

RSPO PRINCIPLE AND CRITERIA PUBLIC SUMMARY REPORT

□ Initial Assessment
⋈ Annual Surveillance Assessment (2_4)
☐ Recertification Assessment (Choose an item.)
☐ Extension of Scope

Client Company Name / Parent Company: J.C Chang Holdings Sdn. Bhd

Client Company / Parent Company Address:
Unit 30-01, Level 30, Menara Landmark, No. 12, Jalan Ngee Heng, 80000 Johor
Bahru, Johor, Malaysia

Certification Unit:

Carotino Palm Oil Mill (Carotino Production Unit)

Location of Certification Unit: PT 116, Lot No. 3840, Mukim Ulu Lepar, 26500 Kuantan, Pahang, Malaysia

Date of Final Report: 30/05/2024



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Section 1: Scope of the Assessment

1. Company Details					
Parent Company	J.C Chang Holding Sdn Bhd				
RSPO Membership Number	2-0029-06-000-00	Membership	Approval Date	10/05/2006	
Address	Unit 30-01, Level 30, Menara L Bahru, Johor, Malaysia	andmark, No.	12, Jalan Ngee Heng	80000 Johor	
Palm Oil Mill / Group Manager / Estate (Certification Unit)	Carotino Palm Oil Mill (Carotino	Production Ur	nit)		
Location / Address	PT 116, Lot No. 3840, Mukim U	Jlu Lepar, 2650	00 Kuantan, Pahang,	Malaysia	
Website	www.carotino.com				
Management Representative	Mr Wong Chun Wei E-mail wongcw@jcc.com.my				
Telephone	+607 2231633 (Head Office) +607-223 1633 (Mill)	Facsimile	+607 224 1546 (He +607-223 1546 (Mi	,	

2. Certification Informat	2. Certification Information				
Certificate Number	RSPO 649410	Certificat	te Start Date	27/04/2020	
Date of First Certification	27/04/2010 Certificate Expiry Date 26/04/2025				
Scope of Certification	Production of Sustainable Cru	ıde Palm Oi	l (CPO) and Palm K	ernel (PK)	
Visit Objectives	 Determination of the conformity of the client's management system, or parts of it, with audit criteria. Evaluation of the ability of the management system to ensure the client organization meets applicable statutory, regulatory and contractual requirements. 				
Assessment Cycle	 □ Pre Assessment (Choose a □ Initial Assessment ☑ Annual Surveillance Assess □ Recertification Assessment □ Scope Extension 	sment (ASA	- ,		
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; ☐ Mas	ss Balance	Mill Capacity	45 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 Certifications						
Certificate Number	Standard(s)	Certificate Issued by	Expiry Date			
50450685 MSPO4	MS 2530-4:2013 – General Principles for Palm Oil Mills	DQS Certification (M) Sdn Bhd	08/10/2024			
50450684 MSPO3	MS 2530-3:2013 General Principles for Oil Palm Plantations and Organized Smallholders		09/10/2025			
50450685 MSPO SCCS	MSPO Supply Chain Certification Standard 2018		09/10/2025			
EU-ISCC-Cert- DE119- 60221376	ISCC EU (International Sustainability and Carbon Certification)	ASG cert GmbH	04/10/2024			

4. Location(s) of Mill & Supply Bases					
Name	Location	GPS Coordinates			
(Mill / Supply Base / Group Manager / Smallholders)		Latitude	Longitude		
Carotino Palm Oil Mill	PT 116, Lot No. 3840, Mukim Ulu Lepar 26500 Kuantan, Pahang	3° 48′ 58.10″ N	102° 49′ 3.80″ E		
Asia Oil Palm Estate 1	PT 116, Lot No. 3840, Mukim Ulu Lepar 26500 Kuantan, Pahang	3º 48′ 59.86″ N	102º 49' 5.57" E		
Hwa Li 1 Estate	LOT 51, 52, 53, 54, 55, 56, 415, 406, 513, 523, 524 ,317, 318, Mukim Keratong, Rompin, Pahang	2° 44′ 40.74″ N	103° 1′ 59.41″ E		
Carotino Estate	Lot 2389, Mukim Bera, Bera, Pahang	2° 50' 43.25" N	102° 43' 29.21" E		
Maran Estate	Lot 929, 6460, 245, 351, 957, 930, Mukim Lepar, Kuantan, Pahang	3° 44' 31.28" N	102° 50' 42.93" E		
Pahang Oil Palm Estate 1	Lot No 23604, 23605, 23600, 23601, 23602, 23603, 23606, 23607, & 23608, Mukim Ulu Lepar-Kuantan Pahang	3° 48′ 35.70″ N	102° 49′ 15.59″ 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
Asia Oil Palm Estate 1	1,948.71	0.00	218.71	2,167.42	89.91
Hwa Li 1 Estate	1,935.74	0.00	221.66	2157.40	89.73
Carotino Estate	1,522.81	0.00	136.40	1,659.21	91.78
Maran Estate	1,786.27	0.00	334.13	2,120.40	84.24



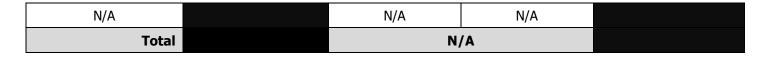
Pahang Oil Palm Estate 1	1,835.21	0.00	317.89	2,153.10	85.24	
Total	9,028.74	0.00	1,228.79	10,257.53	88.02	
Note: Changes in Hwa Li 1 Estate & Carotino Estate planted & other area due to resurvey						

6. Plantings & Cycle						
Estate / Smallholders		Age (Ye	ars) - ha		Mature	Immature
	0 - 3	4 - 14	15 - 25	>25		
Asia Oil Palm Estate 1	58.05	137.50	1,688.09	65.07	1,890.66	58.05
Hwa Li 1 Estate	6.00	435.89	1,336.87	156.98	1,929.74	6.00
Carotino Estate	397.06	767.26	0.00	358.49	1,125.75	397.06
Maran Estate	0.00	1,092.45	693.82	0.00	1,786.27	0.00
Pahang Oil Palm Estate 1	128.56	112.84	1,478.58	115.23	1,706.65	128.56
Total (ha)	589.67	2,545.94	5,197.36	695.77	8,439.07	589.67
Note: Only Mature area is considered	ed as production	area				

7. Summary of Certified Tonnage of FFB (Own Certified Scope)									
Estate / Smallholders		Tonnage (MT) / year							
	Estimated last year		Actual (Jan 23 - Dec 23)						
	(Apr 23 – Mar 24)	Previous license period (Jan 23 - Mar 23)	Current license period (Apr 23 - Dec 23)						
Asia Oil Palm Estate 1	46,825.20	6,837.70	23,398.60	49,507.00					
Hwa Li 1 Estate	39,164.20	2,302.92	6,451.19	38,964.00					
Carotino Estate	14,168.40	2,630.38	11,276.28	13,764.00					
Maran Estate	33,809.20	4,263.74	22,832.88	37,099.00					
Pahang Oil Palm Estate 1	41,070.62	6,437.52	21,488.30	42,267.00					
Total	Total 175,037.62 107,919.51 181,601.00								
Note: Low yield due to flood	ing in Jan-Feb & Nov-Dec	2023		Note: Low yield due to flooding in Jan-Feb & Nov-Dec 2023					

8. Summary of Certified Tonnage of FFB (from other certified unit(s))					
Estate /	Tonnage (MT) / year				
Smallholders	Estimated last year (Apr 23 – Mar 24)		cual · Dec 23)	Forecast (Apr 24 - Mar 25)	
		Previous license period (Jan 23 - Mar 23)	Current license period (Apr 23 - Dec 23)		





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

9A. N	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	Jan 2023	8,685.28	0.00	8,685.28				
2	Feb 2023	6,901.85	0.00	6,901.85				
3	March 2023	6,885.13	0.00	6,885.13				
4	April 2023	5,503.99	0.00	5,503.99				
5	May 2023	7,322.00	0.00	7,322.00				
6	June 2023	7,263.09	0.00	7,263.09				
7	July 2023	7,905.57	0.00	7,905.57				
8	August 2023	9,813.20	0.00	9,813.20				
9	September 2023	10,771.85	0.00	10,771.85				
10	October 2023	13,095.29	0.00	13,095.29				
11	November 2023	12,392.67	0.00	12,392.67				
12	December 2023	11,379.59	0.00	11,379.59				
	TOTAL	107,919.51	0.00	107,919.51				

10. Summary of Certified Tonnage (MT) (not applicable for ISS)					
Estimated last year (Apr 23 – Mar 24)	Act (Jan 23 -	Forecast (Apr 24 - Mar 25)			
	Previous license period (Jan 23 - Mar 23)	Current license period (Apr 23 - Dec 23)			
FFB	FFB		FFB		



175,037.62 mt	22,472.26 mt	85,447.25 mt	181,601.00 mt			
	TOTAL 107,919	.51 mt				
CPO (OER: 20.13 %)	CPO (OE	CPO (OER: 20.56 %)				
35,236.15 mt	4,017.96 mt	17,148.15 mt	37,339.05 mt			
	TOTAL 21,166.3	11 mt				
PK (KER: 5.18 %)	PK (KEF	R: 4.28 %)	PK (KER: 5.28 %)			
9,059.90 mt	1,049.54 mt	3,566.50 mt	9,586.38 mt			
	TOTAL 4,616.04					
Note: Low FFB yield due to flooding in Jan-Feb & Nov-Dec 2023						

10A.	10A. Monthly Records of Certified CPO & PK since the last audit						
No.	Month - Year	Certified CPO (MT)	Certified PK (MT)				
1	Jan 2023	1,583.81	416.11				
2	Feb 2023	1,201.08	310.84				
3	March 2023	1,233.07	322.59				
4	April 2023	1,123.97	245.47				
5	May 2023	1,496.19	310.29				
6	June 2023	1,445.98	310.52				
7	July 2023	1,573.44	316.44				
8	August 2023	1,990.63	386.48				
9	September 2023	2,233.18	457.10				
10	October 2023	2,731.38	559.65				
11	November 2023	2,421.95	510.29				
12	December 2023	2,131.43	470.26				
	TOTAL	21,166.11	4,616.04				

11. Summary of Actual Volume sold								
Current License period (Apr 23 - Dec 23)								
	RSPO Certified	Other Scher	nes Certified	Conventional	Total			
	RSPO Certified	ISCC	Others	Conventional				
CPO (MT)	14,979.76	452.58	0.00	0.00	15,432.34			
PK (MT)	3,526.01	0.00	0.00	0.00	3,526.01			
Credits	0.00	0.00	0.00	0.00	0.00			
Previous License period (Jan 23 - Mar 23)								



CPO (MT)	4,935.08	194.83	0.00	0.00	5,129.91
PK (MT)	1,079.18	0.00	0.00	0.00	1,079.18
Credits	0.00	0.00	0.00	0.00	0.00

11A. R	11A. Records of Certified CPO & PK Sold under PalmTrace since the last audit (if any)							
No.	Buyers Name	PalmTrace Trading License Number	Certified CPO Sold (MT)	Certified PK Sold (MT)				
1	Carotino Sdn Bhd	RSPO_PO1000000034	19,879.51	0.00				
2	Carotino Sdn Bhd	RSPO_PO1000005894	35.33	0.00				
3	Sang Kee Edibles Oil Sdn Bhd	RSPO_PO1000001551	0.00	1,354.23				
4	PGEO Oil Mill Sdn Bhd	RSPO_PO1000002945	0.00	1,232.47				
5	Wilmar Kuantan Edible Oil Sdn Bhd	RSPO_PO100012501	0.00	2,018.49				
		TOTAL	19,914.84	4,605.19				

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 Sol (MT)						
1	Carotino Sdn Bhd	ISCC	647.41	0.00		
	TOTAL 647.41 0.00					

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

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

12. Independent Smallholders Certified Tonnage (MT) / Volume					
	Estimated last year	Actual	Forecast		
	(Not Applicable)	(Not Applicable)	(Not Applicable)		



Phase	Eligibility	MS A	MS B	Eligibility	MS A	MS B	Eligibility	MS A	MS B
	40%	70%	100%	40%	70%	100%	40%	70%	100%
FFB			N/A			N/A			N/A
IS-CSPO	N/A	N/A		N/A	N/A		N/A	N/A	
IS-CSPKO	N/A	N/A		N/A	N/A		N/A	N/A	
IS-CSPKE	N/A	N/A		N/A	N/A		N/A	N/A	
CSPK	N/A	N/A		N/A	N/A		N/A	N/A	

12A.	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 Li	cense period (N	Not Applicable)					
Credits				N/A	N/A	N/A	N/A
Physical	N/A	N/A	N/A				
Previous License period (Not Applicable)							
Credits				N/A	N/A	N/A	N/A
Physical	N/A	N/A	N/A				

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



Section 2: Assessment Process

Certification Body:

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

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

2.1 Assessment Methodology, Programme, Site Visits

The on-site assessment was conducted on 22/01/2024 - 26/01/2024. 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 was conducted off-site on 25/04/2024.

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

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

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

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

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



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

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 (Certification)	Year 2 (ASA2-1)	Year 3 (ASA2-2)	Year 4 (ASA2-3)	Year 5 (ASA2-4)	
Carotino Palm Oil Mill	✓	√	√	√	√	
Asia Oil Palm Estate 1	✓	-	-	-	√	
Hwa Li 1 Estate	-	-	-	√	-	
Carotino Estate	-	√	√	√	√	
Maran Estate	✓	-	-	√	√	
Pahang Oil Palm Estate 1	-	✓	✓	✓	✓	

Tentative Date of Next Visit: January 22, 2025 - January 26, 2025

Total Number of Mandays: 15 Mandays

2.2 BSI Assessment Team

Name	Role	Competency
Hafriazhar Mohd. Team Leader Mokhtar (HMM)		Education: Bachelor of Engineering (Hons.) Chemical Engineering, UTM Work Experience: Environmental Officer (2002-2003), Mill Engineer (2003-2008), Project Control Engineer (2008-2011), Auditor/Client Manager (2011-present)
		Training attended: Social Auditing & SMETA Training (2021), ISO 45001 LA Training (2018), RSPO LA Training (2017), RSPO SCCS LA Training (2016), RSPO P&C LA Training (2015), ISO 9001 LA Training (2013), ISO 50001 LA Training (2012), ISO 14001 LA Training (2011)
		Language proficiency: Fluent in in both verbal/written Bahasa Malaysia and English Language
		Aspect covered in this audit:
		\square Good Agriculture Practice \square Health and Safety \boxtimes Supply chain requirements
		☐ Social ☑ Environmental ☑ Market Communication and claim requirements
		$\hfill \square$ ISH context (ICS, internal audit, policy, business planning and trading system)
Fahmi Othman (FBO)	Team Member	Education: Bachelor's Degree in Industrial Biology from Universiti Teknologi Malaysia, graduated in 2010.



		Work Experience: He gained his working exposure in the plantation sector, serving as an Assistant Manager with FGV Plantation (M) Sdn Bhd managing the day-to-day plantation operations before joining FGV Holdings Berhad as Sustainability Officer for another significant numbers of years. In his career at FGV, Fahmi had accumulated more than 7 years of sustainability implementation experience including workers' welfare, workers' occupational, health & safety, environment conservation and protection at buffer areas and continuous improvement management plans Training attended: He has completed CQI – IRCA approved ISO 9001, and
		ISO 45001 Lead Auditor Course, MSPO 2530:2013 Lead Auditor Course, Endorsed RSPO Lead Auditor and RSPO SCC Auditor course as well as SA 8000.
		Aspect covered in this audit: Best practices, Legal Requirements, environmental and HCV, Environmental Aspect impact, Environmental Management plan, and greenhouse gas.
		Language proficiency: Fluent in in both verbal/written Bahasa Malaysia and English.
		Aspect covered in this audit:
		\square Good Agriculture Practice \square Health and Safety \square Supply chain requirements
		oximes Social $oximes$ Environmental $oximes$ Market Communication and claim requirements
		$\hfill \square$ ISH context (ICS, internal audit, policy, business planning and trading system)
Yusof Khairan Nizar (YKN)	Team Member	Education: Holds a Diploma in Public Administration-ITM (1991), Certificate of Safety and Health Officer-MII (2003), Bachelor of Corporate Administration
		(Hons), MARA University of Technology and a Master of Science in Occupational Safety and Health Management-Northern University of Malaysia.
		(Hons), MARA University of Technology and a Master of Science in Occupational Safety and Health Management-Northern University of Malaysia. Work Experience: Has more than 30 years of working experience in varies industries including as safety officer in manufacturing company; consultant and trainer for management systems including ISO 9001:2015, ISO 14001:2015, ISO 45001:2018, OHSAS 18001:2007, MS1722:2011, Environmental Legislation; contract auditor with varies accredited certification bodies for scheme including Malaysia Sustainable Palm Oil (MSPO), RSPO Principles & Criteria; MPOCC Registered Peer Reviewer and was a Certificate of Safety and Health Officer-Malaysian Insurance Institute. Training attended: He has completed ISO 9001:2000 IRCA/IATC A Lead
		(Hons), MARA University of Technology and a Master of Science in Occupational Safety and Health Management-Northern University of Malaysia. Work Experience: Has more than 30 years of working experience in varies industries including as safety officer in manufacturing company; consultant and trainer for management systems including ISO 9001:2015, ISO 14001:2015, ISO 45001:2018, OHSAS 18001:2007, MS1722:2011, Environmental Legislation; contract auditor with varies accredited certification bodies for scheme including Malaysia Sustainable Palm Oil (MSPO), RSPO Principles & Criteria; MPOCC Registered Peer Reviewer and was a Certificate of Safety and Health Officer-Malaysian Insurance Institute.
		(Hons), MARA University of Technology and a Master of Science in Occupational Safety and Health Management-Northern University of Malaysia. Work Experience: Has more than 30 years of working experience in varies industries including as safety officer in manufacturing company; consultant and trainer for management systems including ISO 9001:2015, ISO 14001:2015, ISO 45001:2018, OHSAS 18001:2007, MS1722:2011, Environmental Legislation; contract auditor with varies accredited certification bodies for scheme including Malaysia Sustainable Palm Oil (MSPO), RSPO Principles & Criteria; MPOCC Registered Peer Reviewer and was a Certificate of Safety and Health Officer-Malaysian Insurance Institute. Training attended: He has completed ISO 9001:2000 IRCA/IATC A Lead Auditor Training; ISO 14001:2004 IEMA Approved EMS Advanced Lead Auditor Training Course; OH&SMS IRCA Certified Lead Auditor Training Course; MS 1722 Lead Auditor Training; MSPO Auditing; Endorsed RSPO P&C 2018 Lead Auditor Course; SMETA Requirements Training; HCV & HCS Introductory Training, RSPO Independent Smallholder (IHS) Auditor Training and Endorsed RSPO Refresher Trainings (P&C). Also attended the Quality & Environmental MS Auditing Skills Based on Risk Management, Conformity Assessment – For Bodied Providing Audit and Certification (ISO/IEC 17021:2015) collaboration with Institute of Quality Malaysia, ISO/IEC 17021. MSPO Peer Reviewer Training (MPOCC).
		(Hons), MARA University of Technology and a Master of Science in Occupational Safety and Health Management-Northern University of Malaysia. Work Experience: Has more than 30 years of working experience in varies industries including as safety officer in manufacturing company; consultant and trainer for management systems including ISO 9001:2015, ISO 14001:2015, ISO 45001:2018, OHSAS 18001:2007, MS1722:2011, Environmental Legislation; contract auditor with varies accredited certification bodies for scheme including Malaysia Sustainable Palm Oil (MSPO), RSPO Principles & Criteria; MPOCC Registered Peer Reviewer and was a Certificate of Safety and Health Officer-Malaysian Insurance Institute. Training attended: He has completed ISO 9001:2000 IRCA/IATC A Lead Auditor Training; ISO 14001:2004 IEMA Approved EMS Advanced Lead Auditor Training Course; OH&SMS IRCA Certified Lead Auditor Training Course; MS 1722 Lead Auditor Training; MSPO Auditing; Endorsed RSPO P&C 2018 Lead Auditor Course; SMETA Requirements Training; HCV & HCS Introductory Training, RSPO Independent Smallholder (IHS) Auditor Training and Endorsed RSPO Refresher Trainings (P&C). Also attended the Quality & Environmental MS Auditing Skills Based on Risk Management, Conformity Assessment — For Bodied Providing Audit and Certification (ISO/IEC 17021:2015) collaboration with Institute of Quality



☐ Social ☐ Environmental ☐ Market Communication and claim requirements
$\hfill \square$ 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	нмм	FBO	YKN
Sunday, 21/01/2024	PM	Audit team travel to Sri Jaya/Kuantan	✓	√	√
Monday, 22/01/2024	9:00 AM - 9:30 AM	Opening meeting @ Pahang Oil Palm Estate Opening presentation by audit team leader	✓	✓	✓
Day 1 Pahang Oil		Confirmation of assessment scope and finalize audit plan			
Palm Estate	9:30 AM - 12:30 PM	Pahang Oil Palm Estate Field visit: Boundary inspection, field operations, staff & workers interview, buffer zone, HCV area, IPM implementation, OSH & ERP, workshop, storage area (agrochemical, fertilizer, lubricant etc.), agrochemical mixing area, Schedule waste management, worker housing, clinic, Landfill etc.	√	✓	✓
	12:30 PM - 1:30 PM	Lunch break	✓	✓	✓
	1:30 PM - 4:30 PM	Document Assessment P1 – P7: General Documentation e.g. Legal, Manual and Procedure, production & monitoring records, IPM, HCV records, SEIA documents & records, OSH records, assessment on pay documents, records of communication with stakeholder/workers representatives, new planting, CIP and implementation & etc.)	√	√	~
	4:30 PM - 5:00 PM	Auditors discussionDay 1 Interim Closing Briefing	✓	✓	✓



