, the management need to paythe salaries to some of the workers in cash since the bank unable to open saving account for those workers with expired permit. This has been confirmed through interview with sample workers and management.	Non-compliance
		Mungka Estate	

Criterion 3.5: A system for managing human resources is in place.				
3.4.3	(C) The social and environmental management and monitoring plan is implemented, reviewed and updated regularly in a participatory way.  - Critical (Major) compliance -	Management plan was review and updated regularly in a participatory way based on feedback and issues collected during various of meeting such as stakeholder meeting, social dialogue session, OSH meeting, trade union meeting, and complaint book. Social Impact Assessment Plan for year 2024 has been developed by each operating unit which consists of list of issues, sources of issues, action plan, status, person in charge and date of commenced. Verification during the audit found that there is evidence that all issues that has been highlighted in the social impact assessment and management plan that has been established has been implemented based on document review. It has been further confirmed through interview with sampled stakeholders that there are no repeating	Complied	
		An interview with the crèche attendant was conducted by the auditor. During the interview, the attendant stated that she had requested a job change. However, her request was not approved as the management could not find a qualified replacement due to her specific qualifications from the <i>Kursus Asuhan PERMATA</i> conducted by <i>Jabatan Kebajikan Masyarakat</i> . The management acknowledged the issue and confirmed that they are in the process of establishing a management plan to address it.  Despite this, it was noted that the highlighted issues have not been incorporated into the social management plan through participatory methods.		

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 -	Documented in the Recruitment of local workers for operating units document no: JPG/PRO/SID/SD/SMS effective date 14/11/2023 revision number:0. The procedure included process for recruitment, promotion, retirement and terminations. While for migrant workers, it has been documented in Ethical recruitment migrant workers document No JPB/PRO/Operations/Plantation/01 dated 05/07/2023. The procedure has been classified as publicly available and can be requested by stakeholder/workers if needed.	Complied
3.5.2	Employment procedures are implemented, and records are maintained.  - Minor Compliance -	Based on interview with sampled workers and relevant stakeholder and documentation review, it was found that employment procedures as mentioned in indicator 3.5.1 were implemented and all the records are adequately maintained. Induction process is mandatory to be carried out by operating units to ensure company's rules and regulations were socialized and acknowledged by the workers.  Induction briefing, fill out application form, medical checkup, interview session, briefing on salary, employment terms and conditions, as well as information about grievance channel were conducted as per required in the procedures established. This was confirmed during interview with sampled workers comprising both of foreign workers from different origin countries and local workers. During the audit, stakeholder consultation was conducted with several neighbouring operating unit and local community. It was noted that job vacancies, if any, would be advertised near the locations of the operating units.  At the operating units, application forms, interview assessment form, medical check-up report, copy of identification documents and employment contract for newly recruited employees were made available for verification. These are among the pre-requisites outlined in the recruitment procedure.	Complied

Criterion 3.6: An occupational health and safety (H&S) plan is documented, effectively communicated and implemented.				
3.6.1	(C) All operations are risk assessed to identify H&S issues. Mitigation plans and procedures are documented and implemented Critical (Major) compliance -	The mill and estates ha hazards and risks and measures. The hazard id control (HIRARC) records, during the assessment. HI the following:  - Change in work proces: - Revision/changes in leteral control of accidents: - Appropriate risk control implemented for the result of the result	Non- compliance	
		HIRARC	Date: 14/09/2024	
		Chemical Hazard Risk Assessment	Date: 09/06/2023  Report Reference No: HQ/16/ASS/00/35-2023/23  Assessor Reg No: HQ/16/ASS/00/35	
		Noise Risk Assessment	Date: 28/02/2024  Report Ref No: HQ/23/PEB/00/00082-2024/012	

## RSPO P&C Public Summary Report Revision 16 (Oct 2024)

I	Assessor Reg No: HQ/23/PEB/00/00082 Date: 02/07/2024
	Report Ref No: R-NE-24-LPE-04
Palong Cocoa Palm Oil Mill	
HIRARC	Date: 27/03/2024
Chemical Hazard Ris	sk Date: 09/06/2023
Assessment	Report Reference No: JKKP HQ/16/ASS/00/35-2023/48
	Assessor Reg No: JKKP HQ/16/ASS/00/35
Noise Risk Assessment	Date: 19/10/2023  Report Ref No: HQ/PEB/00/00018-2023/75
	Assessor Reg No: HQ/PEB/00/00018
UMAC Estate	
HIRARC	Date: 10/09/2024
Chemical Hazard Ris Assessment	Date: 06/06/2023  Report Reference No: JKKP HQ/16?ASS/00/35-2023/28

...making excellence a habit."

	Assessor Reg No: JKKP HQ/16?ASS/00/35
Noise Risk Assessment	Date: 26/02/2024
	Report Ref No: HQ/23/PEB/00/00082-2024/010,
	Assessor Reg No: HQ/23/PEB/00/00082
Mungka Estate	
HIRARC	Date: 20/04/2024
	Date: 08/06/2023
Assessment	Report Reference No: JKKP HQ/16/ASS/00/35-2023/31
	Assessor Reg No: JKKP HQ/16/ASS/00/35
Noise Risk Assessment	Date: 27/04/2024
	Report Ref No: HQ/23/PEB/00/00082- 2024/011
	Assessor Reg No: HQ/23/PEB/00/00082

Do	along Estate	
	HIRARC	Date: 21/09/2024
	Chemical Hazard Risk	Date: 07/06/2023
	Assessment	Report Reference No:
		JKKP HQ/10/ASS/00/35 2023/29
		Assessor Reg No: JKKP HQ/10/ASS/00/35
1	Noise Risk Assessment	Date: 07/06/2023
		Report Ref No: HQ/18/PEB/00/00014-2023/010
		Assessor Reg No: HQ/18/PEB/00/00014
L	ite visit at the Manuring and Sp	praying Operation at UMAC Estate:
		g and Spraying Operation at UMAC
		ety Data Sheets (SDS) were not operation. This is not in line with
th	ne recommendations in the C	themical Health Risk Assessment
		manuring operations, which state ble to employees. Employers must
en	nsure that the SDS is kept up to	date and available in areas where
ha	azardous chemicals are stored	and used."



Palong Cocoa Palm Oil Mill – observation:

At Palong Cocoa Palm Oil Mill, a tractor transporting Fresh Fruit Bunches (FFB) from Sepang Loi Division was observed without prominent warning notices. This does not comply with the recommendations in the Noise Risk Assessment (NRA), which require management to affix prominent warning notices to field grass cutters and tractor drivers, indicating that Personal Hearing Protectors (PHP) must be worn when operating these machines.

Mill operation site visit - Kernel Plant:

During a site visit to the Kernel Plant during mill operations, an employee was observed walking through the mill without wearing an approved Personal Hearing Protector (PHP). This contravenes the recommendations in Chapter 8.8 of the Noise Risk Assessment, which state that management must provide and enforce the use of personal hearing protectors in hearing protection zone areas, especially during activities near sources of excessive noise.

Verification of SDS copies at mill's lab and store: During the verification of SDS copies at the mill's lab and store, it was confirmed that SDS copies for hexane, isopropyl alcohol (IPA), vibrating screen grease, and welding rod were available. However, the SDS copies were only in English, which is not in compliance with the CHRA recommendations that require all SDS to be in both Malay and English.

Thus, the Non Conformance is raised .



3.6.2	<b>(C)</b> The effectiveness of the H&S plan to address health and safety risks to people is monitored.	Johor Plantations Group (JPG) has consistently upheld the approved Health and Safety Policy, dated 01/07/2023, which is prominently displayed on notice boards. The policy has been	Complied
	- Critical (Major) compliance -	approved by Board Of Director dated 28/05/2023. Additionally, a Safety & Health Management Plan was prepared and made available for the year 2024.	
		In addition to regular daily supervision, various methods have been employed to assess the effectiveness of the Health and Safety plan. These methods include SHO Workplace Inspections, internal audits, safety committee meetings, medical surveillance, and audiometric tests. Records documenting these monitoring activities have been provided for verification by selected management units.	
		Labis Bahru Estate  Health surveillance was conducted every month for all workers work with manuring, spraying, diesel handler, and workshop. Latest health surveillance was conducted on October 2024. The management has conducted medical surveillance for the workers that are directly involved in handling chemical dated on 20/06/2024 for 6 workers, which is 5 workers tested for the pesticides and 1 worker tested for manganese. Result shown all workers are fit.	
		The audiometric testing was conducted on 08/10/2023 for 12 workers which stated 8 having normal audiometric with 1 workers having hearing impairment and 3 workers having hearing loss. No STS recorded. The management has sent 13 workers to conduct audiometric test on 08/10/2024, the result is yet to be available during audit.	



#### Palong Cocoa Palm Oil Mill

Medical surveillance was conducted on 19/06/2024 for 38 workers which are related to the operators works in the lab, maintenance, and chemical operators. All workers were declared fit, with no MRP.

Audiometric test was conducted on 18/07/2024 for 51 workers. Result shows that 23 workers are having normal audiometric, 27 having hearing loss, and 6 workers having temporary STS and 1 worker having reverse STS that needed to be retest within three months. Retest was conducted on 09/10/2024 and result is yet to be available.

#### **UMAC Estate**

Medical surveillance was conducted as per of the recommendation of CHRA, which the estate has sent 37 workers to conduct the test on 24/09/2024. All workers were declared fit.

The audiometric testing was conducted on 08/10/2023 for 4 workers which stated 4 workers having normal. Audiometric assessment for the year 2024 has been conducted on 08/10/2024, however the report is yet to be available during the audit.

#### Mungka Estate

Medical surveillance was conducted as per of the recommendation of CHRA, which the estate has sent 66 workers to conduct the test on 19/06/2024. All workers were declared fit.

Audiometric test for year 2024 were conducted on 07/10/2024, and the report is yet to be available during the audit.

#### Palong Estate

		Medical surveillance was conducted as per of the recommendation of CHRA, which the estate has sent the workers to conduct the test on 18/06/2024. All 72 workers tested were declared fit.  The audiometric testing was conducted on 08/10/2024 for 23 workers. Report stated 18 workers having normal audiometric with 3 workers having Hearing loss, 2 workers having hearing impairment. The workers were referred to OHD on 27/11/2023 and confirmed the hearing loss is non occupational. Audiometric test for year 2024 were conducted on 07/10/2024, and the report is yet to be available during the audit	
Criterio	on 3.7: All staff, workers, Scheme Smallholders, out-growers, and contract w	vorkers are appropriately trained.	
3.7.1	(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.  - Critical (Major) compliance -	An annual training program has been created and documented within the Occupational Safety and Health (OSH) Plan. This program includes a comprehensive Training Matrix and Training Schedule that addresses all aspects of the RSPO elements. The training program clearly outlines the specific groups of employees to be trained in various subjects, ensuring that the program caters to the requirements of all the estates and mills	Complied
3.7.2	Records of training are maintained Minor Compliance -	Records of training were maintained by the mill and estates and made available for verification. Among the records verified are as follows:  Labis Bahru Estate  1. Briefing On Noise Risk Assessment dated 04/04/2024 2. Fire Drill Training dated 07/02/2024 3. First Aid Training dated 22/04/024 4. Triple Rinsing dated 22/07/2024 5. Hearing Conservation Training dated 09/10/2024	Complied



6.	PPE	training	dated	19/07	/2024
----	-----	----------	-------	-------	-------

7. PCD Management Training dated 04/06/2024

#### Sungai Tong Palm Oil Mill

- 1. Policy Briefing dated 11/10/2024
- 2. SDS Training dated 18/08/2024
- 3. Hearing conservation training and audiometric result briefing dated 18/08/2024
- 4. Fire drill and ERP training dated 13/10/2024
- 5. Chemical Handling training dated 17/07/2024
- 6. Work at height and confined space training dated 04/07/2024
- 7. PPE Training dated 03/07/2024
- 8. LOTO and PTW training dated 16/05/2024
- 9. First Aider Training dated 04/10/2024

#### **UMAC Estate**

- 1. Schedule Waste Handling Training 17/04/2024
- 2. Chemical Handling Training 17/04/2024
- 3. First Aid Training -16/07/2024
- 4. Emergency Procedure Training 20/08/2024
- 5. Bagworm treatment training 23/09/2024
- 6. Spraying SOP, buffer Zone Training dated 22/02/2024
- 7. Audiometric result briefing dated 21/11/2023

#### Mungka Estate

		1. Schedule Waste training – 03/02/2024
		2. Manuring – Manual and Spreader Application and HCV Buffer Zone Training – 23/08/2024
		3. First Aid Training – 09/06/2024
		4. Hearing Conservation Training – 20/10/2024
		Palong Estate
		1. PPE Training – 18/02/2024
		2. First Aid Training – 16/07/2024
		3. ERP Training – 29/05/2024
		4. Fire Drill Training – 18/10/2024
		5. Chemical Handling – 03/04/2024
3.7.3	Appropriate training is provided for personnel carrying out the tasks critical to the effective implementation of the Supply Chain Certification Standard (SCCS). Training is specific and relevant to the task(s) performed.  - Minor Compliance -	Training conducted from time to time to all personnel critical in SCCS effective implementation. Latest training was conducted by HQ sustainability department personnel, attended by mill manager, assistant mill manager, lab supervisor, lab despatch operator, weighbridge clerk and auxiliary police. Latest training was conducted on 18/01/2024 and 07/01/2024
Criterio	on 3.8: Supply chain requirement for mills	
(note: A	Il supply chain requirements are considered as <b>Critical (C)</b> . However, it will i	ot contribute to suspension if there is more than 5 non-compliance within a principle)
3.8.1	Identity Preserved Module  A mill is deemed to be Identity Preserved (IP) if the FFB processed by the mill are sourced from plantations/estates that are certified against the RSPO Principles and Criteria (RSPO P&C), or against the Group Certification scheme.	Johor Plantations Group Berhad (JPGB) are in the midst of updating its documented information related to traceability and supply chain procedures to reflect its change of name.  As per SOP established, under section 4. Definition, Identity Preserved (IP) defined as FFB used by the mill sourced from
	Certification for CPO mills is necessary to verify the volumes and sources of certified FFB entering the mill, the implementation of any processing	plantations/ estates that are certified against the RSPO Principle

	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.	scheme.	P&C), and /or against the Group Certification  M received FFB from certified source using IP	
3.8.2	Mass Balance Module A mill is deemed to be Mass Balance (MB) if the mill process FFB from both RSPO certified and uncertified plantations/estates. A mill may be taking delivery of FFB from uncertified growers, in addition to those from its own and 3rd party certified supply base. In that scenario, the mill can claim only the volume of oil palm products produced from processing of the certified FFB as MB.	Palong Cocoa PC applicable.	OM opted for IP, thus this indicator is not	Not Applicable
3.8.3	The estimated tonnage of CPO and PK products that could potentially be produced by the certified mill shall be recorded by the certification body (CB) in the public summary of the P&C certification report. This figure represents the total volume of certified oil palm product (CPO and PK) that the certified mill is allowed to deliver in a year. The actual tonnage produced shall then be recorded in each subsequent annual surveillance report.	potentially be pro- public summary re	onnage of CPO and PK products that could duced by the certified mill is recorded in this eport. The actual tonnage produced from last ted in the summary in Table 10.	Complied
3.8.4	The mill shall also meet all registration and reporting requirements for the appropriate supply chain through the RSPO IT platform.		PalmTrace will be carried out by the Marketing . Company has registered in PalmTrace system	Complied
		Member name	Johor Plantations Group Berhad – Palong Cocoa Palm Oil mill	
		Palm Trace ID	RSPO_PO1000001265	
		Membership No	1-0080-09-000-00	
		Type of business	Oil mill	



#### 3.8.5 Documented procedures

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:

- a) Complete and up to date procedures covering the implementation of all the elements of the supply chain model requirements.
- b) Complete and up to date records and reports that demonstrate compliance with the supply chain model requirements (including training records).
- c) Identification of the role of the person having overall responsibility for and authority over the implementation of these requirements and compliance with all applicable requirements. This person shall be able to demonstrate awareness of the mill's procedures for the implementation of this standard.
- d) The mill shall have documented procedures for receiving and processing certified and non-certified FFBs including ensuring no contamination in the IP mill.

Johor Plantations Group (JPG) are in the midst of updating its documented information related to traceability and supply chain procedures to reflect its change of name.

- a) As of the date of on-site assessment, the documented procedures for supply chain still based on existing as following:
- JPG Sustainable Management System Doc. Doc No: JPG/PRO/SID/SMS, Effective Date: 14/11/2023.
- Operational Procedure title: CSPO & CSPK Supply Chain; Rev.
   # 02; Procedure # MKTG 04; Date: January 2021
- b) Palong Cocoa POM maintained the records and reports on the implementation of supply chain model requirements as per procedure Doc. Title: JPG Sustainable Management System Doc Traceability. Doc No: JPG/PRO/SID/SD/SMS, Effective Date: 14/11/2023. stated that records shall be kept for seven years. Among records maintained in the supply chain implementation including the following:
- Training records
- Internal audit report
- Invoice and contracts
- Weighbridge tickets
- Daily production reports
- Sustainable product monthly movements summary report (mass balance sheet)
- c) Sighted the letter of appointment made to each operating unit to be the PIC for sustainability and certification program. The email dated 04/09/2024 is verified. Palong Cocoa Mill Manager has been appointed to be the PIC in the mill including the traceability and supply chain requirement.

Complied

		The documented procedure # SQD/SMS/2.1 Traceability clause 6.4 Procedure Reception of FFB specifies procedures for receiving and processing certified and non-certified FFBs including ensuring no contamination in the IP mill. However, Palong Cocoa POM certified as MB.	
3.8.6	<ul> <li>Internal Audit</li> <li>i) The mill shall have a written procedure to conduct annual internal audit to determine whether the mill:</li> <li>a. Conforms to the requirements in the RSPO Supply Chain Certification Standard and the RSPO Market Communications and Claims Documents.</li> <li>b. Effectively implements and maintains the standard requirements within its organisation.</li> <li>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.</li> </ul>	Johor Plantations Group Berhad (JPB) are in the midst of updating its documented information related to traceability and supply chain procedures to reflect its change of name.  i) As of the date of on-site assessment, the documented procedures for supply chain based JPG Sustainable Management System Doc. Doc No: JPG/PRO/SID/SD/SMS, Effective Date: 14/11/2023.  a. The procedure with aim to ensure the implementation of Sustainable Management System including RSPO SCCS in line with the defined policies, procedures and requirements in the RSPO Supply Chain Certification Standard and the RSPO Market Communications and Claims Documents.  b. Palong Cocoa POM implemented and maintained the standard requirements internal audit conducted once a year with latest done on 22/08/2024  Based on the records of latest internal audit conducted on 22/08/2024 documented as Internal Audit Report; Doc. # JPB/PRO/SID/SD/SMS/6.7-FS; Issue # 0; Rev. # 0; Effective date: 2023; no non-conformity raised by the internal auditors. The internal audit report maintained together with records of internal audit plan, attendance list and internal audit checklists.	Complied
3.8.7	Purchasing and Goods In  i) The mill shall verify and document the tonnage and sources of certified and the tonnage of non-certified FFBs received.	Purchasing and Goods In documents maintained as per sample Certified FFB received verified as following:	Complied

	ii) The mill shall inform the CB immediately if there is a projected overproduction of certified tonnage.  iii) The mill shall have a mechanism in place for handling non-conforming FFB and/or documents.	<ul> <li>FFB Receive Ticket # 219574; Date: 20/10/2024; Supplier: Mungka Estate; Field: P08/02; DO # 64714; Nett weight: 6800 kg; Cert. # RSPO 613087 – Certified FFB</li> <li>FFB Receive Ticket # 215893; Date: 20/08/2024; Supplier: Labis Bahru Estate; Field: P13,P20,P07,P05; DO # 84789; Nett weight: 39500 kg; Cert. # RSPO 613087 – Certified FFB</li> <li>i) The mill weighbridge clerk verified all incoming documents prior to receiving and this has been approved by the assistant mill manager</li> <li>ii) Based on the production records, no overproduction of certified tonnage as to date.</li> <li>The mill has a mechanism in place for handling non-conforming FFB and/or documents as specified in the procedure Doc. Title: JPG Sustainable Management System Doc - Traceability. Doc No: JPG/PRO/SID/SD/SMS, Effective Date: 14/11/2023</li> </ul>	
3.8.8	Sales and Goods Out 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):  a) The name and address of the buyer; b) The name and address of the seller; c) The loading or shipment / delivery date; d) The date on which the documents were issued; e) RSPO certificate number;	Sales and Goods Out documents maintained as per sample verified as following:  Certified CPO:  Buyer: Ngo Chew Hong Oils & fats (M) Sdn Bhd  Seller: Johor Plantations Group Berhad, Palong Cocoa Palm Oil Mill  Despatch Ticket # C12074; Date:27/09/2024  RSPO Cert. # RSPO 613087  Product: CSPO IP  Nett weight: 41,700 kg  Vehicle # NDB6691  Certified PK:	Complied

	<ul> <li>f) A description of the product, including the applicable supply chain model (Identity Preserved or Mass Balance or the approved abbreviations);</li> <li>g) The quantity of the products delivered;</li> <li>h) Any related transport documentation;</li> <li>i) A unique identification number.</li> </ul>	<ul> <li>Buyer: PGEO Edible Oils Sdn. Bhd</li> <li>Seller: Johor Plantations Group Berhad, Palong Cocoa Palm Oil Mill.</li> <li>Despatch Ticket # K03087; Date: 04/09/2024</li> <li>RSPO Cert. # RSPO 61307</li> <li>Product: CSPK IP</li> <li>Nett weight: 42,440 kg</li> <li>Vehicle # JPA3222</li> </ul>	
3.8.9	<ul> <li>Outsourcing Activities</li> <li>i) The mill shall not outsource its milling activities. In cases where he mill outsources activities to independent third parties (e.g. subcontractors for storage, transport or other outsourced activities), the mill holding the certificate shall ensure that the independent third party complies with relevant requirements of this RSPO Supply Chain Certification</li> <li>ii) The mill shall ensure the following: <ul> <li>a) The mill has legal ownership of all input material to be included in outsourced processes</li> <li>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.</li> <li>c) The mill has a documented control system with explicit procedures for the outsourced process which is communicated to the relevant contractor.</li> <li>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</li> </ul> </li> </ul>	<ul> <li>No processing outsource activity by Palong Cocoa POM except for transportation as per Memorandum of Agreement (MOU) as following:         <ul> <li>Renewal of Contract: Transport of Crude Palm Oil (CPO) from Johor Plantations Group Berhad Group Mills to Various Refineries; Contract # JPGB/CTD/88/20/2024 (NFH); Renewal period: 01/07/2024 to 31/12/2024; Transporter: Mirzafiz Sdn. Bhd.</li> <li>Renewal of Contract: Transport of Crude Palm Oil (CPO) from Johor Plantations Group Berhad Group Mills to Various Refineries; Contract # JPGB/CTD/85/20/2024 (NFH); Renewal period: 01/07/2024 to 31/12/2024; Transporter: Teo Tuan Kwee Sdn. Bhd.</li> <li>Renewal of Contract: Transport of Crude Palm Oil (CPO) from Johor Plantations Group Berhad Group Mills to Various Refineries; Contract # JPGB/CTD/84/20/2024 (NFH); Renewal period: 01/07/2024 to 31/12/2024; Transporter: Yewtan Enterprise.</li> <li>Renewal of Contract: Transport of Crude Palm Oil (CPO) from Johor Plantations Group Berhad Group Mills to Various Refineries; Contract # JPGB/CTD/87/20/2024 (NFH); Renewal</li> </ul> </li> </ul>	Complied

	operations, systems, and all information, when this is announced in advance.	period: 01/07/2024 to 31/12/2024; Transporter: SBK Logistic Sdn Bhd.	
		<ul> <li>The agreement specified that -</li> <li>The mill has legal ownership of all CPO transported until it reaches customer.</li> <li>The explicit procedure specified is Doc. Title: JPG Sustainable Management System Doc - Traceability. Doc No: JPG/PRO/SID/SD/SMS, Effective Date: 14/11/2023</li> <li>Transporters agreed to provide relevant access for duly accredited CBs to their respective operations, systems, and all information with signing on the contract by both parties.</li> </ul>	
3.8.10	The mill shall record the names and contact details of all contractors used for the physical handling of RSPO certified oil palm products.	The list of outsourced contractors was sighted, "list of stakeholders" to include the transport contractor for CPO. The independent third parties involve in Mill operation is only transportation services for CPO and PK.	Complied
3.8.11	The mill shall inform its CB in advance prior to conduct of its next audit of the names and contact details of any new contractor used for the physical handling of RSPO certified oil palm products.	No new contractor used for the processing or physical handling of RSPO certified oil palm products transportation.	Complied
3.8.12	<ul> <li>Record keeping</li> <li>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.</li> <li>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.</li> </ul>	Accurate, complete, up-to-date and accessible records and reports covering all aspects of this RSPO Supply Chain Certification Standard requirements available for verification. As spelt out in its supply chain procedure, records are to be maintained minimum of two years for sample records as per following:  - Mass Balancing Records (Sustainable Product Monthly Movements Summary Report) for Palong Cocoa Palm Oil Mill  - Daily Production Summary Report  - Monthly Production Summary Report	Complied

	<ul> <li>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.</li> <li>iv) For Mass Balance Module, the mill: <ul> <li>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.</li> <li>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.</li> <li>c) The mill can only deliver Mass Balance sales from a positive stock. Positive stock can include product ordered for delivery within three (3) months. However, a mill is allowed to sell short (i.e. product can be sold before it is in stock.</li> </ul> </li> </ul>	Based on mass balance sheet latest dated end of September 2024, no negative stock recorded.	
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.	The oil extraction rate (OER) and the kernel extraction rate (KER) for Palong Cocoa POM is determined and set their own extraction rates based upon past experience, documented and applied consistently.  The management has recorded the extraction in monthly progress report and in mass balance sheet. Both records were found to be tallied.	Complied
3.8.14	Extraction rates shall be updated periodically to ensure accuracy against actual performance or industry average if appropriate.	Extraction rates are calculated daily through measurement in production and storage tanks for CPO and bunkers for PK. This daily extraction aggregated monthly and annually for monitoring and reporting. As of September, the 2024 year to-date OER: 20.31% and KER: 5.16%. the figure was taken from monthly progress report latest for the month of September 2024.	Complied
3.8.15	Processing	It has been confirmed through documented procedures and record keeping that the RSPO certified oil palm product is kept separated	Complied

	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.	from non-certified oil palm products, including during transport and storage to strive for 100% separation. There was no receipt of uncertified FFB and the mill only processes RSPO certified FFB from Johor Plantations Group Berhad estates within the period under review.	
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.	<ul> <li>i) Shipping Announcement in the RSPO IT platform carried out by the mills when RSPO certified products are sold as certified to refineries, crushers, and traders within three months after dispatch with the dispatch date being the Bill of Lading or the dispatch documentation date. Sighted sample of Shipping Announcement made as following: <ul> <li>Product name: CSPO; SC Model: IP; Volume: 1110.78 MT; Transaction ID: TR-5210d4d8-d6b5; Creation date: 30/09/2024.</li> <li>Product name: CSPK; SC Model: MB; Volume: 300 MT; Transaction ID: TR-fd0e730a-e86f; Creation date: 18/09/2024;</li> <li>ii) Verification made to the mass balance sheet and records of the production of CPO and PK as well as sales records of both products. In the current license period found that there are downgraded PK sold as conventional. Verification of transaction records is available for review in the PalmTrace transaction. Verification of transaction no: ST-TR-470b20e5-d5f3 and ST-TR-c4b3fd07-7101 verified the total removal of certified PK</li> </ul> </li> </ul>	Complied
3.8.17	Claims	stocks.  There is no claim on RSPO SCCS by Palong Cocoa POM.	Complied

	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.		
Genera	l 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.	Palong Cocoa POM has not made any off-product claims, a fact verified through document and site reviews, including examinations of the notice board, business cards, shipping documentation, procurement/purchasing documents, and promotional materials, among others	Complied
		Johor Corporation has obtained the RSPO Trademark License with the License Number: 1-0080-100-01 dated 12/12/2023, the license is valid until 11/12/2025. Term and Condition is as per RSPO Rules On Market Communication & Claims.	
4.2	In corporate communications, a member is allowed to: A. display its RSPO membership status B. display the RSPO web address (www.rspo.org) C. state that the member supports the work of RSPO D. state the member's history with regard to RSPO	On the parent company's website, it is explicitly mentioned that they are a member of RSPO and are dedicated to adopting RSPO standards.	Complied
	E. use the RSPO Trademark (as shown below) with a valid trademark licence number to promote its RSPO membership		
4.3	Members are <b>not allowed</b> to use the RSPO corporate logo as shown below. This is for the sole use of the RSPO Secretariat.	Based on site visit and documentation review, verified that RSPO corporate logo is not use by the UoC.	Complied
4.4	In corporate communications, RSPO members must not make any statement that may lead consumers to believe that RSPO membership by itself implies the selling of RSPO certified palm oil products.	Palong Cocoa Palm Oil Mill does not make any statement that may lead to believe that RSPO memberships by itself implies the selling of RSPO certified oil palm product.	Complied

4.5	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:  • "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."	On the parent company's website, it is explicitly mentioned that they are a member of RSPO and are dedicated to adopting RSPO standards.  Not applicable as no off-product claim made by the mill as to date.	Not Applicable
4.6	RSPO non-certified members are allowed to make product-related claims in their corporate communication tools by doing the following:  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.  B. Claim statements are limited to the following examples:  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.  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".	Palong Cocoa Palm Oil Mill is a RSPO certified unit and Johor Plantations Group Berhad (Johor Corporation) is a certified member. Therefore, this indicator is not applicable.	Not Applicable



Produc	t-specific communications		
5.1 Ge	neral		
5.1.1	Product-specific communications refer to any public statement about an individual product that contains RSPO certified sustainable palm oil. These product-specific communications can be made on pack and/or off pack such as shipping documents, advertisements, flyers, brochures, posters, displays, newsletters, websites, emails, letters, offerings, invoices, (annual) reports, or media interviews.	Not applicable as no packings required for the mill products as deliveries made in bulk via tanker for CPO and cargo lorry for PK. Delivery documents specified only RSPO module i.e. CPO IP and PK IP.	Not Applicable
5.1.2	Product-specific communications are voluntary.	No Product-specific communications are being made by the UoC.  Not applicable as no packings required for the mill products as deliveries made in bulk via tanker for CPO and cargo lorry for PK. Delivery documents specified only RSPO module i.e. CPO IP and PK IP.	Not Applicable
5.1.3	Wherever the RSPO Label is displayed for product-specific communications, the applicable trademark licence number must be shown immediately under or next to the RSPO Label or the statement itself.	No RSPO Label used.  Not applicable as no packings required for the mill products as deliveries made in bulk via tanker for CPO and cargo lorry for PK. Delivery documents specified only RSPO module i.e. CPO IP and PK IP	Not Applicable
5.1.4	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 other trademark or label use to highlight.  Not applicable as no packings required for the mill products as deliveries made in bulk via tanker for CPO and cargo lorry for PK. Delivery documents specified only RSPO module i.e. CPO IP and PK IP.	Not Applicable

		I	
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  • 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	No on products claims made.  Not applicable as no packings required for the mill products as deliveries made in bulk via tanker for CPO and cargo lorry for PK. Delivery documents specified only RSPO module i.e. CPO IP and PK IP.	Not Applicable
	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	Only produce CPO and PK, no further modify end products.  Not applicable as no packings required for the mill products as deliveries made in bulk via tanker for CPO and cargo lorry for PK. Delivery documents specified only RSPO module i.e. CPO IP and PK IP.	Not Applicable
5.2 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	Product specific communications made off pack such as shipping documents. Sighted shipping documents of below transaction:  Certified CPO:  - Buyer: Ngo Chew Hong Oils & fats (M) Sdn Bhd	Complied

	should be used together with the valid trademark licence number wherever an off pack claim is made.	<ul> <li>Seller: Johor Plantations Group Berhad, Palong Cocoa Palm Oil Mill</li> <li>Despatch Ticket # C12074; Date:27/09/2024</li> <li>RSPO Cert. # RSPO 613087</li> <li>Product: CSPO IP</li> <li>Nett weight: 41,700 kg</li> <li>Vehicle # NDB6691</li> <li>Certified PK:</li> <li>Buyer: PGEO Edible Oils Sdn. Bhd</li> <li>Seller: Johor Plantations Group Berhad, Palong Cocoa Palm Oil Mill.</li> <li>Despatch Ticket # K03087; Date: 04/09/2024</li> <li>RSPO Cert. # RSPO 61307</li> <li>Product: CSPK IP</li> <li>Nett weight: 42,440 kg</li> <li>Vehicle # JPA3222</li> <li>There was no logo being used in the shipping documents.</li> </ul>	
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.	Product specific communications made off pack such as shipping documents. Sighted shipping documents of below transaction:  Certified CPO:  - Buyer: Ngo Chew Hong Oils & fats (M) Sdn Bhd  - Seller: Johor Plantations Group Berhad, Palong Cocoa Palm Oil Mill  - Despatch Ticket # C12074; Date:27/09/2024  - RSPO Cert. # RSPO 613087	Complied

		- Product: CSPO IP	
		- Nett weight: 41,700 kg	
		- Vehicle # NDB6691	
		Certified PK:	
		- Buyer: PGEO Edible Oils Sdn. Bhd	
		- Seller: Johor Plantations Group Berhad, Palong Cocoa Palm Oil Mill.	
		- Despatch Ticket # K03087; Date: 04/09/2024	
		- RSPO Cert. # RSPO 61307	
		- Product: CSPK IP	
		- Nett weight: 42,440 kg	
		- Vehicle # JPA3222	
5.2.3	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:	Not distributor or wholesaler. Therefore, it is not applicable.	Not Applicable
	<ul> <li>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.</li> <li>If the distributor or wholesaler is supply chain certified, they should follow the requirements outlined in section 5.2.2.</li> </ul>		
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	No on-pack claims.	Not Applicable



	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.	Not applicable as no packings required for the mill products as deliveries made in bulk via tanker for CPO and cargo lorry for PK. Delivery documents specified only RSPO module i.e. CPO MB and PK MB.	
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:  A) For Identity Preserved (IP)/ Segregated (SG) Certified Products:	No on-pack claims.  Not applicable as no packings required for the mill products as deliveries made in bulk via tanker for CPO and cargo lorry for PK. Delivery documents specified only RSPO module i.e. CPO MB and PK MB.	Not Applicable
	<ul> <li>RSPO IP/SG CERTIFIED*</li> <li>Contains RSPO IP/SG palm oil*</li> <li>Contains RSPO certified palm oil (IP/SG)*</li> </ul>		
	*Add RSPO TM Licence Number below or next to the claim.		
	<ul> <li>B) or Mass Balance (MB) Certified Products:</li> <li>RSPO MIXED*</li> <li>Contributes to the production of RSPO certified palm oil*</li> <li>Contains RSPO certified palm oil (MB)*</li> <li>*Add RSPO TM Licence Number below or next to the claim.</li> </ul>	No on-pack claims.  Not applicable as no packings required for the mill products as deliveries made in bulk via tanker for CPO and cargo lorry for PK. Delivery documents specified only RSPO module i.e. CPO MB and PK MB.	Not Applicable
	C) For Partially Certified Products:  RSPO 50% MIXED*  Contains at least 50% RSPO certified palm oil*  *Add RSPO TM Licence Number below or next to the claim.	No on-pack claims.  Not applicable as no packings required for the mill products as deliveries made in bulk via tanker for CPO and cargo lorry for PK. Delivery documents specified only RSPO module i.e. CPO MB and PK MB.	Not Applicable
	D) For Products covered with Book and Claim (B&C):  RSPO CREDITS*	No on-pack claims.	Not Applicable

	<ul> <li>Supports the production of RSPO certified palm oil*</li> <li>Contains palm oil covered by the purchase of RSPO Credits*</li> <li>*Add RSPO TM Licence Number below or next to the claim.</li> </ul>	Not applicable as no packings required for the mill products as deliveries made in bulk via tanker for CPO and cargo lorry for PK. Delivery documents specified only RSPO module i.e. CPO MB and PK MB.	
5.3.3	On pack claims shall not include information about the claimant's RSPO membership status.	No on-pack claims.  Not applicable as no packings required for the mill products as deliveries made in bulk via tanker for CPO and cargo lorry for PK. Delivery documents specified only RSPO module i.e. CPO MB and PK MB.	Not Applicable
5.3.4	Members shall not communicate to consumers information about their suppliers' RSPO membership status.	No on-pack claims.  Not applicable as no packings required for the mill products as deliveries made in bulk via tanker for CPO and cargo lorry for PK. Delivery documents specified only RSPO module i.e. CPO MB and PK MB.	Not Applicable
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.  Not applicable as no packings required for the mill products as deliveries made in bulk via tanker for CPO and cargo lorry for PK. Delivery documents specified only RSPO module i.e. CPO MB and PK MB.	Not Applicable
5.3.6	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.  Not applicable as no packings required for the mill products as deliveries made in bulk via tanker for CPO and cargo lorry for PK.	Not Applicable



		Delivery documents specified only RSPO module i.e. CPO MB and PK MB.	
MODULE	A – IDENTITY PRESERVED		
	95% of the palm oil content must be RSPO IP certified.	Oil palm content is 100% CPO and claim 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.	Complied
Messagi	ng		
	<ul> <li>Messaging ALLOWED for storytelling in product-specific communications may include any of the following elements:         <ul> <li>The palm oil products contained in this product have been certified to come from RSPO sources. www.rspo.org</li> <li>By choosing this product, you are sure that it contains RSPO certified palm oil. For more information: www.rspo.org</li> <li>RSPO certified sustainable palm oil products were kept apart from other palm oil products throughout the supply chain.www.rspo.org</li> <li>Certified sustainable palm oil products can be traced back to RSPO certified mills and plantations. www.rspo.org</li> <li>The entire supply chain is monitored by independent, RSPO-accredited auditors. www.rspo.org</li> </ul> </li> <li>RSPO certified sustainable palm oil has been produced according to stringent environmental and social criteria. www.rspo.org</li> </ul>	Palong Cocoa POM is producing crude palm product and does not involve in any labelling of end product.	Complied
Product-	-Specific Communications Labelling		
	<ul> <li>Members are allowed to use the RSPO Label in one of the following ways:</li> <li>RSPO Trademark that includes the tag "CERTIFIED"; or</li> <li>RSPO Trademark that includes the tag "This product contains certified sustainable palm oil".</li> </ul>	No RSPO label and storytelling in product-related communications used as CPO and PK is semi-finished product. No messaging	Complied

...making excellence a habit."

		involved since Palong Cocoa POM is producing crude palm product and does not involve in any labelling of end product	
Princip	le 4: Respect community and human rights and deliver benefits		
Criterio	on 4.1: The unit of Certification respects human rights, which includes resp	ecting the rights of Human Rights Defenders.	
4.1.1	(C) A policy to respect human rights, including prohibiting retaliation against Human Rights Defenders (HRD), is documented and communicated to all levels of the workforce, operations, FFB suppliers and local communities and prohibits intimidation and harassment by the unit of certification and contracted services, including contracted security forces.  - Critical (Major) compliance -	Documented in the document number JPPG/POL/SID/SD/003 dated 01/07/2023 title Core Labour. Stated in the JPG will not engage in nor discrimination in any form. JPG does not support and will not engage in the use of corporate punishment, mental or physical coercion and verbal abuse.  The procedure has been communicated to all workers for all operating units during the morning muster call and stakeholders during the stakeholders' consultations on 30/09/2024.  Interview with sample workers and stakeholders confirmed that they have been communicated with the policy and able to demonstrate their understanding.	Complied
4.1.2	The unit of certification does not instigate violence or use any form of harassment in their operations.  - Minor compliance -	, and the second	Complied
Criterio	on 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	<b>(C)</b> The mutually agreed system, open to all affected parties, resolves disputes in an effective, timely and appropriate manner, ensuring anonymity of complainants, HRD, community spokespersons and whistle-blowers, where requested, without risk of reprisal or intimidation and follows the RSPO policy on respect for HRD.  - Critical (Major) compliance -		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 -	There are few of illiterate workers has been identified during the interview for all operating units. As per interview, all of the workers are able to demonstrate their understanding on the procedure has been established.  Communication of the procedure has been conducted during morning muster briefing and verified based on the communication records.	Complied
4.2.3	The unit of certification keeps parties to a grievance informed of its progress, including against agreed timeframe and the outcome is available and communicated to relevant stakeholders.  - Minor compliance -	All operating units under Palong Cocoa POM did not receive any complaint which has been verified based on 'Buku aduan dan Cadangan'. This has been further confirmed through interview with sampled workers and stakeholders. For any cases of housing repair, it has been recorded under housing repair records and sighted that all the issues report has been responded with 7 days from the days received.	Complied
4.2.4	The conflict resolution mechanism includes the option of access to independent legal and technical advice, the ability for complainants to choose individuals or groups to support them and/or act as observers, as well as the option of a third-party mediator.  - Minor compliance -	The Company's conflict resolution mechanism is contained in Clause 5.5 of Grievance Mechanism Doc. No. SQD/SMS/4.1 Issue No. 1 dated 1 August 2020. This mechanism applies throughout the Johor Plantations Group Berhad.  A mechanism which provides an option for parties to engage independent legal, technical advice and third-party mediator is available under Clause 5.5 of the same document.	Complied
Criterio	on 4.3: The unit of Certification contributes to local sustainable developmen	nt as agreed by local communities.	
4.3.1	Contributions to community development that are based on the results of consultation with local communities are demonstrated.  - Minor compliance -	There is evidence contribution has been made by operating units as per requested by the stakeholders. This has been confirmed based on records of contribution and interview with sample stakeholders.	Complied
		<u>Labis Bharu Estate</u>	



- 1. Request for Maulidur Rasul celebration donation from Surau Kampung Melayu Bukit Siput dated 16/10/2024.
- 2. Request for Maulidur Rasul celebration donation from Masjid Jamek Naemah Kampung Melayu dated 16/10/2024.
- 3. Request by Kuil Sri Maha Mariamman on 24/07/2024 to used estate roads.

#### **UMAC Estate**

- 1. Request by PIBG Sekolah Kebangsaan Bukit Serok dated 17/10/2024.
- 2. Donation of hamper to Sekolah Kebangsaan (FELDA) Keratong 02 dated 08/08/2024.
- 3. Request to borrow fertilizers spreader by Ladang Palong dated 12/09/2024.

#### Mungka Estate

- 1. Request of donations from Sekolah Agama Kemedak to purchase fan for classroom.
- 2. Request for donation from Sekolah Kebangsaan Kemedak for school sport day.
- 3. Request for donations from SK Kebangsaan Buloh Kasap to upgrade PPKI classroom.

#### Palong Estate

- 1. Request for van assistance to transport school kids
- 2. Request to used estate van to attended International Women Day celebrations.