Date	Time	Subjects	нмм	FBO	YKN
Tuesday, 23/01/2024 Day 2 Carotino POM	9:00 AM - 12:30 PM	Carotino POM Mill visit: FFB receiving, warehouse, workshop, wastes management & Landfill, Effluent Ponds, OSH & ERP, Environment issues, POME application, water treatment. Laboratory, weighbridge and palm product storage area, staff, workers and contractor interview, housing and facility inspection, clinic, lab, weighbridge, and palm product storage area etc.	√	√	✓
	12:30 PM - 1:30 PM	Lunch break	✓	✓	✓
	1:30 PM - 4:30 PM	Document Review P1 – P7: SOPs, review on management plans, SEIA documents, GHG records, wage records, employee data, training records, legal permits, mill inspection and internal monitoring records, CIP & implementation	✓	~	✓
		RSPO SCC general requirements, supply chain for CPO mill, internal audit, management review, sales and purchasing documents, IP accounting and other relevant documents and records.	✓	-	-
	4:30 PM - 5:00 PM	Auditors' discussionDay 3 Interim Closing Briefing	✓	✓	✓
Wednesday, 24/01/2024 Day 3 Asia Oil Palm Estate 1	9:00 AM - 12:30 PM	Asia Oil Palm Estate 1 Field visit: Boundary inspection, field operations, staff & workers interview, buffer zone, HCV area, IPM implementation, OSH & ERP, workshop, storage area (agrochemical, fertilizer, lubricant etc.), agrochemical mixing area, Schedule waste management, worker housing, clinic, Landfill etc.	√	√	√
	10:30 AM - 12:30 PM	Meeting with stakeholders (Government, village representatives, smallholders, employee union representatives, vendor etc.)	-	✓	-
	12:30 PM - 1:30 PM	Lunch break	√	✓	√
	1:30 PM – 4:30 PM	Document Assessment P1 – P7: SOPs, assessment on management plans, SEIA documents, GHG records, wage records, employee data, training records, legal permits, mill inspection and internal monitoring records, CIP & implementation	√	✓	✓



Date	Time	Subjects	нмм	FBO	YKN
	4:30 PM - 5:00 PM	Auditors' discussionDay 2 Interim Closing Briefing	✓	✓	✓
Thursday, 25/01/2024 Day 4 Maran Estate	9:00 AM - 12:30 PM	Maran Estate Field visit: Boundary inspection, field operations, staff & workers interview, buffer zone, HCV area, IPM implementation, OSH & ERP, workshop, storage area (agrochemical, fertilizer, lubricant etc.), agrochemical mixing area, Schedule waste management, worker housing, clinic, Landfill etc.	✓	√	✓
	10:30 AM - 12:30 PM	Meeting with stakeholders (Government, village representatives, smallholders, employee union representatives, vendor etc.)	-	✓	-
	12:30 PM - 1:30 PM	Lunch break	✓	√	✓
	1:30 PM - 4:30 PM	Document Assessment P1 – P7: SOPs, assessment on management plans, SEIA documents, GHG records, wage records, employee data, training records, legal permits, mill inspection and internal monitoring records, CIP & implementation	✓	✓	✓
	4:30 PM - 5:00 PM	Auditors' discussionDay 4 Interim Closing Briefing	√	✓	✓
	5:00 PM	Travel to Segamat	✓	✓	✓
Friday, 26/01/2024 Day 5 Carotino Estate	9:00 AM - 12:30 PM	Carotino Estate Field visit: Boundary inspection, field operations, staff & workers interview, buffer zone, HCV area, IPM implementation, OSH & ERP, workshop, storage area (agrochemical, fertilizer, lubricant etc.), agrochemical mixing area, Schedule waste management, worker housing, clinic, Landfill etc.	√	√	*
	10:30 AM - 12:30 PM	Meeting with stakeholders (Government, village representatives, smallholders, employee union representatives, vendor etc.)	-	✓	-
	12:30 PM - 1:30 PM	Lunch break	√	√	✓



Date	Time	Subjects	нмм	FBO	YKN
	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' discussionPreparation for Closing Meeting	√	<	✓
	5:00 PM - 5:30 PM	Closing Meeting	✓	✓	✓



Section 3: Assessment Findings

3.1 Multiple Management Units and Time Bound Plan

Requirement	Assessment	Compliance
Does the time bound plan include all current subsidiaries, estates and mills that is under the control and/or minor shareholding of the holding company?	The plan includes all current subsidiaries, estates and mills that is under management control.	Complied
Have all the estates and mills certified within five (5) years after obtaining RSPO membership? If no, has RSPO Secretariat approval obtained? Was the submission according to the template as announced by the RSPO Secretariat on 21/12/2021	The Group has achieved 100% RSPO certification for all existing Operating Units under the management of JC Chang Group at ended year of 2021 which the remaining Operation Units from Takon Production Unit namely Muis Melewar Plantation 1, Muis Melewar Plantation 2 and Pelita Estate had undergone audit on 6-10/12/2021 and recommended for certification under Melewar Production Unit.	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.	JC Chang Group has completed the purchase of properties from a RSPO certified company i.e TSH Resources Berhad namely Lahad Datu Palm Oil Mill, Ong Yah Ho Estate and Gomantong Estate. Takeover process was carried on 23rd February 2022 for Lahad Datu Palm Oill Mill and Ong Yah Ho Estate (currently known as Sharikat Keratong Sdn. Bhd., Hwa Li 2) whereas for Gomantong Estate (currently known as Gomantong Division as one of Hwa Li 2 division) was on 25th April 2022. These new properties yet to be certified under JC Chang Group due to waiting for Land Use Changes Analysis (LUCA) to be carried out which has been planned in 2 nd half this year 2024.	Complied
Any deviations from the maximum periods requires approval by the RSPO Secretariat.	No deviations from the maximum periods requires approval by the RSPO Secretariat.	Complied
Have there been any changes to the time-bound plan since the last audit (both new acquisition and existing)? If yes, justification is required. Is this consistent with the ACOP reporting?	Changes involved the newly acquired properties of Lahad Datu Palm Oil Mill, Hwa Li 2 Main Division and Gomantong Division.	Complied
Have there been any isolated lapses in implementation of the plan? If yes a Minor non-compliance shall be raised	No isolated lapses in implementation of the 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 Major non-compliance shall be raised	No fundamental failure in 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.	As of to date there are no replacement of primary forest or any area required to maintain or enhance HCVs and HCS in accordance with RSPO P&C criterion 7.12.	Complied
Any new plantings since January 1 st 2010 shall comply with the RSPO New Plantings Procedure.	No new development since January 1 st 2010	Complied
Any Land conflicts are being resolved through a mutually agreed process, such as RSPO Complaints System or Dispute Settlement Facility, in accordance with RSPO P&C criteria 4.4, 4.5, 4.6, 4.7 and 4.8.	No land conflict as per interview with stakeholder and document verification. RaCP concept note have approved by RSPO and the Group have restructure Takon Production Unit to include the remaining Operation Units from Takon Production Unit namely Muis Melewar Plantation 1, Muis Melewar Plantation 2 and Pelita Estate to Melewar Production Unit.	Complied
Any Labor disputes are being resolved through a mutually agreed process, in accordance with RSPO P&C criterion 4.2	No labour dispute reported.	Complied
Any Legal non- compliance is being addressed through measures consistent with the requirements of RSPO P&C criteria 2.1	No legal non-compliance reported and found during the onsite audit.	Complied
Did the company conduct internal audit for those uncertified estates against the uncertified management units requirement and covering the RSPO P&C criterion 2.1 4.2, 4.4, 4.5, 4.6, 4.7, 4.8 and 7.12? If yes, a positive assurance statement shall be available and justified.	Yes. Internal audit conducted with findings highlighted for site further improvement. Internal audit report and management review are available at each respective estate and mill. As for the uncertified management unit, the latest audit was carried out on 12-14/6/2023. Positive assurance can be seen as no negative recommendation made on the issue under clause 2.1 4.2, 4.4, 4.5, 4.6, 4.7, 4.8 and 7.12.	Complied
Are there any Critical (Major) non-compliance raised against any of the RSPO P&C criterion 2.1 4.2, 4.4, 4.5, 4.6, 4.7, 4.8 and 7.12 during the last internal audit of the uncertified estates? If yes is the NC(s) actively addressed with RSPO?	No. There is no Critical (Major) noncompliance raised during the last internal audit.	Complied
Have there been any stakeholder (including NGO) consultation conducted?	Yes. Stakeholder Consultation has been conducted annually at each operating unit.	Complied



3.2 Progress of scheme smallholders and/or outgrowers

Progress of scheme smallholders or outgrowers towards compliance with relevant standards				
Requirement	Remarks	Compliance		
Has 100% of scheme smallholders and/or scheme outgrowers comply with the standard within three years of the mill's initial certification? OFI shall be raised if after one year where 100% of	Not applicable as no scheme smallholder or scheme out-growers is associated with the certification unit.	Not Applicable		
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

		Name of	ne of	GPS Coordinates (in decimal degree)		Certificati	Certificatio	ratus for Certificatio n	Actual Certificatio n Year	Date of Last TBP Verified and Approve d by CB	REVISION OF THE TBP (Only applicable when revision is made)			
Name of the Unit of Certificatio n (UoC)	lame of e Unit of ertification (UoC) the Mills and Supply Bases		Location Address		Longitud e	Total Managed Area (Ha)	n Status (Certified / Not certified)				Any revision from the last approve d TBP? (Yes / No)	New Proposed Year for Certificatio n	Justificatio n of changes for each UoC	Date of approv al from RSPO
Asia	Malaysi	Asia	KM45 Off Jalan Lahad Datu-	5.2923	118.207	43.3800	Certified		2013		No			
Production	а	Palm Oil	Sandakan, 91100 Lahad Datu, Sabah		6									
Unit		Mill												
		Asia Oil	Sungai Tenegang, CL 095317383,	5.3047	118.199	2,980.620	Certified		2013		No			
		Palm Estate 2	Tenegang / Koyah, Kinabatangan, Sabah, Malaysia.		1	0								
		Hwa Li 3	KM45, Jalan Lahad Datu-Sandakan	5.3449	118.305 4	4,388.710 0	Certified		2013		No			
		Melewar Estate 2	KM45, Jalan Lahad Datu-Sandakan	5.2662	118.159 8	2,023.400 0	Certified		2013		No			
Carotino	Malaysi	Carotino	PT 116, Lot No. 3840, Mukim Ulu	3.8162	102.817	16.8000	Certified		2010		No			
Production	а	Palm Oil	Lepar, 26500 Kuantan, Pahang.		4									
Unit		Mill												
		Asia Oil Palm Estate 1	Lot 23599,23594,23595,23596,23597,23 598, Mukim Ulu lepar, 26500 Kuantan, Pahang.	3.8279	102.797	2,167.420 0	Certified		2010		No			
		Carotino Estate	Lot 2389, Mukim Bera, Bera, Pahang.	2.8453	102.724 8	1,659.210 0	Certified		2010		No			



		Maran Estate Pahang Oil Palm Estate 1	LOT 51, 52, 53, 54, 55, 56, 415, 406, 513, 523,524, 317, 318, Mukim Keratong, Rompin, Pahang. Lot 929,6460, 245, 351, 957, 930, Mukim Ulu Lepar, 26500 Kuantan, Pahang. Lot No 23604, 23605, 23600, 23601, 23602, 23603, 23606, 23607 & 23608, Mukim Ulu Lepar, 26500 Kuantan, Pahang.	2.7440 3.7426 3.8098	103.033 0 102.845 4 102.820 6	2,157.400 0 2,120.400 0 2,153.100 0	Certified Certified Certified	2010	No No	
Melewar Palm Oil Mill	Malaysi a	Melewar Palm Oil Mill	CL 095310400, KM46, Jalan Sandakan - Lahad Datu, Kinabatangan, Sabah, Malaysia	5.2726	118.053 4	70.7700	Certified	2014	No	
		Gerola Estate	CL 095310919, Mukim Sg. Koyah, Kinabatangan, Sabah, Malaysia	5.2052	118.034 6	1,587.400 0	Certified	2014	No	
		Hwa Li 2	CL 095327218, CL 095310731, Mukim Tenegang Koyah, Kinabatangan 90200, Kinabatangan Sabah	5.3247	118.045 8	3,007.260 0	Certified	2023	No	
		Melewar Estate 1	CL 095310400, Mukim Sg. Koyah, Kinabatangan, Sabah, Malaysia	5.2636	118.063 5	2,252.410 0	Certified	2014	No	
		Muis Melewar Plantatio n 1	CL 105426784, Tawau, Sabah	4.4592	117.848 4	2,320.000	Certified	2022	No	
		Muis Melewar Plantatio n 2	CL 245360523, Mukim Sungai Binuang, Ulu Tingkayu, Kunak, Sabah	4.6643	117.902 2	1,793.000 0	Certified	2022	No	



	Pahang Oil Palm Estate 2	CL095317285, 17490, 17516, 17507, 17534, 17525, 25983, 38695, 38702, 38711, 38720, 38757, 38739, 39012, 38999, 39003, 38748, Kinabatangan, Sabah, Malaysia	5.2939	118.139 4	2,852.720 0	Certified		2014	No		
	Pahang Oil Palm Estate 3	CL095317285, 17490, 17516, 17507, 17534, 17525, 25983, 38695, 38702, 38711, 38720, 38757, 38739, 39012, 38999, 39003, 38748, Kinabatangan, Sabah, Malaysia	5.3744	118.138 5	2,619.300 0	Certified		2014	No		
	Pelita Estate	CL 115397496, Mukim Ulu Tungku, Lahad Datu, Sabah	5.1465	118.933 4	1,694.700 0	Certified		2022	No		
	Tye Yang Estate	CL 095311407, Mukim Sg. Koyah, Kinabatangan, Sabah, Malaysia	5.2425	117.999 6	3,759.900 0	Certified		2014	No		
Malaysi	Lahad	CL 005227218 Mukim Tonogang	5.3197	118.042	15.7300	Not	2025		No		
a	Datu Palm Oil Mill	CL 095327218, Mukim Tenegang Koyah, Kinabatangan 90200, Kinabatangan Sabah	3.3197	5	15.7300	Certified	2023		INU		



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 one (1) Opportunity For Improvement raised. The Carotino Palm Oil Mill (Carotino Production Unit) Certification unit submitted Corrective Action Plans for the nonconformity. Corrective action plans with respect to the nonconformity was reviewed by the BSI audit team and accepted.

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

Non-conformity							
NCR Ref #	2450120-202401-M1	Issued Date	26/01/2024				
Due Date	25/4/2024	Closure Date	25/04/2024				
Indicator & Category (Critical / Minor)	3.6.1 – Critical						
Statement of Nonconformity:		The procedure and implementation of hazard identification and risk assessment (HIRARC) for reviewing risks after occurrence of accident at workplace not consistently established.					
Requirement Reference:	(C) All operations are risk assessed to identify H&S issues. Mitigation plans and procedures are documented and implemented.						
• Guidelines on Hazard Assessment, Prevention and Control (Risk M and Mitigation Plan) (U029-01/2019) dated 15/08/2019. The requestion Plan (Review only covering: Every 3 years, Any changes to process or activities by DG or officer of DOSH. No requirement to review in the case mentioned.							
	• HIRARC in Carotino Estate was not revised after accident on 04/04/2023 accordingly. Sampled HIRARC dated 03/07/2023 for (Operation-General Worker) Activity: Slashing/cutting uprooting/pulling/weeds/creepers/vops. Hazard: Sharp Parang. Effect: Injury to body parts due to cuts. Risk (3X2=6) and No Recommended Control proposed. 10 days mc (Mandal Ajay Kumar/Gen Worker) on 04/04/2023.						
	HIRARC was reviewed in Carotino Estate on 03/07/2023 and found Operation of Harvesting: fall down while harvesting at slope and slippery area found no included.						
	 Found risk of hot work activity (Acetylene & Oxygen) in Carotino properly control with standby and reachable fire extinguisher nearby during workers repairing of conveyor platform at loading ramp. It was part of requirements for the particular job in the Job Instruction sample 						
	Works (Oxy-Acetylene) dat	0-01/2008) Safety Operation ed 10/11/2008 and similar Works (P/024-01/2008) date uirements.	risk of Safety Operation				
Corrections:	• Revise the SOP U/029-01/	/2019					



	• Revise the HIRARC include the harvesting at slope and slippery area & use of
	sharp tools (parang etc.)
	Provide specific training on hot work activities, conduct morning briefings by the
	head department before starting work, and revise SOP P024 and P030.
Root Cause Analysis:	• Due to Guidelines on Hazard Assessment, Prevention and Control (Risk Management and Mitigation Plan) (U029-01/2019) dated 15/08/2019. Where mention Part 6 Requirement to review was not mention review HIRARC when accident case happened.
	• Management didn't notice work on harvesting at slope and slippery area, due to no accident cases have ever occurred on slope and slippery area. Some parang use by harvester not properly covered.
	• Lack of specific training and briefing on hot work activities, insufficient supervision by the head department, and the SOP does not specify the need to have a fire extinguisher on standby for hot work activities.
Corrective Actions:	• Revised the SOP U/029-02/2024 has been completed on 14/02/2024. And briefed to person in-charge.
	Revised the HIRARC has been completed on 10/04/2024
	• Training has been provided and safety procedures have been briefed for hot work activities (refer to Training Workshop). The foreman will conduct specific briefings for hot work activities, with particular emphasis on safety equipment readiness. All sharp tools provided with covers.
	• The required equipment will be as specified in the work permit (refer to Borang Kebenaran Kerja), and the SOP (P024-022024 & P030-022024) will be updated and briefed to all personnel involved in hot work activities."
Assessment Conclusion:	CAP has been accepted. Effectiveness of CAP was verified off-site via submission of evidence as following:
	• Revision of SOP Safety Operation Procedure During Welding Works; Ref. # P/024-02/2024; Date: 31/01/2024
	• Revision of SOP Safety Operation Procedure during Cutting Works (Oxy-Acetylene); Ref. # P/030-02/2024; Date: 31/01/2024
	Revision of work permit form (Borang Kebenaran Kerja) for monitoring
	Briefing of revised SOP to person in-charges and workshop personnels dated on 31/01/2024
	• Revision of SOP Hazard Assessment, Prevention and Control (Risk Management and Mitigation Plan); Ref. # U/029-02/2024; Date: 14/02/2024
	Based on evidence submitted, the CAP verified effective to address the issue. Hence, Major NC was closed off-site effective on 25/04/2024.

Non-conformity			
NCR Ref #	2450120-202401-N1	Issued Date	26/01/2024
Due Date	Next assessment	Closure Date	"Open"
Indicator & Category (Critical / Minor)	1.1.2 – Minor		



Statement of Nonconformity:	Information regarding RSPO P&C is not provided and accessible to all relevant stakeholders.
Requirement Reference:	Information is provided in appropriate languages and accessible to relevant stakeholders.
Objective Evidence:	Carotino Production Unit in Mukim Ulu Lepar region, which includes Pahang Oil Palm Estate 1, Carotino POM, Asia Palm Oil Estate 1, and Maran Estate, held an external stakeholder meeting on 12/06/2023. Despite inviting 32 stakeholders, only 12 attended the meeting and were briefed on company's sustainability commitment, practices, policies, and procedures. However, there is no evidence to show that the absent stakeholders were subsequently approached to ensure comprehensive delivery of the information. While for Carotino Estate, there were series of physical visits conducted to aware nearby stakeholders regards to the procedures. Sighted visit report for Ladang Pertanian Kelapa Sawit Sdn Bhd (09/08/2023), Havys Palm Oil Mill (10/08/2023), En Yahazam from Kg Jeram Panjang (10/08/2023) and Tok Batin Kamisan Bin Wahab from Kg Pasal (10/08/2023). Unfortunately, there are other stakeholders
	such as nearby estate (FELDA Palong Timur 5), suppliers, and government authorities were not yet visited.
Corrections:	• The management will send out an invitation letter/ email to all relevant stakeholders including the statutory bodies, suppliers and local communities for upcoming stakeholder engagement.
	• The management will update the stake holder list as per guideline E/006-08/2019, and conduct the stakeholder meeting, sent invitation letter / email to all relevant stakeholders.
Root Cause Analysis:	• The management invited other relevant stakeholder through phone calls for stakeholder engagement but due to location of mill and estates which is quite a distance to travel and poor road condition most unable to attend.
	• Management conducted site visits to stakeholders but did not include the supplier and government. and not aware that Felda Palong, Timur 5 is within the estate boundary.
Corrective Actions:	• The management will ensure all related parties will be invited to the stakeholder engagement and any party which fails to attend, a copy of meeting minutes will be extended to them for information and reference. The evidence on the communication will be documented accordingly.
	• The management will ensure that all relevant stakeholders are listed in the stakeholder list. And upcoming stakeholder meeting will be include all the relevant stakeholder
Assessment Conclusion:	CAP has been accepted. Effectiveness of CAP to be verified during next assessment.

Non-conformity			
NCR Ref #	2450120-202401-N2	Issued Date	26/01/2024
Due Date	Next assessment	Closure Date	"Open"
Indicator & Category (Critical / Minor)	7.5.2 – Minor		



Statement of Nonconformity:	The state governments approval documents for replanting on steep slopes in Field # R23 (Previous Field # PM90A Block 8) was insufficient.
Requirement Reference:	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.
Objective Evidence:	Visit in Field # PR23 (Previous Field # PM90A Block 8) found there was a replanting for steep area of about 4 ha which based on the contour map indicated slope >25 degree area.
	Based on the letter to Jabatan Pertanian Negeri Pahang "Perkara: Pemberitahuan Berkenaan Projek Penanam Semula Ladang Carotino Seluas 748.69 ha; Date: 17/7/2023"; The approval documents by the Jabatan Pertanian was insufficient.
	Based on the earlier Peta Tanah Teren Carotino Sdn. Bhd. Hwa Li Estate Div. 2 Mukim Bera, Daerah Bera, Pahang Darul Makmur; Jabatan Pertanian Semenanjung Malaysia Unit Pengurusan Dan Pemuliharaan Sumber Tanah Kuantan Pahang; No. rujukan peta: BPTh/KTN/005/2011; 25/11/2011. Petunjuk Untuk Unit Pemetaan
	STP\7 Curam Curam (>30o) 10.08 0.60.
	The recommendations were "Laporan Kesesuaian Tanah (Soil Suitability Report); Ref. # JP TNH PHG (K) 207/680/4/6 (36); Tujuan Rancangan: Laporan Kesesuaian Tanah Tanaman; Kawasan: Lot 6408, Hwa Li Estate Div. 2; Mukim: Bera; Daerah Bera Recommendation (Syor): Tidak sesuai untuk kegiatan pertanian kerana kecerunan yang tersangat curam dan risiko hakisan yang terlalu tinggi. Disyorkan bahawa kawasan ini dikekalkan sebagai hutan."
Corrections:	The management will get proper information and correct clause of words and sentences used by authorised government department before continuing to develop or do oil palm replanting for better understanding the actual meaning.
Root Cause Analysis:	Management is pre-assertive and the understanding of the concept that the steep land in estate can be replant as the area of replant is not more than 25ha in total and the hills are not continuous and connected. As information the replanting was done by reuse the old terraces which was already planted by oil palm before.
Corrective Actions:	Management will acquire an approval letter from government authorities to replant the area said from government authorities as the clause said. The reports of steep land stated in Peta Tanah Teren Carotino Sdn Bhd by Jabatan Pertanian as referred.
Assessment Conclusion:	CAP has been accepted. Effectiveness of CAP to be verified during next assessment.