			3. Con	tribution to T	abika Kemas				
Criterio	on 4.4: Use of the land for oil palm does not diminish the legal, customary	or us	er rights	of other user	s without their	free, prior	and informed	cons	sent.
4.4.1	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.								Complied
			No	District	Grant No	Lot No	Hectare		
		1	Segamat	GM38194	2012 (1164)	100.56			
		-	2	Segamat	GM38195	2013 (1165)	110.23		
			3	Segamat	GM38196	2014 (1166)	111.19		
			4	Segamat	GM36809	89 (974)	2.48		
		All Agr cov the 01/	icultural ers the c financia 01/2023 2022, th	es are register Corporation. Apperations of all year ender to 31/12/202 ne Company e	ered under the According to the Johor Plantation and 31 December 3, it is stated the entered into re (Malaysia) B	ne Integrate ons Group I ber 2023 chat: espective B	ed Report, wh Berhad (JPG) (FY2023), fr usiness Trans	for for om	



Bertam Plantations Berhad ("KBP"), Selai Sdn Bhd ("Selai"), Sindora Berhad ("Sindora"), Ulu Tiram Manufacturing Company (Malaysia) Sdn Bhd ("UTM"), and United Malayan Agricultural Corp Berhad ("UMAC") which are under common control by Johor Corporation for corporate reorganisation between the Company and its immediate holding company, Kulim (Malaysia) Berhad ("KMB")." Therefore, it is verified that the United Malayan Agricultural Corporation is a subsidiary of Johor Plantations Group Berhad

#### Mungka Estate

No	District	Grant No	Lot No	Hectare
1	Segamat	-	MLO 530	20.2343
2	Segamat	HSD1625	MLO 512	20.2343
3	Segamat	HSD 9439	PTD 54	40.4685
4	Segamat	HSD 9440	PTD 94	77.09

#### Palong Cocoa POM

Palong Cocoa POM located in Mungka Estate under Land title HSD 52398 leased for 99 years ended 11/09/2024. The land title under Mahamurni Plantations Sdn Bhd (currently known as Johor Plantations Group Berhad)

#### Palong Estate

There 4 land titles for Palong Estate

				T	T	I	I	1 1	
			No	District	Grant No	Lot No	Hectare		
			1	Segamat	HSD 52400	PTD 15680	931.002		
			2	Segamat	HSD 52398	PTD 1578	20.2343		
			3	Segamat	HSD 9439	PTD 54	40.4685		
			4	Segamat	HSD 9440	PTD 94	77.09		
4.4.2	Copies of documents evidencing agreement-making processes and negotiated agreements detailing the FPIC process are available and include:	PO wh pal Joh Pla ver wh cor	As reflected earlier in indicator 4.4.1, all estates under Palong Cocoa POM have documents indicates the legal ownership and lease land which clearly indicates that the approved usage of the land is for oil palm plantation activities. No land dispute as the land is belongs to Johor Plantation Group Berhad (Formerly Known As Johor Plantations Berhad and Mahamurni Plantations Sdn Bhd). Further verification during interview with sampled of relevant stakeholders which consists of local communities and neighbouring estates confirms that there are no land dispute issues that requires FPIC process since the last audit.				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 -	PO wh pal Joh Pla ver wh cor	As reflected earlier in indicator 4.4.1, all estates under Palong Cocoa POM have documents indicates the legal ownership and lease land which clearly indicates that the approved usage of the land is for oil palm plantation activities. No land dispute as the land is belongs to Johor Plantation Group Berhad (Formerly Known As Johor Plantations Berhad and Mahamurni Plantations Sdn Bhd). Further verification during interview with sampled of relevant stakeholders which consists of local communities and neighbouring estates confirms that there are no land dispute issues that requires FPIC process since the last audit.				Complied		

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 -	As reflected earlier in indicator 4.4.1, all estates under Palong Cocoa POM have documents indicates the legal ownership and lease land which clearly indicates that the approved usage of the land is for oil palm plantation activities. No land dispute as the land is belongs to Johor Plantations Group Berhad (Formerly Known As Johor Plantations Berhad and Mahamurni Plantations Sdn Bhd). Further verification during interview with sampled of relevant stakeholders which consists of local communities and neighbouring estates confirms that there are no land dispute issues that requires FPIC process since the last audit.	Complied
4.4.2c	Evidence that the legal, economic, environmental and social implications of permitting operations on their land have been understood and accepted by affected communities, including the implications for the legal status of their land at the expiry of the unit of certification's title, concession or lease on the land.  - Minor compliance -	As reflected earlier in indicator 4.4.1, all estates under Palong Cocoa POM have documents indicates the legal ownership and lease land which clearly indicates that the approved usage of the land is for oil palm plantation activities. No land dispute as the land is belongs to Johor Plantations Group Berhad (Formerly Known As Johor Plantations Berhad and Mahamurni Plantations Sdn Bhd). Further verification during interview with sampled of relevant stakeholders which consists of local communities and neighbouring estates confirms that there are no land dispute issues that requires FPIC process since the last audit.	Complied
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 -	As reflected earlier in indicator 4.4.1, all estates under Palong Cocoa POM have documents indicates the legal ownership and lease land which clearly indicates that the approved usage of the land is for oil palm plantation activities. No land dispute as the land is belongs to Johor Plantations Group Berhad (Formerly Known As Johor Plantations Berhad and Mahamurni Plantations Sdn Bhd). Further verification during interview with sampled of relevant stakeholders which consists of local communities and neighbouring estates confirms that there are no land dispute issues that requires FPIC process since the last audit.	Complied

4.4.4	All relevant information is available in appropriate forms and languages, including assessments of impacts, proposed benefit sharing, and legal arrangements.  - Minor compliance -	As reflected earlier in indicator 4.4.1, all estates under Palong Cocoa POM have documents indicates the legal ownership and lease land which clearly indicates that the approved usage of the land is for oil palm plantation activities. No land dispute as the land is belongs to Johor Plantations Group Berhad (Formerly Known As Johor Plantations Berhad and Mahamurni Plantations Sdn Bhd). Further verification during interview with sampled of relevant stakeholders which consists of local communities and neighbouring estates confirms that there are no land dispute issues that requires FPIC process since the last audit.	Complied
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 -	As reflected earlier in indicator 4.4.1, all estates under Palong Cocoa POM have documents indicates the legal ownership and lease land which clearly indicates that the approved usage of the land is for oil palm plantation activities. No land dispute as the land is belongs to Johor Plantations Group Berhad (Formerly Known As Johor Plantations Berhad and Mahamurni Plantations Sdn Bhd). Further verification during interview with sampled of relevant stakeholders which consists of local communities and neighbouring estates confirms that there are no land dispute issues that requires FPIC process since the last audit.	Complied
4.4.6	There is evidence that implementation of agreements negotiated through FPIC is annually reviewed in consultation with affected parties.  - Minor compliance -	As reflected earlier in indicator 4.4.1, all estates under Palong Cocoa POM have documents indicates the legal ownership and lease land which clearly indicates that the approved usage of the land is for oil palm plantation activities. No land dispute as the land is belongs to Johor Plantations Group Berhad (Formerly Known As Johor Plantations Berhad and Mahamurni Plantations Sdn Bhd). Further verification during interview with sampled of relevant stakeholders which consists of local communities and neighbouring estates confirms that there are no land dispute issues that requires FPIC process since the last audit.	Complied

Complied

## bsi.

### RSPO P&C Public Summary Report Revision 16 (Oct 2024)

**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.

- **(C)** Documents showing identification and assessment of demonstrable legal, customary and user rights are available.
  - Critical (Major) compliance -

Land titles are available to demonstrate evidence of ownership. The land titles contain information, hectarage, terms and conditions and grant numbers.

The following land titles were sampled:

#### Labis Bharu Estate

No	District	Grant No	Lot No	Hectare
1	Segamat	GM38194	2012 (1164)	100.56
2	Segamat	GM38195	2013 (1165)	110.23
3	Segamat	GM38196	2014 (1166)	111.19
4	Segamat	GM36809	89 (974)	2.48

#### **UMAC Estate**

All land titles are registered under the name of United Malayan Agricultural Corporation. According to the Integrated Report, which covers the operations of Johor Plantations Group Berhad (JPG) for the financial year ended 31 December 2023 (FY2023), from 01/01/2023 to 31/12/2023, it is stated that:

"In 2022, the Company entered into respective Business Transfer Agreements with Kulim (Malaysia) Berhad ("KMB"), Kumpulan Bertam Plantations Berhad ("KBP"), Selai Sdn Bhd ("Selai"), Sindora



Berhad ("Sindora"), Ulu Tiram Manufacturing Company (Malaysia) Sdn Bhd ("UTM"), and United Malayan Agricultural Corp Berhad ("UMAC") which are under common control by Johor Corporation for corporate reorganisation between the Company and its immediate holding company, Kulim (Malaysia) Berhad ("KMB")." Therefore, it is verified that the United Malayan Agricultural Corporation is a subsidiary of Johor Plantations Group Berhad

#### Mungka Estate

No	District	Grant No	Lot No	Hectare	
1	Segamat	-	MLO 530	20.2343	
2	Segamat	HSD1625	MLO 512	20.2343	
3	Segamat	HSD 9439	PTD 54	40.4685	
4	Segamat	HSD 9440	PTD 94	77.09	

#### Palong Cocoa POM

Palong Cocoa POM located in Mungka Estate under Land title HSD 52398 leased for 99 years ended 11/09/2112. The land title under Mahamurni Plantations Sdn Bhd (currently known as Johor Plantations Group Berhad)

#### Palong Estate

There 4 land titles for Palong Estate

No	District	Grant No	Lot No	Hectare
----	----------	----------	--------	---------



				I	I	I	1	1	
			1	Segamat	HSD 52400	PTD 15680	931.002		
			2	Segamat	HSD 52398	PTD 1578	20.2343		
			3	Segamat	HSD 9439	PTD 54	40.4685		
			4	Segamat	HSD 9440	PTD 94	77.09		
4.5.2	<b>(C)</b> FPIC is obtained for all oil palm development through a comprehensive process, including in particular, full respect for their legal and customary rights to the territories, lands and resources via local communities' own representative institutions, with all the relevant	und	ler Palong lit.	Cocoa POM	s of customary that requires bal Risk Asse	FPIC proce	ess since the	last	Complied
	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.  - Critical (Major) compliance -	(GR cha dev	It was verified via Global Risk Assessment Services System (GRASS), a system that monitors new development and changes on changes of landscape via satellite images, that there was no new development all estate under Palong Cocoa POM in the past recent years.					on new	
		cha	nges to t	he planted a	ent was verif rea. This was nents and MP0	cross ched	cked against		
4.5.3	Evidence is available that affected local peoples understand they have the right to say 'no' to operations planned on their lands before and during initial discussions, during the stage of information gathering and associated consultations, during negotiations, and up until an agreement with the unit of certification is signed and ratified by these local peoples. Negotiated agreements are non-coercive and entered into voluntarily and carried out prior to new operations.  - Minor compliance -		ler Palong		s of customary that requires				Complied
	•								
4.5.4	To ensure local food and water security, as part of the FPIC process, participatory SEIA and participatory land-use planning with local peoples,				bal Risk Asse onitors new de		,		Complied



	the full range of food and water provisioning options are considered. There is transparency of the land allocation process Minor compliance -	changes of landscape via satellite images, that there was no new development all estate under Palong Cocoa POM in the past recent years.	
4.5.5	Evidence is available that the affected communities and rights holders have had the option to access to information and advice that is independent of the project proponent, concerning the legal, economic, environmental and social implications of the proposed operations on their lands.  - Minor compliance -	The estate's land statement was verified to have no additional changes to the planted area. This was cross checked against the previous year's land statements and MPOB License.	Complied
4.5.6	Evidence is available that the communities (or their representatives) gave consent to the initial planning phases of the operations prior to the issuance of a new concession or land title to the operator.  - Minor compliance -	No new planting and issues of customary land occurred in all estate under Palong Cocoa POM that requires FPIC process since the last audit.	Complied
4.5.7	New lands are not acquired for plantations and mills after 15 November 2018 as a result of recent (2005 or later) expropriations without consent under the right of eminent domain of the federal and state land acquisition legislations.  - Minor compliance -		Complied
4.5.8	(C) New lands are not acquired in areas inhabited by communities in voluntary isolation.  - Critical (Major) compliance -	The estate's land statement was verified to have no additional changes to the planted area. This was cross checked against the previous year's land statements and MPOB License.	Complied
	n 4.6: Any negotiations Concerning compensation for loss of legal, customal local communities and other stakeholders to express their views through the		ables indigenous
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 Property Department Management Manual Doc KMD/PMB/MP/05 dated 9/6/2020. This procedure is to ensure any	Complied

		negotiation with regards to compensation for loss of local rights are dealt with fairly.	
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 -	Procedure for calculating and distributing fair compensation is contained in Property Department Management Manual Doc KMD/PMB/MP/05 dated 9/6/2020. The implementation and evaluation of the procedure could not be verified because there was no evidence of any payment of compensation made for loss of legal customary or user rights.	Complied
4.6.3	Evidence is available that equal opportunities are provided to both men and women to hold land titles for scheme small holdings.  - Minor compliance -	There has been no issue related to loss of legal customary rights with indigenous people, local communities and other stakeholders reported in all estates under Palong Cocoa POM. This has also been evident through interview with the local communities.	Complied
4.6.4	The process and outcomes of any negotiated agreements, compensation and payments are documented, with evidence of the participation of affected parties, and made publicly available to them.  - Minor compliance -	There has been no issue related to loss of legal customary rights with indigenous people, local communities and other stakeholders reported in all estates under Palong Cocoa POM. This has also been evident through interview with the local communities.	Complied
	<b>n 4.7:</b> Where it can be demonstrated that local peoples have legal, cushment of rights, subject to their FPIC and negotiated agreements.	stomary or user rights, they are compensated for any agreed land a	ecquisitions and
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 Property Department Management Manual Doc KMD/PMB/MP/05 dated 9/6/2020. This procedure is to ensure any negotiation with regards to compensation for loss of local rights are dealt with fairly.	Complied
4.7.2	<b>(C)</b> A mutually agreed procedure for calculating and distributing fair and gender-equal compensation (monetary or otherwise) is established and implemented, monitored and evaluated in a participatory way, and corrective actions taken as a result of this evaluation.	Procedure for calculating and distributing fair compensation is contained in Property Department Management Manual Doc KMD/PMB/MP/05 dated 9/6/2020. The implementation and evaluation of the procedure could not be verified because there was	Complied

	- Critical (Major) compliance -	no evidence of any payment of compensation made for loss of legal customary or user rights.	
4.7.3	Communities that have lost access and rights to land for plantation expansion are given opportunities including employment and supply contracts to benefit from plantation development.  - Minor compliance -	There is no customary right land for all operating unit under Palong Cocoa POM. No evidence that community have lost access and rights to land for plantation expansion as the operating units expands the planting area under certified area.	Complied
		Further verification during interview with sampled of the relevant stakeholders which consists of local communities and neighbouring smallholders confirms that there are no land dispute issues.	
Criterio rights.	on 4.8: The right to use the land is demonstrated and is not legitimately co	ntested by local people who can demonstrate that they have legal, cus	tomary, or user
4.8.1	Where there are or have been disputes, proof of legal acquisition of title and evidence that mutually agreed compensation has been made to all people who held legal, customary, or user rights at the time of acquisition is available and provided to parties to a dispute, and that any compensation was accepted following a documented process of FPIC.  - Minor compliance -	There is no customary right land for all operating unit under Palong Cocoa POM. Further verification during interview with sampled of the relevant stakeholders which consists of local communities and neighbouring smallholders confirms that there are no land dispute issues. Boundary stone and trenches were available to demarcate boundary of land.	Complied
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 -	There is no customary right land for all operating unit under Palong Cocoa POM. Further verification during interview with sampled of the relevant stakeholders which consists of local communities and neighbouring smallholders confirms that there are no land dispute issues. Boundary stone and trenches were available to demarcate boundary of land.	Complied
4.8.3	Where there is evidence of acquisition through dispossession or forced abandonment of customary and user rights prior to the current operations and there remain parties with demonstrable customary and land use	There is no customary right land for all operating unit under Palong Cocoa POM. Further verification during interview with sampled of the relevant stakeholders which consists of local communities and neighbouring smallholders confirms that there are no land dispute	Complied



	rights, these claims will be settled using the relevant requirements (Indicators 4.4.2, 4.4.3 and 4.4.4)  - Minor compliance -	issues. Boundary stone and trenches were available to demarcate boundary of land.	
4.8.4	For any conflict or dispute over the land, the extent of the disputed area is mapped out in a participatory way with involvement of affected parties (including neighbouring communities where applicable).  - Minor compliance -	There is no customary right land for all operating unit visited. Further verification during interview with sampled of the relevant stakeholders confirms that there are no land dispute issues. Boundary stone and trenches were available to demarcate boundary of land.	Complied
Princip	ole 5: Support smallholder inclusion		
Criteri	on 5.1: The unit of certification deals fairly and transparently with all smallh	olders (Independent and Scheme) and other local businesses.	
5.1.1	Current and previous period prices paid for FFB are publicly available and accessible by smallholders.  - Minor compliance -	The Palong Cocoa POM is an Identity Preserved Mill as evidenced by Certificate No. RSPO 613087 which is valid from until 22/01/2029. The Mill processes only FFB from its own estates namely Palong Estate, Mungka Estate, UMAC Estate, Labis Bahru Estates. No independent smallholder crop is received and therefore this Indicator is not applicable.	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 -	The Mill processes only FFB from its own estates namely Palong Estate, Mungka Estate, UMAC Estate, Labis Bahru Estates. No independent smallholder crop is received and therefore this Indicator is not applicable.	Not Applicable
5.1.3	(C) Fair pricing, calculated as a portion of the international CPO price less costs is provided to smallholders in the supply base and documented.  - Critical (Major) compliance -	The Mill processes only FFB from its own estates namely Palong Estate, Mungka Estate, UMAC Estate, Labis Bahru Estates. No independent smallholder crop is received and therefore this Indicator is not applicable.	Not Applicable
5.1.4	<b>(C)</b> Evidence is available that all parties, including women and independent representative organisations assisting smallholders where requested, are involved in decision-making processes and understand the	The Mill processes only FFB from its own estates namely Palong Estate, Mungka Estate, UMAC Estate, Labis Bahru Estates. No	Not Applicable

	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 -	independent smallholder crop is received and therefore this Indicator is not applicable.	
5.1.5	Contracts are fair, legal and transparent and have an agreed timeframe.  - Minor compliance -	Sighted during the audit were the following contracts:  1. Between JPG and bus operator to transport the kids to school, Moxx Firdaxx Bix Hasxxx dated 22/11/2023;	Complied
		The above contracts are fair, legal and transparent as they contain agreed time frame, scope of work, fees and payment of services, rights and obligations of both parties, mutual termination clause, force majeure, etc. This was further confirmed during audit interviews conducted with contractors and suppliers.	
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 -	Audit interviews held with all local suppliers and contractors confirmed that payments are made in a timely manner, often within one week of invoice. Palong Cocoa Mill and its supply base were able to demonstrate that payments were made within 30 days of invoice as agreed in the contracts	Complied
5.1.7	Weighbridges used for determining payment to smallholders are verified by an independent third party on a regular basis (this can be government).  - Minor compliance -	The Mill processes only FFB from its own estates namely Palong Estate, Mungka Estate, UMAC Estate, Labis Bahru Estates, Renggam Estate. No independent smallholder crop is received and therefore this Indicator is not applicable.	Not Applicable
		The mill has conducted the stamping process on 06/08/2024 and 02/10/2024 for both weighbridge in the mill. Verification on the stamping certificate with reference number B2168694 and B2169241 is conducted and found to be valid.	
5.1.8	The unit of certification supports Independent Smallholders with certification, where applicable, ensuring mutual agreements between the unit of certification and the smallholders on who runs the internal control	The Mill processes only FFB from its own estates namely Palong Estate, Mungka Estate, UMAC Estate, Labis Bahru Estates, Renggam	Not Applicable

	system (ICS), who holds the certificates, and who holds and sells the certified material.  - Minor compliance -	Estate. No independent smallholder crop is received and therefore this Indicator is not applicable.	
5.1.9	(C) The unit of certification has a grievance mechanism for smallholders and all grievances raised are dealt with in a timely manner.  - Critical (Major) compliance -	The Mill processes only FFB from its own estates namely Palong Estate, Mungka Estate, UMAC Estate, Labis Bahru Estates, Renggam Estate. No independent smallholder crop is received and therefore this Indicator is not applicable.	Not Applicable
Criterio	on 5.2: The unit of certification supports improved livelihoods of smallholde	rs and their inclusion in sustainable palm oil value chains.	
5.2.1	The Company consults with interested smallholders (irrespective of type) within the Unit of Certification, including women or other partners in their supply base, to assess their needs for support to improve their livelihoods and their interest in RSPO certification.  - Minor compliance -	The Mill processes only FFB from its own estates namely Palong Estate, Mungka Estate, UMAC Estate, Labis Bahru Estates, Renggam Estate. No independent smallholder crop is received and therefore this Indicator is not applicable.	Not Applicable
5.2.2	The unit of certification develops and implements smallholder support programme to improve smallholder livelihood and build their capacity to enhance productivity, quality, organisational and managerial competencies, and specific elements of RSPO certification (including the RSPO Independent Smallholder Standard or RISS).  - Minor compliance -	The Mill processes only FFB from its own estates namely Palong Estate, Mungka Estate, UMAC Estate, Labis Bahru Estates, Renggam Estate. No independent smallholder crop is received and therefore this Indicator is not applicable.	Not Applicable
5.2.3	Where applicable, the unit of certification provides support to smallholders to promote legality of FFB production.  - Minor compliance -	The Mill processes only FFB from its own estates namely Palong Estate, Mungka Estate, UMAC Estate, Labis Bahru Estates, Renggam Estate. No independent smallholder crop is received and therefore this Indicator is not applicable.	Not Applicable

5.2.4	(C) Evidence exists that the unit of certification trains Scheme Smallholders on pesticide handling.  - Critical (Major) compliance -	The Mill processes only FFB from its own estates namely Palong Estate, Mungka Estate, UMAC Estate, Labis Bahru Estates, Renggam Estate. No independent smallholder crop is received and therefore this Indicator is not applicable.	Not Applicable
5.2.5	The unit of certification regularly reviews and publicly reports on the progress of the Smallholder support programme.  - Minor compliance -	The Mill processes only FFB from its own estates namely Palong Estate, Mungka Estate, UMAC Estate, Labis Bahru Estates, Renggam Estate. No independent smallholder crop is received and therefore this Indicator is not applicable.	Not Applicable
Principl	e 6: Respect workers' rights and conditions		
Criterio	n 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 -	Documented in the document Sustainability Policy document number JPG/POL/SID/SD/001 dated 01/07/2024. Stated in clause 6.10; JPG did not engage in discrimination of race, ethnic origin, caste, national origin, religion, disability, gender, sexual orientation, gender identity, union membership, political affiliation or age. The policy has been established in both Bahasa Malaysia and English.	Complied
		Communication of the policy has been done to all workers during morning muster briefing and has been verified from interview with sample workers which all the workers able to demonstrate their understanding on the policy.	
		Implementation of the policy has been verified and confirmed through interview, where the workers respond that they are allowed to be member of trade union. This has been further verified from the membership fee payment to NUPW total RM 8 paid by the workers and RM 3 has been paid by all the estates	

## RSPO P&C Public Summary Report Revision 16 (Oct 2024)

6.1.2	(C) Evidence is provided that workers and groups including local communities, women, and migrant workers have not been discriminated against including charging of recruitment fees for foreign workers.  - Critical (Major) compliance -	There is evidence that there are no parties has been discriminated by the management where it has been confirmed through interview, site visit and records review. Sample has been taken for women workers where they have been treated equally as other workers where there has been paid equally with other workers which work as same job scope and entitle with the same benefits.	Complied
		All foreign workers have been allocated at the same housing compound and received same benefits regardless of the origin. There are no recruitment fees has been charged to all foreign workers that has been recruited in year 2024. It has been confirmed through interview with the new recruited workers.	
6.1.3	The unit of certification demonstrates that recruitment selection, hiring, access to training and promotion are based on skills, capabilities, qualities and medical fitness necessary for the jobs available.  - Minor compliance -	There is evidence that operating units have demonstrated that recruitment are based on capabilities and qualities which has been verified during the interview by the operating units and for foreign workers at the origin countries. Sample of 12 workers was selected from Indonesia and Malaysia, considering race and gender, and has been verified based on interviews and documentation review such as medical checkups and interview records.	Complied
6.1.4	Pregnancy testing is not conducted as a discriminatory measure and is only permissible when it is legally mandated. Alternative equivalent employment is offered for pregnant women.  - Minor compliance -	There is no pregnancy test has been done in all operating units. It has been confirmed through interview with Hospital Assistant and female workers. If there are any cases of menstrual delay, the hospital assistant will advise the female workers to undergo test at nearest government health clinic.	Complied
6.1.5	(C) A gender committee is in place specifically to raise awareness, identify and address issues of concern, as well as opportunities and improvements for women.  - Critical (Major) compliance -	The Gender Committee, known as Women (WOW), has been established by each operating unit. It is chaired by the chief clerk and includes participation from all female workers. The objective of the gender committee is to communicate/socialize all the policy related to women, as a channel to report any grievance/cases related to women such as sexual harassment, to plan and conduct activities to improves skill and opportunities for female workers.	Complied

...making excellence a habit."