Opportunity for Improvements					
OFI#	Description				
OFI 1	2450120-202401-I1				
	Indicator 3.7.1				
	The training and instruction on proper usage of personal hearing protector to be further enhanced and improved for the right technique and method of inserting ear plugs for better protection from noise.				



Positive Findings			
PF#	Description		
PF 1	Very good cooperation and hospitality by management team/staff/sustainability team		
PF 2	Prompt retrieval of relevant documents by the management team		
PF 3	Generally good maintenance of workers accommodation and its area		

3.3.1 Status of Nonconformities Previously Identified and Opportunity for Improvement

Previous Audit Critical (Major) Non-conformity			
NCR Ref #	2294507-202301-M1	Issued Date	07/01/2023
Due Date	07/04/2023	Closure Date	23/03/2023
Indicator & Category (Critical / Minor)	3.4.3 – Critical		
Statement of Nonconformity:	The Social and Environmenta	l Management Plan was not e	effectively implemented.
Requirement Reference:	(C) The social and environmental management and monitoring plan is implemented, reviewed and updated regularly in a participatory way.		
During site visit at oil trap for workshop, sighted that all 4 compartments of trap were filled with oil and water emulsion. There is also evidence of the water emulsion overflow from the oil trap contaminated adjacent soil. As per Environmental and Social Improvement Plan dated 29/06/2022 Pollution (4) Lubricant & Greases (5) Diesel Spillage: Soil Contamination lubricant and grease spillage: Oil Trap to be built at storage area to trap the lu / greases before the water flow into the monsoon drain / Oil Trap to be bu maintain at appropriate interval to prevent oil spillage reach second compared to the trap. Carotino Palm Oil Mill Social management plan for Carotino POM has been established and docume "Carotino Palm Oil Mill, environmental and social improvement plan" upda 01/11/2021 and signed by POM manager, Mr Kenny Alvin Ligunjang which that line site inspection need to be done on weekly basis. However, it has verified that line site inspection has been conducted every 2 weeks latest has			be evidence of the oil and djacent soil. ated 29/06/2022 section oil Contamination due to area to trap the lubricant. Oil Trap to be build and each second compartment ished and documented in ement plan" updated on a Ligunjang which stated is. However, it has been
Corrections:	 Hwa Li 1 Estate 1. Removed oil, cleaning oil trap and drain, ensure no oil flowing into drain. 2. Training on handling trapped oil to the workshop attendants and staff in-charge was done on 7 January 2023. (Appendix 3.0) Carotino Palm Oil Mill 		



	Carotino P.O.M will appoint 2nd personnel to carry out site inspection as per schedule and stated in Social management plan. Schedule will be prepared, briefed & given to both personnel in-charge. Whenever 1st P.I.C on leave 2nd personnel will take in-charge to carry out line site inspection.			
Root Cause Analysis:	Hwa Li 1 Estate 1. Lacked supervision monitoring by staff in charge which lead to maintenance of oil trap were not properly done.			
	2. Lack of briefing to Person in-charge which caused Environmental Improvement Plan not effectively implemented.			
	Carotino Palm Oil Mill			
	1. Currently Carotino P.O.M appointed 1 personnel only to carry out line site inspection. So whenever in-charge person on leave line site inspection for that week will be carried over to next week. Other than that management presumed appointed person understood his duty. No verification done by management personnel (Manager/ Assistant) immediately after inspection done by appointed person. Management personnel only verified the inspection book after action taken by P.I.C.			
	2. Lack of briefing to Person in-charge which caused social Improvement Plan not effectively implemented			
Corrective Actions:	Hwa Li 1 Estate			
	1. Oil trap maintenance and inspection will be performed on a weekly basis. Checklist of monitoring oil trap & chemical trap will be developed and implemented accordingly to ensure the oil trap is effectively functioned to trap any oil spillage overflow from the oil trap and contaminated the adjacent soil. Staff in charge will ensure oil trap maintenance will be performed properly. Appointment letter has been given to person in-charge for monitoring oil and chemical trap (Appendix 4.0)			
	Person in-charge: Mr. Lee Yew Hin			
	Appointment Date: 03.01.2023			
	2. The staff in-charge will handle the waste as per estate waste management. The current oil trap is sufficient to control the oil overflow as cleaning will be done on weekly basis base on waste amount.			
	3. In-house EIA improvement plan had been improved and make additions to the shortcoming found. (Appendix 5.0)			
	4. Re-training and briefings to be given to personnel in charge and to ensure the maintenance is properly done as per plan. (Appendix 6.0)			
	Carotino Palm Oil Mill			
	1. Both appointed persons will be given appointment letter stated clearly on their duty. (Appendix 1.0 & 1.1)			
	2. Briefing will be given for both P.I.C and Management in-charge on line site inspection schedule and their duties. (Appendix 2.0 & 2.1)			
	3. P.I.C will be carried out Line site inspection as per schedule.			
	4. After line site inspection done by P.I.C , management (Manager/ Assistant) will verify and ensure that Line site inspection is as per requirement.			



with the participant from person in-charge to ensure the inspection is properly done as per plan. Major NC verification visit: During Major NC verification visit, the evidence sighted and reviewed as follows: Hwa Li Estate 1. The estate has appointed the field staff, Mr. Lee Yew Hin as person responsible to conduct monitoring of oil trap and chemical trap on weekly basis as per appointment letter dated 03/01/2023 signed by the Estate Manager. 2. The oil trap maintenance and cleaning was conducted on weekly basis by the workshop attendance. Reviewed the weekly oil trap maintenance records for the months of February (03/02/2023, 3/02/2023) and 17/03/2023) and March (03/03/2023, 10/03/2023, 13/03/2023 and 17/03/2023) and commented in Oil Trap Maintenance Records Book. 3. The estate has established checklist for oil trap and chemical trap monitoring. The monitoring includes the structure condition, evidence of spillage, water condition and cleanilenses. The field staff appointed (PIC) conducted the monitoring in weekly basis. Reviewed the records of monitoring for oil trap and chemical trap for the month of February and March 2023 for workshop, chemical store, and fertilizer store and genset room. 4. Waste collected form the oil trap/ chemical trap were collected and disposed as scheduled waste. Reviewed the Scheduled Waste inventory records for the month of January and February 2023. The inventory was notified to DOE through ESWISS. Reviewed the First Scheduled dated 28/02/2023 and 31/01/2023. 5. Sighted during site visit at the oil trap for workshop, the condition was satisfactory. No evidence of oil and water emulsion overflow from the oil trap to the adjacent ground. The condition was consistent with the report. 6. The estate has conducted training to the PIC a		5. Environmental & social plan in the aspect of line site will be reviewed accordingly
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		Kampung"/ person responsible conducted the linesite inspection on weekly basis



	Reviewed the records for the month of February 2023 (05/02/2023, 11/02/2023, 18/02/2023 and 25/02/2023) and March 2023 (04/03/2023, 11/03/2023, and 1803/2023).
	4. Any issues found during the inspection recorded in the linesite inspection book. The report was submitted to the Asst. Manager and Mill Manager for verification and approval.
	5. The mill has reviewed the Social and Environmental Plan on 15/02/2023 with reviewed on the action plan for Aspect Identified: Accommodation. The reviewed was conducted with involvement of "Ketua Kampung"/ person responsible and they have been brief on the Social and Environmental Plan during briefing dated 13/01/2023.
	The evidence was found adequate. Thus the major non-conformity was effectively closed on 23/03/2023.
Effectiveness Closure	ASA 2_4 on-site verification:
(for previous audit closed Critical NC):	1. Verified appointment letter for Mr. Abdul Qaiyyum b. Abdul Rashid, dated as "Ketua Kampung"/ person in addition to existing responsible person for linesite inspection, Mr. Mohd Naim b. Azmi.
	2. Reviewed the training material and records that both Mr Mohd Naim B. Azmi and Mr Abdul Qayyum B. Abdul Rashid attended to improve their knowledge and job description for monitoring and inspection of the line site, dated 13/01/2023.
	3. Reviewed the linesite inspection records for the month December 2023 (02/12/2023, 09/12/2023, 16/12/2023, 23/12/2023 and 30/12/2023) and January 2024 (06/01/2024, 13/03/2024, and 20/01/2024).
	4. Verified reviewed Social and Environmental Plan conducted with involvement of "Ketua Kampung"/ person responsible and they have been briefed on 13/01/2023.
	No recurrence of issue hence, Major NC remained closed.

Previous Audit Minor Non-conformity			
NCR Ref #	2294507-202301-N1	Issued Date	07/01/2023
Due Date	26/01/2024	Closure Date	22/01/2024
Indicator & Category (Critical / Minor)	7.3.2 (Minor)		
Statement of Nonconformity:	Labelling for waste storage and disposal according to the procedures were not effectively implemented.		
Requirement Reference:	Proper disposal of waste material, according to procedures that are fully understood by workers and managers, is demonstrated.		
Objective Evidence:	Carotino Palm Oil Mill and Pahang Oil Palm Estate 1 During site visit at Schedule waste store, Carotino POM, it was found that SW305 has been generated on 28/12/2022 and stored in the SW store. However, some information in the labelling was not correct (Labelled with SW409 instead of SW305) not accordance with the procedures. Other than that, sighted during site visit at Schedule waste store, Pahang Oil Palm Estate 1. Estate was yet to generate any Schedule waste, but they already prepared Labelling for each drum for SW305		



	without inserting the date generation. However, the Hazard Label used was inflammable liquids instead of Toxic Substance as per procedures. Every container of scheduled waste must be properly label for identification and warning purposes. It has been clearly mentioned Regulation 10, of Environmental Quality (Scheduled Waste) Regulation 2005. (2) Containers of scheduled wastes shall be clearly labelled in accordance with the types applicable to them as specified in the Third Schedule and marked with the scheduled waste code as specified in the First Schedule for identification and warning purposes.
Corrections:	Carotino Palm Oil Mill 1. Specific checklist will be created to cover all criteria requirement of "Regulation 10, of Environmental Quality (Scheduled Waste) Regulation 2005". The code label of SW409 has been corrected to SW305 Pahang Oil Palm Estate 1 The Hazard Label of the 'Inflammable' has been changed to Hazard Label of 'Toxic'.
Root Cause Analysis:	Carotino Palm Oill Mill 1. Lack of understanding from Person handle scheduled waste store according to the code due to the briefing given didn't cover all aspect of requirement. Further to that, existing checklist didn't cover all criteria of "Regulation 10, of Environmental Quality (Scheduled Waste) Regulation 2005". Pahang Oil Palm Estate 1 The Hazard Label used was inflammable and not toxic due to misinterpretation of the person in-charge handling the scheduled waste where any one of the labels can be used for SW305. This is due to the previous training provided does not specifically cover for hazard label characteristic.
Corrective Actions:	 Carotino Palm Oil Mill New checklist will be prepared to cover all criteria and will be monitored on weekly basis by competent person of Scheduled waste Briefing will be given by competent person of scheduled waste to personnel in charge of schedule waste store and will cover all the criteria requirement of 'Regulation 10 of Environmental Quality (Scheduled Waste) Regulation 2005' Pahang Oil Palm Estate 1 The management will re-train person in-charge on schedule waste handling to be more aware on the scheduled waste management. The management also will review the scheduled waste training to captured topic of the hazard label characteristic for better understanding The management will re-train person in-charge on scheduled waste training specifically on the hazard label characteristic and to be more aware on the scheduled waste management.
Assessment Conclusion:	 ASA 2_4 on-site verification: Correct labels were used for all scheduled wastes (SW) stored in the SW store such as SW305 Spent lubricant oil Records of weekly monitoring checklist by competence person for samples dated on 27/03/2023, 26/06/2023, 25/09/2023 and 26/12/2023 Records of regular briefing and training of SW handling for sample dated 26/12/2023



Evidence of CAP implementation verified effective to address the issue with no
recurrence. Hence, Minor NC was closed on 22/01/2024.

Previous Audit Minor N	Previous Audit Minor Non-conformity			
NCR Ref #	2294507-202301-N2	Issued Date	07/01/2023	
Due Date	26/01/2024			
Indicator & Category (Critical / Minor)	3.5.2 – Minor			
Statement of Nonconformity:	Employment procedures has	not been properly implement	ed.	
Requirement Reference:	Employment procedures are	implemented, and records are	e maintained.	
Objective Evidence:	Carotino POM As per stated in the SOP title "Guidelines on procedure of recruitment, selection, hiring, promotion, retirement and termination" dated 12/08/2019 document reference number E020-01/2019" that selection of new workers is subject to medical fitness. Sample of 2 workers has been taken that has been recruited on 01/10/2022 and 13/09/2022 found out that there is no medical and physical fitness screening has been conducted for both sample workers. Details as per below a. Date joined: 13/09/2022, ID: G043X b. Date joined: 01/10/2022, ID G0442X			
Corrections:	All new workers appointed will go through estates or mill HA health examination regardless to their nationality and recorded in their personnel files.			
Root Cause Analysis:	 Current practice management carry out medical and physical fitness screening for foreign workers only. As for local workers management just determine their health and fitness base on verbal interview only and physical observation. Person in-charge misunderstood on SOP and carried out medical and Physical screening on foreign workers and missed out on local workers. SOP is available and briefing is provided but due to lack of understanding on the SOP, the requirement to carry our medical and physical fitness screening to the local workers not cover during the briefing. 			
Corrective Actions:	 Management will prepare health examination form and HA will fill up and carry out medical and physical fitness screening for new local workers. Management will study through the existing SOP and briefing to be given to Person In-charge involved to carry out medical and physical screening on all new workers upon recruitment. 			
Assessment Conclusion:	 ASA 2_4 on-site verification: Verified FOMEMA examination result for 4 new foreign workers prior to employment on 01/09/2023. All 4 Nepalese workers passed the FOMEMA test. While for latest local employment on 11/05/2023, sighted Health Examination Form (New Employee) which checked on blood pressure, height, weight and declaration to any health condition. Health Assistant (H.A) then declare the new local worker his/her fitness condition accordingly. 			



Evidence of CAP implementation verified effective to address the issue with no	l
recurrence. Hence, Minor NC was closed on 22/01/2024.	l

Previo	Previous Audit Opportunity for Improvement			
OFI#	Description			
OFI 1	OFI Statement:			
	2294507-202301-I1			
	Indicator 6.2.6			
	Assessment of decent living wages has been conducted and documented in the document number E/027-01/2019 title "Implementation plan for decent living wages" document date 29/11/2019. Base on household expenditure survey 2016, wages survey, RSPO guidance for implementing a decent living wages. Management plan has been established to conduct re- assessment on 16/01/2023 by using latest household expenditure survey 2019 and documented in document title "Action Plan for decent wages review as per E027" updated on 12/12/2022 OFI has been raised to ensure that the management implement of the management plan that has been established.			
	Verification / Follow-up actions:			
	Verified the re-assessment and action plan for decent living wage review as per E027. The re-assessment has been conducted by 4 members of headquarters staffs by using 2023 latest household expenditure survey. It was noted that the assessment report has included Pahang region as well as Sabah region for their other sister estates. 6 parameters were taken into account of Food, housing, medical, transportation, education, unexpected events (5%), total living basket and net living basket.			
	It was found that the prevailing wage for mill and estate are RM1,840.01 and RM1849.93 respectively. Both figures are above the Living Wage identified for both Pahang state and Sabah estate.			

3.3.2 Summary of the Nonconformities and Status

CAR Ref.	Category (Critical / Minor)	P&C Indicator	Issued Date	Status & Date (Closure)
1871353-202001-M1	Critical	7.10.1	10/01/2020	Closed out on 06/03/2020
1871353-202001-M2	Critical	D.5.1	10/01/2020	Closed out on 06/03/2020
1871353-202001-N1	Minor	2.1.3	10/01/2020	Closed out on 22/01/2021
1871353-202001-N2	Minor	3.3.2	10/01/2020	Closed out on 22/01/2021
2014302-202101-M1	Critical	3.4.3	22/01/2021	Closed out on 25/02/2021
2014302-202101-M2	Critical	7.8.2	22/01/2021	Closed out on 25/02/2021
2014302-202101-N1	Minor	6.2.4	22/01/2021	Closed out on 21/01/2022
2156930-202201-M1	Critical	6.7.3	21/01/2022	Closed out on 05/04/2022
2156930-202201-M2	Critical	3.3.1	21/01/2022	Closed out on 05/04/2022
2294507-202301-M1	Critical	3.4.3	06/01/2023	Closed out on 23/03/2023
2294507-202301-N1	Minor	7.3.2	06/01/2023	Closed out on 22/01/2023
2294507-202301-N2	Minor	3.5.2	06/01/2023	Closed out on 22/01/2023

...making excellence a habit."



2450120-202401-M1	Critical	3.6.1	26/01/2024	Closed out on 25/04/2024
2450120-202401-N1	Minor	1.1.2	26/01/2024	"Open"
2450120-202401-N2	Minor	7.5.2	26/01/2024	"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 Carotino Palm Oil Mill (Carotino Production Unit) Certification Unit's environmental and social performance, legal and any known dispute issues.

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

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

Stakeholders contacted					
Type of Stakeholder (e.g. Internal, Union, Contractor, Governmental Department, NGO, External, Communities)	Stakeholder name / organization	Means of communication (e.g. face to face interview, email, phone interview, comment from public notice)			
Internal audit	Joint Consultative Committee & Gender representative for each operating unit	Face to face			
Neighbouring estate	FGVPM Lepar Utara 5 KEMA Development Sdn Bhd Mentiga Plantation Sdn Bhd	Face to face			
Government Agency	Pondok Polis Paya Bungor Balai Polis Gambang	Face to face			
Local communities	Tok Batin Kampung Pasal	Phone call			
Local communities	JPKK Kampung Jeram Panjang	Phone call			

Stakeholders comment

1

Feedbacks: Gender representative for each operating unit

A total of 5 gender representatives for each operating have been interviewed. Based on the interview, it was confirmed that they are having gender committee meeting every 6 months and all female workers are invited where the meeting will provide consistent awareness on complaints and grievance mechanism regards to sexual harassment, identification of new mothers and their needs and discussion and other related concerns. They are all aware about their rights and currently satisfied with the management.

Audit Team verification and response: Noted on the information and no further issue.



2 Feedbacks: Neighbouring Estates

Representative from FGVPM Lepar Utara 5, KEMA Development estates and Mentiga Plantation Sdn Bhd has attended and based on interview, there are no any problems with Carotino Production Unit. They all work together to maintain their borders to ensure it was clearly demarcated and well visible to avoid any dispute. They also show their appreciation to Carotino Production Unit for maintaining the roads and investing money for construction of new bridge that heavily damaged due to heavy rain and flood in early January 2024.

Audit Team verification and response: Noted on the information and no further issue.

3 Feedbacks: Government Agency – Balai Polis Gambang, Pondok Polis Paya Bungor

Good relationship has been maintained by both parties and it was confirmed that Carotino Production Unit has been always communicate and provide support to any concern with the police. There is one proposal given by the police officer. He suggested that the estates should conduct background check in terms of crime history in addition of health checkup and fitness assessment before employment of any local workers. Estates can simply communicate with the police station, and they can help to check the crime history by key-in the IC number into their system. This is to avoid Carotino Production Unit employ any worker who has crime history which may bring social concern in future.

Audit Team verification and response: The management took the suggestion and will consider updating their recruitment and hiring procedure by including crime history assessment with cooperation of Police Station.

4 Feedbacks: Head of village for Kampung Pasal and Kampung Jeram Panjang

Phone call interview has been taken place with both head of village for Kampung Pasal and Kampung Jeram Panjang. Both villages are located next to the Carotino Production Unit and shared same main road.

They mentioned that Carotino Production Unit has maintained the main road and spend money to construct the damaged bridge which make them felt thankful to the management. Good cooperation and support have been shown by Carotino Production Unit for any event occurred in both village. Noted that there are numbers of local workers also has been provided with employment opportunities at the estates and Carotino POM.

Audit Team verification and response: Noted the information and will continue their support to the villages.

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
There is no customary rights land in the Carotino Palm Oil Mill (Carotino Production Unit) Certification Unit. Moreover, most of the planting cycles had passed their second cycle of planting.					

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



3.5 Impartiality and conflict of interest

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

Formal Signing-off of Assessment Conclusion and Recommendation

The audit objectives have been achieved and the certificate scope is appropriate. Based on the results of this audit, it is concluded that discuss Carotino Palm Oil Mill (Carotino Production Unit) has complied with the Malaysia National Interpretation 2019 of the RSPO P&C 2018 and audit criteria identified within the audit report. It is deemed that the management system has achieved its intended outcomes. Therefore, it is recommended that discuss Carotino Palm Oil Mill (Carotino Production Unit) is remain certified.