Meetings has been conducted every 2 months and minutes meeting has been made available. Several activities have been conducted and records activities has been verified.

#### Labis Bharu Estate

Latest meeting were conducted on 23/05/2024 and 22/08/2024. During the meeting, policy and procedure has been communicated and no issues were raised. Bowling tournament was also held.

#### **UMAC Estate**

Latest meeting conducted on 24/02/2024 chaired by Puan Zarina binti Raof. During the meeting, policy and procedure has been communicated, and no issues were raised.

#### Mungka Estate

Latest meeting conducted on 12/06/2024 chaired by Puan Halimatun Mahmud with attendance of most of the female workers. During the meeting, the committee has communicated policy and procedure that related to women such as anti-discrimination, sexual harassment and reproductive rights. During the gender meeting, an assessment was conducted, identifying six new mothers. It was noted that none of the new mothers had any special needs or specific requests.

#### Palong Cocoa POM

Latest meeting conducted on 28/08/2024 chaired by Puan Azlina Abu with attendance of most of the female workers. During the meeting, the committee has communicated policy and procedure

		related to women such as anti-discrimination, sexual harassment and reproductive rights. No new mother has been identified.  Palong Estate  Latest meeting conducted on 26/07/2024 chaired by Puan Shamsuliana Mustafa with attendance of most of the female workers. During the meeting, the committee has communicated policy and procedure related to women such as anti-discrimination, sexual harassment, and reproductive rights. Total of 5 new mother has been identified, and there is request for breastfeeding during working hours.  Several activities have been conducted.  1. Recitation of Yassin- 07/10/2024	
		<ol> <li>Mammogram assessment dated 23/07/2024.</li> <li>Cooking class- 14/08/2024</li> <li>Janazah Management Course in year 2023</li> </ol>	
6.1.6	There is evidence of equal pay for the same work scope Minor compliance -	Verification through sample of pay slips taken for month April 2024, June 2024 and August 2024 confirmed that all workers were paid equally. All workers have been paid either based on daily rate (RM57.69/day) according to Minimum Wages Order or Piece rate (as per MAPA- NUPW collective agreement and employment contract). Interview with sampled workers, confirmed the statement	Complied
	on <b>6.2:</b> Pay and conditions for staff and workers and for contract workers a iving wages (DLW).	lways meet at least legal or industry minimum standards and are suffi	cient to provide
6.2.1	<b>(C)</b> Applicable labour laws, union and/or other collective agreements and documentation of pay and conditions are available to the workers in national languages (English or Bahasa Malaysia) and explained to them in language they understand.	The collective agreement between MAPA and NUPW, along with the associated member agreements, has been reviewed. It is documented in the MAPA/NUPW file and includes details of general employee benefits and fringe benefits for 2019.Latest collective	Complied

	- Critical (Major) compliance -	agreement is still at Industrial Court. Other than that, the management of all operating units adopt Employment Act 1955 and Minimum Wages Order 2022. All workers were provided with employment contract and sample has been taken. There is evidence that the contracts were signed by both parties. The employment contract has been provided in Bahasa Malaysia, English, and Tamil.  There is evidence that it has been explained to all workers and verified based on training records and interview with sampled workers.	
6.2.2	(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.  - Critical (Major) compliance -	Payment details and employment terms are clearly outlined and formally recorded in employment contracts provided to all employees. These contracts encompass various aspects, such as the employment duration, working hours, overtime policies, annual and medical leave entitlements, public holiday arrangements, mutual termination provisions, maternity benefits, and more. Importantly, these terms are in strict adherence to the Employment Act 1955, the Minimum Wages Order of 2020, the SOCSO Act of 1969, the EPF Act of 1991, the EIS Act of 2017, and the MAPA/NUPW agreement.	Complied
		Additionally, payroll documents, specifically payslips, provide accurate and comprehensive information regarding compensation for all labour performed. This encompasses individuals receiving daily rated wages, piece-rated wages, payments for any overtime work, and remuneration for public holidays. Furthermore, our examination of sampled payslips confirms that all wages were disbursed in full compliance with the applicable national legal requirements. Salary deductions and overtime payments align with the stipulations of the relevant laws, including SOCSO, EPF, EIS, and are also in accordance with Labor Office permits.	

### RSPO P&C Public Summary Report Revision 16 (Oct 2024)

		Stated in the employment contract, working hours, deduction, overtime and leave entitlement. Mentioned in the employment contract that entitlement of leave is depending on the length of service. For workers less than 2 years services, they are entitled for 14 days of sick leave and 8 days of annual leave. Highlighted in the contract reasons for dismissal, period of notice and other legal labour requirements.	
6.2.3	(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.  - Critical (Major) compliance -	Verification has been done on legal compliance-based sample of 47	Complied
6.2.4	<b>(C)</b> The unit of certification provides adequate housing, sanitation facilities, water supplies, medical, educational and welfare amenities to	Each operating units provide housing with 3 bedrooms equipped with fan and lamp for all workers with subsidized water and	Complied

...making excellence a habit."

	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.  - Critical (Major) compliance -	other facilities such as mattress, bed, cooking stove, wardrobe. Surau and temple were maintained and has been used for workers	
6.2.5	The unit of certification makes efforts to improve workers' access to adequate, sufficient and affordable food.  - Minor compliance -	Evidence was available that efforts were made to improve workers' access to adequate, sufficient, and affordable food. This includes permitting workers to plant vegetables behind their houses. Additionally, each estate has its own canteen and grocery shops where hot meals and basic daily necessities can be purchased. Price monitoring of the items sold in the shops are also done.	Complied
6.2.6	A DLW is paid to all workers, including piece rate/quotas, for whom the calculation is based on achievable quotas during regular work hours.  PROCEDURAL NOTE:  STATEMENT FROM THE RSPO STANDARDS STANDING COMMITTEE REGARDING INDICATOR 6.2.6 ON DECENT LIVING WAGE  With reference to procedural note of indicator 6.2.6, the RSPO has published a guidance on the DLW calculation in June 2019. The RSPO Secretariat will endeavour to carry out DLW country benchmarks for palm oil producing countries in which RSPO members operate and for which no Global Living Wage Coalition (GLWC) benchmarks exist (As of September 2019, GLWC has developed national benchmarks in Bangladesh, Belize, Brazil, China, Colombia, Costa Rica, Dominican Republic, Ecuador, Ethiopia, Ghana, Guatemala, India, Kenya, Malawi, Mexico, Nicaragua, Pakistan, South Africa, Sri Lanka, Uganda and Vietnam These benchmarks are developed based on banana, coffee, floriculture, textile, manufacturing, seafood processing and tea industry. The RSPO is in the process of commissioning benchmarks for Malaysia and Indonesia for the palm oil sector and will develop methods to calculate and/or define DLW applicability for all palm oil producing countries in which RSPO members operate).	DLW has been calculated for both estates and POM and has been documented in the document Prevailing Wage Assessment and has been verified by the auditor. The calculation has been done by including information on any additional allowance, services and facilities provided such as housing and medical facilities, and etc. The calculation has taken Minimum Wages Order 2022 as guidance and baseline. Sample of pay slips has been taken for month April'24, June'24 and August'24 for each operating units and found that all the workers has been paid as per DLW.	Complied

	Where a GLWC living wage standard (benchmark), or one that fulfils the basic requirements	
	of the RSPO-endorsed living wage methodology, has been established in the country or region of operation, the same should be used as benchmarks.	
	In the absence of such benchmarks, the RSPO will collaborate with the GLWC and/or local experts on developing oil palm industry benchmarks (Benchmark in this context may include other approaches and/or methods to calculate the applicability of DLW in the country or region in accordance to the RSPO endorsed method for determining a DLW. Local applicability for benchmarks is important and it may differ based on the needs of each locality or country). These benchmarks will be developed in collaboration and consultation with relevant stakeholders such as palm oil industry members, workers' union, authorities and/or relevant organisations.	
	For countries where no living wage standard is established, until such time that an RSPO endorsed benchmark for the country is in place, national minimum wages shall be paid to all workers. In addition to the payment of minimum wages, the Unit of Certification (UoC) shall conduct an assessment of the prevailing wages and in-kind benefits provided to workers in the Unit of Certification aligned with the RSPO Guidance for Implementing a Decent Living Wage (RSPO Guidance for Implementing a Decent Living Wage (RSPO Guidance and tools to calculate DLW in line with the RSPO endorsed methodology which may include independent studies by local experts in their respective region or country).	
	Once these benchmarks are available, this procedural note is no longer applicable. UoC shall have an implementation plan towards the payment of a DLW with specific targets, and a phased implementation process including:	
	Updated assessment on prevailing wages and in-kind benefits	
	There is annual progress on the implementation of living wages	
	<ul> <li>Where a minimum wage, based on equivalent of baskets of goods, is stipulated in Collective Bargaining Agreements (CBAs), this should be used as the foundation for the gradual implementation of the living wage payment</li> </ul>	
	• 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.	
	- Minor compliance -	
6.2.7	Permanent, full-time employment including contractors' workers and contracted workers is used for all core work performed by the unit of	Complied

	certification. Casual, temporary and day labour is limited to jobs that are temporary or seasonal - Minor compliance -	Bharu Estate and UMAC Estate, there is 1 contractor for harvesting with total 8 workers have been recruited permanently.	
freedom	<b>on 6.3:</b> The unit of Certification respects the rights of all personnel to form of association and collective bargaining are restricted under law, the employersonnel.		
6.3.1	(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.  - Critical (Major) compliance -	Documented in the document Core Labour Standards document number: JPG/POL/SID/SD/003 effective date 01/07/2023.Stated in clause 6.2.2, that JPG recognizes and respects the rights of employees to form and/or join trade unions of their choice which given due to recognition by JPG. The policy has been established in both Bahasa Malaysia and English.	Complied
		Communication of the policy has been done to all workers during morning muster briefing and has been verified from interview with sampled workers which all the workers able to demonstrate their understanding on the policy.	
		Implementation of the policy has been verified and confirmed through interview, where the workers respond that they are allowed to be member of trade union. This has been further verified from the membership fee payment to NUPW total RM 8 paid by the workers and RM 3 has been paid by the estates	
6.3.2	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.  - Minor compliance -	Labis Bharu Estate Minutes meeting with the NUPW representative held on 07/08/2024, were verified. The meeting was attended by Mr A. Muthamil Varnann, NUPW Johor Branch Secretary, workers representative, NUPW members and management representative.	Complied
		<u>UMAC Estate</u>	

		Minutes meeting with NUPW representative held on 11/03/2024 were verified. The meeting has been chaired by Puan Normaliza binti Mohd Desa. During the latest meeting, election has been conducted to elect new committee for year 2024.	
		Mungka Estate  Minutes meeting with NUPW representative held on 25/06/2024 were verified. The meeting has been chaired by Mr Mohd Hussni as estate manager and attended by NUPW representative for Johore Branch, Mr A, Muthammil Vanann and workers representative. During the latest meeting, several issues has been discussed such new SOCSO contribution, NUPW roles and responsibilities and workers welfare and safety.	
		Palong Cocoa POM  Meeting conducted on 07/10/2024 between the management and representative from NUPW and AMESU. The meeting also has been attended by workers representative. Issues such as workers housing repair, new regulations on SOCSO contribution have been discussed during the meetings.	
		Palong Estate  Meeting conducted on 24/05/2024 between the management and representative from NUPW and AMESU. The meeting also has been attended by workers representative. Issues such as workers housing repair, new regulations on SOCSO contribution have been discussed during the meetings.	
6.3.3	Management does not interfere with the formation or operation of registered unions/ labour organisations or associations, or other freely	Based on the records of NUPW representative meetings minutes, letters of appointment of NUPW representatives (as mentioned	Complied

	elected representatives for all workers including migrant and contract workers.  - Minor compliance -	under Indicator 6.3.2 above), and confirmation by workers interviewed during the audit, Palong Cocoa POM and its supply base have demonstrated that management does not interfere with the formation and operation of NUPW and worker organizations such Safety Committee and Women Onwards (WOW).  Evidence was also available from minutes of meetings and confirmed during audit interviews that Malaysian, migrant and contract workers were represented and freely chosen.	
Criterio	on 6.4: Children are not employed or exploited.	contract workers were represented and meetly disease.	
6.4.1	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.  - Minor compliance -	Documented in the document Core Labour Standards document number: JPG/POL/SID/SD/003 effective date 01/07/2023.Stated in clause 6.1.1, that JPG shall not knowingly engage in or support the use of child labour as defined by Malaysia Law and will provide adequate support to enable children of its employee to attend and remain in school until no longer a child. The policy has been established in both Bahasa Malaysia and English.	Complied
6.4.2	(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.  - Critical (Major) compliance -	Verification through sample of workers from different categories including origin countries, gender, types of workers found that no workers below than minimum ages have been recruited. This was verified based on master list, personal files and interviews with the workers. Procedure for age screening has been established for both migrant and local workers in the recruitment procedure.	Complied
6.4.3	(C) Young persons may be employed only for non- hazardous work, with protective restrictions in place for that work Critical (Major) compliance -	Stated in the "Core labour" dated 01/07/2023 signed by the Chief Executive Officer. Stated in clause 6.1.1; children and young workers shall not be exposed to situation in or outside of the workplace that are hazardous, unsafe, or unhealthy. Verified through personal file, list workers, site visit and interview with sampled workers, there is no child labour and young persons have been recruited in all operating units.	Complied

6.4.4	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.  - Minor compliance -	The policy of no child labour were communicated to stakeholders during the stakeholder's consultation meeting conducted on 30/09/2024 for Palong Cocoa Palm Oil Mill and Supply Bases . While for workers, it has been communicated during the morning muster briefing. This has been demonstrated from interview conducted during interview with sample workers and stakeholders.	Complied
Criterio	n 6.5: There is no harassment or abuse in the workplace, and reproductive	e rights are protected.	
6.5.1	(C) A policy to prevent sexual and all other forms of harassment and violence is implemented and communicated to all levels of the workforce.  - Critical (Major) compliance -	Documented in the document title "Sexual Harassment" document number; JPB/POL/HCD/OHR/05 effective date 01/07/2023. Stated in the policy that JPG recognizes that sexual harassment exists both in the workplace and society at large. Johor Plantations Group Berhad strives to eradicate all forms of sexual harassment in the workplace and where possible influence the behaviour of its employee in a wider social environment.  Based on the interview with the workers (male and female), no issues on sexual harassment have been lodged or happened. They were also aware of the channels that they can use to lodge their concern. This has also been reminded during morning muster occasionally. Details of communication as per below  Labis Bharu Estate- 10/07/2024  UMAC Estate- 02/07/2024  Palong Cocoa POM- 14/06/2024  Palong Estate- 15/05/2024	Complied
6.5.2	(C) A policy to protect the reproductive rights of all, especially of women, is implemented and communicated to all levels of the workforce.  - Critical (Major) compliance -	Documented in the document Sustainability Policy document number JPG/POL/SID/SD/001 dated 01/07/2024.Stated in clause 6.10; Reproductive right that is in line with countries/regions laws	Complied

		where the company operate and shall be respected. The policy has been established in both Bahasa Malaysia and English.  Based on the interview with the workers (male and female), no issues on sexual harassment have been lodged or happened. They were also aware of the channels that they can use to lodge their concern. This has also been reminded during morning muster occasionally. Details of communication as per below:  Labis Bharu Estate- 10/07/2024  UMAC Estate- 02/07/2024  Palong Cocoa POM- 14/06/2024  Palong Estate- 15/05/2024	
6.5.3	Management has assessed the needs of new mothers, in consultation with the new mothers, and actions are taken to address the needs that have been identified.  - Minor compliance -	Labis Bharu Estate  3 new mothers have been identified and new mother assessment were conducted every 3 months. There are no special needs highlighted during the assessment. Interview were conducted with sample of new mother, mentioned that management has provided sufficient time for breastfeeding and assigned job which not related to chemicals.  UMAC Estate  There is only 1 new mother has been identified for 1 general clerk who delivered on 03/07/2024. The new mother requested for time break for breastfeeding and milk pumping. From the interview with the new mother, the management has provided time break for breastfeeding and suitable place for milk pumping.  Mungka Estate	Complied

6.5.4	A grievance mechanism, which respects anonymity and protects complainants where requested, is established, implemented and communicated to all levels of the workforce.  - Minor compliance -		Complied
Criterio	n 6.6: No forms of forced or trafficked labour are used.	and the same of the sequence o	
6.6.1	<ul> <li>(C) All workers have entered into employment voluntarily and the following are prohibited:</li> <li>Retention of identity documents or passports (except for administration purposes including legalisation and renewal processes)</li> <li>Charging the workers for recruitment fees.</li> <li>Contract substitution</li> <li>Involuntary overtime</li> <li>Lack of freedom of workers to resign</li> </ul>	Based on interview with the sampled workers, observation, documentation review and site visit to the labour quarters and estate facilities, the following were verified:  a. Retention of identity documents or passports: All workers are free to keep their own passports. There is no retention of identity documents or passports unless these are needed for passport/work permit renewal. Sampled workers were interviewed and confirmed that they keep their passports themselves. This was further verified during the site visit to the	Complied



- Penalty for termination of employment
- Debt bondage
- · Withholding of wages
- Critical (Major) compliance -

- labour quarters, where passport was observed to be kept in the workers houses. Furthermore, the management provides lockers for workers to keep their passport safely. The locker keys are kept by the workers with no duplicate keys held by the management.
- b. Charging of recruitment fee: As specified in the Migrant Worker Responsible Recruitment Procedure 2024, all recruitment fees are borne by the company. Interviews conducted with sampled workers also confirmed that they have not been charged any recruitment fees. They inform that the workers can report any recruitment fees incurred by them to the management prior to departure in source countries, after arrival, during induction process and through grievance procedures.
- c. Contract substitution: Based on document review, worker interview and site tour, it was noted all the migrant workers are legally recruited. Written employment contract was provided to them in a language that was understood by the workers. Explanation of terms and condition in the contracts was conducted in their origin country. Interview with the sampled workers confirmed that they have entered employment by voluntarily and freely basis. They also informed that all contract signed in their origin country is consistent with the terms and condition that they received upon arrival.
- d. Involuntary overtime: Based on interviews conducted with the sampled workers, all overtime work was carried out on a voluntary basis. Workers are free to decline any offers for overtime work.
- e. Lack of freedom to resign: Workers are free to resign as per stated in their employment contracts. This was confirmed during interviews with workers. There is no term and condition for any resignation and the flight tickets will bear by the

		company. Verification of the repatriation records and interview with the sampled workers, shows that the workers are given freedom to going back for long leaves or going back for goods. Some workers, who have been employed in the estate and mill for 5 to 12 years, have taken long leaves 2 or 3 times during their services.  f. Debt bondage: There is no evidence of any incidence of debt bondage. It has been verified based on sample of pay slips where there is no deduction of salary for debt. Further verification has been done through interview where there is no loan/borrowing money has been given by the management to the workers. The is also no recruitment fee has been charged to the workers hence confirmed that there is debt bondage implement.  Withholding of wages: There is no evidence of withholding of wages. Workers' wages have been paid by account and can be withdraw at the nearest bank and sighted evidence of payment that has been signed by the workers. There is evidence that there no workers' wages have been withheld. It has been further confirmed through interview with sampled workers.
6.6.2	(C) Where temporary or migrant workers are employed, a specific labour policy and/or procedures are established and implemented.  - Critical (Major) compliance -	There are migrant workers has been recruited from Indonesia to work in Palong Cocoa POM. Verification during the audit found that there is evidence that the policy and procedures has been implemented where each process of recruitment has been done such as signing employment contract, interview, and consultation with migrant workers at origin countries and estates. Based on interview with sampled workers, it has been confirmed that all facilities and benefits has been provided equally for all foreign workers. Passport has been kept by the workers itself. There is no evidence of contract substitution where all migrant workers have been explained the content of the employment contract at the origin

		countries. It has been confirmed through interview with the workers itself.	
Criterio	on 6.7: The unit of certification ensures that the working environment unde	r its control is safe and without undue risk to health.	
6.7.1	(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.  - Critical (Major) compliance -	The management has appointed the estate manager for the OSH	Complied
		Palong Cocoa Palm Oil Mill  The management has appointed the mill manager for the OSH Chairman for the estate. Appointment letter dated 09/09/2024 with Ref No: OSH/ADMIN/001/2024 verified the appointment. The Organisation Chart on safety details the chairman, secretary, employer representative, and employee representative roles  The Organisation Chart on safety details the chairman, secretary, employer representative, and employee representative roles.  The meeting was conducted once in each quarters, the minutes of meeting was verified as discussing the safety and health issues,	



worker's welfare are discussed and minutes. The meeting was conducted as followings:

- 1. Quarters 03/2024 06/09/2024
- 2. Quarters 02/2024 04/06/2024
- 3. Quarters 01/2024 01/03/2024
- 4. Quarters 04/2023 08/12/2023

#### **UMAC Estate**

The management has appointed the estate manager for the OSH Chairman for the estate. Appointment letter dated 09/09/2024 with Ref No: OSH/ADMIN/001/2024 verified the appointment. The Organisation Chart on safety details the chairman, secretary, employer representative, and employee representative roles

The meeting was conducted once in each quarters, the minutes of meeting was verified as discussing the safety and health issues, worker's welfare are discussed and minutes. The meeting was conducted as followings:

- 1. Quarters 03/2024 07/08/2024
- 2. Quarters 02/2024 13/05/2024
- 3. Quarters 01/2024 22/02/2024
- 4. Quarters 04/2023 09/11/2023

#### Mungka Estate

The management has appointed the estate manager for the OSH Chairman for the estate. Appointment letter dated 09/09/2024 with Ref No: OSH/ADMIN/001/2024 verified the appointment. The Organisation Chart on safety details the chairman, secretary, employer representative, and employee representative roles

		The meeting was conducted once in each quarters, the minutes of meeting was verified as discussing the safety and health issues, worker's welfare are discussed and minutes. The meeting was conducted as followings:  1. Quarter 03/2024 – 13/08/2024  2. Quarter 02/2024 – 15/05/2024	
		3. Quarter 01/2024 – 13/02/2024	
		4. Quarter 04/2023 – 13/11/2023	
		Palong Estate	
		The management has appointed the estate manager for the OSH Chairman for the estate. Appointment letter dated 09/09/2024 with Ref No: OSH/ADMIN/001/2024 verified the appointment. The Organisation Chart on safety details the chairman, secretary, employer representative, and employee representative roles	
		The meeting was conducted once in each quarters, the minutes of meeting was verified as discussing the safety and health issues, worker's welfare are discussed and minutes. The meeting was conducted as followings:	
		1. Quarter 03/2024 – 19/09/2024	
		2. Quarter02/2024 – 12/06/2024	
		3. Quarter 01/2024 – 20/03/2024	
		<b>4.</b> Quarter 04/2023 – 13/12/2023	
6.7.2	Accident and emergency procedures are in place and instructions are clearly understood by all workers. Accident procedures are available in national languages (English and/or Bahasa Malaysia) and explained in the language understandable to the workforce. Assigned operatives trained in first aid are present in both field and other operations, and first aid	The procedures for handling accidents and emergencies are well- established and accessible within Johor Plantations Group Berhad. These procedures are documented in the Business Continuity Management - Emergency Response Team dated 22/02/2022. An Emergency Response Plan (ERP) team has been formed to address	Complied



equipment is available at worksites. Records of all accidents are kept and periodically reviewed.

- Minor compliance -

various identified incidents. To enhance accessibility and understanding, these procedures have been condensed into flowchart formats and displayed for all employees to reference. The emergencies covered include fire, chemical spillage, floods, and workplace accidents.

The management has communicated the procedures to the workers, sample of records sighted as the following:

- 1. Labis Bahru Estate 07/02/2024
- 2. Palong Cocoa Palm Oil Mill 13/10/2024
- 3. UMAC Estate 20/08/2024
- 4. Mungka Estate 11/06/2024
- 5. Palong Estate 29/05/2024

During site visits to the mills and estates, it was observed that all workstations and operations were adequately equipped with fire extinguishers and first aid kits. Interviews with employees and workers indicated a good understanding of the first aid procedures. Sighted the records of trainings at each estate, details as followings:

- 1. Labis Bahru Estate 22/04/2024
- 2. Palong Cocoa Palm Oil Mill 04/10/2024
- 3. UMAC Estate 16/07/2024
- 4. Mungka Estate 09/06/2024
- 5. Palong Estate 16/07/2024

Furthermore, the mill has established an Emergency Response Team (ERT) led by the Mill Manager. The ERT chart, Fire Hydrant locations, and Fire Extinguisher Map have been prominently displayed on various notice boards within the mill. First aiders have been designated at multiple workstations in the mill and estates, and they are responsible for maintaining the first aid kits at their



respective workstations or operations. Workers in both the mill and estate field operations demonstrated awareness regarding the emergency procedures, including actions to take in case of an accident, the designated person responsible for each first aid box, and the location of the nearest first aid kit.

Accident records are consistently maintained by the mill and estates on a monthly basis and are submitted to the headquarters as required. Additionally, JKKP 6, JKKP 7, and JKKP 8 forms are readily available for verification purposes.

#### Labis Bahru Estate

There are 14 accidents happened in the year 2023. The management has fill and sent the JKKP 8 forms for each accidents and submitted to DOSH dated 16/01/2024 with Ref No: JKKP8/163103/2023.

Verified that the JKKP 6 has been submitted for the specific accident that is having 5 or more days of medical leaves

#### Palong Cocoa Palm Mill

There are no accidents happened in the year 2023 and 2024. The management has fill and sent the JKKP 6 forms for each accidents and submitted to DOSH. The management has conducted the review on each accident. Sighted the accident investigation reports conducted for both accidents and communication on the accidents were brief to all the workers.

JKKP 8 submission was submitted on 18/01/2024 with Ref No: JKKP8/153582/2023

#### UMAC Estate

		There are 4 accident happened in the year 2023 which there are no medical leave given. As the accident is minor related to torn and loading spike . JKKP 8 submission was submitted on 14/01/2024 with Ref No: JKKP8/163388/2023  Mungka Estate There are 26 accident happened in the year 2023, However, all accident is categorised as minor accident as there is medical leave above 5 days reported. JKKP 8 submission was submitted on 12/01/2024 with Ref No: JKKP8/162425/2023  Palong Estate There are 3 accident happened in the year 2023, However, all	
		accident is categorised as minor accident as there is medical leave above 5 days reported. JKKP 8 submission was submitted on 14/01/2024 with Ref No: JKKP8/148557/2023	
6.7.3	<b>(C)</b> Workers use appropriate personal protective equipment (PPE), which is provided free of charge to all workers at the place of work to cover all potentially hazardous operations, such as pesticide application, machine operations, land preparation, and harvesting. Sanitation facilities for those applying pesticides are available, so that workers can change out of PPE, wash and put on their personal clothing.	employees with suitable Personal Protective Equipment (PPE), following the principles of Hazard Identification, Risk Assessment, and Risk Control (HIRARC). The process is guided by a PPE Matrix and Standard Operating Procedure.	Complied
	- Critical (Major) compliance -	A well-maintained record of PPE issuance is in place and readily available for verification. This record contains essential information such as the employee's name, the specific type of PPE provided (including items like aprons, safety shoes, rubber boots, N95 masks, respirators, cartridges, helmets, goggles, cotton gloves, nitrile gloves, etc.), the date when the PPE was received, and acknowledgment of receipt by the recipient. This ensures that	

		employees have access to the necessary protective gear in line with safety guidelines and procedures.  During site visits to all the sampled sites and their respective activities, it was observed that the workers consistently and correctly used the provided Personal Protective Equipment (PPE). Interviews conducted with the workers further confirmed that the PPE was distributed to all workers free of charge.  PPE Training dated 19/07/2024 at Labis Bahru Estate, 08/02/2024, 25/02/2024 and 22/02/2024 during SOP and PPE training UMAC Estate, 18/02/2024 at Palong Estate	
6.7.4	All workers are provided with medical care and covered by accident insurance. Costs incurred from work- related incidents leading to injury or sickness are covered in accordance with Malaysian law.  - Minor compliance -	with certified Medical or Hospital Assistants in-charge were provided at all the sampled management units. Based on site visits, all the clinics were well maintained and managed. Records of medical inventory, VMO visits, and patients treated were made available for verification.  The sampled estates and mill are subscribing to SOCSO to cover the accident insurance for all their workers. Latest monthly contributions were verified and confirmed with the following details:  Labis Bahru Estate:  Sample of SOCSO Contribution made for the month of July, August and September 2024 is available for review. Sighted the	Complied
		Acknowledgement Contribution Received (ACR) Number and Payment Receipt with details as following:  1. July 2024 – 20240004311297 – RM 11,661.20  2. August 2024 – 20240005024923 – RM 11,551.70  3. September 2024 – 20240005585091 – RM 10,604.40	



#### Palong Cocoa Palm Oil Mill:

Sample of SOCSO Contribution made for the month of March, May and July 2024. is available for review. Sighted the Acknowledgement Contribution Received (ACR) Number with details as following:

- 1. March 2024 20240001867002 RM 6,857.30
- 2. May 2024 20240003185622 RM 6,953.00
- 3. July 2024 20240004418904 RM 7,646.60

#### **UMAC Estate:**

Sample of SOCSO Contribution made for the month of April – May 2024 is available for review. Sighted the Acknowledgement Contribution Received (ACR) Number and Payment Receipt with details as following:

- 1. June 2024 20240003722030 RM 6,849.50
- 2. July 2024 20240004313253 RM 9,845.00
- 3. August 20204 20240004934057 RM 9,731.70

#### Mungka Estate:

Sample of SOCSO Contribution made for the month of July – September 2024 is available for review. Sighted the Acknowledgement Contribution Received (ACR) Number and Payment Receipt with details as following

- 1. July 2024 20240004337650 RM 5,144.50
- 2. Aug 2024 20240004979635 RM 5,177.80
- 3. September 2024 2024000558487 RM 5,155.90



		Palong Estate: Sample of SOCSO Contribution made for the month of June 2024 and August 2024 is available for review. Sighted the Acknowledgement Contribution Received (ACR) Number with details as following:  1. June 2024 – 20240003687060 – RM 12,153.10 2. August 2024 – 20240005084542 – RM 17,384.90	
6.7.5	Occupational injuries are recorded using Lost Time Accident (LTA) metrics.  - Minor compliance -	The Lost Time Injury Frequency Rate (LTIFR) metrics from RSPO were utilized to record lost time injuries and total work hours between January and December 2023. A comprehensive verification process involved cross-referencing with records like JKKP 8, affirming the accuracy and reliability of injury and work hour data for that period.	Complied

#### Summary of stakeholders interviewed, documents sighted and workplace that were visited during the audit for Principle 6

Interviewee and/or sighted documents and records	Workplace
Awang Kechik bin Sikang; Tok Batin RPS Bukit Serak	Stakeholder consultations
BhoratyRaj; GP Subramaniam Enterprise	
Amirzan bin Ahmad, Manager, FELCRA Bukit Serok	
Rohani bt Yassin; SK Bukit Serok.	
Cher Guan Heng, Tong Woon Trading	
Muhammad Faiz, Darul Prospek Sdn Bhd	
Kamarul Rizal, Jabatan Tenaga Kerja	



Local workers	Palong Cocoa POM
Workers with shift A and shift B	
Newly recruited workers	
Worker's representative	
Gender committee	
Daily rate workers	
Piece rate workers.	
Group interview	
Total 12 workers	
Local and foreign workers	UMAC Estate
Newly recruited workers in 2024	
Worker's representative	
Gender committee	
Daily rate workers	
Piece rate workers.	
Contractor workers	
Group interview.	
Total 17 workers	
Local and foreign workers	Mungka Estate
Newly recruited workers in 2024	
Worker's representative	
Gender committee	
Daily rate workers	
Piece rate workers.	
Contractor workers	





Group interview	
Total: 15 workers	
Local and foreign workers	Palong Estate
Newly recruited workers in 2024	
Worker's representative	
Gender committee	
Daily rate workers	
Piece rate workers.	
Contractor workers	
Group interview	
Total: 15 workers	
Employment contract	All Estate
Pay slips for month April'24, June'24 and August'24	
Attendance records/ Check roll	
SOCSO/ EPF contribution April'24, June'24 and August'24	
Passport and Permit	
Retirement records and payment of Special Gratuitous Payment	All Estate
Company policy and procedure	All Estate
Line site inspection/ VMO visits	All Estate
Salary deduction records/ Electricity and Water Bill/ Membership of NUPW	All Estate
Newly recruited workers document (Application form/ interview records/ medical check-up/offer letter)	All Estate

#### **Principle 7: Protect, conserve and enhance ecosystems and the environment**

Criterio	on 7.1: Pests, diseases, weeds and invasive introduced species are effective	ely managed using appropriate Integrated Pest Management (IPM) techniqu	ues.
7.1.1	(C) IPM plans are implemented and monitored to ensure effective pest control.  - Critical (Major) compliance -	The Palong Cocoa Supply Bases Estates continued to monitor the Implementation of Integrated Pest Management (IPM) plans.  i. 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 JPG – ARM J01 -J10 dated 01/03/2024.  ii. In order to minimize use of insecticides on leaf-eating pest, the estates planted beneficial plants such as <i>Turnera subulata, Cassia cobanensis, Antigonon leptopus,</i> along the road and designated points in the fields and also within the nursery perimeter.  iii. To develop beneficial plant nursery comprised of the beneficial plant.  iv. 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.  v. 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 RC /Agronomist. Baiting is continued until bait acceptance threshold level	Complied
7.1.2	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.  - Minor compliance -	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.	Complied

7.1.3	There is no use of fire for pest control unless in exceptional circumstances such as plantation sanitation, i.e. where no other effective methods exist, and with prior approval of government authorities.  - Minor compliance -	There was no land preparation in Northern Region Mill and Estates by burning ever since Johor Plantations Group Berhad practiced zero burning as per the policy in:  i. JPG Agricultural Reference Manual B07 dated 01/03/2024 - Under felling/clearing & land preparation ii. Environmental Policy - dated 01/07/2023 iii. Sustainability Policy - 01/07/2023 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.	Complied
Criterio	Criterion 7.2: Pesticides are used in ways that do not endanger health of workers, families, communities or the environment.		
7.2.1	(C) Justification of all pesticides used is demonstrated. Selective products and application methods that are specific to the target pest, weed or disease are prioritised.  - Critical (Major) compliance -	The justification of all pesticides used in the estate were documented in Agricultural Manual Section IO Weeds Management and HO Chemical Management. The manual provides the guideline on type of agrochemical use, target pest/weed/disease, weed situation, recommended chemical brand name, application rate, and method of application. Verification of chemical register, chemical issuance records, and site visits showed that the pesticides used were in accordance with the justification in the manual.	Complied
7.2.2	(C) Records of pesticides use (including active ingredients used and their LD50, area treated, amount of active ingredients applied per ha and number of applications) are provided.  - Critical (Major) compliance -	Records of pesticides use (including active ingredients used and their LD 50, area treated, amount of a.i. applied per ha and number of applications) had been maintained and kept by the estates. Based on the records, the total a.i per ha for 2023 and 2024 is available for review. Sample of records sighted are as followings:  1. Labis Bahru Estate  - July 2024 – 0.044	Complied

		- August 2024 – 0.050
		- September 2024 – 0.104
		2. UMAC Estate
		- March 2024 – 0.110
		- April 2024 – 0.022
		- May 2024 – 0.054
		3. Mungka Estate
		- April 2024 – 0.253
		- May 2024 – 0.117
		- June 2024 – 0.151
		4. Palong Estate
		- Jan 2024 – 0.315
		- Feb 2024 – 0.051
		- March 2024 – 0.070
7.2.3	(C) Any use of pesticides is minimised as part of a plan, eliminated where possible, in accordance with IPM plans Critical (Major) compliance -	The Oil Palm Manual for Chemical Management dated 01/03/2024 meticulously outline the quantities and justifications for agrochemicals required under various field conditions. These guidelines offer detailed information about the selection of agrochemicals, their intended targets (pests, weeds, or diseases), the prevailing weed situation, recommended chemical names, application rates, and application methods.
		Through a verification process involving chemical registers, chemical issuance records, and on-site visits, it was confirmed that the use of pesticides adhered to the justifications provided in the manual. Additionally, beneficial plants designed to support leafeating predators were strategically planted along the estate's roadsides.

		The consistent implementation of these practices in the field reflects a strong commitment to following the established SOP. Notably, all sampled estates have discontinued the use of Class I herbicides.  The management has outlined the Pesticides Reduction Plan which is to include the usage of Mechanization – usage of roto slasher for possible filed, as well as biological control of using the IPM (Beneficial Plant and Barn owl Box) as well as chemical usage which is the usage of chemical will be as per the agronomist recommendation and for specific target of pest, weed and diseases.	
7.2.4	There is no prophylactic use of pesticides, unless in exceptional circumstances, as identified in national best practice guidelines.  - Minor compliance -	There was no evidence of prophylactic use of pesticide at all the sampled estates.	Complied
7.2.5	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.  The due diligence refers to:  a) Judgment of the threat and verify why this is a major threat b) Why there is no other alternative which can be used c) Which process was applied to verify why there is no other less hazardous alternative d) What is the process to limit the negative impacts of the application e) Estimation of the timescale of the application and steps taken to limit application to the specific outbreak.  - Minor compliance -	At all the sampled estates, there has been a strict adherence to not using pesticides categorized as World Health Organization Class 1A or 1B, or those listed by the Stockholm or Rotterdam Conventions. This commitment to not using such pesticides was verified through a comprehensive process, which included visits to the pesticide's stores, reviewing inventory records, examining chemical registers submitted to the appropriate authorities, referencing CHRA reports, and conducting interviews with employees. This rigorous verification process ensures that these hazardous pesticides are not in use, emphasizing a responsible and safe approach to pest management.	Complied
7.2.6	<b>(C)</b> Pesticides are only handled, used or applied by persons who have completed the necessary training and are always applied in accordance	Training programs focused on the safe handling of chemicals and the correct spraying methods were provided to relevant employees,	Complied

	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.  - Critical (Major) compliance -	including storekeepers, pre-mixers, and herbicide sprayers. This initiative aligns with the recommendations from the CHRA assessor, emphasizing the importance of safety and proper techniques.  To ensure the effective transfer of knowledge, a variety of training methods were employed, including briefings, practical training sessions, and on-the-job supervisions. This multifaceted approach aimed to guarantee that employees fully understood and could implement safe chemical handling and spraying practices. Additionally, comprehensive records of these training sessions were diligently maintained for verification purposes.  A couple of sample training records include:  1. Labis Bahru Estate – 27/03/2024.  2. UMAC Estate – 17/04/2024.  3. Mungka Estate – Chemical handling training – 17/04/2024  4. Palong Estate – Chemical handling training – 03/04/2024	
7.2.7	<ul><li>(C) Storage of all pesticides is in accordance with recognised best practices.</li><li>- Critical (Major) compliance -</li></ul>	Pesticides were found stored in 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 to prevent unauthorised entrance. The hazard signage was observed to be adequately displayed on the exterior and interior walls. Ventilation facilities and safety data sheets were also adequately provided.	Complied
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 -	Unused chemical containers not utilized for premixing were responsibly managed. They underwent a thorough process of triple rinsing and puncturing before being classified as scheduled waste. The disposal was carried out through waste collecting contractors in compliance with Indicator 7.3.2.	Complied
7.2.9	<b>(C)</b> Aerial spraying of pesticides is prohibited, unless in exceptional circumstances where no other viable alternatives are available. This	Aerial spraying of pesticides is not practiced in the sampled estates.	Complied

### RSPO P&C Public Summary Report Revision 16 (Oct 2024)

	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 -		
7.2.10	(C) Specific annual medical surveillance for pesticide operators, and documented action to treat related health conditions, is demonstrated.  - Critical (Major) compliance -	Labis Bahru Estate  The CHRA report stated that there is need to conduct the annual medical surveillance for pesticide operators. The management has conducted the monthly health surveillance checking for all pesticides operators. Sighted the records of medical surveillance conducted on 20/06/2024, which declared all workers are fit.  UMAC Estate  Medical surveillance was conducted as per of the recommendation of CHRA, which the estate has sent 37 workers to conduct the test on 24/09/2024. All workers were declared fit.  Mungka Estate  Medical surveillance was conducted as per of the recommendation of CHRA, which the estate has sent 66 workers to conduct the test on 19/06/2024. All workers were declared fit.  Palong Estate  Medical surveillance was conducted as per of the recommendation of CHRA, which the estate has sent the workers to conduct the test on 18/06/2024. All 72 workers tested were declared fit.	Complied
7.2.11	<b>(C)</b> No work with pesticides is undertaken by persons under the age of 18, pregnant or breastfeeding women or other people that have medical restrictions and they are offered alternative equivalent work.	On-site observations, verification of the employee master list, and interviews conducted at selected estates confirmed that no individuals under 18, pregnant or breastfeeding women, or	Complied

...making excellence a habit."