Caronic Frontación Condition de Caronic Condition d				
Report prepared by	Acceptance of Assessment Conclusion			
Name: Hafriazhar Mohd. Mokhtar	Name: Wong Chun Wei			
Company Name: BSI Services Malaysia Sdn. Bhd.	Company Name: J. C. Chang Hoilding Sdn Bhd			
Title: Lead Auditor	Title: Sustainability Manager			
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: 26/04/2024	Date: 10/05/2024			



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 iate 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 -	All documents specified in the RSPO P&C are accessible to every operating unit within the J.C Chang Group. They can be reached through the company's website at http://www.carotino.com/publicly-available-documents-97.aspx via the consultation and communication procedure outlined in document number E/004-08/2019 dated 12/08/2019. Listed list of publicly available but not limited too as per below; a. Environmental information such as assessment of riparian zone management, HCV assessment report, waste management and etc. b. Social information such as social impact assessment and report, details of complaints and grievances, negotiation procedures and etc. c. Legal information such as all legal license and permits, land rights including estate's map and boundaries. d. Other information such as CIP, Public Summary Assessment Report and other policies.	Complied				
1.1.2	Information is provided in appropriate languages and accessible to relevant stakeholders. - Minor compliance -	Sustainability related policies were displayed in various locations including the main notice boards of the estates/mill for employees and visitors to view. Interview conducted on-site with sampled internal and external stakeholders confirmed that the information provided were in appropriate languages and accessible to them.	Non- compliance				

		Carotino Production Unit in Mukim Ulu Lepar region, which includes Pahang Oil Palm Estate 1, Carotino POM, Asia Palm Oil Estate 1, and Maran Estate, held an external stakeholder meeting on 12/06/2023. Despite inviting 32 stakeholders, only 12 attended the meeting and were briefed on company's sustainability commitment, practices, policies, and procedures. However, there is no evidence to show that the absent stakeholders were subsequently approached to ensure comprehensive delivery of the information. While for Carotino Estate, there were series of physical visits conducted to aware nearby stakeholders regards to the procedures. Sighted visit report for Ladang Pertanian Kelapa Sawit Sdn Bhd (09/08/2023), Havys Palm Oil Mill (10/08/2023), En Yahazam from Kg Jeram Panjang (10/08/2023) and Tok Batin Kamisan Bin Wahab from Kg Pasal (10/08/2023). Unfortunately, there are other stakeholders such as nearby estate (FGVPM Palong Timur 5), few numbers of suppliers, and government authorities were not yet visited. Thus, non-conformity was raised.	
1.1.3	(C) Records of requests for information and responses are maintained Critical (Major) compliance -	Stakeholder requests are collected through various channels such as stakeholder meetings, visitor books, letters, and forms. The operating units systematically document all requests and responses. Verified that regular annual face-to-face session with stakeholders was conducted for each operating unit. Request and response for mill and each estate are compiled in their own request records, complaints records, JCC meeting, Gender Committee Meeting particularly for internal stakeholder. While request and response from external stakeholders, it was compiled within their 35th stakeholder consultation minute meeting, dated 12/06/2023.	Complied

1.1.4	(C) Consultation and communication procedures are documented, disclosed, implemented, made available, and explained to all relevant stakeholders by nominated representative. - Critical (Major) compliance -	The Consultation and Communication Procedure, identified as document number E/004-08/2019 dated 12/08/2019, has been made publicly available on the company website, www.carotino.com . Additionally, it has been presented to external stakeholders in consultation meetings and shared with all employees during various workers' meetings and assembly sessions periodically.	Complied
		The procedure was briefed to external stakeholders during the consultation meeting that conducted for whole Carotino Production Unit, dated 12/06/2023 and to all workers during workers meeting and assembly sessions from time to time.	
		While for Carotino Estate, there were series of physical visits conducted to aware nearby stakeholders regards to the procedures. Sighted visit report for Ladang Pertanian Kelapa Sawit Sdn Bhd (09/08/2023), Havys Palm Oil Mill (10/08/2023), En Yahazam from Kg Jeram Panjang (10/08/2023) and Tok Batin Kamisan Bin Wahab from Kg Pasal (10/p08/2023). Conversation via phone call with En Yahazam (Kg Jeram Panjang) and Tok Batik Kamisan Bin Wahab (Kg Pasal) confirmed the report.	
		Each operating unit has assigned an individual responsible for social issues, tasked with implementing and monitoring consultation and communication procedures. Verification was possible through the records of appointment letters for these designated persons incharge.	
1.1.5	There is a current list of contact and details of stakeholders and their nominated representatives.	The estates and the mill consistently update and retain information about stakeholders, encompassing details such as addresses,	Complied

	- Minor compliance -	contact numbers, and nominated representatives. This comprehensive list includes contractors, vendors/suppliers, foreign recruitment agencies, embassies, government agencies, schools, local communities, and CPO/PK customers. Stakeholders list was updated annually and also when there are any changes of owner, land lease and any new development nearby.	
Criterio	n 1.2: The unit of certification commits to ethical conduct in all business of	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 -	Carotino / JC Chang has formalized its Corruption Prevention Policy, encompassing a commitment to a code of ethical conduct and integrity. The company embeds the principles of fairness, integrity, and ethics throughout all business processes. Stringent measures are in place to strictly prohibit any involvement in bribery within the business operations including recruitment and contracts.	Complied
		It was established on 04 September 2015, signed by the plantation director and available in Bahasa Malaysia and English. Verified that the policy has been communicated and implemented to all Operating Units and all levels of the workforce. Sighted the policy had been displayed at the offices of each operating units.	
1.2.2	A system is in place to monitor compliance and the implementation of the policy and overall ethical business practice. - Minor compliance -	Carotino / JC Chang has established monitoring compliance and implementation process with their contractors/suppliers through Sustainability Compliances Contract with Operating Unit under J.C. Chang Group, Doc No E/024-02/2020. Sighted samples as below:	Complied
		- Supplier – TM Kay Fertilizers Sdn Bhd	
		- Certification Body – ASG Cert GmbH	
		- Clinic – My Health Clinic	
		- Recruitment Agency – PT Bina Kridatama Lestari	
		- Grocery Shop – Mr Zulkifli Bin Abdullah	



Princi	ple 2: Operate legally and respect rights		
Criteri	ion 2.1: There is compliance with all applicable local, national and ratif	ied international laws and regulations.	
		Sighted compliance supporting record such as: Pahang Oil Palm Estate 1 CHRA was conducted on 07/12/2021 by Dr. Yasriza Yahaya (JKKP HQ/10/ASS/00/8) from Occumed Consultancy & Services Sdn. Bhd. NRA was conducted by Alam Hijau Integrasi Assessor Iszaifah Bt Eshabah (HQ/15/PEB/00/146): Baseline Area on 15/01/1/2020 and Personal Monitoring on 10/09/2020. Audiometric Test was conducted as Annual & Baseline Audiometric Testing Report conducted on 25/05/2023 by Procoma Environmental (M) Sdn. Bhd. 25 employees as in the list was sen to attend the test. MPOB License No. 501382102000 valid till 31/03/2024 for estate size 2,153.1 Ha at Mukim Ulu Lepar. Permit for Diesel Storage from KPDNKK KPDNHEP TLH 600-5/2/321/81 for 20,000 litres valid till 21/04/2024. Unfired Pressure Vessel (Compressor) PH PMT 82302 valid till 16/06/2024.	Complied
		 Carotino POM Annual Audiometric was conducted on 30/01/2023 by Procoma Environmental (M) Sdn. Bhd. 38 employees were tested and 4 with abnormal audiometric results pattern. Repeat on them was conducted on 02/05/2023 with normal results. LEV Testing on Fume hood was conducted on 13/12/2023 bt Mohd Rashid Gelamdin (HQ/16/JHII/00/23) from Procoma Environmental (M) Sdn. Bhd. 	



- CHRA was conducted on 16/12/2022 by Dr. Yasriza Yahaya (HQ/10/ASS/00/8) from Occumed Consultancy & Services Sdn. Bhd.
 NRA (Baseline Personal Monitoring) was conducted by Alam Hijau Integrasi Assessor Iszaifah Bt Eshabah (HQ/15/PEB/00/146) on 07/09/2020. Area Monitoring was done on 15-16/01/2020.
- Fire Certificate under Fire Services Act 1988 found valid from 18/08/2023-17/08/2024.
- License No. 005110 (Syarat Lesen) under valid from 01/07/2023-30/06/2024.
- Environmental Audit as under item 22 of (Syarat Lesen) to be conducted twice in a license period was conducted by Norul Syukiena Jaafar (EA0140) on 19/12/2023.
- Water Tube Boiler PMD 15277
- Calibration of Weight bridge 164950031 under Akta Timbang dan Sukat 1972, 60,000 Kg X 10 Kg service done on 14/02/2023.
- Extraction Water Surface Permit from Sungai Belayar issued by Pahang Water and Energy Resources Sdn Bhd. expired on 31/12/2023 and was renewed as payment evident made on 08/12/2023 for amount of RM 600.00.
- License from Energy Commission under Electricity Supply Act 1990 for capacity of not more than 3,548 kW valid from 28/02/2023-27/02/2024. Cumming Diesel with capacity 375 kVA having Written Notification from DOE Pahang dated 23/04/2015
- Permit to purchase Sodium Hydroxide under Poison Ordinance 1952 (Form A) (Solid: 10,000 Kg and Liquid: 2,500 Kg) dated 01/01/2024.



- Diesel Permit KPDNHEP TLH600-5/2/16/90 under Regulation 2 of Control of Supplies Regulations 1974 for 16,000 litres of Diesel valid from 18/05/2021-17/05/2024.
- MPOB License No. 500356604000 for buying, transport, milling FFB processing, storage, transport, selling CPO, SPO and PK valid from 01/11/2023-31/10/2024.
- All CF for certificated machineries under DOSH sampled PH PMT 3410, PH PMD 961, PMD 15277, PH PMT 3413, PH PMT 3411, PH PMT 3412 and etc found valid till year 2024 as verified.

Asia Oil Palm Estate 1

- Diesel Permit under KPDNKK No. KPDNHE TLH 600-5/2/32/83 for 20,000 litres valid from 17/01/2023-16/01/2026.
- Energy Commission for private Installation of electrical generation not more than 65 kW valid from 20/03/2023-19/03/2024.
- Air Compressor PH PMT 82684 under FMA 1967 valid till 22/10/2024.
- MPOB License No. 621884011000 at Lot No. 23599, Mukim Ulu Lepar valid from 29/05/2023-30/04/2024.
- License under Regulation 23(1) 5th Schedule of Water Services Industry (licensing) Regulations 2007, Water Services Industry 2006. Conventional Licence with capacity of 0.04Million Litres per day valid from 08/11/2023-07/11/2026. Issued by SPAN

Maran Estate

- CF for Air Compressor PH PMT 1656 valid till 01/06/2024
- MPOB License No. 502407502000 with size of 2,120.4 Ha valid from 01/05/2023-30/04/2024.



		 License for Private Installation under Electrical Supply Act 1990 for generation of electricity not more than 100 kW valid from 06/07/2023-05/07/2024 Petrol Ron 95 100 Litres/Day to buy and store under Regulation 18 of Control of Supplies Regulations (Amendment) 2021 valid from 11/03/2023-10/03/2024. Diesel Storage 14,000 litres valid from 04/07/2023-03/07/2024. Water Extraction from PT 245 Well Certificate No. 0321010013 from Pahang Water and Energy Resources Sdn. Bhd. Valid till 31/12/2024. 	
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 -	SOP on Mechanism to Trace Changes in Legal Requirements. Refer doc. no. E/005-08/2021 dated 13/12/2021. In the SOP stated that the Headquarters has subscribed with Malaysia Gazette On – Line with website www.lawnet.com.my. The Lead Auditor for Internal Control Team will access the subscribed website at the end of every month to track any relevant changes. The Lead Auditor will notify the Plantation Department on any changes. The Plantation Department will convey any changes and the appropriate action to be taken via email and hardcopy letters to the operating units. As part of tracking changes Head Office has subscribed Lawnet under PNMB for legal changes.	Complied
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 -	Guidelines on Legal or Authorised Boundaries are guided by the documented procedure Guidelines On Field Blocking and Boundary Maintenance; Doc Ref Number: B/003-04/2017; Doc Date: 07/07/2017. Pahang Oil Palm Estate 1 Sampled boundary at Mining Cermat Aman, Mentiga Plantation was sampled and found boundary was clearly seen and marked with poles and previously installed electrical fence.	Complied

Criterio	on 2.2: All contractors providing operational services and supplying labour,	Maran Estate Sighted a boundary map clearly demarcated the estate boundaries. During site visit the marking found visible and maintained with trenching and pole (red and white) Carotino Estate Sighted during site visit a boundary adjacent to Smallholder Plot (south) and Bukit Kerisik Forest (East). Trenching found built as separation and a red and white poles clearly seen as marking. and Fresh Fruit Bunch (FFB) suppliers, comply with legal requirements.	
2.2.1	A list of contracted parties is maintained Minor compliance -	Available list of Stakeholders that included contracted parties for Year 2024. Among Others in Carotino POM: Chin Wood Industries Sdn Bhd. (Transporter) Hup Shing Berjaya Enterprise (Transporter-CPO) Pritam Sigh Agency Sdn. Bhd. (Transporter-CPO) En Lee Sing Sdn. Bhd. (Palm Kernel & FFB Transporter) As sampled in Carotino Estate, maintained a contracted parties such as FFB transporters. As a group, J.C Chang maintained 4 recruitment agents for foreign workers such as. PT Tekad Jaya Abadi, PT Genta Gumi Selapawis, PT Teja Mukti Utama and PT Sekar Tanjung Lestari.	Complied
2.2.2	All contracts, including those for FFB supply, contain specific clauses on meeting applicable legal requirements, and this can be demonstrated by the third party. Evidence of legal due diligence of all contracted third parties, recruitment agencies (licensed/ accredited) for migrant workers, service providers and labour contractors, is available. - Minor compliance -	requirements. Evidence of due diligence of all contracted parties, recruitment agencies for migrant workers, service providers and	Complied

2.3.1	(C) For all directly sourced FFB, the mill requires:Information on geo-location of FFB origins	Carotino POM received only crop from own estates within the certification scope of J. C Chang. All estates from the same	Complied
Criterio	n 2.3: All FFB supplies from outside the unit of certification are from legal	sources.	
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 -	As in Code of Conduct signed by contractors for those supplying FFB, and included as sampled in contract that contained clauses disallowing child, forced and trafficked labour. Where young workers are employed, the contracts include a clause for their protection. These were verified for sample agreement between the company with contractor as following: - Nathan Gunasekaran (transporter) with Asia Oil Palm Sdn Bhd and other estates (Maran, Pahang Oil Palm Estate 1).	Complied
		Both signed a Due Diligence Declaration to comply with legal requirements including all contracted third parties, recruitment agencies (licensed/ accredited) for migrant workers, service providers and labour contractors.	
		Available a Questionnaire on Legal Compliance and Ethical Conduct Due Diligence (E/024-03/2022) dated 11/10/2023 that had to filled up by contracted parties. Carotino Estate Sighted a contract agreement (HL2/AGR/011-2023-2024) dated 01/03/2023. Contract Agreement for Replanting Works. Between Estate Manager and Hiew Ming Lung (Darul Prospek Development Sdn. Bhd.) Transport Contractor (Eng Lee Sing) signed a contract Agreement (CRE/FFB/FY2023/2024-01) with Estate Manager on 01/12/2023.	
		Daya Eco Techno Sdn Bhd (06/08/2023) Represented by Linda Tan Pei Sue Available a Quarting and Local Compliance and Ethical Conduct.	

	Evidence of the ownership status or the right/claim to the land, or valid use of land by the grower/smallholder	certification scope 01/07/2023) as ve		ollowing informa	ition (updated	
	One or more supporting documents for claims	Estate	Geo Location	MPOB License	Area (Ha)	I
	 Valid MPOB license - Critical (Major) compliance - 	Asia Oil Palm Estate 1	3° 48' 59.86" N 102° 49' 5.57" E	501433902000	2,167.42	
		Hwa Li 1 Estate	2° 44' 40.73" N 103° 01' 59.412" E		2,157.40	
		Carotino Estate	2° 50' 43.25" N 102° 43' 29.21" E	504216202000	1,659.21	
		Maran Estate	3° 44' 31.28" N 102° 50' 42.93" E	502407502000	2,120.40	
		Pahang Oil Palm Estate 1	1 3° 48' 35.70" N 102° 49' 15.59" E	501382102000	2,153.10	
2.3.2	For all indirectly sourced FFB, the unit of certification obtains from the collection centres, agents or other intermediaries, the evidence as listed in Indicator2.3.1.	As audited and ve indirect sourced Ff or other intermedia	B or obtains from	the collection c		Complied
Dringin	- Minor compliance - le 3: Optimise productivity, efficiency, positive impacts and resilie					
-	, ,, ,, ,		ad financial viability			
	on 3.1: There is an implemented management plan that aims to achieve lor					
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.					Complied
	- Critical (Major) compliance -	Target	2024/2025	2025/2026	2026/2027	
		FFB	23.21	23.13	23.56	
		Oil	4.87	4.92	5.03	



Kernel		1.22	1.23	1.27
OER%		20.96	21.28	21.35
KER%		5.26	5.34	5.39
Cost Production	of	1,756.10	1,805.1	1,914.03
Cost/CPO/MT				

Carotino POM

Sighted Overall Revenue Expenditure Estimate for Fiscal Year 2024-2026. A summary of Three Years Social, Welfare, Environment, OSH Budget Projection for Carotino POM (2024/2025, 2025/2026, 2026/2027) established. Three Year Projection:

Projected	2024/2025	2025/2026	2026/2027
FFB (MT)	179,000	181,000	189,000
OER%	20.57	20.53	20.35
KER%	5.3	4.9	5.4
Production Cost (RM/MT CPO)	272.68	482.4	466.87
Forecast Price (RM/MT CPO)	3,000	3,000	3,000
Baseline Production Cost	507	507	507

Asia Oil Palm Estate 1

Three Years Product Projection for FY 2024/2025, 2025/2026. 2026/2027 for size of 1,935.74 Ha established as below:

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Financial Year	Target FFB Yield	Target Oil	Target KER	Target OER%
2024/2025	40375	8117	2212	20.10
2025/2026	36890	7420	2020	20.11
2026/2027	318.65	6540	1743	2053

Maran Estate

Sighted Summary of General Charges Expenditure For Estimate Year 2023/2024, 2024/2025, 2025/2026, 2026/2027. Among Information included:

Area in Hectarage: 1,786.27

Staff Expenditures (Salary, EPF, SOCSO, Renewal Permit, Medicals, Welfare, Accommodation, Reimbursement)

Labour Lines (Labour lines, Piece Rate, EPF & SOCSO, Medicals, Leave Paid, Welfare, Recruitment of Foreign Workers, Allowance and Incentives)

Upkeep Premise (Electricity Supply, Water Supply, Vehicles Lease, Upkeep Sundry Buildings, Security, Waste Management)

Office Expenses (Mgt Agent Expenses, IT, Communication Expenses, Permit, Fees, License, Membership, Stationery, Advertising & Publication etc)

Depreciation.

Three Years Crop Projection established as below:

Target	2024/2025	2025/2026	2026/2027
FFB	43,911	45,115	45,147
Oil	9251	9519	9498



				1					1
		Kernel		233	34	2427		2443	
		OER%		21.	07	21.10		21.10	
		KER%		5.3	31	5.38		5.41	
		Cost Product Cost/Cl		1,800	0.86	1,816.4	7 1,	.840.40	
3.1.2	An annual replanting programme projected for a minimum of five years with yearly review, is available. - Minor compliance -	Available Guideline on Replanting Planning (A/016-11/2024) dated 04/01/2024 provide guidance on planning and implementation of replanting. Long Term Replanting Programme 2022-2024 established.				entation of	Complied		
		Estate	На	2024	2025	2026	2027	2028	
		POP1	1,835.67	240.44	166.52	130.33	152.41	100.00	
		AOP1	1,948.71	174.14	174.90	230.23	131.75	265.81	
		Maran	Next repla	nting plan	ned in 203	31 (118.03 I	Ha)		
		CRE	1,511.45	165.94		No replanti	ng planne	d	
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 -	Oil Palm Manager	Estate 1 s, Sr. Asst,	at 10.00 Asst Mar	am. Att	ended by O as state	all Estated in atten	at Pahang e and Mill dance list. Il Director.	Complied
	on 3.2: The unit of Certification regularly monitors and reviews their econor with demonstrable Continuous improvement in key operations.	nic, social	and enviro	onmental	performa	nce and d	evelops a	and impleme	ents action plans
3.2.1	(C) The action plan for continuous improvement is implemented, based on consideration of the main social and environmental impacts and opportunities of the unit of certification. - Critical (Major) compliance -	improve Social	ement plar Empact Ass	ns, alignir sessment	ng with t Plan and	he objecti I Environm	ves outlir iental Ma	ronmental ned in the inagement ified areas	Complied



	e been raised. The Conti ccordance with the follo		
Estate – Social			
	education aid for the school students and R		
- To repaint all staff	bungalow and labour qu	uarters	
- To replace old and	poor furniture with new	one one	
- To continuously r grocery shop, Hind	maintain sundry buildin lu temple	ngs such as surau,	
Carotino POM - Social			
	parency in terms of emporkers, payslip, overtime	-	
- To provide clinica cases of emergenc	l facilities and passeng y.	er van transport in	
	•		
Description	Improvement plan	Completion date	
Environmental impacts	River Water Quality Analysis	6-monthly	
	Maintenance work for upkeep jungle trees	Dec 2023	

Maximizing recycling and minimizing waste or by-products	planted on hill slope & riparian Sales used lubricants, used oil filters, clinical waste to licensed collector	Dec 2023	
generation	Arrange the workers for separate household wastes	Dec 2023	
	To organize recycle campaigns for estate resident	18/10/2023	
	Disposed off the triple rinsed plastic herbicide containers through supplier for recycle	Continuous	
	Disposed off fertilizer inner linings bags, scrap iron used fertilizer bags, old vehicle batteries, old tyers/tubes/flabs, old discarded computer CPU and monitors for recycle	Continuous	

		To reduce chemicals and increased IPM	To maintain and upkeep barn owl boxes To upkeep and maintain Cassia Cobenensis to increase caterpillars predators	Continuous	
			To plant more guetamala grass and jungle trees along river riparian to reduce soil erosion	Continuous	
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 -	template version 2.1 assessment. Based of including land titles, recording system, and	Unit (CPU) completed L and submitted to the On verification through JKKP report, employees I monitoring records etc. Were found to be accurate	e CB prior to the various documents register, Lintramax the data reported in	Complied
Criterio	n 3.3: Operating procedures are Appropriately documented, consistently im	plemented and monitor	ed.		
3.3.1	(C) Standard Operating Procedures (SOPs) for the unit of certification are in place.- Critical (Major) compliance -	Receiving Station	Mill SOP Register update ght bridge Station SOP	ed 15/09/2019.	Complied

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CCP/02-03/2019: Grading Station SOP CCP/03-02/2019: Extraction Station SOP CCP/04-04/2019: Clarification Station SOP CCP/05-02/2019: Nut Station SOP CCP/06-02/2019: Kernel Station SOP CCP/07-03/2019: Storage Station SOP CCP/08-07/2019: CPO & PK Despatch SOP CCP/09-02/2019: Effluent Treatment & Effluent Tertiary Plant SOP CCP/13-01/2018: Transport Ordering SOP CCP/11-03/2019-CPOM: Mechanism for Handling Non-conforming FFB SOP MBC/10-02/2018: ISCC IP/SG Calculation Methodology SOP MBC/10-04/2018-CPOM: RSPO SCC Standard Product Calculation SOP. Asia Oil Palm Estate 1 Sampled Guidelines on FFB Harvesting & Evacuation (D/004-02/2009) dated 02/01/2009. Guidelines for Biodiversity Conservation Management Plan for Estate (C/006/01/2019) dated 20/02/2009. Guideline for Peat Management (C/030-01/2020) 31/01/2020. Guideline on Traceability of Harvested FFB from Fields (D/002-02/2020) dated 07/10/2020. Guidelines on Reducing Chemical Usage for Catchment Areas of Estate Water Pond (C/010-01/2010) dated 27/01/2010 Guidelines on Managing Steep Areas Planted with Oil Palms (C/005-01/2008) dated 26/12/2008

Guidelines on Soils and Water Conservation (C/002-01/2008) dated 10/11/2008	
Guidelines on Establishment of Riparian Buffer Zone (C/001-01/2009) dated 16/02/2009.	
<u>Carotino Estate</u>	
J.C Chang group of companies established variety Procedures and SOP to be used for mill and plantation operation. Among found in a masterlist included Procedure and Guideline Register (A-U)	
A: Oil Palm Nursery and Replanting	
B: Upkeep and Cultivation	
C: Soil, Water and Biodiversity Conservation & Management	
D: FFB Harvesting & Despatch	
Legal, Employment, Welfare, Communication and Consultation	
E: Waste and Pollution Management	
G: Vehicle and Workshop Management	
H: Store Management	
I: Building, Construction and Maintenance	
J: Insurance	
K: Buffalo Management	
L: Pest and Disease Management	
M: OSH Estate	
N: Improvement Plan	
O: Impact Register and Assessment	
S: Memo	
T: General	
U: OSH General.	