	- Critical (Major) compliance -	individuals with medical restrictions were involved in pesticide- related work. These protective measures prioritise the safety and well-being of employees. Additionally, the management's Sustainable Management System, effective from 14/11/2023, clause 6.11, protects female workers by restricting their involvement in chemical-related tasks from the confirmation of pregnancy and for breastfeeding women.
Criterio	n 7.3: Waste is reduced, recycled, reused and disposed of in an environment	entally and socially responsible manner.
7.3.1	A waste management plan which includes reduction, recycling, reusing, and disposal based on toxicity and hazardous characteristics, is documented and implemented.  - Minor compliance -	Palong Cocoa POM and all the 4 estates had identified all wastes and sources of pollution. The Waste Management Action Plan 2024 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;
		<ul> <li>i. Air - Sources from boiler stack (smoke and particulate), vehicle &amp; generator (smoke and gases), anaerobic processes (ETP, EFB dumping)- GHG.</li> <li>ii. Water - Cleaning water/run-off/process station waters (hydrocyclone /sterilizer condensate/clarification waste) &amp; boiler quenching water and blow down.</li> <li>iii. Land - Scheduled waste, ddomestic waste and industrial/process waste.</li> </ul>
		All waste and pollution are identified and documented in the Waste Management Action Plan 2024 reviewed annually. The waste generated from the mill/estates operations as shown below: i. Scheduled waste - Spent IPA, hexane, filter, lubricants, hydraulic oil, grease, used batteries. ii. Domestic waste - rubbish from the mill/estate complex and employees' quarters



		<ul> <li>iii. Industrial waste - Fiber, palm kernel shell, boiler ash, scrap iron</li> <li>iv. Sewage - Sewage from housing/office complex</li> <li>e pollution identified from the mill/estate activities:</li> </ul>	
		<ul><li>i. Black smoke - Emission from Boilers/vehicles/engines</li><li>ii. Odor &amp; gases - Activities from the effluent treatment</li><li>iii. Leakage of lubricant - Storage &amp; vehicle maintenance</li></ul>	
7.3.2	Proper disposal of waste material, according to procedures that are fully understood by workers and managers, is demonstrated.  - Minor compliance -	Palong Cocoa POM and the estates in the CU, procedure O/W1/06-10 Scheduled Wastes (Hazardous Waste) Management s been established.	Complied
		Management and disposal of wastewater 2024 has been established compiled by Assistant Engineer/Assistants/Staff. Waste Management Action Plan 2024 has been established prepared by Sustainability Department (SD) and verified by the Assistant Engineer/Assistants/Manager.  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.  Among the identified wastes include empty chemical containers including pesticides containers. Empty pesticides containers were washed at washing station prior to disposal. 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 expiring 30/04/2025). Records of disposal as tabulated below.	
		P Cocoa SW SW SW SW SW	
		POM   409   408   410   307   429   110	

## RSPO P&C Public Summary Report Revision 16 (Oct 2024)

27/08/2024   0.127   0.019   0.236   0.023   0.049   0.014   0.07/03/2024   0.187   0.019   0.155   0.121   0.032   0.005							
Palong Estate   SW   SW   SW   SW   SW   SW   SW   102   409   307   305   110   410   27/08/2024   0.040   0.002   0.200   0.220   0.014   0.146   22/02/2024   -   0.057   -   0.190   0.013   0.003   0.003   0.003   0.004   0.005   0.005   0.005   0.005   0.005   0.005   0.006   0.005   0.006	27/08/2024	0.127	0.019	0.236	0.023	0.049	0.014
Palong Estate 102 409 307 305 110 410  27/08/2024 0.040 0.002 0.200 0.220 0.014 0.146  22/02/2024 - 0.057 - 0.190 0.013 0.003    Kemedak	07/03/2024	0.187	0.019	0.155	0.121	0.032	0.005
Palong Estate 102 409 307 305 110 410  27/08/2024 0.040 0.002 0.200 0.220 0.014 0.146  22/02/2024 - 0.057 - 0.190 0.013 0.003    Kemedak			l	I	I	I	
102   409   307   305   110   410   27/08/2024   0.040   0.002   0.200   0.220   0.014   0.146   22/02/2024   -   0.057   -   0.190   0.013   0.003	Palong Estat	SW	SW	SW	SW	SW	SW
Sw   Sw   Sw   Sw   Sw   Sw   Sw   Sw	raiong Estat	102	409	307	305	110	410
Kemedak         SW         SW <t< td=""><td>27/08/2024</td><td>0.040</td><td>0.002</td><td>0.200</td><td>0.220</td><td>0.014</td><td>0.146</td></t<>	27/08/2024	0.040	0.002	0.200	0.220	0.014	0.146
Kemedak       408       409       307       305       110       410         30/07/2024       0.023       0.054       0.138       0.159       0.008       0.328         30/01/2024       0.059       0.165       0.128       0.131       0.010       0.116         Mungka Estate       SW       SW       SW       SW       SW       SW       SW         Estate       110       409       307       305       408       410         15/09/2024       0.018       0.089       0.012       0.358       0.024       0.016         13/03/2024       0.025       0.064       0.018       0.145       0.061       0.013    Sep Loi Estate          Sw       SW       SW       SW       SW       SW       SW         110       409       307       305       408       410	22/02/2024	-	0.057	-	0.190	0.013	0.003
Kemedak       408       409       307       305       110       410         30/07/2024       0.023       0.054       0.138       0.159       0.008       0.328         30/01/2024       0.059       0.165       0.128       0.131       0.010       0.116         Mungka Estate       SW       SW       SW       SW       SW       SW       SW         Estate       110       409       307       305       408       410         15/09/2024       0.018       0.089       0.012       0.358       0.024       0.016         13/03/2024       0.025       0.064       0.018       0.145       0.061       0.013    Sep Loi Estate          Sw       SW       SW       SW       SW       SW       SW         110       409       307       305       408       410			l	l	I	I	
408   409   307   305   110   410   30/07/2024   0.023   0.054   0.138   0.159   0.008   0.328   30/01/2024   0.059   0.165   0.128   0.131   0.010   0.116	Komodak	SW	SW	SW	SW	SW	SW
30/01/2024     0.059     0.165     0.128     0.131     0.010     0.116       Mungka Estate     SW S	Kenleuak	408	409	307	305	110	410
Mungka         SW         SW <th< td=""><td>30/07/202</td><td>0.023</td><td>0.054</td><td>0.138</td><td>0.159</td><td>0.008</td><td>0.328</td></th<>	30/07/202	0.023	0.054	0.138	0.159	0.008	0.328
Estate 110 409 307 305 408 410 15/09/2024 0.018 0.089 0.012 0.358 0.024 0.016 13/03/2024 0.025 0.064 0.018 0.145 0.061 0.013 Sep Loi Estate SW	30/01/2024	0.059	0.165	0.128	0.131	0.010	0.116
Estate 110 409 307 305 408 410 15/09/2024 0.018 0.089 0.012 0.358 0.024 0.016 13/03/2024 0.025 0.064 0.018 0.145 0.061 0.013 Sep Loi Estate SW			l	l	I	I	
15/09/2024	Mungka	SW	SW	SW	SW	SW	SW
13/03/2024     0.025     0.064     0.018     0.145     0.061     0.013       Sep Loi Estate     SW     SW     SW     SW     SW     SW     SW       110     409     307     305     408     410	Estate	110	409	307	305	408	410
Sep Loi Estate         SW         A08         410	15/09/2024	0.018	0.089	0.012	0.358	0.024	0.016
Sep Loi Estate         110         409         307         305         408         410	13/03/2024	0.025	0.064	0.018	0.145	0.061	0.013
Sep Loi Estate         110         409         307         305         408         410				1	1	1	
110   409   307   305   408   410	Son Loi Ecta	SW	SW	SW	SW	SW	SW
17/09/2024 0.004 0.005 0.150 0.090 0.110 0.008	jeβ Loi Esta	110	409	307	305	408	410
	17/09/2024	0.004	0.005	0.150	0.090	0.110	0.008

...making excellence a habit."

Page 143 of 187

T [2-	7/02/2024	0.004	0.010	0.002	0.025	0.000	0.010
2/	7/02/2024	0.004	0.010	0.002	0.025	0.002	0.010
La	abis Bahru	SW	SW	SW	SW	SW	SW
	Estate	110	409	109	305	408	410
30	0/07/2024	0.250	0.630	-	0.430	0.540	0.140
27	7/02/2024	0.020	-	0.041	0.385	0.511	0.134
	UMAC	SW	SW	SW	SW	SW	SW
	Estate	103	409	109	305	408	410
10	0/09/2024	0.040	0.030	0.004	0.135	0.035	0.012
21	1/03/2024	-	0.029	0.004	0.170	0.007	0.012
		l					
	SW 404	Da	te	Mt	Da	ite	Mt
	Palong	05/09,	/2024	0.0013	07/03	/2024	0.0037
	Kemedak	05/09	/2024	0.0013	07/03	/2024	0.0009
	Mungka	15/09	/2024	0.0066	07/03	/2024	0.0058
Sc	Sepang Loi	05/09,	/2024	0.0001	-	-	-
La	abis Bahru	05/09,	/2024	0.0039	04/04	/2024	0.0013
	UMAC	19/09,	/2024	0.0014	12/03	/2024	0.0009
All esi	states dispos	ed the d	omestic	waste to			managed
by SWM located in Segamat. Exception for Ladang UMAC having							

#### RSPO P&C Public Summary Report Revision 16 (Oct 2024)

own internal landfill at field no P03/B6. The site was visited and verified for in compliance. Collections are made  $2/3 \times 4$  x week

There are procedures and guidelines in the disposal of wastes and pollutants guided by Sustainability Department (SD) Head Office level to minimize pollution on the routine operation. Training in relation to environment as shown below;

Estate - Subject	Palong	UMAC	L Bahru
CPR/ERP procedure	29/05/24	20/08/24	21/05/24
Compound hygiene &disease	29/03/24	11/09/24	02/07/24
Company Policies	09/02/24	02/01/24	23/07/24
Recycling & Environment	19/07/24	18/01/24	04/07/24
RSPO / MSPO awareness	01/03/24	16/07/24	18/04/24
Buffer Region maintenance	13/02/24	25/02/24	15/02/24
Oil trap- maintenance	05/02/24	19/09/24	04/06/24
S Waste inventory /disposal	01/04/24	17/04/24	21/02/24
Fire - ERP - Zero Burning	18/10/24	18/01/24	07/02/24
RTE /HCV /Buffer Region	26/07/24	02/09/24	27/03/24
Landfill Management / SOP	26/01/24	07/10/24	04/07/24
WTP /Chemical Management	01/04/24	04/09/24	12/06/24

Estate - Subject	Mungka	Sep Loi	PCPOM
CPR/ERP procedure	14/06/24	12/09/24	12/02/24
Compound hygiene &disease	23/01/24	12/09/24	18/08/24
Company Policies	15/04/24	06/02/24	11/10/24
Recycling & Environment	26/08/24	23/02/24	-
RSPO / MSPO awareness	12/02/24	02/01/24	14/08/24
Buffer Region maintenance	12/08/24	23/08/24	-
Oil trap- maintenance	24/08/24	10/07/24	31/01/24
S Waste inventory /disposal	26/08/24	03/02/24	18/08/24
Fire - ERP - Zero Burning	14/06/24	09/01/24	13/10/24

...making excellence a habit."



		, <u>, , , , , , , , , , , , , , , , , , </u>	
		RTE /HCV /Buffer Region       12/08/24       23/02/24       07/04/24         Landfill Management / SOP       26/08/24       15/02/24       07/04/24         WTP /Chemical Management       14/04/24       20/05/24       17/07/24	
		The mill waste produced from the processing operations as listed below;  i. POME - Application at designated field specified by Agronomist.  ii. EFB - Application at designated field specified by Agronomist.  iii. Fibre/Shell - Utilization as fuel in the boiler.  iv. Surplus fibre used in compost production & shell sold externally  v. Boiler Ash - Placed in area far from water source to prevent water pollution.	
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 Environmental Policy.  i. The operating units adhered to the policy of "Zero open burning" for any replanting. From field visits and interviews with the workers there is no open burning being practiced in the estates. All the estates had replanting program spanned over the forthcoming years as shown in 3.1.2.  ii. There was no evidence that fire had been used to prepare land for replanting in the estate No fire was used for waste disposal.  iii. The management endorsed commitment to fully comply with the Malaysian environmental law – EQA and Regulations 1974.	Complied
Criterio	on 7.4: Practices maintain soil fertility at, or where possible improve soil fer	tility to, a level that ensures optimal and sustained yield.	
7.4.1	Good agriculture practices, as contained in SOPs, are followed to manage soil fertility to optimise yield and minimise environmental impacts.  - Minor compliance -	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	Complied

		implemented which involved safety, health, environmental, quality, employees, etc. had followed the established SOP.  i. JPG Manual established in 2023 revised 01/03/2023. ii. Guidelines On Natural Water Course ARM no B021 01/03/2024 iii. Pictorial Safety Standards and Security Guidelines (PSS). iv. Laboratory Process Control Manual v. Manuring JPG ARM no D01 - D07 dated 01/03/2024  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	
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 -	bottom-line of which is Good Agricultural Practice and the care for their safety and health and the environment.  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 JPAC (Johor Plantations Agritech Centre) Central Analytical Laboratory to formulate the year 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:	Complied

			Coil Am	alveie		Foliar Anal	voic		
		Estate	Soil An Report		Report No	Foliar Analy Report Date		No	
		Palong			S1/02/024	15/02/2024			
			ak 29/01/		S1/01/107	24/01/2024			
		Mungka	a 02/09/	2024	S1/09/108	08/06/2023	B L1/06/1	.64	
		L Bahru	ı 25/04/	2024	S1/04/59	17/10/2024	L1/10/4	187	
		UMAC	29/10/	2023	S1/10/136	22/08/2024	L1/08/3	371	
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 -	Ca & Extended Scale Scal	ch Mg was mpling & ory. of John ified. 4 estates was mose, grass mpose in thition, dured and left olied Composition in 20	s carried analysis or Planta visited ha acking p cutting he field, E ing replote to decorpost at 7r 023/24 a	out on a 5-y was condition Group I ad a nutrier runed fronc narvesters p EFB mulchin lanting, pa mpose. Rec mt/ha and E	otal P, Avail year cycle baucted by Control Report recycling sister and letter and applications were ords showed as as follows:	sis. All folia entral Ana orts were si strategy in pective fie ing the cut ation of con felled, chi that the e mt/ha. Re	place lds to mass ipped, states	Complied
			Estate	Туре			Mt		
			Palong	Compo			339.20		
			Palong	Compo	ost P12K/	6 45.44	318.08		
		N	Mungka	EFB	P11/B	4 110.14	2202.00		

Mungka   Compost   P07   76.00   532.00			,						_	
T.4.4 Records of fertiliser inputs are maintained.  - Minor compliance -  Records of fertilizer inputs are maintained.  - Minor compliance -  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 auditor. Review of the records revealed that the actual fertilizers applied in 2023/24 was in line with the program. The following fertilizers were applied in Northern Region estates subject to the recommendation by the Agronomist.  Fertilizer Kg/palm application month MOP 1.50 June / July Kieserite 1.75 Feb / June  A Sulphate 2.75 Mac / June / Aug  BRP 1.50 Feb  CPD44 2.50 Jan / Feb / Aug				Mungka	Compost	P07	76.00	532.00		
T.4.4 Records of fertiliser inputs are maintained.  - Minor compliance -  Records of fertiliser inputs are maintained.  - Minor compliance -  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 auditor. Review of the records revealed that the actual fertilizers were applied in 2023/24 was in line with the program. The following fertilizers were applied in Northern Region estates subject to the recommendation by the Agronomist.    Fertilizer   Kg/palm   application month   MOP   1.50   June / July   Kieserite   1.75   Feb / June   A Sulphate   2.75   Mac / June / Aug   BRP   1.50   Feb   CPD44   2.50   Jan / Feb / Aug				Mungka	Compost	P09	70.00	490.00		
7.4.4 Records of fertiliser inputs are maintained Minor compliance -  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 auditor. Review of the records revealed that the actual fertilizers applied in 2023/24 was in line with the program. The following fertilizers were applied in Northern Region estates subject to the recommendation by the Agronomist.  Fertilizer Kg/palm application month MOP 1.50 June / July Kieserite 1.75 Feb / June A Sulphate 2.75 Mac / June / Aug BRP 1.50 Feb CPD44 2.50 Jan / Feb / Aug				Labis Bahru	Compost	P08/B1	45.13	315.91		
7.4.4 Records of fertiliser inputs are maintained.  - Minor compliance -  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 auditor. Review of the records revealed that the actual fertilizers were applied in Northern Region estates subject to the recommendation by the Agronomist.  Fertilizer Kg/palm application month MOP 1.50 June / July Kieserite 1.75 Feb / June A Sulphate 2.75 Mac / June / Aug BRP 1.50 Feb CPD44 2.50 Jan / Feb / Aug				Labis Bahru	Compost	P06/B1	53.58	375.06		
7.4.4 Records of fertiliser inputs are maintained.  - Minor compliance -  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 auditor. Review of the records revealed that the actual fertilizers applied in 2023/24 was in line with the program. The following fertilizers were applied in Northern Region estates subject to the recommendation by the Agronomist.  Fertilizer Kg/palm application month MOP 1.50 June / July Kieserite 1.75 Feb / June A Sulphate 2.75 Mac / June / Aug BRP 1.50 Feb CPD44 2.50 Jan / Feb / Aug				UMAC	Compost	P05/B1	68.19	477.33		
- Minor compliance - program sheets, bin cards, field cost book, fertilizer application monitoring forms, etc. Records of programs and applications of fertilizers were reviewed by auditor. Review of the records revealed that the actual fertilizers applied in Northern Region estates subject to the recommendation by the Agronomist.    Fertilizer   Kg/palm   application month				UMAC	Compost	P08/B2	30.59	214.13		
- Minor compliance - program sheets, bin cards, field cost book, fertilizer application monitoring forms, etc. Records of programs and applications of fertilizers were reviewed by auditor. Review of the records revealed that the actual fertilizers applied in Northern Region estates subject to the recommendation by the Agronomist.    Fertilizer   Kg/palm   application month								L	_	
- Minor compliance - program sheets, bin cards, field cost book, fertilizer application monitoring forms, etc. Records of programs and applications of fertilizers were reviewed by auditor. Review of the records revealed that the actual fertilizers applied in Northern Region estates subject to the recommendation by the Agronomist.    Fertilizer   Kg/palm   application month										
MOP 1.50 June / July  Kieserite 1.75 Feb / June  A Sulphate 2.75 Mac / June / Aug  BRP 1.50 Feb  CPD44 2.50 Jan / Feb / Aug	7.4.4	•	prog mor ferti that prog	gram sheets, nitoring forms, ilizers were rev the actual fe gram. The follo	bin cards, for etc. Recor etecent by au rilizers appowing fertilizers	field cost ds of pro ditor. Rev lied in 20 ters were	book, fert grams and iew of the 23/24 was applied in	cilizer appli d application records res in line wi Northern F	ication ons of vealed th the	Complied
Kieserite       1.75       Feb / June         A Sulphate       2.75       Mac / June / Aug         BRP       1.50       Feb         CPD44       2.50       Jan / Feb / Aug				Fertilize	r Kg/p	alm app	lication mo	onth		
A Sulphate 2.75 Mac / June / Aug  BRP 1.50 Feb  CPD44 2.50 Jan / Feb / Aug				MOP	1.5	0	June / July	/		
BRP         1.50         Feb           CPD44         2.50         Jan / Feb / Aug				Kieserite	e 1.7	5	Feb / June	9		
CPD44 2.50 Jan / Feb / Aug				A Sulpha	te 2.7	5 Ma	c / June /	Aug		
				BRP	1.5	0	Feb			
MIX2B 2.00 Mac / July / Sept				CPD44	2.5	0 Ja	n / Feb / A	lug		
				MIX2B	2.0	0 Ma	c / July / S	Sept		



			Н	GFB	0.10	July		
			G	ML	2.00	June		
		MOP -	– Muriato	e of Potash				
		GML -	- Ground	d Magnesium	Limestone			
		HGFB	– High (	Grade Fertili	zer Borate			
		BRP -	- Bayova	r Rock Phos	phate			
Criterio	n 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 -	draina	age, par	ent materia	I and key as	spect for ma	texture, depth, anagement was ed as follows:	Complied
		Pa	along	Mungka	Sepang Loi	L Bahru	UMAC	
		Bu	ungor	Benta	Bungor	G Chenak	Bukit Tuku	
		1 1	Gajah Mati	Bungor	Kekura	G Mati	Bungor	
		Ke	edah	Holyrood	Nami	Chat	Chuping	
		Seg	gamat	Jabor	Serdang	Lubok Itek	Gajah Mati	
		Sog	goman a	Katong	Sitiawan	Melaka	Harimau	
		Te	ebuk	Melaka	Telemong	Sogomana	Holyrood	
		Tok	k Yong	Nangka	-	Serok	Kemahang	
		Set	tiawan	Serdang	-	Sitiawan	Rasau	



		Melaka	Telemong	-	Tepus	Serok	
		_	-	-	Terap	Tai Tak	
			-	-	-	Telemong	
			-	-	-	Terap	
		There were soils) in the	•	lem soils (e.	g. podzols a	nd acid sulphate	
7.5.2	No replanting on steep slopes (above 25 degrees) unless approved by state governments. In case of replanting is permitted, no replanting in contiguous area of steep terrain (greater than 25 degrees) larger than 25 Ha within the Unit of Certification.  - Minor compliance -	in CU contin slopes in ord soils. The p guided by: i. Slope Plantati ii. Buffer Plantati iii. Land F	ued to have a er to minimize antings on s  River Protons Group AR Region & 25 ons Group AR	a manageme e and control lopes betwe tection Polic M 5-degree slo M or Terracing	ent strategy l erosion and en 9 and 2 cy in Section	e estates visited for planting on degradation of 5 degrees was on B014 Johor on B014 Johor on B014 Johor	Complied
		degradation EFB applica terraces, roa the interline certain matu planted alor	of soils were in tion, avoidar d maintenances. Cover crop re areas. The g crucial slop	n place throunce of blance and maintos were plare cover croppes by man	gh proper stanket spraying enance of some of s	ntrol erosion and acking of fronds, ag, construction oft vegetation in replants and in acteata had been arge areas with during the visit.	

					The slope maps were provided by the AASD (Agronomy Advisory Service Dept) with details as follows:						
		Topography	Palon g	Mungka	Sep Loi	L Bahru	UMAC				
		0-2	36.33	72.92	37.62	26.25	40.5				
		2-6	54.61	25.94	26.92	49.59	16.03				
		6-12	8.87	0.98	15.77	21.01	36.80				
		12-20	0.19	0.16	15.87	2.95	5.71				
		20-25	0.00	0.00	2.49	0.18	0.96				
		>25	0.00	0.00	1.33	0.02	0.00				
		Total	100.0 0	100.00	100.00	100.00	100.00				
							<u>I</u>				
7.5.3	There is no new planting of oil palm on steep terrain Minor compliance -	This compliand and River Pro stating the foll	tection"	signed by	the Chair			Complied			
		"To preserve s control". Sim Environmental	ilar coı	mmitments	are als						
<b>Criterio</b> operatio	<b>n 7.6:</b> Soil surveys and topographic information are used for site planning ns.	in the establishr	ment of	new plantir	ngs, and th	ne results a	re incorporate	ed into plans and			
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 ar Topographic c manage the d provided in 7.5 All estates in t	ontour n Irainage 5.1. and	nap is also and road 7.5.2 abov	available works in t e).	which are the estates	both used to s. (Details as	Complied			
		also for the for									

### RSPO P&C Public Summary Report Revision 16 (Oct 2024)

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 had no planting on areas of more than 25 degree. Plantings on steep slope are either avoided or minimized. Ref statement in 7.5.3 above.  All estates in the CU had no new planting for the current year and also for the forthcoming 5 years operations.	Complied
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).  All estates in the CU had no new planting for the current year and also for the forthcoming 5 years operations.	Complied
on 7.7: No new planting on peat, regardless of depth after 15 November 20	18 and all peatlands are managed responsibly.	
(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 4 estates	Complied
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 4 estates	Complied
(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 4 estates	Complied
(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, Costal and Peat lands)	Complied
	necessary, done in accordance with the soil management plan for best practices.  - Minor compliance -  Soil surveys and topographic information guide the planning of drainage and irrigation systems, roads and other infrastructure.  - Minor compliance -  On 7.7: No new planting on peat, regardless of depth after 15 November 20  (C) There is no new planting on peat regardless of depth after 15 November 2018 in existing and new development areas.  - Critical (Major) compliance -  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 -  (C) Subsidence of peat is monitored, documented and minimised.  - Critical (Major) compliance -  (C) A documented water and ground cover management programme is in place.	hecessary, done in accordance with the soil management plan for best practices.  - Minor compliance -  Soil surveys and topographic information guide the planning of drainage and irrigation systems, roads and other infrastructure.  - Minor compliance -  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).  All estates in the CU had no new planting for the current year and also for the forthcoming 5 years operations.  There is no new planting on peat regardless of depth after 15 November 2018 and all peatlands are managed responsibly.  (C) There is no new planting on peat regardless of depth after 15 November 2018 in existing and new development areas.  - Critical (Major) compliance -  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 -  (C) Subsidence of peat is monitored, documented and minimised.  - Critical (Major) compliance -  (C) Subsidence of peat is monitored, documented and minimised.  - Critical (Major) compliance -  (C) Subsidence of peat is monitored, documented and minimised.  - Critical (Major) compliance -  (C) A documented water and ground cover management programme is in place.  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 4 estates in the current year and also for the forthcoming 5 years operations.  There is no peat soil or soil categorized as marginal or fragile soil in all estates visited. There was

...making excellence a habit."

		<ul> <li>issued on 01.03.2024 Ref G01 -G06. Details are described in 7.8.1. individual estates and mill had their respective water management plan mainly to monitor among others the following;</li> <li>i. Monitor the quality of main water inlet/outlet for pollutants from estate's operations.</li> <li>ii. Good drainage system to ensure adequate water supply for the palm trees via growth monitoring.</li> <li>iii. Construction of road side pits for a good road drainage.</li> <li>iv. Contingency during water shortage.</li> <li>v. Monitoring of water level at low lying fields during the monsoon months for flood mitigation.</li> </ul>	
7.7.5	(C) For plantations planted on peat, drainability assessments are conducted following the RSPO Drainability Assessment Procedure, or other RSPO recognised methods, at least five years prior to replanting. The assessment result is used to set the timeframe for future replanting, as well as for phasing out of oil palm cultivation at least 40 years, or two cycles, whichever is greater, before reaching the natural gravity drainability limit for peat. When oil palm is phased out, it is replaced with crops suitable for a higher water table (paludiculture) or rehabilitated with natural vegetation.  This is subject to transitional (5 years: 2019 to 2024) arrangement stated in the Drainability Assessment Procedure.  Within 12 months initial implementation period, company could submit	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 4 estates	Complied
	other alternate methodologies to be considered by RSPO for recognition.  - Critical (Major) compliance -		
7.7.6	(C) All existing plantings on peat are managed according to the 'RSPO Manual on Best Management Practices (BMPs) for existing oil palm cultivation on peat', version 2 (2019) and associated audit guidance.  - Critical (Major) compliance -	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 4 estates	Complied



(regardle new drain on peat s 'RSPO BN Associate associate	reas of unplanted and set-aside peatlands in the managed areases of depth) are protected as "peatland conservation areas"; nage, road building and power lines by the unit of certification oils is prohibited; peatlands are managed in accordance with the MPs for Management and Rehabilitation of Natural Vegetation d with Oil Palm Cultivation on Peat', version 2 (2019) and d audit guidance.  (Major) compliance -	a	all estates visited. There was also no new planting in the 4 estates						
Criterion 7.8: Pra	ctices maintain the quality and availability of surface and groun	dwa	iter.						
efficient negative the follow a) The u contri	nanagement plan is in place and implemented to promote more use and continued availability of water sources and to avoid impacts on other users in the catchment. The plan addresses ving:  Init of certification does not restrict access to clean water or bute to pollution of water used by communities.  Pers have adequate access to clean water.  Dispution of water used by communities.	re p	i. rainv ii. wate iii. conti v. Work sourc capa ri. The a	view made in has emporater harve refrom the nual training ters have accessive of supplying of walking of walking of walking es similarly	on respectively ohasized; sting for cleanin reservoir/catching for workers on dequate access to the mill and, own catchmenter reservoir to in event of draus possessed the	has been established with the by the OU. Among others the g purposes, nent for the mill operations water efficiency consumption, to clean water. The same water d estates are from the same at with WTP facilities. The retain the reservoir optimal aight/water pollution.  following water management ollowing initiatives.  Action Plan  Enforcement of buffer Region as non-spraying activities.	Complied		

## RSPO P&C Public Summary Report Revision 16 (Oct 2024)

Rain	General Upkeep  Line site  Drain upkeep	Draught Wastage  Interruption water flow at drainage system.  Water pollution	Follow WI & SOP to avoid water pollution.  Follow SW SOP to avoid pollution caused from SW.  Every house is supplied with containers.  To schedule water supply to avoid wastage.  Awareness on water usage efficiency.  Outsource from neighboring estates.  Periodic desilting  Building of sandbags at specific points to contain water (weirs)  Prohibit workers from activities at water source.  Drinking water analysis.  Monitor condition of septic tank  Adhere SW management	
Water Ma 01/08/202		political	tank	

...making excellence a habit."

The Mill Identification & Management of Wastewater 2024 among others as summarized below;						
location		Treatment/ containment	Reuse/recycle /disposal			
Processing stations	Clarification condensate Sterilizer condensate	Oil recovery/				
Boiler			Monsoon drain			
Process ramp	D : C II CC	Sedimentati on trap	Monsoon drain			
Engine room	Steam condensate, turbine cooling water	,	Monsoon drain			
Lab	Cl :- :		Monsoon drain			
Wash room	Toilet water, cleaning water	Septic tank	Collected by licensed contractor.			
	,	septic talik				

		The mill co consumption. shown above. Shah Alam Se Water Quality estates for the supply from S						
		12/06/2024 unit result Regn raw std drinking water Result						
		рН	-	5.8	5.5-9.0	6.5-9.0	7.0	
		Turbidity	-	23.8	1000	5	4.0	
		Aluminium	NTU	<0.2	-	0.2	<0.2	
		Chlorine	mg/L	-	-	0.2-5	1.2	
		Coli form	mg/L	ND	5000	Nil	ND	
		E coli	MPN/	ND	5000	Nil	ND	
			•		•			
7.8.2	(C) Water courses and wetlands are protected, including maintaining and restoring appropriate riparian and other buffer zones in line with 'RSPO Manual on BMPs for the management and rehabilitation of riparian reserves' (April 2017) or applicable National legislation or specific 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 -	restoring appropriate riparian buffer Regions has been verified at the Estates and mill catchment. Riparian buffer Regions have been identified and demarcated. No chemicals and fertilizer application observed been used in their maintenance. In certain areas						Complied



Manual no D01 – D07 revised dated 01/03/2024. The buffer Regions established are as follows:

River width	Buffer Region
>40 meters	50 meters
20 - 40 meters	40 meters
10 - 20 meters	20 meters
5 - 10 meters	10 meters
< 5 meters	5 meters

Buffer Regions were protected. Areas visited for the estates as tabled follows. There were also areas i.e. catchment and pond within the estate and mill vicinity.

The management monitors the water quality through water sampling:

Monitoring of upstream, and downstream of water streams within the estates. Sighted and verified the following analysis for the respective estates. Limit (Standard) for N (Nitrogen) and P (Phosphorus) is 7.0 mg/l and 0.2 mg/l respectively.

	PO	)6	PR	23	P05		PO	)4
L Bahru	Р	N	Р	N	Р	N	Р	N
24/09/2024	0.11	0.12	0.07	0.71	0.23	3.25	0.16	2.10
15/08/2024	0.09	0.33	0.10	4.94	0.11 5.41		0.16	0.90

	Sg Badoh	Sg Badoh	Sg Perlah	Sg Perlah
--	----------	----------	-----------	-----------

Palong	Р	N	Р	N	Р	N	Р	N
07/10/20	24 0.05	0.77	0.05	1.07	0.05	0.48	0.05	0.46
		20/01		20	DO	2/2	D/	\ <del>7</del>
Kemeda		08/01		)9		8/2	P(	
24/09/20	24 0.17	3.24	0.11	3.01	0.14	2.51	0.08	2.14
	C	01 To	CD1	Out	CDC	) T	CD3	0
	St	P1-In	SPI	- Out	SPZ	2-In	SP2	- Out
Mungka	P	N	Р	N	Р	N	Р	N
12/09/20	24 0.05	1.83	0.05	0.93	0.05	1.22	0.05	0.81
	•	1	•				l	
	P	05/2	P0	3/1	P0	8/3	P0	5/4
Sep Lo	Р	N	Р	N	Р	N	Р	N
12/09/20	24 0.05	1.69	0.05	1.46	0.05	1.69	0.05	0.92
	Sg S	Seraya	Sg S	eraya	Sg (	Opar	Sg (	Opar
UMAC	Р	N	Р	N	Р	N	Р	N
29/07/20	24 0.05	0.68	0.05	1.05	0.05	0.71	0.05	1.33
27/08/20	24 0.05	0.57	0.05	1.32	0.05	0.98	0.05	1.57
Analysis m								
Analysis m	ade at	ionor Pl	antatio	nns (Te	ntrai ∆	nalytic	allah	oratory



Lab & Analytical Testing Sdn Bhd for water drinking standard 2x/year.

Labis Bahru, Palong Main Div Estates used SAJ for the domestic consumption. UMAC estate uses supply from PAIP. Others rely on own water treatment samples taken on 2x/year.

The mill made the following water analysis at a stream within the estate / mill vicinity as per DOE Jadual Pematuhan requirement. Details as follows. All units in mg/l except for pH.

Parameter	STD	30/09	9/2024	02/07	7/2024
		Hulu	Hilir	Hulu	Hilir
рН	6-9	5.1	7.1	5.0	4.8
BOD	3	<10	<10	<10	<10
COD	25	15	15	22	21
A Nitrogen	0.3	1.63	0.69	3.98	2.89
N Nitrogen	1	0.81	2.49	0.31	0.32
Phosphorus	-	0.16	0.77	0.44	0.45
TD Solids	-	204	228	220	216
D Oxygen	-	6.84	6.91	7.85	7.40

Variations and action plan were discussed during the quarterly Mesyuarat Alam Sekitar. Prevention is made especially during the manuring activities. Johor Plantations Group Berhad reviewed the environmental performances during the monthly EPMC Environmental Performance Monitoring Committee. Sighted

7.8.3	8.3 Mill effluent is treated to be in compliance with national regulations. Discharge quality of mill effluent, especially Biochemical Oxygen Demand (BOD), is regularly monitored.		recorded da to DOE thro Palong Coc application mg/l in Palo	e following atment a wastes an onitoring atal Progrent plant charge of was old was old was also was old was also was als	ng; nd perform nd others w  rams.  was made revealed the doperation baserved, and mill monitor rang Penyal DOE licens nent of wh re Mungka I nal dischar	in accordant the open process and flow meaning the efficial Suku Talle no 0047 iich is BOE Division field ge were contact and the contact and	nce and interperation was dure and leter reading uent and subhunan'. 120 was for 0 less than 21 do P12. compliance w	view s in legal was mits land 2500	Complied
		-	Date PH BOD COD Total solids S Solids A Nitrogen Total N	Std 5-9 2500 - - - -	07/9/24 8.00 374 1134 9000 412 111 129	06/8/24 8.40 143 671 3920 232 64 75	24/9/24 8.20 500 2853 7404 408 30 121		
7.8.4	Mill water use per tonne of FFB is monitored and recorded Minor compliance -		mill processing cent to the n						Complied



		monitorina	ic mad	0 00 0 000	thly basis	with the latest	rocordina	
						with the latest bunches FFB)		
			Month	Water/Mt	FFB /mt	Water /FFB		
			Jan	20370	13839	1.47		
			Feb	16337	11343	1.44		
			Мас	17893	11851	1.51		
			Apr	13157	9163	1.44		
			May	14193	9800	1.45		
			June	14411	9432	1.53		
			July	16956	12672	1.34		
			Aug	19533	16479	1.19		
			Sept	22187	18884	1.17		
			Oct	22012	17507	1.26		
			Nov	21435	15560	1.38		
			Dec	19999	14618	1.37		
			Total	218483	161151	1.36		
		to rainy o	days, si		oiler wate	robable factors r rinsing/discha		
Criterio	n 7.9: Efficiency of fossil fuel use and the use of renewable energy is optir	nised						
7.9.1	A plan for efficiency of the use of fossil fuels and to optimise renewable energy is implemented, monitored and documented.					e use of fossil Environmental <i>I</i>		Complied

- Minor compliance -			The Environment Management le are detailed below:
	Target	Objective	Action plan
	Backhoe, tractor	from company-	to ensure the vehicle engine is turn off during idle time to record vehicle activity which consume fuel
	Van / Supervisory vehicle	To reduce fossil fuel (diesel) consumption from companyowned vehicles and fuel using mobile equipment	which consume fuel.  to turn off vehicle engine during idle time.
	Housing/ Office Complex	Reduce electricity usage	monitor usage vs baseline. install capacitor at identified large power consumption motor. Adopted LED bulb type for the lighting system
		ation for the mill and Diesel L/FFB mt for 2	estates is provided in the below 023.



	1	1	1	1	1
Month	Palong	Mungka	L Bahru	UMAC	PCPOM
Jan	1.23	0.87	1.03	2.18	0.36
Feb	1.88	0.85	1.09	2.50	0.31
Мас	1.78	1.26	0.99	3.39	0.33
April	2.32	1.37	1.03	2.74	0.27
May	2.21	1.36	1.22	3.04	0.28
Jun	1.92	1.82	1.41	2.46	0.34
July	1.53	1.22	0.54	2.99	0.22
Aug	1.50	1.13	0.64	2.36	0.26
Sept	1.50	0.98	0.60	1.78	0.22
Oct	1.33	0.84	0.78	2.17	0.28
Nov	1.35	0.82	0.69	2.51	0.32
Dec	1.51	1.26	0.76	2.20	0.29
Total/L	62982.4	36587.5	33631.3	25912.8	46106
B/line	1.40	1.16	1.05	2.41	0.40

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

- i. Infrastructure of estates,
- ii. Community size
- iii. No. of vehicles / age of machine.

...making excellence a habit."

### RSPO P&C Public Summary Report Revision 16 (Oct 2024)

	<b>n 7.10:</b> Plans to reduce pollution and emissions, including greenhouse g	<ul> <li>iv. To reduce reliance on fossil fuel by utilization of methane gas from Biogas Plant to generate electricity.</li> <li>v. Weather interference / crop production volume</li> <li>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.</li> </ul>	velopments are
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 -	Palong Cocoa Palm Oil Mill and Estates had identified emission of greenhouse gas (GHG) from their operations such as emission from their farm tractor and gen set operation.  i. 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.  ii. 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 -	, ·	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	Complied

...making excellence a habit."



activities. Environmental aspect and impact (EIA) in form doc no KULIM-L-2024 which covers estates and mill activities / operation. Pollution Identification Environmental Improvement Management Plan' is used to identify the waste products and sources of pollution, was in place and is reviewed accordingly.

The objectives are to minimize environmental impact (pollution and emission) from all estates and mill operations activities among others;

- i. Monitoring of buffer region near water course
- ii. Inlet/outlet water monitoring for nitrate and phosphate
- iii. Cleaning and monitoring on PCD
- iv. Maintenance and inspection of vehicles
- v. Erosion control program cover crop and Guatemala grass
- vi. Monitoring of SW disposal/transfer
- vii. Triple rinsing empty chemicals

Among others the significant environmental receptors for the estates and mill operations are;

- i. Air Sources from boiler stack (smoke and particulate), vehicle & generator (smoke and gases), anaerobic processes (ETP, EFB dumping)- GHG
- i. Water Cleaning water/run-off/process station waters (hydro-cyclone /sterilizer condensate/clarification waste) & boiler quenching water and blow down
- ii. Land Scheduled waste, domestic waste and industrial/process waste.

Palong Cocoa Palm Oil Mill conducted boiler stack sampling for 1 boiler stack by Mareff Management Sdn Bhd. The mill has installed

		an ESP in Sept 2019 commissioned in Nov 2019. Results were within the limit.    Boiler ref   Date   Dust concentration   EQA std     No 4 JH PMD1273   04/06/2024   135 mg/m3   150 mg/m3     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.  An assessment of identified polluting activities is being conducted and monitored, inclusive of gaseous emissions, particulate / soot emissions and effluent. The Waste Management Action Plan 2024 is used to identify the waste products and sources of pollution – is in place and is being reviewed and implemented accordingly. Among
Critoric	on 7.11: Fire is not used for preparing land and is prevented in the manag	of action has been taken by CU were:  i. Scheduled wastes – disposed to Kualiti Alam Sdn Bhd. Details as shown in 7.3.2 above.  ii. Domestic waste is disposed at respective external and internal landfill.  iii. Full compliance to zero burning practices.
7.11.1	(C) Land for new planting or replanting is not prepared by burning.	There was no land preparation of existence or new planting in Complied
7.11.1	- Critical (Major) compliance -	Northern RegionEstates by burning ever since Johor Plantations Group Berhad practiced zero burning as per the content in:
		i. Under JPG SOP B01 – B09 Replanting felling/clearing & land preparation

		ii. Environmental Policy signed by the Chairman dated 01/07/2023 to include the adoption of Zero Open Burning Policy.  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 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 -	This is established in the ERP procedure. Therein containing the  i. Objective ii. Activity and prevention. iii. Function of Fire and Rescue Team iv. Emergency Evacuation Plan / Drill  The procedure was formalized by Sustainability Department for use in all operating units in Northern Region Estates and Mills. Training related to fire drill /prevention were held respectively all estates and mill.  i. Palong Estate – 18/10/2024 ii. Mungka Estate – 18/01/2024 iii. UMAC Estate – 18/01/2024 iv. Labis Bahru Estate on 07/02/2024 v. Mungka Estate dated 14/06/2024 vi. Palong Cocoa POM on 13/10/2024	Complied
7.11.3	The unit of certification engages with adjacent stakeholders on fire prevention and control measures.  - Minor compliance -	The entire Northern Region estates and mill held a combined Stakeholder Meeting on 30/09/2024 with 78 participants present. Information in slides form in relation to Sustainability Policy, Environmental Policy and ERP procedure - Program Pencegahan	Complied

## RSPO P&C Public Summary Report Revision 16 (Oct 2024)

	n 7.12: Land clearing does not cause deforestation or damage any area re		h Carbon Stock
7.12.1	(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.  A historic Land Use Change Analysis (LUCA) is conducted prior to any new land clearing, in accordance with the RSPO LUCA guidance document.  - Critical (Major) compliance -	The audit findings have confirmed that there is no new planting affecting present HCV and primary forest. There were no land clearing activities made nor had damaged any forest to protect or enhance the HCV.	Complied
7.12.2	<b>(C)</b> HCVs, HCS forests and other conservation areas are identified as follows:	The latest assessment conducted was in a range of 2007 – 2009 for Palong Cocoa Complex Supply Base Estates respectively. The assessment was conducted by A.J.F.M Dekker. The assessment was made in relation to the Rapid Biodiversity Assessment. The report	Complied

...making excellence a habit."