3.3.2	A mechanism to check consistent implementation of procedures is in place Minor Compliance -	Mill Director has conducted visit for period of July 2022-June 2023 for checking on consistent Implementation of procedures at all department and stations in the mill.	Complied
		Asia Oil Palm Estate 1 Sighted and available Estate Visit Report dated 16/10/2023- 18/10/2023. Among checking points included Yield Performance (Over 3 years period), Field Upkeep and Maintenance, FFB Quality, Weeding, Fertilizer, Nursery, Pest and Disease, Abandoned Area, Vehicle and Implementation Inspection, Workshop, Labor line.	
		Carotino Estate Plantation Controller (Seow Chee Chiang and Mohammad Faiz Asyraf Razali) Visit Report (26-28/07/2023). Checking points similar as other estate report as verified.	
3.3.3	Records of monitoring and any actions taken are maintained and available. - Minor Compliance -	Records of monitoring and any actions taken are maintained and available as per Mill Visit Report (FY 2022/2023) for visit dated on 04/12/2023 by Plantation Controller (Seow Chee Chiang and Mohammad Faiz Asyraf Razali) Visit Report (26-28/07/2023). Mill and Estate Managers made a comment on action to be taken as stated in the report.	Complied
	on 3.4: A comprehensive Social and Environmental Impact Assessment (SEI/ement and monitoring plan is implemented and regularly updated in ongoing		d environmental
3.4.1	(C) In new plantings or operations including mills, an independent SEIA, undertaken through a participatory methodology involving the affected stakeholders and including the impacts of any smallholder/out-grower scheme, is documented. - Critical (Major) compliance -	No new planting activities have been verified in any of the sampled estates, and there are no new operations assessed at the mill. It was noted that Social and Environmental Impact Assessment has been carried out by Wild Asia in a participatory manner back in 2011. The assessment of the environmental impact of the existing activities and the corresponding Management Plan is thoroughly documented via Environmental and Social Improvement Plan-West (Pahang), dated 22/11/2023 with reference number N/009-	Complied

		04/2023. Identified main social aspects and impacts from SIA considered in the plan including the following categories:	
		- Workers' Pay & Living Condition – Selection, Recruitment, Employment Contract Agreement	
		- Workers' Working Condition- Housing Condition & Inspection,	
		- Communication & Consultation- External stakeholder's feedbacks	
		- Fair pricing for internal & external contractors/tenants.	
		For environmental, the assessment documented as per Final Report Social & Environmental Impact Assessment Scoping Assessment for Carotino Palm Oil Mill (JC Chang Group) and its associated supply base; Promoting Responsible Palm Oil A Report Prepared by Wild Asia for Carotino Sdn Bhd; Report dated: 14/1/2009.	
		Additionally, there are Risk Assessment of Agro-Chemical Impact on Health and Environment; Doc. Ref. # O/001-16/2019; Doc. Date: 24/10/2019. These assessments were conducted through a participatory methodology involving the affected stakeholders.	
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 -	SEIA is available and its plan has been reviewed for all operating units on annual basis. SIA management plan has been developed after compilation the feedbacks and issues during various of meeting such as stakeholder meeting, union meeting and gender committee meeting. Summary of issues raised will be incorporated in the SIA management plan for further monitoring.	Complied
		- Pahang Oil Palm Estate 1 updated their social management plan on 22/11/2023.	
		- Carotino POM updated their social management plan on 01/11/2023.	
		- Asia Palm Oil Palm Estate updated document social	

		management plan annually. Last updated on 03/12/2023.	
		- Maran Estate updated social management plan on 05/01/2024.	
		- Sighted Carotino Estate updated their social management plan	
		For environmental management and monitoring plan, all implementations were reviewed from time to time as per sample discussed in latest 8th Environmental Meeting; Date: 4/5/2023; Attended by 12 committee members; Next (9th) Environmental Meeting Planned Date: 7/5/2024.	
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 -	The social and environmental management and the corresponding Management Plan is thoroughly documented via Environmental and Social Improvement Plan- West (Pahang), dated 22/11/2023 with reference number N/009-04/2023. This management plan also based on the Environmental Policy signed by Plantation Director; Date: 12/8/2019.	Complied
		The assessment actively engaged affected stakeholders, including contractors, government authorities' officers, and internal workers. Concerns and insights raised by these stakeholders were integrated into a comprehensive management plan. The social profile, encompassing aspects like the social background of employees, local community background, education, safety, and health, living conditions, and infrastructure and amenities, as well as stakeholder engagement, were thoroughly evaluated and addressed in accordance with established standard.	
		PIC appointed for management sighted as per sample Letter of Appointment as Person Responsible for EIA Asia Oil Palm Estate 1; Mr. Sivanesan A/L Kolanthenesunathan; Date: 14/10/2019. Sample of management plan and implementation as per	



Environmental and Social Improvement Plan – West (Maran Estate); Date: 2/12/2022 as following:

<u>Pahang Oil Palm Estate 1/Asia Oil Palm Estate 1/Maran Estate/Carotino Estate</u>

- To conduct post arrival orientation for all newly workers until the workers is competence to do job. Verified latest newly recruited workers is on 13/06/2023. There are 4 workers involved and sighted clear evidence that all recently hired employees undergo a post-orientation process and are remunerated on a daily wage basis.
- To monitor worker's productivity on weekly basis and act accordingly. Unproductive workers will be advised, and reminder will be given or will be offered other jobs to increase their income.
- To monitor discharge water quality via sampling of river water upstream and downstream
- To monitor use of chemicals through IPM implementation
- To monitor buffer zones and HCV areas
- To monitor wastes management including SW

Carotino POM

- To provide clear pricing system in all agreement regards to FFB transaction with supplier for both on cash and credit term with appointed third party.
- To monitor worker's working hours and overtime payment are made according to law and legal regulation.
- To monitor treated POME final discharge quality
- To monitor boiler stack emission
- To monitor wastes management including SW

Criterio	on 3.5: A system for managing human resources is in place.		
3.5.1	Employment procedures for recruitment, selection, hiring, promotion, retirement and termination are documented and made available to the workers and their representatives where applicable. - Minor Compliance -	The Plantation Department in HQ has established "Guidelines on procedure of recruitment, selection, hiring, promotion, retirement and termination" dated 12/08/2019 document reference number E020-01/2019 to explain the recruitment processes for both local and foreign workers.	Complied
		Sighted memo from headquarters for J.C Chang dated 28/10/2022 and 05/12/2022 title "Guidelines on newly recruited migrant workers". The guidelines outline various steps that operating units are required to take, as detailed below:	
		a. One (1) paid rest day for all newly arrived workers.	
		b. To conduct post orientation one day after arrival, wages paid to the workers as daily wages.	
		c. To ensure all new workers signed employment contract as per endorsed by embassy/consulate. One copy will be kept by workers/management.	
		d. Registration for SOCSO under Employment Injury Scheme	
		e. To send new workers for FOMEMA within 7 days from arrival.	
		f. To ensure workers housing is in good condition with necessity as mentioned in the guideline.	
		The procedures and guidelines were available for review upon request.	
3.5.2	Employment procedures are implemented, and records are maintained Minor Compliance -	Pahang Oil Palm Estate 1 Sample of 4 newly immigrant workers recruited on 02/06/2023 as harvester. Sighted medical test results (FOMEMA) and series of awareness briefing provide as their induction program. Among	Complied



topics shared are rules & regulation during work, working hours, PPE implementation, Hazard at workplace and etc.

Carotino POM

Verified FOMEMA examination result for 4 new foreign workers prior to employment on 01/09/2023. All 4 Nepalese workers passed the FOMEMA test.

While for latest local employment on 11/05/2023, sighted Health Examination Form (New Employee) which checked on blood pressure, height, weight and declaration to any health condition. Health Assistant (H.A) then declare the new local worker his/her fitness condition accordingly.

New workers (foreign and locals) were included in company induction program where will be briefed regarding to rules and regulation during work, working hours, rate of payment and hazards in workplace.

Details as per below

a. Date joined: 30/08/2023, ID: G0485b. Date joined: 11/05/2023, ID: G0466

Asia Oil Palm Estate 1

Verified 8 new foreign workers registered on 27/06/2023. Documents reviews provide evidence that all workers were recruited according to employment procedures such as FOMEMA examination result, post arrival orientation checklist, employment agreement and briefing on policies and company rules and

		regulations. Interview session with 2 org newly recruited workers confirmed the statement. Details of sample as per below a. Date joined: 27/06/2023, ID: AOP 1684 b. Date joined: 27/06/2023, ID: AOP 1679	
		Maran Estate Sample of 2 newly recruited workers has been taken for foreign workers recruited on 11/01/2024 and one local worker recruited on 20/11/2023. Verified local worker was hired watchmen and sighted application form, medical checkup which mentioned fit to work and interview records. While for foreign workers, sighted the demand letter, post arrival checklist form, employment agreement, passport consent and advance deduction consent form.	
Criterio	on 3.6: An occupational health and safety (H&S) plan is documented, effective	vely 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 -	NRA was conducted by Alam Hijau Integrasi Assessor Iszaifah Bt Eshabah (HQ/15/PEB/00/146): Personal Monitoring on 10/09/2020. Result Farm Tractor Driver Exceeding Excessive Noise of 82.0 dBA and Exceeding Noise Exposure Limit 85 dBA. Estate has identified hazard and risk assessment conducted for activities and operations such as Harvesting, Weeding/P&D, Manuring, Store Operation, Workshop Operation, Grass Cutting and etc dated reviewed 09/03/2023 and next review om 09/03/2026. Further sampling on Vehicle Driving/Operation dated 09/03/2023 from Risk	Non- compliance



of Spraying (Mechanical) for exposure to odour/fume from chemicals and noise. Risk scored 4 (Low) and recommended control measure Training/SOP, PPE such as Respirator, Ear Plugs, Apron, Green Nitrile Gloves, Safety Helmet, Safety Boots and etc.

Carotino POM

Sighted Hazard Identification, Risk Assessment and Risk Control (Hirarc). Date reviewed on 01/07/2022 and next review on 01/07/2024. Available a Guidelines on Hazard Assessment, Prevention and Control (Risk Management and Mitigation Plan) (U029-01/2019) dated 15/08/2019. The requirement of Review only covering:

- Every 3 years
- Any changes to process or activities
- Directed by DG or officer of DOSH
- Not included when accident or dangerous occurrence happened.

Noraziman Accident 18/10/2022: Conveyor accident, emptying fibre cyclone and pulling the cover he felt down into the conveyor (MC 74 days).

Duraisamy Accident 18/11/2022, motorcycle accident (MC 43 days)

Among assessment covering:

Grading, FFB Reception, Sterilizer Station and other activities in the mill.

Observed risk of hot work activity (Acetylene & Oxygen) in Carotino POM not properly control with standby and reachable fire extinguisher nearby as sighted during workers repairing of conveyor platform at loading ramp. It was stated as part of requirements for the particular job in the Job Instruction sampled.

		Acetylene & Oxygen (P/030-01/2008) Safety Operation Procedure During Cutting Works (Oxy-Acetylene) dated 10/11/2008 and similar risk of Safety Operation Procedure During Welding Works (P/024-01/2008) dated 10/11/2008 was found not adequately include this requirements. Hence, a nonconformity has been raised. Carotino Estate Hirarc was reviewed on 03/07/2023 and next will be 01/07/2026. Among Activities included Nursery Operation, Harvesting: fall down while harvesting at slope, slippery area found not included. Also included Spraying (Power Spray), Spraying (Geo ST), Manuring, Driving Tractor, Workshop and etc. Hirarc was not revised after accident on 04/04/2023 and only revised on 03/07/2023. (Operation-General Worker) Activity: Slashing/cutting uprooting/pulling/weeds/creepers/vops. Hazard: Sharp Parang. Effect: Injury to body parts due to cuts. Risk (3X2=6) and No	
3.6.2	(C) The effectiveness of the H&S plan to address health and safety risks to people is monitored Critical (Major) compliance -	Recommended Control proposed. In Estate sighted OSH Plan and Improvement (Estate) (M/013-03/2015) dated 09/11/2015. Among in the plan included: • Meeting of SHC • Workplace Inspection • Investigation of accident • Risk Assessment • Awareness and Training Programme • Appropriate PPE • First Aider and First Aid Boxes • OSH Committee will monitor and review the OSH plan and discussed in the SHC meeting.	Complied

		In Carotino POM sighted OSH Plan 2023/2024 date reviewed 10/07/2023. Monitoring was done as sighted progress and status of completion for each programme recorded.	
Criterio	Criterion 3.7: All staff, workers, Scheme Smallholders, out-growers, and contract workers 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 -	Training Programme 2023/2024 was established covering all types of training planned such as: Mandatory training such as listed below found planned and included: Scheduled Waste (25/12/2023) Noise induces hearing Loss (Feb 2024) Tractor and Driver (09/12/2023) Chemical Hazardous to Health SOP Training: Manuring, Spraying, Harvesting (Along the year 2024) First Aid Training (July 2023) Environmental Awareness (Dec 2023) EFB Training (March 2024) HCV Training and Awareness (Dec 2024) Available A Training Matrix comprised of 39 type of trainings and cross-linked with all levels of workers (Field Supervisor, Store Clerk, Office Clerk, Medical Assistant, Harvester, Sprayer, Manurer, Tractor Driver, Workshop Worker, Mandores, Fogging Operator, Security, OSH Committee, Grass Cutter, Nursery Staff, Waste Handler). Carotino POM Available a Training Matrix matching all level of workers (Workshop, Effluent, Biogas, Store, Housekeeping, Engine Driver,	OFI

	_	_ ,	
		Grading, Kernel Plant and etc. The Training included under topics of Communication and Social, OSH Training, Others Training.	
		Asia Oil Palm Estate 1	
		Training and Briefing Programme for Year 2024 established. Among included:	
		First Aid (March)	
		ERP (May & Oct)	
		Manuring, SDS Training (Feb & July)	
		• Spraying, Safe Handling, Triple rinse, SDS, Premix ect (Feb & Jul)	
		Scheduled Waste (Mac & Aug)	
		Harvesting (Apr & Aug)	
		• Driver (Jan & Aug) and others (total 18 types of training & briefing planned).	
		The training and instruction on proper usage of personal hearing protector to be further enhanced and improved for the right technique and method of inserting ear plugs for better protection from noise.	
3.7.2	Records of training are maintained Minor Compliance -	Noise Training was conducted on 13/06/2023 and attended by 26 workers.	Complied
		Driving Training was conducted on 11/07/2023 and attended by 38 workers.	
		Pest and Disease Training was conducted on 05/01/2023 and attended by 9 workers	
		SDS Training was conducted on 10/01/2023 and attended by 2 workers	



EFB Training was conducted 16/03/2023 and attended by 31 workers.

OSH Training was conducted 13/02/2023 and attended by 11 workers and etc.

Asia Oil Palm Estate 1

Training record for year 2024 so far on 16/01/2024. Training on Driving of tractor, PPE and Hirarc attended by 18 Tractor drivers.

Maran Estate

Among training record sighted included:

- PBDS & PPE Training for Mechanise Spray conducted on 14/06/2023 and attended by 2 workers.
- SOP Harvesting, Pruning, Quality Training was conducted on 29/04/2023 and attended by 21 workers (Harvester, Loader, QC, Loose Fruit Picker).
- Harvesting and Loose Fruit Training was conducted on 03/05/2023 and attended by 22 Harvester, Loose Fruits Pickers.
- First Aid Boxes NA Emergency Case Handling Training was conducted on 19/04/2023 and attended by 17 workers (Field Conductor, Mandores, Store Keeper, Drivers, Foreman).
- Vehicle and Tractor Driving Training was conducted on 03/04/2023 and attended by 11 workers
- Workshop Safety Training was conducted on 21/03/2023 and attended by 2 Workshop workers.
- First Aid Boxes NA Emergency Case Handling Training was conducted on 07/07/2023 and attended by 16 workers (Field Conductor, Mandores, Store Keeper, Drivers, Foreman).
- Genset and Water Pump Training was conducted on 26/07/2023 and attended by (Aziz Harun-Genset Operator).

		 Grass Cutting Training was conducted on 27/07/2023 and attended by 2 Grass Cutters. Pesticides Handling Training was conducted on 13/09/2023 and attended by6 workers. 	
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 SCCS was conducted under CCP1 on 27/12/2023, CCP2 on 05/09/2023, CCP3 on 06/11/2023, CCP4 on 06/11/2023, CCP5 on 06/11/2023, CCP6A on 21/10/2023. Supply Chain Mass Balance Calculation and Non-conforming Training was conducted on 14/04/2023 and attended by Norsilawati. CPO & PK Despatch Training was conducted on 21/02/2023 and attended by Atikah, Fatin, Arma. Transport Ordering was conducted on 21/02/2023 and attended by Atikah, Fatin, Arma.	Complied
Criteri	on 3.8: Supply chain requirement for mills		
(note: /	All supply chain requirements are considered as Critical (C) . However, it will r	not contribute to suspension if there is more than 5 non-compliance w	vithin a principle)
3.8.1	Identity Preserved Module A mill is deemed to be Identity Preserved (IP) if the FFB processed by the mill are sourced from plantations/estates that are certified against the RSPO Principles and Criteria (RSPO P&C), or against the Group Certification scheme. Certification for CPO mills is necessary to verify the volumes and sources of certified FFB entering the mill, the implementation of any processing controls (for example, if physical separation is used), and volume sales of RSPO certified products. If a mill process certified and uncertified FFB without physically separating them, then only Mass Balance Module is applicable.	Carotino POM only receives certified FFB. Therefore, qualifies for the Identity Preserved supply chain system and module. During the P&C assessment, the audit team verified the volumes and sources of certified FFB entering the mill, the implementation of processing controls and volume sales of RSPO certified products.	Complied
	Maca Palanca Madula	Not applicable as Carotino POM opted for IP model.	Not Applicable
3.8.2	Mass Balance Module A mill is deemed to be Mass Balance (MB) if the mill process FFB from both	Not applicable as Carotino Pori opted for IP model.	Not Applicable



	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.			
3.8.3	The estimated tonnage of CPO and PK products that could potentially be produced by the certified mill shall be recorded by the certification body (CB) in the public summary of the P&C certification report. This figure represents the total volume of certified oil palm product (CPO and PK) that the certified mill is allowed to deliver in a year. The actual tonnage produced shall then be recorded in each subsequent annual surveillance report.	The estimated tonnage of CPO and PK products that could potentially be produced by the certified mill is recorded in this public summary report (see 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.	Carotino POM meet all registration and reporting requirements for Identity Preserved supply chain through the RSPO IT platform with information as following:		Complied
		Member Name	Carotino Sdn Bhd	
		Member ID	RSPO_PO1000000128	
		RSPO Membership Number	2-0029-06-000-00 (J.C. Chang Holdings Sdn. Bhd.)	
		Type of Business	Oil mill	
		Issued On	30-05-2023	
		Issued By	BSI Services Malaysia Sdn Bhd.	
		Start Date	02-06-2023	
		End Date	26-06-2024	
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) Carotino POM has ensured the SCCS implementation of Identity Preserved based on the established written procedures as following:		Complied



	a) Complete and up to date procedures covering the implementation of all the elements of the supply chain model requirements.	- SOP Reception Station; Ref. # CCP/01-05/2019; Date: 15/07/2019	
	 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. 	 SOP Dispatch CPO & PK; CCP/08-07/2019; Date: 15/07/2019 SOP RSPO SCC Standard Products Calculation; SCC/10-05/2019-CPOM; Date: 01/07/2019 SOP Mechanism for Handling Non-Conforming FFB, CCP11-04/2019; Date: 16/07/2019 SOP Production Reporting and Documentation; ref. # CCP/12-43/2018; Date: 10/07/2019 Carotino POM has demonstrated complete SCCS records include the materials (FFB) incoming received tickets, daily, weekly and monthly production reports, mass balance spreadsheet, sales transactions and products (CSPO & CSPK) despatched tickets c) Identified PIC are as per Letter of Appointment as Sustainability 	
		Operation Manager; Kenny Alvin Ligunjang (Mill Manager); By Tay Chwee Leong (Mill Director); Date: 7/7/2014	
		d) Carotino POM has documented the SOP Mechanism for Handling Non-Conforming FFB, CCP11-04/2019; Date: 16/07/2019 for receiving and processing certified only FFB since no non-certified FFB received/purchased	
3.8.6	Internal Audit i) The mill shall have a written procedure to conduct annual internal audit to determine whether the mill: a. Conforms to the requirements in the RSPO Supply Chain Certification Standard and the RSPO Market Communications and Claims Documents.	 i) a. Carotino POM has established SOP for Internal audit written as Guideline for Internal Auditing and Management Review of the Sustainability and Supply Chain System; Ref. # T/001-04/2022; Date: 01/12/2022. b. The SOP conforms to the latest requirements of RSPO SCCS and RSPM Rules of Market Communications and Claims. Internal audit was implemented effectively with latest conducted on 3-4/07/2023. 	nplied

	 b. Effectively implements and maintains the standard requirements within its organisation. 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. 	ii) No non-conformities related to RSPO SCCS found in the latest internal audit. Audit results were reviewed by management during meeting latest conducted on 11/07/2023.	
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. 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.	 i) Carotino POM verified and documented the tonnage and sources of all certified FFB received as per sample as following: Receiving Slip; Ticket # FFB24000917W; Date: 21/1/2024; Product: FFB/IP; Supplier: Asia Oil Palm Estate 1 (AO1); Field Block # 98-A1; Net weight: 6.79 mt Receiving Slip; Ticket # FFB24000834W; Date: 19/1/2024; Product: FFB/IP; Supplier: Carotino Estate (HL2); Field Block # 90A03; Net weight: 20.49 mt ii) No overproduction of certified tonnage by Carotino POM. In case of any, the PIC (Mill Manager) will alert the HQ Sustainability Manager to request for volume extension from CB iii) Carotino POM has documented the SOP Mechanism for Handling Non-Conforming FFB, CCP11-04/2019; Date: 16/07/2019 for receiving and processing certified only FFB since no non-certified FFB received/purchased 	Complied
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	Carotino POM ensured the required information is available in document form. Verified sample sales and goods out transactions documents as following: - Buyer: Carotino Sdn. Bhd.; Address: PLO 519, Jalan Besi Satu, Pasir Gudang Industrial Estate, Pasir Gudang, Johor, Malaysia;	Complied

	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; f) A description of the product, including the applicable supply chain model (Identity Preserved or Mass Balance or the approved abbreviations); g) The quantity of the products delivered; h) Any related transport documentation; i) A unique identification number.	Seller: Carotino Palm Oil Mill Sdn. Bhd.; PT 116, Lot # 3840 Mukim Ulu Lepar, 26500 Kuantan, Pahang Malaysia; Delivery/Documents date: 1/12/2023; RSPO Cert # RSPO 649410; Product description: CSPO/IP; Net weight: 37.27 mt; DO # 28082; Weighbridge Ticket # CPO23000515W - Buyer: Wilmar Kuantan Edible Oils Sdn. Bhd.; Address: Lot 1A, Kawasan Perindustrian Gebeng, 26080 Kuantan, Pahang, Malaysia; Seller: Carotino Palm Oil Mill Sdn. Bhd.; PT 116, Lot # 3840 Mukim Ulu Lepar, 26500 Kuantan, Pahang Malaysia; Delivery/Documents date: 1/12/2023; RSPO Cert # RSPO 649410; Product description: PK/IP; Net weight: 39.12 mt; DO # 8574; Weighbridge Ticket # PK23000107W	
3.8.9	 Outsourcing Activities 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 ii) The mill shall ensure the following: a) The mill has legal ownership of all input material to be included in outsourced processes 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. 	Outsourcing activities in Carotino POM only involve the transportation of products, i.e. CSPO and CSPK, subjected to the buyers' contractual requirements. Implementation for Outsourcing activities was based on the procedure System Management & Documentation; CCP14 Outsourcing Activities; Version 2 (CCP/14-02/2019) Document Date: 13/09/2019. The Procedure System Management & Documentation; CCP14 Outsourcing Activities; Version 2 (CCP/14-02/2019) Document Date: 13/09/2019 states that the site has legal ownership of all input materials to be included in outsourced processes. Verified sample outsource transportations agreements as following: - Crude Palm Oil Transportation Agreement; Validity period: 1/1/2022 – 31/12/2024; Transporter: Pritam Singh Agency Sdn. Bhd.	Complied

	 c) The mill has a documented control system with explicit procedures for the outsourced process which is communicated to the relevant contractor. d) The mill shall furthermore ensure (e.g. through contractual arrangements) that independent third parties engaged provide relevant access for duly accredited CBs to their respective operations, systems, and all information, when this is announced in advance. 	 Renewal of Palm Kernel Transport Agreement; Letter ref. # COM/S4(POM)/58/NKW; Date: 19/5/2021; Validity period: 1/7/2021 - 30/6/2024; Transporter: Eng Lee Sing Sdn. Bhd. Both sample agreements also specified the following: The certification body (CB) has access to the outsourcing contractor or operation if an audit is deemed necessary The outsourcing contractor shall comply with the requirement of RSPO, company's policies and procedures The outsourcing contractor shall provide relevant access for duly accredited CBs to their respective operations, systems, and all information, when this is announced in advance 	
3.8.10	The mill shall record the names and contact details of all contractors used for the physical handling of RSPO certified oil palm products.	Names and contact details of transporters used for the physical handling of RSPO certified oil palm products were recorded and registered in the mill supplier database system.	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.	Names and contact details of any new transporter used for the physical handling of RSPO certified oil palm products to be informed by mill supply chain PIC upon available.	Complied
3.8.12	 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. ii) Retention times for all records and reports shall be a minimum of two (2) years and shall comply with relevant legal and regulatory requirements and be able to confirm the certified status of raw materials or products held in stock. iii) For Identity Preserved Module, the mill shall record and balance all receipts of RSPO certified FFB and deliveries of RSPO certified CPO and PK on a real-time basis. 	Carotino POM maintained records and balance all its receipts of certified FFB and deliveries of certified CPO and PK through the utilization of its "MOM - Sustainable CPO Mass Balance - Quarterly" record. For the period under review (Jan 2023 – Dec 2023): Certified FFB processed = 107,919.51 mt Produced: CPO = 21,166.11 mt, PK = 4,616.04 mt Dispatch: CPO & PK = 20,562.25 mt & 4,605.19 mt The mill maintained the records and balanced all receipts of RSPO certified FFB and deliveries of RSPO certified CPO and PK on a real-time basis. All records retained for minimum 2 years period.	Complied

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	 iv) For Mass Balance Module, the mill: a) Shall record and balance all receipts of RSPO certified FFB and deliveries of RSPO certified CPO and PK on a real-time basis and / or three-monthly basis. b) All volumes of certified CPO and PK that are delivered are deducted from the material accounting system according to conversion ratios stated by RSPO. c) The mill can only deliver Mass Balance sales from a positive stock. Positive stock can include product ordered for delivery within three (3) months. However, a mill is allowed to sell short (i.e. product can be sold before it is in stock. 		
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.	Carotino POM is using the actual extraction rates in reporting and applied the retrospective extraction rates in forecasting.	Complied
3.8.14	Extraction rates shall be updated periodically to ensure accuracy against actual performance or industry average if appropriate.	Carotino POM is using the actual extraction rate and therefore updating of rates is not necessary.	Complied
3.8.15	Processing For Identity Preserved Module, the mill shall assure and verify through documented procedures and record keeping that the RSPO certified oil palm product is kept separated from non-certified oil palm products, including during transport and storage to strive for 100% separation.	Based on SOP for RSPO SCC Standard Products Calculation; Doc. # MBC/10-04/2018-CPOM; Date: 06/12/2018 under section 1. Function the following were specified: "A mill deemed to be Identity Preserved (IP) if the FFB used by the mill are sourced from the plantation/ estates are certified against the RSPO Principle and Criteria." Identity Preserved has explained the processing of RSPO material to prohibit non-certified products processed. The mill is 100% received certified FFB from own certified supplying estate and produced 100% certified products. There are no non-certified	Complied

...making excellence a habit."



		materials will be received and processed as verified through summary mass balance Jan 2023 to Dec 2023 (CPO & PK).	
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. 	Shipping announcement in the RSPO IT platform carried out by by the Trading Department when RSPO certified products are sold as certified to refineries. Details of transaction summarized under table 10 and 10A. Among the announcements sampled were as following: - TR-3bbf111f-7e5d - TR-0e736b03-79cc - TR-75ae63b3-5bb6 Carotino POM aware that the removal of CSPO sold under ISCC in PalmTrace and its system is in place. The plan to remove these volumes prior to the end date of license was verified during the audit and its removal will be reviewed in next audit.	Complied
3.8.17	Claims 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.	RSPO trademark was not use. Nonetheless, the facility is aware with the requirements of the RSPO Rules on Market Communications and Claims.	Complied
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.	Information regarding RSPO membership can be located on the parent company's website. No off-product claim made by the mill, and this was verified through document and site review (notice board, business card, shipping documentation, procurement/ purchasing document and promotional material etc.).	Complied



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 E. use the RSPO Trademark (as shown below) with a valid trademark licence number to promote its RSPO membership	On the parent company's website, it is explicitly mentioned that they are a member of RSPO and are dedicated to adopting RSPO standards via website link as following: http://www.carotino.com/awards-achievements-7.aspx	Complied
4.3	Members are not allowed to use the RSPO corporate logo as shown below. This is for the sole use of the RSPO Secretariat.	Based on site visit and documentation review, verified that RSPO corporate logo is not use by the Carotino POM. Hence, this requirement is not applicable as no off-product claim made by the mill as to date.	Not Applicable
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.	No such insinuating claim has been found. Hence, this requirement is not applicable as no off-product claim made by the mill as to date.	Not Applicable
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."	On the parent company's website, it is explicitly mentioned that they are a member of RSPO and are dedicated to adopting RSPO standards. Notwithstanding, this requirement is not applicable as no off-product claim made by the mill as to date.	Not Applicable

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	• "Our company covered (X%) of palm oil derivative volumes used across all our products manufactured in (YEAR) with smallholder credits."		
	"We are RSPO certified. Ask us for our RSPO certified products."		
	·		
4.6	RSPO non-certified members are allowed to make product-related claims in their corporate communication tools by doing the following:	On the parent company's website, it is explicitly mentioned that they are a member of RSPO and are dedicated to adopting RSPO standards. Notwithstanding, this requirement is not applicable as no off-product claim made by the mill as to date.	Not Applicable
	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".		
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 made off pack such as shipping documents as per sample as following:	Not Applicable
	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.	- Buyer: Wilmar Kuantan Edible Oils Sdn. Bhd.; Address: Lot 1A, Kawasan Perindustrian Gebeng, 26080 Kuantan, Pahang, Malaysia; Seller: Carotino Palm Oil Mill Sdn. Bhd.; PT 116, Lot # 3840 Mukim Ulu Lepar, 26500 Kuantan, Pahang Malaysia; Delivery/Documents date: 1/12/2023; RSPO Cert # RSPO	

		649410; Product description: PK/IP; Net weight: 39.12 mt; DO # 8574; Weighbridge Ticket # PK23000107W Notwithstanding, this requirement is not applicable as no packings required for the mill products as deliveries made in bulk via tanker for CPO and cargo lorry for PK. Delivery documents specified only RSPO module i.e. CPO IP and PK IP.	
5.1.2	Product-specific communications are voluntary.	No Product-specific communications are being made by Carotino POM. Hence, this requirement is 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 hence, this is 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 hence, this is 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
5.1.5	If any organisation, which does not further modify end products or does not need to undergo Supply Chain Certification such as retailers, traders or distributors, enters into any agreement whereby the RSPO certified supplier labels products with the retailers/traders/distributors RSPO Trademark licence number, the following conditions shall be met as shown below	No on products claims made hence, this is 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
	• RSPO members should be registered on the RSPO IT Platform and complete the information under 'description of products' field.		

	 Both parties shall inform their certification body in writing about the agreement. The RSPO certified supplier is responsible for ensuring that the buyer's RSPO Trademark licence number is used only on products that are supplied to that buyer. 		
5.1.6	Organisations that do not further modify end products or that do not need to undergo Supply Chain Certification such as retailers, traders, or distributors who intend to use the RSPO Label with their own RSPO Trademark licence number in any of their product-specific communications, can do so by undergoing a remote audit. A remote audit shall be conducted by an RSPO-accredited certification body (CB) prior to the use of the RSPO Label whereby the organisation will need to demonstrate that the use is in compliance with the rules contained within this document and that the claim itself can be supported through a certified supply chain	The mill produced only CPO and PK, no further modify end products hence, this is 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 should be used together with the valid trademark licence number wherever an off pack claim is made.	No off pack claim made hence, this is 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
5.2.2	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.	The mill announced the certified sales while the buyers confirmed the receipt as of Table 11 above via Palm Trace.	Complied

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: • 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	This is not applicable since the mill is neither a distributor nor wholesaler.	Not Applicable
	own brand products, it is essential that customers are aware that the products have been made on behalf of the distributor or wholesaler, with specific evidence either through on pack claims or documentation.		
	• If the distributor or wholesaler is supply chain certified, they should follow the requirements outlined in section 5.2.2.		
5.3 On	pack claims		
5.3.1	Only RSPO members who have supply chain certification and members who have undergone remote audit as per 5.1.6 are allowed to make on pack claims about the certified sustainable palm oil contained within the product(s) as per Module A, B, C and E. RSPO members who have purchased RSPO Credits are entitled to claim their support for the production of certified sustainable palm oil as per Module D.	No on-pack claims made hence, this is 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
5.3.2	In case of limited space, RSPO allows flexibility to use a one-line arrangement claim together with a valid trademark licence number for on pack communications as below without having to use any RSPO Label. The licence number has to measure at least 4pt (1.4mm) in size and the font must be Calibri. The following options shall be considered:	No on-pack claims made hence, this is 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
	A) For Identity Preserved (IP)/ Segregated (SG) Certified Products:		
	 RSPO IP/SG CERTIFIED* Contains RSPO IP/SG palm oil* 		
	Contains RSPO 1P/SG paint oil * Contains RSPO certified palm oil (IP/SG)*		



	*Add RSPO TM Licence Number below or next to the claim.		
	B) or Mass Balance (MB) Certified Products: • RSPO MIXED* • Contributes to the production of RSPO certified palm oil* • Contains RSPO certified palm oil (MB)* *Add RSPO TM Licence Number below or next to the claim.	No on-pack claims made hence, this is 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
	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 made hence, this is 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
	 D) For Products covered with Book and Claim (B&C): RSPO CREDITS* Supports the production of RSPO certified palm oil* Contains palm oil covered by the purchase of RSPO Credits* *Add RSPO TM Licence Number below or next to the claim. 	No on-pack claims made hence, this is 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
5.3.3	On pack claims shall not include information about the claimant's RSPO membership status.	No on-pack claims made hence, this is 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
5.3.4	Members shall not communicate to consumers information about their suppliers' RSPO membership status.	No on-pack claims made hence, this is 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



5.3.5	Use of the RSPO Label is restricted to claims about RSPO certified sustainable palm oil contained in products and is not authorised for use in relation to any other ingredient.	No on-pack claims made hence, this is 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
5.3.6	All members making on pack claims are encouraged to submit the information and images of their end products that carry the RSPO Label via the MyRSPO portal.	No on-pack claims made hence, this is 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
MODU	LE 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.	Not applicable since oil palm content is 100% CPO and claim as RSPO IP-certified.	Not Applicable
Messag	ging		
	 Messaging ALLOWED for storytelling in product-specific communications may include any of the following elements: The palm oil products contained in this product have been certified to come from RSPO sources. www.rspo.org By choosing this product, you are sure that it contains RSPO certified palm oil. For more information: www.rspo.org RSPO certified sustainable palm oil products were kept apart from other palm oil products throughout the supply chain.www.rspo.org Certified sustainable palm oil products can be traced back to RSPO certified mills and plantations. www.rspo.org 	Currently, no RSPO (Roundtable on Sustainable Palm Oil) trademark is being utilized on RSPO products by Carotino POM/JC Chang Group. The company has provided information about its membership history with RSPO on its website and in the annual report for the year 2022. Notably, the documentation does not include the use of the RSPO trademark logo.	Complied

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	 The entire supply chain is monitored by independent, RSPO- accredited auditors. www.rspo.org 		
	 RSPO certified sustainable palm oil has been produced according to stringent environmental and social criteria. www.rspo.org 		
Produc	t-Specific Communications Labelling		
	 Members are allowed to use the RSPO Label in one of the following ways: RSPO Trademark that includes the tag "CERTIFIED"; or RSPO Trademark that includes the tag "This product contains certified sustainable palm oil". 	No RSPO Label used hence, this is 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
Princip	le 4: Respect community and human rights and deliver benefits		
Criterio	on 4.1: The unit of Certification respects human rights, which includes respect	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	Carotino/JC Chang Group has established the Social & Human Rights Policy; Date: 14/11/2019; Signed by Mr Tee Swee Kee dated 14/11/2019. Stated in the policy that the management is committed to;	Complied
	unit of certification and contracted services, including contracted security forces. - Critical (Major) compliance -	a. Respect the rights to associate and free to join union	
		b. Respect the rights to live with life free of discrimination	
		c. Respect the rights to freely exercise of religion and practice belief	
		d. Respect the rights to be free from prejudice on the basic of race, gender, national origin, color or age	
		e. Respect and protect the reproductive rights.	
		It was also noted that in their "SOP on Mechanism for Complaints and Grievances," dated 12/08/2019, with document reference number E-001-07/2019, emphasizes that the management is responsible for ensuring the confidentiality of complainants, human	

...making excellence a habit."

		rights defenders, community spokespersons, and whistleblowers.	
		The policy dictates that their identities should not be disclosed unless it is legally impossible to maintain confidentiality.	
		Communication of the policy has been done during the morning muster call. Latest briefing on the policy is last 22/11/2023 for Pahang Oil Palm Estate. For Carotino POM, briefing on the policy has been done to all staffs and workers on 01/12/2023. While for Asia Oil Palm Estate 1, policies briefing conducted regularly according to group of works which is on 18/01/2024 for office employees and 27/06/2023 for harvesters. While for Carotino Estate, policy briefing was regularly conducted to employees and workers with latest program on 20/01/2024.	
4.1.2	The unit of certification does not instigate violence or use any form of harassment in their operations. - Minor compliance -	Carotino/J.C. Chang strictly prohibits any form of harassment within their operations, as outlined in the Social & Human Rights Policy. Worker interviews have affirmed that there is no evidence of harassment by the management	Complied
Criterio	n 4.2: There is a mutually agreed and documented system for dealing with	complaints and grievances, which is implemented and accepted by all	affected parties
4.2.1	(C) The mutually agreed system, open to all affected parties, resolves disputes in an effective, timely and appropriate manner, ensuring anonymity of complainants, HRD, community spokespersons and whistle-blowers, where requested, without risk of reprisal or intimidation and follows the RSPO policy on respect for HRD.	The system was based on SOP Mechanism for Complaints and Grievances; Doc. Ref. No.: E/001-07/2019; Doc. date: 12/08/2019 which found effective, timely, appropriate, and open to any affected parties. The complaint and grievances are open to affected parties including internal and external stakeholders.	Complied
	- Critical (Major) compliance -	It was mentioned that the management shall not unlawfully retaliate against any employee or other stakeholders for bringing a grievance under the mechanism while identity of complainants, human right defender, community spokespersons and whistle-blowers would not be revealed unless it is legally impossible to do so or with his/her consent and permission. In addition, the complainants, human right defender, community spokespersons	



		and whistle-blowers will be treated fairly and given whatever protection is possible, without risk of reprisal or intimidation.	
4.2.2	Procedures are in place to ensure that the system is understood by the	Pahang Oil Palm Estate 1	Complied
	affected parties, including by illiterate parties Minor compliance -	- Communication of the procedure to the workers conducted during the morning muster call on 22/11/2023.	
	s a u	- Communication of the procedure to the stakeholders through stakeholder consultation session which conducted on 12/06/2023 as well as via "Sustainability compliances contract with operating units under J.C Chang Group" that been distributed to external stakeholders. Sighted samples as below:	
		- Supplier – TM Kay Fertilizers Sdn Bhd	
		- Certification Body – ASG Cert GmbH	
		- Clinic – My Health Clinic	
		- Recruitment Agency – PT Bina Kridatama Lestari	
		Carotino POM	
		- Communication of the procedure to the staffs and workers conducted during the morning muster call on 01/12/2023.	
		- While for external stakeholders, sighted minutes of meeting dated 12/06/2023.	
		As per interview with workers and stakeholders, there is evidence that communication of the procedure has been done and all workers and stakeholders that has been interviewed can demonstrate their understanding on the procedure. The is no illiterate workers/stakeholders has been identified in each operating unit	
		Asia Oil Palm Estate 1	

		It was noted that briefing on procedure of complaints for estates were conducted regularly for internal workforces which are	
		18/01/2024 for general workers and 27/06/2023 for harvesters.	
		Maran Estate	
		Briefing on procedure of complaints for estates were conducted regularly for internal workforces which are 10/01/2024 for workers and 13/06/2023 for external stakeholders.	
		<u>Carotino Estate</u>	
		Verified that complaints and grievances procedures was regularly communicated to employees and workers during muster call. Latest briefing was on 20/01/2024. While for external stakeholders, there are series of physical visit conducted by assistant manager to brief identified stakeholders regarding company's policies and procedures. Sighted briefing report to Ladang Pertanian Kelapa Sawit Sdn Bhd on 09/08/2023 and Kg Pasal's representative, Tok Batin Kamisan Bin Wahb on 10/08/2023.	
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 -		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 complaint and grievance resolution process incorporates several options, including access to independent legal and technical advice. Complainants can choose individuals or groups to support them or act as observers. Additionally, the process provides the option of engaging a third-party mediator to facilitate resolution.	Complied