- a) For existing plantations with an HCV assessment conducted by an RSPO-approved assessor and no new land clearing after 15 November 2018, the current HCV assessment of those plantations remains valid.
- b) Any new land clearing (in existing plantations or new plantings) after 15 November 2018 is preceded by an HCV-HCS assessment, using the HCSA Toolkit and the HCV-HCSA Assessment Manual. This will include stakeholder consultation and take into account wider landscape-level considerations.

#### **PROCEDURAL NOTE:**

Requirement is further clarified under the Interpretation of Indicator 7.12.2 and Annex 5 (approved by BOG on 12 June 2019).

- Critical (Major) compliance -

had identified the list of natural habitats that is possible present in the operating units. The reports detail the findings of a rapid appraisal of the biodiversity in the estates and address the RSPO P&C/MSPO relevant to biodiversity conservation and HCV. Therein being provided details relating to the following;

- i. General biodiversity issues
- Watercourses and drainage
- iii. Habitats natural and man-made
- iv. Wildlife
- v. Ponds and reservoirs
- vi. Wetlands /watercourses
- vii. Legal aspects
- viii. Immediate and long-term effect.

In all the estates within the Palong Cocoa Complex Supply Base the HCV present is as per HCV summary shown in the table below. There were no primary forest habitats present at any of the estates. There is also no wildlife neither reported nor observed by the employees. The estates within contains pockets of semi-natural vegetation. Other observation as recorded below;

- i. Natural Habitat Within Strips of degraded forest, riparian, very degraded swamp.
- ii. Natural Habitat at Boundary Degraded Forest, riparian
- iii. Water Bodies As per HCV summary
- iv. Wildlife species within Black shouldered kite, crested serpent eagle, purple heron, kingfishers, red wattled lapwing
- v. Wildlife species at boundary Storks, long tailed macaque

The HCV identified in the e	states summarize	ed as fo	lows;
Labis Bahru Estate	Location	На	Туре
Swampy	P03/03	3.12	HCV 4
Pocket Forest	P07/03	5.88	HCV 2
Swampy	P08/02	0.51	HCV 4
Pond	P08/03	5.02	HCV 4
	Sub-Total	14.53	
UMAC Estate			
Pond	P03/05	0.16	HCV 4
Steep Area	P07/03	0.68	HCV 4
	Sub - Total	0.84	
Palong Estate			
Pond	P12/2, P12/3	1.19	HCV 4
Drains	P12/P08/P07	2.72	HCV 4
Boundary Drain	P13/7, P13/8	0.94	HCV 4
Pocket Forest	P07/01, P08/2	0.83	HCV 2
	Sub - Total	5.68	



			T	1	1	
		Palong Estate /Kemedak				
		River Buffer Zone	P10K/1	1.23	HCV 4	
		Pond	P10K/11K	11.01	HCV 4	
		Buffer Zone	P12K/1 - 3	1.47	HCV 4	
		Sanctuary	P12K/96B	1.05	HCV 2	
		Swamp	P12K/06B	0.30	HCV 4	
			Sub - Total	15.06		
		Mungka Estate				
		Reserve/river Buffer	P09/04	7.29	HCV 4	
		Reservoir / Buffer Zone	P10/01	53.64	HCV 4	
		INFAQ Warisan	P10/01	3.17	HCV 4	
		Shrubland	P10/03	1.89	HCV 2	
		Pond	P11/07	0.22	HCV 4	
		River Buffer Zone	P12/04	1.89	HCV 4	
			Sub - Total	68.10		
					<u>.                                    </u>	
7.12.3	Indicator is not applicable in Malaysia context	Not Applicable				Not Applicable



- 7.12.4 **(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).
  - Critical (Major) compliance -

The audit findings have confirmed that there is no new HCVs, HCS forests peatland and other conservation areas been identified after 15 Nov 2018 in CU estates.

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;

- i. Overview of HCV assessment.
- Description of assessment areas.
- ii. Finding and discussion
  - landscape context
  - HCV criteria and application to agriculture
  - HCV monitoring and management

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 Sustainability Department SD. 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.

The entire Region estates and mill held a combined meeting on a combined Stakeholder Meeting on 30/09/2024 with 78 participants present. Information in slides form in relation to RTE / HCV / Biodiversity management in the organization were presented. Therein containing the integrated management plan comprises among others covering the following scope.

- i. Biological Diversity
- ii. Management of High Conservation Value Area.

Complied

...making excellence a habit."

	<ul> <li>There are 6 categories of HCV in the estates and mill</li> <li>The HCV management using the concept of Access, plan, action and monitoring</li> <li>Rare Threatened and Endangered Species</li> <li>Definition and protection under law</li> <li>Disciplinary action / Punishment / Legality Consequences</li> <li>Continuous monitoring of RTE / HCV</li> <li>Flow chart of RTE Conflict management</li> <li>Emergency Evacuation Plan / Drill</li> </ul>	
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.  - Minor compliance -	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 2024.	Complied
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.  - Minor compliance -	The audit findings have confirmed that there is no new HCVs, HCS forests peatland and other conservation areas been identified after 15 Nov 2018 in the audited CU estates.  There is no RTE or high biodiversity value at Palong Cocoa CU complex. The management and monitoring plan for HCV/Biodiversity areas was established and reviewed annually. There were displays of signage made at site i.e.  i. No fishing, no manuring, ii. no spraying, no slashing, no swimming  There were programs held by the estates to all employees in	Complied
	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.  - Minor compliance -  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.	- The HCV management using the concept of Access, plan, action and monitoring iii. Rare Threatened and Endangered Species - Definition and protection under law - Disciplinary action / Punishment / Legality Consequences - Continuous monitoring of RTE / HCV - Flow chart of RTE Conflict management iv. Emergency Evacuation Plan / Drill  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 Minor compliance -  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 a laccordance 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 Minor compliance -  - The HCV management using the concepts of Access, plan, action and monitoring Pine in potential management of Piccontinuous monitoring of RTE / HCV - Flow chart of RTE Conflict management 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 2024.  All rare, threatened or endangered (RTE) species are protected, whether to regularly educate the workforce about the status of RTE species is in place. Appropriate measures that are expected to maintain and/or enhance them



7.12.7	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.  - Minor compliance -	Interview with the employees concluded that training and briefing were made during the ad-hoc session and morning muster. This is also emphasized during the training held by the SID programs. Employees are aware of the following reminders;  i. An offence to capture, harm, kills any wildlife.  ii. Disciplinary measures shall be taken if found violating company rules.  iii. Riparian buffer zone to be free from any chemical's application/pollution  iv. Relevant signs NO HUNTING NO FELLING ALLOWED  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 Northern 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 Sustainability Department SD. 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	Complied
7.12.8	(C) Where there has been land clearing without prior HCV assessment since November 2005, or without prior HCV-HCSA assessment since 15 November 2018, the Remediation and Compensation Procedure (RaCP) applies.  - Critical (Major) compliance -		Complied



#### **Appendix B: GHG Reporting Executive Summary**

The GHG emissions that were produced in [2023] for [Palong Cocoa Mill] and supply base was calculated using the PalmGHG Calculator version 4.0. The assessment team had verified the data input in the PalmGHG Calculator against operations records. PalmGHG Calculation Options selected 'Full version' and 'Exclude LUC Emission' calculation option is not applied. The records verified includes:

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

The summary of the Net GHG emitted in [2023] for [Palong Cocoa Mill] and supply base are as following:

Emission per product	tCO <sub>2</sub> e/tProduct 0.85		
СРО			
PK	0.85		

Extraction	%
OER	20.10
KER	5.30

Production	t/yr
FFB Process	161,151.23
CPO Produced	32,383.58
PK Produced	8,542.16

Land Use	На
Oil palm planted on mineral soi	11,978.28
Oil palm planted on peat	0.00
Total oil palm planted area	11,978.28
Conservation area (forested)	37.82
Conservation area (non-forested)	93.19
Total	12,109.29

#### **Summary of Field Emission and Sink**

	Own Crop*			Group			3 <sup>rd</sup> Party			Total
Description	tCO₂e	tCO₂e / ha	tCO₂e / t FFB	tCO₂e	tCO₂e / ha	tCO <sub>2</sub> e / t FFB	tCO₂e	tCO₂e / ha	tCO₂e / t FFB	
Emission source	Emission source									
Land Conversion	95253. 07	9.88	0.60	1093.1 9	0.47	0.54	0.00	0.00	0.00	96346.26
CO <sub>2</sub> Emission from fertilizer	8062.3 6	0.84	0.05	105.68	0.05	0.05	0.00	0.00	0.00	8168.04
NO <sub>2</sub> Emission from peat	0.00	0.00	0.00	0.00	0.00	0.00	0.00	0.00	0.00	0.00
NO <sub>2</sub> Emission from fertilizer	7788.7 1	0.81	0.05	96.91	0.04	0.05	0.00	0.00	0.00	7885.62
Fuel Consumption	790.99	0.08	0.00	59.01	0.03	0.03	0.00	0.00	0.00	850.01
Peat Oxidation	0.00	0.00	0.00	0.00	0.00	0.00	0.00	0.00	0.00	0.00
Sinks										



Crop Sequestration	- 90287. 28	-9.36	-0.57	- 1036.2 0	-0.44	-0.51	0.00	0.00	0.00	-91323.48
Sequestration in Conservation area	- 232.92	-0.02	0.00	-5.40	0.00	0.00	0.00	0.00	0.00	-238.32
Total	2137 4.84	2.32	0.13	313.1 9	0.13	0.15	0.00	0.00	0.00	21688.13

<sup>\*</sup>Note: Includes both estates and smallholders

#### **Summary of Mill Emission and Credit**

	tCO₂e	tCO₂e/tFFB
Emission sources		
POME	16,286.82	0.10
Fuel Consumption	143.85	0.00
Grid Electricity Utilization	231.49	0.00
Credits		
Export of excess electricity to housing & grid	0.00	0.00
Sales of PKS	-3,431.93	-0.02
Sales of EFB	0.00	0.00
Total	13,230.24	0.08

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

Emissions	tCO₂e
PK from own mill	0.00
PK from other source	0.00
Fuel Consumptions	0.00
Total Crusher emissions	0.00

<sup>\*</sup>This mill has no kernel crusher operation.

Palm Oil Mill Effluent (POME) Treatment:				
Divert to Compost (%)	70.00			
Divert to anaerobic diversion (%)	30.00			

POME Diverted to Anaerobic Digestion:				
Divert to anaerobic pond (%)	30.00			
Divert to methane captured (flaring) (%)	70.00			
Divert to methane captured (energy generation) (%)	0.00			



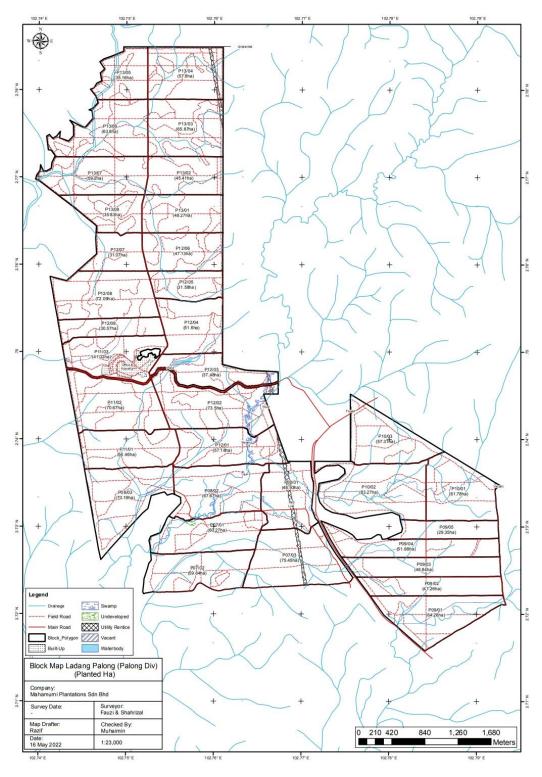
**Appendix C: Location Map of Certification Unit and Supply bases** 





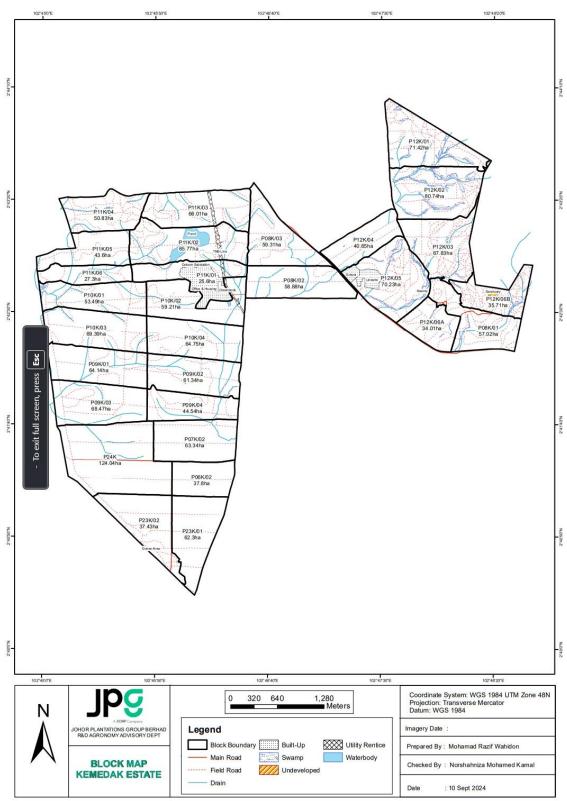
#### **Appendix D: Estate Field Map**

Palong Estate

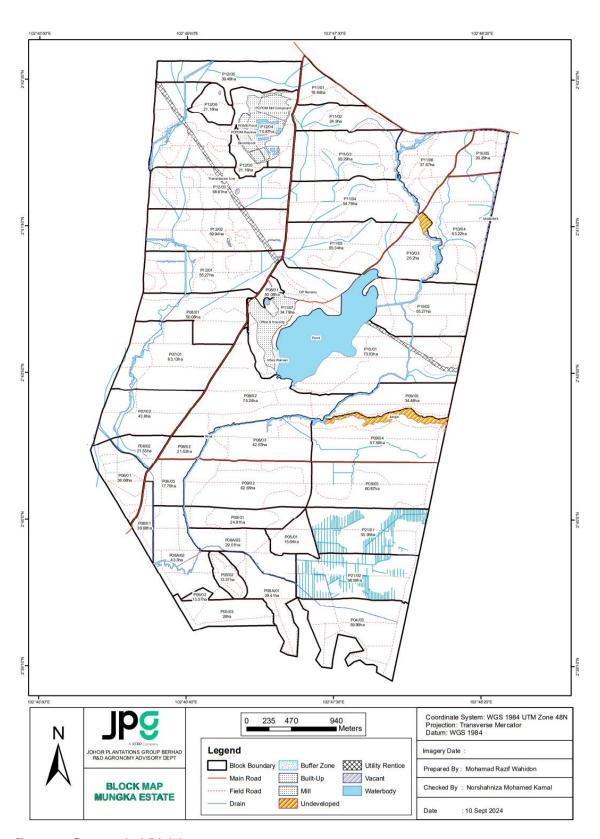




#### Palong Estate - Kemedak Division

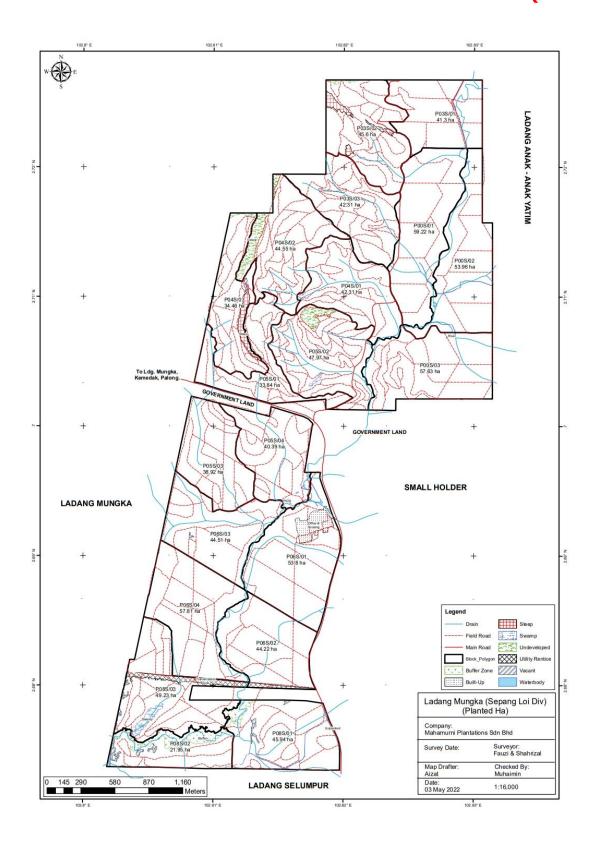




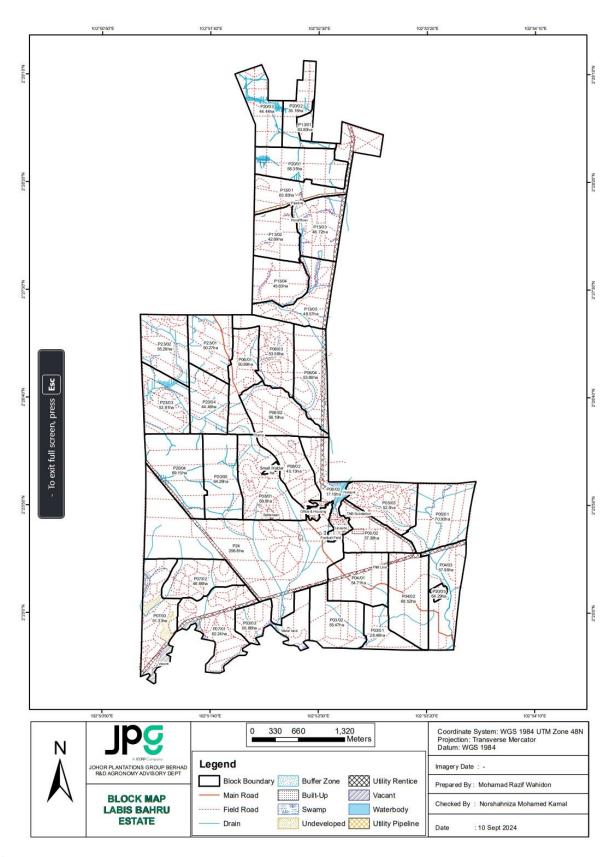


Mungka Estate – Sepang Loi Division

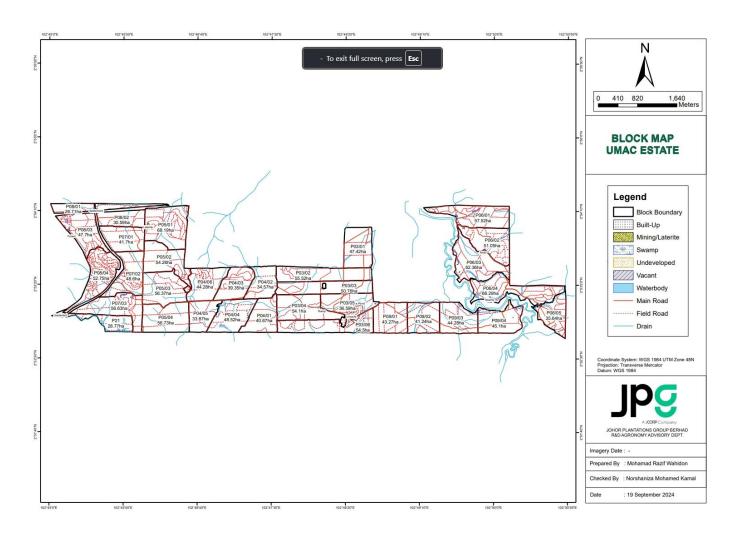














#### Appendix E: List of Smallholder Registered and/or sampled

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

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



#### **Appendix F: List of Abbreviations**

a.i Active Ingredient

BOD Biochemical Oxygen Demand

CB Certification Bodies

CHRA Chemical Health Risk Assessment

COD Chemical Oxygen Demand

CPO Crude Palm Oil

CSPO Certified Sustainable Palm Oil
CSPKO Certified Sustainable Palm Kernel Oil

EFB Empty Fruit Bunch

EHS Environmental, Health and Safety
EIA Environmental Impact Assessment
EMS Environmental Management System

FFB Fresh Fruit Bunch

FPIC Free, Prior, Informed and Consent

GAP Good Agricultural Practice

GHG Greenhouse Gas

GMP Good Manufacturing Practice
GPS Global Positioning System
HCV High Conservation Value
IPM Integrated Pest Management

IP Identity Preserved

IS - CSPO Independent Smallholder Certified Sustainable Palm Oil

IS – CSPKO Independent Smallholder Certified Sustainable Palm Kernel Oil IS – CSPKE Independent Smallholder Certified Sustainable Palm Kernel Expeller

ISCC International Sustainable Carbon Certification

ISS Independent Smallholder Standard

LD50 Lethal Dose for 50 sample

MB Mass Balance

MSDS Material Safety Data Sheet

MT Metric Tonnes
OER Oil Extraction Rate

OSH Occupational Safety and Health

PK Palm Kernel
PKO Palm Kernel Oil
POM Palm Oil Mill

POME Palm Oil Mill Effluent

PPE Personal Protective Equipment
RSPO Roundtable on Sustainable Palm Oil

P&C Principles & Criteria

RTE Rare, Threatened or Endangered species SCCS Supply Chain Certification Standard

SEIA Social & Environmental Impact Assessment

SIA Social Impact Assessment SOP Standard Operating Procedure