		This approach ensures a comprehensive and fair mechanism for addressing complaints and grievances within the organization.	
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 -	Consultation with local communities has been conducted for all operating units through email and memo which has been sent to all stakeholders and queries if there any contribution required. It has been confirmed through interview with stakeholders, that contribution is upon request and stakeholders able to demonstrate the consultation and communication procedure.	Complied
		Summary list of donations sighted and details as per below.	
		- Donation for organizing breaking fast ceremony in conjunction of Eid Fitri (Pahang Oil Palm Estate 1)	
		- Sponsorship of school transport for employee's children SK Sri Jaya, Maran (23km) (Carotino POM)	
		- Sponsorship of school transport for employee's children to SK FELDA Lepar Utara 01, Lepar (Asia Oil Palm Estate 1)	
		- Sponsorship of school transport for employee's children SK Sri Jaya, Maran (13km) (Maran Estate)	
		- Education Aids to staff's children for new school terms, SK Runchang 1 (Carotino Estate)	
Criterio	on 4.4: Use of the land for oil palm does not diminish the legal, customary	or user rights of other users without their free, prior and informed cons	ent.
4.4.1	(C) Documents showing legal ownership or lease, or authorised use of customary land authorised by customary landowners through a Free, Prior and Informed Consent (FPIC) process. Documents Related to the history of land tenure and the actual legal or customary use of the land are available. - Critical (Major) compliance -	Pahang Oil Palm Estate 1/Carotino POM Documents showing legal ownership available for Carotino POM that located within Pahang Oil Palm Estate 1 and owns a total of 2,153.10 ha under 9 titles. Sighted sample copy of land titles for Pahang Estate kept by the mill as following:	Complied



- Title # 27263; District: Kuantan; Sub-district: Mukim Ulu Lepar; Lot # 23605; Area: 296.2 ha
- Title # 27262; District: Kuantan; Sub-district: Mukim Ulu Lepar; Lot # 23604; Area: 202.6 ha
- Title # 27260; District: Kuantan; Sub-district: Mukim Ulu Lepar; Lot # 23607; Area: 69.67 ha

Asia Oil Palm Estate 1

- Title PN 24500; District: Kuantan; Sub-district: Mukim Ulu Lepar; Lot # 23599; Area: 438.9 ha
- Title PN 24501; District: Kuantan; Sub-district: Mukim Ulu Lepar; Lot # 23594; Area: 439.4 ha
- Title PN 24502; District: Kuantan; Sub-district: Mukim Ulu Lepar; Lot # 23595; Area: 885.0 ha
- Title PN 24503; District: Kuantan; Sub-district: Mukim Ulu Lepar; Lot # 23596; Area: 266.7 ha
- Title PN 24504; District: Kuantan; Sub-district: Mukim Ulu Lepar; Lot # 23597; Area: 117.2 ha
- Title PN 24505; District: Kuantan; Sub-district: Mukim Ulu Lepar; Lot # 23598; Area: 20.22 ha

Maran Estate

- Title PN 28690; District: Kuantan; Sub-district: Mukim Ulu Lepar; Lot # 11362; Area: 201.7 ha
- Title PN 28691; District: Kuantan; Sub-district: Mukim Ulu Lepar; Lot # 11363; Area: 404.5 ha
- Title PN 28692; District: Kuantan; Sub-district: Mukim Ulu Lepar; Lot # 11364; Area: 404.1 ha
- Title PN 28693; District: Kuantan; Sub-district: Mukim Ulu Lepar; Lot # 11365; Area: 405 ha

		 Title PN 28694; District: Kuantan; Sub-district: Mukim Ulu Lepar; Lot # 11366; Area: 279.2 ha Title PN 28695; District: Kuantan; Sub-district: Mukim Ulu Lepar; Lot # 11361; Area: 425.9 ha Carotino Estate Title H.S. (D) 2850; District: Bera; Sub-district: Mukim Bera; PT No: 2389; Area 1659.21 ha 	
4.4.2	Copies of documents evidencing agreement-making processes and negotiated agreements detailing the FPIC process are available and include:	No land disputes requiring the FPIC process have occurred in CPU estates since the last audit, as confirmed through on-site consultations with stakeholders	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 -	estates since the last audit, as confirmed through on-site	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 -	No land disputes requiring the FPIC process have occurred in CPU estates since the last audit, as confirmed through on-site consultations with stakeholders.	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 -	estates since the last audit, as confirmed through on-site	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 -		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 -	No land disputes requiring the FPIC process have occurred in CPU estates since the last audit, as confirmed through on-site consultations with stakeholders	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 -	No land disputes requiring the FPIC process have occurred in CPU estates since the last audit, as confirmed through on-site consultations with stakeholders	Complied
4.4.6	There is evidence that implementation of agreements negotiated through FPIC is annually reviewed in consultation with affected parties. - Minor compliance -	No land disputes requiring the FPIC process have occurred in CPU estates since the last audit, as confirmed through on-site consultations with stakeholders	Complied
	on 4.5: No new plantings are established on local peoples' land where it called the with through a documented system that enables these and other stakes		
4.5.1	(C) Documents showing identification and assessment of demonstrable legal, customary and user rights are available Critical (Major) compliance -	Documents showing legal ownership available for Carotino POM that located within Pahang Oil Palm Estate 1 and owns a total of 2,153.10 ha under 9 titles. Sighted sample copy of land titles for Pahang Estate kept by the mill as following: a) Title # 27263; District: Kuantan; Sub-district: Mukim Ulu Lepar; Lot # 23605; Area: 296.2 ha b) Title # 27262; District: Kuantan; Sub-district: Mukim Ulu Lepar; Lot # 23604; Area: 202.6 ha	Complied

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c) Title # 27260; District: Kuantan; Sub-district: Mukim Ulu Lepar; Lot # 23607; Area: 69.67 ha
Asia Oil Palm Estate 1
- Title PN 24500; District: Kuantan; Sub-district: Mukim Ulu Lepar; Lot # 23599; Area: 438.9 ha
- Title PN 24501; District: Kuantan; Sub-district: Mukim Ulu Lepar; Lot # 23594; Area: 439.4 ha
- Title PN 24502; District: Kuantan; Sub-district: Mukim Ulu Lepar; Lot # 23595; Area: 885.0 ha
- Title PN 24503; District: Kuantan; Sub-district: Mukim Ulu Lepar; Lot # 23596; Area: 266.7 ha
- Title PN 24504; District: Kuantan; Sub-district: Mukim Ulu Lepar; Lot # 23597; Area: 117.2 ha
- Title PN 24505; District: Kuantan; Sub-district: Mukim Ulu Lepar; Lot # 23598; Area: 20.22 ha
Maran Estate
- Title PN 28690; District: Kuantan; Sub-district: Mukim Ulu Lepar; Lot # 11362; Area: 201.7 ha
- Title PN 28691; District: Kuantan; Sub-district: Mukim Ulu Lepar; Lot # 11363; Area: 404.5 ha
- Title PN 28692; District: Kuantan; Sub-district: Mukim Ulu Lepar; Lot # 11364; Area: 404.1 ha
- Title PN 28693; District: Kuantan; Sub-district: Mukim Ulu Lepar; Lot # 11365; Area: 405 ha
- Title PN 28694; District: Kuantan; Sub-district: Mukim Ulu Lepar; Lot # 11366; Area: 279.2 ha

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		- Title PN 28695; District: Kuantan; Sub-district: Mukim Ulu Lepar; Lot # 11361; Area: 425.9 ha Carotino Estate Title H.S. (D) 2850; District: Bera; Sub-district: Mukim Bera; PT No: 2389; Area 1659.21 ha	
4.5.2	(C) FPIC is obtained for all oil palm development through a comprehensive process, including in particular, full respect for their legal and customary rights to the territories, lands and resources via local communities' own representative institutions, with all the relevant information and documents made available, with option of resourced access to independent advice through a documented, long-term and two-way process of consultation and negotiation. - Critical (Major) compliance -	There have been no new plantings in any Carotino Production Unit estates. The audit verified legal land ownership and tenure history. Land titles for each estate were presented for auditor verification.	Complied
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 -	There have been no new plantings in any Carotino Production Unit estates. The audit verified legal land ownership and tenure history. Land titles for each estate were presented for auditor verification.	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, the full range of food and water provisioning options are considered. There is transparency of the land allocation process. - Minor compliance -	There have been no new plantings in any Carotino Production Unit estates. The audit verified legal land ownership and tenure history. Land titles for each estate were presented for auditor verification	Complied



4.5.5	Evidence is available that the affected communities and rights holders have had the option to access to information and advice that is independent of the project proponent, concerning the legal, economic, environmental and social implications of the proposed operations on their lands. - Minor compliance -	There have been no new plantings in any Carotino Production Unit estates. The audit verified legal land ownership and tenure history. Land titles for each estate were presented for auditor verification.	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 -	There have been no new plantings in any Carotino Production Unit estates. The audit verified legal land ownership and tenure history. Land titles for each estate were presented for auditor verification	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 -	There have been no new plantings in any Carotino Production Unit estates. The audit verified legal land ownership and tenure history. Land titles for each estate were presented for auditor verification	Complied
4.5.8	(C) New lands are not acquired in areas inhabited by communities in voluntary isolation. - Critical (Major) compliance -	There have been no new plantings in any Carotino Production Unit estates. The audit verified legal land ownership and tenure history. Land titles for each estate were presented for auditor verification	Complied
	n 4.6: Any negotiations Concerning compensation for loss of legal, customal local communities and other stakeholders to express their views through the content of the co		bles 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 -	Documents titled document "Guideline for Identifying Legal and Customary Rights and Identifying People Entitled to Compensation Documents;" Doc. Ref. # E/002-05/2019; Doc. Date: 12/8/2019 was sighted. The guidelines emphasize on SOP for identifying legal, customary or user rights, and a procedure for identifying people entitled to compensation that been documented in the in case of land dispute issue. There is no changes or content updates verified.	Complied

4.6.2	(C) A mutually agreed procedure for calculating and distributing fair compensation (monetary or otherwise) is established and implemented, monitored and evaluated in a participatory way, and corrective actions taken as a result of this evaluation. - Critical (Major) compliance -	Documents titled document "Guideline for Identifying Legal and Customary Rights and Identifying People Entitled to Compensation Documents;" Doc. Ref. # E/002-05/2019; Doc. Date: 12/8/2019 was sighted. The guidelines emphasize on SOP for identifying legal, customary or user rights, and a procedure for identifying people entitled to compensation that been documented in the in case of land dispute issue. There is no changes or content updates verified	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 -	Documents titled document "Guideline for Identifying Legal and Customary Rights and Identifying People Entitled to Compensation Documents;" Doc. Ref. # E/002-05/2019; Doc. Date: 12/8/2019 was sighted. The guidelines emphasize on SOP for identifying legal, customary or user rights, and a procedure for identifying people entitled to compensation that been documented in the in case of land dispute issue. i There is no changes or content updates verified	Complied
4.6.4	The process and outcomes of any negotiated agreements, compensation and payments are documented, with evidence of the participation of affected parties, and made publicly available to them. - Minor compliance -	No issues related to loss of legal customary rights with indigenous peoples, local communities, settlers and other stakeholders reported during the time of audit through interviewed with the local communities. Painting of oil palm trees, boundary stone and trenches were available to demarcate the boundary of land between the neighboring stakeholders.	Complied
	on 4.7: Where it can be demonstrated that local peoples have legal, customent of rights, subject to their FPIC and negotiated agreements.	stomary or user rights, they are compensated for any agreed land a	acquisitions and
4.7.1	(C) A mutually agreed procedure for identifying people entitled to compensation is in place. - Critical (Major) compliance -	Documents titled document "Guideline for Identifying Legal and Customary Rights and Identifying People Entitled to Compensation Documents;" Doc. Ref. # E/002-05/2019; Doc. Date: 12/8/2019 was sighted. The guidelines emphasize on SOP for identifying legal, customary or user rights, and a procedure for identifying people entitled to compensation that been documented in the in case of land dispute issue. There is no changes or content updates verified	Complied

4.7.2	(C) A mutually agreed procedure for calculating and distributing fair and gender-equal compensation (monetary or otherwise) is established and implemented, monitored and evaluated in a participatory way, and corrective actions taken as a result of this evaluation. - Critical (Major) compliance -	Documents titled document "Guideline for Identifying Legal and Customary Rights and Identifying People Entitled to Compensation Documents;" Doc. Ref. # E/002-05/2019; Doc. Date: 12/8/2019 was sighted. The guidelines emphasize on SOP for identifying legal, customary or user rights, and a procedure for identifying people entitled to compensation that been documented in the in case of land dispute issue. There is no changes or content updates verified	Complied
4.7.3	Communities that have lost access and rights to land for plantation expansion are given opportunities including employment and supply contracts to benefit from plantation development. - Minor compliance -	No issues related to loss of legal customary rights with indigenous peoples, local communities, settlers, and other stakeholders reported during the time of audit through interviewed with the local communities. Painting of oil palm trees, boundary stone and trenches were available to demarcate the boundary of land between the neighboring stakeholders.	Complied
Criterio rights.	on 4.8: The right to use the land is demonstrated and is not legitimately con	ntested by local people who can demonstrate that they have legal, cu	stomary, 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 -	Documents titled document "Guideline for Identifying Legal and Customary Rights and Identifying People Entitled to Compensation Documents;" Doc. Ref. # E/002-05/2019; Doc. Date: 12/8/2019 was sighted. The guidelines emphasize on SOP for identifying legal, customary or user rights, and a procedure for identifying people entitled to compensation that been documented in the in case of land dispute issue. There is no changes or content updates verified	Not Applicable
		There are no customary right land concerns within Carotino Production Units. It has been confirmed through verification of land title for each operating unit. Interview with neighbouring estates and local communities confirmed the statement. Therefore, the clause is not applicable.	

4.8.2	(C) Land conflict is not present in the area of the unit of certification. Where land conflict exists, acceptable conflict resolution processes (see Criteria 4.2 and 4.6) are implemented and accepted by the parties involved. In the case of newly acquired plantations, the unit of certification addresses any unresolved conflict through appropriate conflict resolution mechanisms. - Critical (Major) compliance -	was sighted. The guidelines emphasize on SOP for identifying legal,	Not Applicable
		There are no customary right land concerns within Carotino Production Units. It has been confirmed through verification of land title for each operating unit. Interview with neighbouring estates and local communities confirmed the statement. Therefore, the clause is not applicable.	
4.8.3	Where there is evidence of acquisition through dispossession or forced abandonment of customary and user rights prior to the current operations and there remain parties with demonstrable customary and land use rights, these claims will be settled using the relevant requirements (Indicators 4.4.2, 4.4.3 and 4.4.4) - Minor compliance -	Customary Rights and Identifying People Entitled to Compensation Documents;" Doc. Ref. # E/002-05/2019; Doc. Date: 12/8/2019 was sighted. The guidelines emphasize on SOP for identifying legal, customary or user rights, and a procedure for identifying people entitled to compensation that been documented in the in case of land dispute issue. There is no changes or content updates verified There are no customary right land concerns within Carotino Production Units. It has been confirmed through verification of land title for each operating unit. Interview with neighbouring estates	Not Applicable
		and local communities confirmed the statement. Therefore, the clause is not applicable.	
4.8.4	For any conflict or dispute over the land, the extent of the disputed area is mapped out in a participatory way with involvement of affected parties (including neighbouring communities where applicable).	Documents titled document "Guideline for Identifying Legal and Customary Rights and Identifying People Entitled to Compensation Documents;" Doc. Ref. # E/002-05/2019; Doc. Date: 12/8/2019	Not Applicable

	- Minor compliance -	was sighted. The guidelines emphasize on SOP for identifying legal, customary or user rights, and a procedure for identifying people entitled to compensation that been documented in the in case of land dispute issue. There is no changes or content updates verified There are no customary right land concerns within Carotino Production Units. It has been confirmed through verification of land title for each operating unit. Interview with neighbouring estates and local communities confirmed the statement. Therefore, the clause is not applicable.	
Princip	e 5: Support smallholder inclusion		
Criterio	n 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 -	Sighted and posted FFB price at the notice board near the weighbridge ramp and stated in the weighbridge tickets given to FFB seller as reference.	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 -	Carotino POM received and processed own certified FFB only and not purchasing any external smallholders' FFB. No such request received by Carotino POM as of audit date hence, this is not applicable.	Not Applicable
5.1.3	(C) Fair pricing, calculated as a portion of the international CPO price less costs is provided to smallholders in the supply base and documented. - Critical (Major) compliance -	No smallholder and external surrounding estate suppling FFB to Carotino POM and the mill is practicing Identity preserve module, therefore this criteria is not applicable.	Not Applicable
5.1.4	(C) Evidence is available that all parties, including women and independent representative organisations assisting smallholders where requested, are involved in decision-making processes and understand the contracts. These include those involving finance, loans/credits, and		Not Applicable



Contracts are fair, legal and transparent and have an agreed timeframe Minor compliance -	No signed contract with smallholder and external surrounding estate	Not Applicable
	suppling FFB to Carotino POM and the mill is practicing Identity preserve module, therefore this criteria is not applicable	нос дрисавіе
(C) Agreed payments are made in a timely manner and receipts specifying price, weight, deductions and amount paid are given. - Critical (Major) compliance -	No payment made with smallholder and external surrounding estate suppling FFB to Carotino POM and the mill is practicing Identity preserve module, therefore this criteria is not applicable	Not Applicable
Weighbridges used for determining payment to smallholders are verified by an independent third party on a regular basis (this can be government). - Minor compliance -	No signed contract with smallholder and external surrounding estate suppling FFB to Carotino POM and the mill is practicing Identity preserve module, therefore this criteria is not applicable. However as practices and required the mill has calibrated the weight bridge annually as verified.	Not Applicable
The unit of certification supports Independent Smallholders with certification, where applicable, ensuring mutual agreements between the unit of certification and the smallholders on who runs the internal control system (ICS), who holds the certificates, and who holds and sells the certified material. - Minor compliance -	No signed or agreed mutual agreement on internal control system (ICS) with smallholder and external surrounding estate as they are not suppling FFB to Carotino POM and the mill is practicing Identity preserve module, therefore this criteria is not applicable	Not Applicable
(C) The unit of certification has a grievance mechanism for smallholders and all grievances raised are dealt with in a timely manner. - Critical (Major) compliance -	No signed contract with smallholder and external surrounding estate suppling FFB to Carotino POM and the mill is practicing Identity preserve module, therefore this criteria is not applicable. However the grievance SOP established, implemented and available upon request.	Not Applicable
	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 unit of certification supports Independent Smallholders with certification, where applicable, ensuring mutual agreements between the unit of certification and the smallholders on who runs the internal control system (ICS), who holds the certificates, and who holds and sells the certified material. Minor compliance - (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 -	- Critical (Major) compliance - 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 unit of certification supports Independent Smallholders with certification, where applicable, ensuring mutual agreements between the unit of certification and the smallholders on who runs the internal control system (ICS), who holds the certificates, and who holds and sells the certified material. - Minor compliance - (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 -

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 -	No consultation for support to improve their livelihoods and their interest in RSPO certification made with smallholders and external surrounding estate as they are not supplying FFB to Carotino POM and the mill is practicing Identity preserve module, therefore this criteria 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 -	No signed contract with smallholder and external surrounding estate suppling FFB to Carotino POM and the mill is practicing Identity preserve module, therefore this criteria is not applicable.	Not Applicable
5.2.3	Where applicable, the unit of certification provides support to smallholders to promote legality of FFB production. - Minor compliance -	No signed contract with smallholder and external surrounding estate suppling FFB to Carotino POM and the mill is practicing Identity preserve module, therefore this criteria is not applicable.	Not Applicable
5.2.4	(C) Evidence exists that the unit of certification trains Scheme Smallholders on pesticide handling Critical (Major) compliance -	No signed contract with smallholder and external surrounding estate suppling FFB to Carotino POM and the mill is practicing Identity preserve module, therefore this criteria is not applicable.	Not Applicable
5.2.5	The unit of certification regularly reviews and publicly reports on the progress of the Smallholder support programme. - Minor compliance -	No signed contract with smallholder and external surrounding estate suppling FFB to Carotino POM and the mill is practicing Identity preserve module, therefore this criteria is not applicable.	Not Applicable
Princip	le 6: Respect workers' rights and conditions		
Criterio	on 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.	Carotino POM and estates implemented the company's Equal Opportunity Policy; Date: 12/8/2019; Signed by both Plantation Director and Mill Director respectively. Regular briefing also conducted to all employees as per sample sighted for Sustainability	Complied

	- Critical (Major) compliance -	awareness – Company Policy (OSH, Social & Human Right, Equal Opportunity, Environmental, Corruption Prevention, Sexual Harassment, Reproductive Right; Date: 19/10/2020.	
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 -	It has been confirmed that there is no discrimination in terms of salary payment via interview session and pay slip review, particularly for individuals performing similar job scopes. Additionally, it was established that no recruitment fees have been charged for new hires, ensuring a fair and transparent employment process within the company. Details as per below:	Complied
		Pahang Oil Palm Estate 1 Sample of 4 newly immigrant workers recruited on 02/06/2023 as harvester. Sighted medical test results (FOMEMA) and series of awareness briefing provided as their induction program. Among topics shared are rules & regulation during work, working hours, PPE implementation, Hazard at workplace etc.	
		Carotino POM Verified FOMEMA examination result for 4 new foreign workers prior to employment on 01/09/2023. All 4 Nepalese workers passed the FOMEMA test.	
		While for latest local employment on 11/05/2023, sighted Health Examination Form (New Employee) which checked on blood pressure, height, weight and declaration to any health condition. Health Assistant (H.A) then declare the new local worker his/her fitness condition accordingly.	
		New workers (foreign and locals) were included in company induction program where will be brief regarding to employment contract, working hours and etc. Asia Oil Palm Estate 1	



Verified 8 new foreign workers registered on 27/06/2023. Documents reviews provide evidence that all workers were recruited according to employment procedures such as FOMEMA examination result, post arrival orientation checklist, employment agreement and briefing on policies and company rules and regulations. Interview session with 2 org newly recruited workers confirmed the statement.

Noted that one new women employee has been recruited, AOP1462 date joined 06/06/2023. Interview session confirmed that there is no evidence of discrimination of skills and work task.

Details of sample as per below

a. Date joined: 27/06/2023, ID: AOP 1684b. Date joined: 27/06/2023, ID: AOP 1679

Maran Estate

Based on workers master list, newest recruitment of local worker is a woman which is on 28/12/2023. During interview, the worker denied any discrimination elements during recruitment, screening, and selection process. While for foreign workers, latest recruitment was 22/11/2023. Based on document review and interview session with samples, it was determined that the recruitment and hiring processes, there are no recruitment fees being charged to them.

Carotino Estate

Sample of 2 newly recruited workers has been taken for foreign workers recruited on 11/01/2024 and one local worker recruited on 20/11/2023. Verified local worker was hired as watchmen and sighted application form, medical checkup which mentioned fit to work and interview records. While for foreign workers, sighted the

		demand letter, post arrival checklist form, employment agreement, passport consent and advance deduction consent form. No discrimination elements can be observed during recruitment, hiring and screening process. Details of sample as per below - Date joined: 11/01/2024, ID: HE 200537 - Date joined: 11/01/2024, ID: HE 200538 - Date joined: 20/11/2023, ID: HE 200527	
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 -	The procedures for recruitment, selection, hiring, promotion, retirement, and termination are outlined in the document titled "Guidelines on Procedure of Recruitment, Selection, Hiring, Promotion, Retirement, and Termination," dated 12/08/2019, with document reference number E020-01/2019. The document explains that promotion criteria are determined by the candidates' capability, qualifications, and performance in interviews. Details of verification samples as below:	Complied
		Pahang Oil Palm Estate 1 Sample of 4 newly immigrant workers recruited on 02/06/2023 as harvester. Sighted medical test results (FOMEMA) and series of awareness briefing provide as their induction program. Among topics shared are rules & regulation during work, working hours, PPE implementation, Hazard at workplace etc.	
		Carotino POM Reviewed latest local employment on 11/05/2023, sighted Health Examination Form (New Employee) which checked on blood pressure, height, weight, and declaration to any health condition.	

		Health Assistant (H.A) then declare the new local worker his/her fitness condition accordingly. Maran Estate Based on workers master list, newest recruitment of local worker is on 28/12/2023 while for foreign workers, latest recruitment was 22/11/2023. Based on document review and interview session with samples, it was determined that the recruitment and hiring processes were in accordance with CPU's established recruitment procedures. FOMEMA results and medical assessments were duly verified, along with the completion of the post-orientation program Carotino Estate Sample of 2 newly recruited workers has been taken for foreign workers recruited on 11/01/2024 and one local worker recruited on 20/11/2023. Verified local worker was hired as watchmen and sighted application form, medical assessment by Health Assistant and interview records. While for foreign workers, sighted the demand letter, post arrival checklist form, employment agreement, and policy briefing. The hiring and screening process was according to required skills and availability of vacant job.	
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 -		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 -		Complied

		 Asia Oil Palm Estate 1: 15/02/2023, 16/08/2023 Maran Estate: 20/6/2023, 20/12/2023 Carotino Estate: 20/05/2023, 18/11/2023 There was no sexual harassment case reported so far at all estates and mill. 	
6.1.6	There is evidence of equal pay for the same work scope Minor compliance -	It was confirmed that all estates and mill were demonstrate equal pay for the same job roles. Workers across all units receive a base pay aligned with the minimum wages order of RM57.70 per day per person in 2023. While for piece-rate work, the documentation indicates fixed rates irrespective of gender and nationality but differ based on type and scope of job.	Complied
		Interview session with the workers confirmed the statement.	
		always meet at least legal or industry minimum standards and are suffi	cient to provide
	living wages (DLW).		
6.2.1		There is no collective agreement between JC Chang Group with any union. Noted that all estates and mill commit to comply with	Complied
	(C) Applicable labour laws, union and/or other collective agreements and documentation of pay and conditions are available to the workers in national languages (English or Bahasa Malaysia) and explained to them in language they understand.	There is no collective agreement between JC Chang Group with any union. Noted that all estates and mill commit to comply with employment Act 1955 and minimum wages order 2022 where has outline the pays and conditions of each worker. For piece rate workers, it has been documented in the "Schedule of piece-rate work in estate notice" 2023/2024 with validity from 01/07/2023 until	
	(C) Applicable labour laws, union and/or other collective agreements and documentation of pay and conditions are available to the workers in national languages (English or Bahasa Malaysia) and explained to them in language they understand.	There is no collective agreement between JC Chang Group with any union. Noted that all estates and mill commit to comply with employment Act 1955 and minimum wages order 2022 where has outline the pays and conditions of each worker. For piece rate workers, it has been documented in the "Schedule of piece-rate work in estate notice" 2023/2024 with validity from 01/07/2023 until 30/06/2024. Sample of payslips and employment contracts checked at visited	



2. Employee PE 100496; date joined: 27/02/2023, Loose Fruit Collector	
3. Employee PE 100497; date joined: 27/02/2023, General Worker	
4. Employee PE 100510; date joined:07/04/2023, General Worker	
5. Employee PE 100526; date joined: 23/05/2032, Cutter	
6. Employee PE 100532; date joined: 09/06/2023, General Worker	
7. Employee PE 100533; date joined: 22/08/2032, Harvester	
8. Employee POP 7004; date joined: 17/11/1997, Security	
9. Employee POP 0207; date joined 04/01/1995, Gardener	
Carotino POM (8 workers sampled from total 90 workers)	
1. Employee G 0418; date joined 09/05/2022, Workshop	
2. Employee G 0442; date joined 01/10/2022, Grading	
3. Employee G 0466; date joined 11/05/2023, Office Cleaner	
4. Employee G 0192; date joined 07/02/2013, Biogas Plant Operator	
5. Employee G 0244; date joined 15/10/2014, Kernel Plant Operator	
6. Employee G 0315; date joined 01/11/2017, Grading	
7. Employee G 0485; date joined 30/08/2023, Vertical Sterilizer	
8. Employee G0486; date joined 30/08/2023, Press Station	
Asia Oil Palm Estate 1 (9 workers sampled from total 122 workers)	
1. Employee AOP 1669; date joined 03/03/2023, Nursery	

...making excellence a habit."

2. Employee AOP 1667; date joined 03/03/2023, Line Sweeper 3. Employee AOP 1684; date joined 27/06/2023, Harvester 4. Employee AOP 1682; date joined 27/06/2023, General Worker

5. Employee AOP 1679; date joined 27/06/2023, Harvester

		9. Employee HE200013; date joined 16/12/2011, Watchmen 10. Employee HE200527; date joined 21/11/2023, Van Driver	
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 -	The employment contracts provided to all workers comprehensively outline details of payments and conditions of employment, covering aspects such as job category, salary and permitted deduction, accommodation, medical benefit, yearly medical check-up, annual/medical leave, public holidays, insurance coverage, government levy, transportation, restrictions, termination of employment, dispute settlement and application law, and due performance.	Complied
		Payroll documents, namely the payslip, also give accurate information on compensation for all work done. This includes those who receive daily-rated wages, piece rated wages, payment for any overtime work done, and public holiday pay.	
		Salary deductions and overtime were in accordance with the relevant laws (SOCSO, EPF, EIS) and Labour Office permits	
		Sample of payslips and contracts checked at visited operating units as the following:	
		Pahang Oil Palm Estate 1 (9 workers sampled from total of 113 workers)	
		1. Employee PE 100141; date joined: 22/02/2014, Gardener	
		2. Employee PE 100496; date joined: 27/02/2023, Loose Fruit Collector	
		3. Employee PE 100497; date joined: 27/02/2023, General Worker	

4. Employee PE 100510; date joined:07/04/2023, General Worker
5. Employee PE 100526; date joined: 23/05/2032, Cutter
6. Employee PE 100532; date joined: 09/06/2023, General Worker
7. Employee PE 100533; date joined: 22/08/2032, Harvester
8. Employee POP 7004; date joined: 17/11/1997, Security
9. Employee POP 0207; date joined 04/01/1995, Gardener
Carotino POM (8 workers sampled from total 90 workers)
1.Employee G 0418; date joined 09/05/2022, Workshop
2. Employee G 0442; date joined 01/10/2022, Grading
1. Employee G 0466; date joined 11/05/2023, Office Cleaner
2. Employee G 0192; date joined 07/02/2013, Biogas Plant Operator
3. Employee G 0244; date joined 15/10/2014, Kernel Plant Operator
4. Employee G 0315; date joined 01/11/2017, Grading
5. Employee G 0485; date joined 30/08/2023, Vertical Sterilizer
6. Employee G0486; date joined 30/08/2023, Press Station
Asia Oil Palm Estate 1 (9 workers sampled from total 122 workers)
1. Employee AOP 1669; date joined 03/03/2023, Nursery
2. Employee AOP 1667; date joined 03/03/2023, Line Sweeper
3. Employee AOP 1684; date joined 27/06/2023, Harvester
4. Employee AOP 1682; date joined 27/06/2023, General Worker
5. Employee AOP 1679; date joined 27/06/2023, Harvester
6. Employee AOP 1374; date joined 04/08/2017, Harvester
7. Employee AOP 1378; date joined 04/08/2017, Harvester

0 Family - AOD 1642, data initial 20/10/2022, Caming
8. Employee AOP 1643; date joined 20/10/2022, Carrier
9. Employee AOP 1645; date joined 20/10/2022, Sprayer
Maran Estate (9 workers sampled out of 126 workers)
1. Employee MR100517; date joined 14/10/2022, General Worker
2. Employee MR100518; date joined 14/10/2022, General Worker
3. Employee MR100569; date joined 07/02/2023, Sprayer
4. Employee MR100571; date joined 07/02/2023, Sprayer
5. Employee MR100632; date joined 22/08/2023, Harvester
6. Employee MR100633; date joined 22/08/2023, Harvester
7. Employee MR100647; date joined 22/11/2023, General Worker
8. Employee MR100648; date joined 22/11/2023, General Worker
9. Employee MR100651; date joined 28/12/2023, Gate Keeper
Carotino Estate (10 samples from total of 116 workers)
1.Employee HE200537; date joined 11/01/2024; General Worker
2. Employee HE200538; date joined 11/01/2024: General Worker
3. Employee HE200522; date joined 04/04/2023; Sprayer
4. Employee HE200461; date joined 21/10/2022; Driver
5. Employee HE200404, date joined 28/11/2019; General Worker
6. Employee HE200415; date joined 07/12/2019; Harvester
7. Employee HE200500; date joined 16/12/2022; General Worker
8. Employee HE200502; date joined 16/12/2022; Harvester
9. Employee HE200013; date joined 16/12/2011, Watchmen
10. Employee HE200527; date joined 21/11/2023, Van Driver

deductions, overtime, sickness, holiday entitlement, maternity leave, reasons for dismissal, period of notice and other legal labour requirements. - Critical (Major) compliance -	Carotino POM and all estates were found to comply with the Employment Act 1955 upon reviewing sample's punch cards, checkroll, daily work records, employment contracts and payslips. The evidence shows compliance to regulations on working hours, overtime, annual leave and permitted deductions such as SOCSO, EPF and SIP as well as non-statutory deductions such as unions fees and utility bills.	Complied	
		Sampled during the audit were the following payslips and workers' employment contracts for the month of October 2023 (peak), June 2023 (low) and Apr 2023 (average/medium)	
		Pahang Oil Palm Estate 1 (9 workers sampled from total of 113 workers)	
		1. Employee PE 100141; date joined: 22/02/2014, Gardener	
		2. Employee PE 100496; date joined: 27/02/2023, Loose Fruit Collector	
		3. Employee PE 100497; date joined: 27/02/2023, General Worker	
		4. Employee PE 100510; date joined:07/04/2023, General Worker	
		5. Employee PE 100526; date joined: 23/05/2032, Cutter	
		6. Employee PE 100532; date joined: 09/06/2023, General Worker	
		7. Employee PE 100533; date joined: 22/08/2032, Harvester	
		8. Employee POP 7004; date joined: 17/11/1997, Security	
		9. Employee POP 0207; date joined 04/01/1995, Gardener	
		Carotino POM (8 workers sampled from total 90 workers)	
		1. Employee G 0418; date joined 09/05/2022, Workshop	

2 Franksis C 0442; data isinad 01/10/2022 Cardina
2. Employee G 0442; date joined 01/10/2022, Grading
3. Employee G 0466; date joined 11/05/2023, Office Cleaner
4. Employee G 0192; date joined 07/02/2013, Biogas Plant Operator
5. Employee G 0244; date joined 15/10/2014, Kernel Plant Operator
6. Employee G 0315; date joined 01/11/2017, Grading
7. Employee G 0485; date joined 30/08/2023, Vertical Sterilizer
8. Employee G0486; date joined 30/08/2023, Press Station
Asia Oil Palm Estate 1 (9 workers sampled from total 122 workers)
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2. Employee AOP 1667; date joined 03/03/2023, Line Sweeper
3. Employee AOP 1684; date joined 27/06/2023, Harvester
4. Employee AOP 1682; date joined 27/06/2023, General Worker
5. Employee AOP 1679; date joined 27/06/2023, Harvester
6. Employee AOP 1374; date joined 04/08/2017, Harvester
7. Employee AOP 1378; date joined 04/08/2017, Harvester
8. Employee AOP 1643; date joined 20/10/2022, Carrier
9. Employee AOP 1645; date joined 20/10/2022, Sprayer
Maran Estate (9 workers sampled out of 126 workers)
1. Employee MR100517; date joined 14/10/2022, General Worker
2. Employee MR100518; date joined 14/10/2022, General Worker
3. Employee MR100569; date joined 07/02/2023, Sprayer
4. Employee MR100571; date joined 07/02/2023, Sprayer
5. Employee MR100632; date joined 22/08/2023, Harvester

		6. Employee MR100633; date joined 22/08/2023, Harvester 7. Employee MR100647; date joined 22/11/2023, General Worker 8. Employee MR100648; date joined 22/11/2023, General Worker 9. Employee MR100651; date joined 28/12/2023, Gate Keeper Carotino Estate (10 samples from total of 116 workers) 1. Employee HE200537; date joined 11/01/2024; General Worker 2. Employee HE200538; date joined 11/01/2024: General Worker	
		3. Employee HE200522; date joined 04/04/2023; Sprayer 4. Employee HE200461; date joined 21/10/2022; Driver 5. Employee HE200404, date joined 28/11/2019; General Worker 6. Employee HE200415; date joined 07/12/2019; Harvester 7. Employee HE200500; date joined 16/12/2022; General Worker 8. Employee HE200502; date joined 16/12/2022; Harvester 9. Employee HE200013; date joined 16/12/2011, Watchmen 10. Employee HE200527; date joined 21/11/2023, Van Driver	
6.2.4	(C) The unit of certification provides adequate housing, sanitation facilities, water supplies, medical, educational and welfare amenities to national standards or above, where no such public facilities are available or accessible. National laws, or in their absence the ILO Guidance on Workers' Housing Recommendation No. 115, are used. In the case of acquisitions of non-certified units, a plan is developed detailing the upgrade of infrastructure. A reasonable time (5years) is allowed to upgrade the infrastructure. - Critical (Major) compliance -	Pahang Oil Palm Estate 1 There are 54 housing blocks for Pahang Oil Palm Estate 01. Water and electricity were supply by Carotino POM since both are nearby to each other. Verification at line site were satisfactory and reflected with record of line inspection that has been conducted on weekly basis by appointed person, Mr Vejayakumar. Latest inspection has been on 05/01/2024, 12/01/2024 and 19/01/2024. Carotino POM It was affirmed that total 32 workers quarters were provided by the company to the workers includes electricity, water, and domestic waste disposal. Water extracted from Sungai Berlayar and electric	Complied



generated from Biogas Plant which also shared with Pahang Oil Palm Estate 1.

Sighted that there is notice of approval from SPAN to supply water for their own usage, Doc No LK/3/23/02568, dated 24/10/2023. Water analysis result was found to be conducted on 01/04/2023 and the results are satisfactory. Seen the record for weekly line site inspection done by appointed person, in weekly basis. Inspection records checked were on 06/01/2024, 13/01/2024 and 20/01/2024.

Asia Oil Palm Estate 1

Observation during site visit and review of linesite record inspection indicated that there are 42 units of labor quarters. The quarters were provided with treated water and supply of electricity for 18 hours per day for free. Line site inspection was conducted weekly, latest done on 22/01/2024, 15/02/2024 and 08/01/2024.

Maran Estate

Line Site inspection has been conducted weekly by Estate Hospital Assistant (EHA). In 2024, 34 blocks of workers quarter has been inspected accordingly on 04/01/2024, 11/01/2024 and 18/01/2024. Physical verification at the line site was carried out and reflected with observation and notes in estate's line site inspection record.

Carotino Estate

52 Units of workers quarters are identified and well maintained by operating unit. Weekly inspection conducted by Estate Hospital Assistant (EHA) on 03/01/2024, 10/01/2024, 17/01/2024 and 24/01/2024. Water supply from filtered underground water which monitored and examined regularly. Electricity was supplied from generator to workers quarter for 6 hours daily. In addition, it was noted that Visiting Medical Officer (VMO) from Klinik Lee & Surgeri will visit and conduct medical assessment on weekly basis.



6.2.5	The unit of certification makes efforts to improve workers' access to	Pahang Oil Palm Estate 01/ Carotino POM/Maran Estate	Complied
	adequate, sufficient and affordable food. - Minor compliance -	These three operating units are remotely located 23km away from nearest small town called Pekan Sri Jaya. Nevertheless, all operating units were able to demonstrate that efforts have been made to improve workers' access to adequate, sufficient, and affordable food by allowing food canteen sundry shops to operate near the workers' housing.	
		Price comparison assessment was conducted regularly to monitor the price, license and availability of groceries within Carotino Production Unit.	
		<u>Carotino Estate</u>	
		It was confirmed that this operating unit located 50km away from nearest town, Bahau. The grocery shop called Kedai Raida was identified and kept monitored regards to the price labelling, related required license, and legal compliance. Price comparison with external grocery shops was conducted regularly and can be verified.	
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:	JC Chang Group has established Guideline of Implementation Plan for Decent Living Wage (DLW), Doc. No.: E027-01/2019 dated 29/11/2019.	Complied
	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	Carotino Production Unit's management conduct assessment on actual average wage calculation of DLW benchmark calculation for JC Chang Group in Pahang State in 2023 that consists of 6 operating unit were taken into account of Food, housing, medical, transportation, education, unexpected events (5%), total living basket and net living basket.	



	calculate and/or define DLW applicability for all palm oil producing countries in which RSPO members operate). Where a GLWC living wage standard (benchmark), or one that fulfils the basic requirements of the RSPO-endorsed living wage methodology, has been established in the country or region of operation, the same should be used as benchmarks. In the absence of such benchmarks, the RSPO will collaborate with the GLWC and/or local experts on developing oil palm industry benchmarks (Benchmark in this context may include other approaches and/or methods to calculate the applicability of DLW in the country or region in accordance to the RSPO endorsed method for determining a DLW. Local applicability for benchmarks is important and it may differ based on the needs of each locality or country). These benchmarks will be developed in collaboration and consultation with relevant stakeholders such as palm oil industry members, workers' union, authorities and/or relevant organisations. For countries where no living wage standard is established, until such time that an RSPO endorsed benchmark for the country is in place, national minimum wages shall be paid to all workers. In addition to the payment of minimum wages, the Unit of Certification (Uc) 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 process including: Updated assessment on prevailing wages and in-kind benefits There is annual progress on the implementation of living wages Where a minimum wage, based on equivalent of baskets of goods, is stipulated in Collective Bargaining	It was found that the prevailing wage for mill and estate are RM1,840.01 and RM1,849.93 respectively. Both figures are above the Living Wage identified for Pahang state, which is RM1,492.73.	
	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	According to the verification of the master list of workers, pay slips, employment contracts, and interviews with the workers, it has been	Complied

	certification. Casual, temporary and day labour is limited to jobs that are temporary or seasonal - Minor compliance -	established that all permanent workers Carotino Production Unit performed core work. There is no recruitment of casual, temporary, or seasonal workers across all operating units.	
freedom	on 6.3: 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 -	JC Chang Group established Social and Human Rights Policy signed by Mr. Tee Swee Kee, Plantation Director dated 14/11/2019 include statement of recognizing freedom of association and the right to collective bargaining. Website review and onsite visit observed the Policy is available on displayed and in understandable language at main notice boards at each Asia Production Units. Sighted Carotino Production Units conduct briefing on company policies includes Social and Human Rights Policy to workers during muster morning as below: Pahang Oil Palm Estate 1 – 22/11/2023 Carotino POM – 01/12/2023 Asia Oil Palm Estate 1 – 18/01/2024 Maran Estate – 18/09/2023 Carotino Estate – 20/01/2024	Complied
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.	Policy, officially signed by Plantation Director, dated 14/11/2019.	Complied

	- Minor compliance -	is prominently displayed on main notice boards at each Carotino Production Unit. This demonstrates the company's commitment to ensuring that workers are informed about and understand their rights and the policies in place to protect them.	
		Carotino POM – JCC meeting were confirmed has been conducted on 24/06/2023,26/09/2023 and 27/12/2023.	
		Asia Oil Palm Estate 1— Noted that JCC meeting was last conducted on 05/12/2023, 27/09/2023, 01/06/2023	
		Maran Estate – JCC meeting last conducted on 19/12/2023. Verified that there was election session conducted due to replacement of former worker's representative. Evidence of vote counted, and workers involved were noted.	
		Carotino Estate – Latest JCC meeting was conducted on 24/11/2023. It was noted that there are 4 new appointed members replacing former members who return to country of origin. Verification of documents and interview with samples of worker indicated that the appointment of new members/representative was freely elected among workers.	
6.3.3	Management does not interfere with the formation or operation of registered unions/ labour organisations or associations, or other freely elected representatives for all workers including migrant and contract workers. - Minor compliance -	As per interview with the workers representative, it has been confirmed that, workers are free to form Joint Consultative Committee (JCC). Workers are free to elect their own representatives to in the JCC. Meeting with management of Unit of Production were conducted every 3 months.	Complied
		Carotino POM – JCC meeting were confirmed has been conducted on 24/06/2023,26/09/2023 and 27/12/2023.	

		Asia Oil Palm Estate 1– Noted that JCC meeting was last conducted on 05/12/2023, 27/09/2023, 01/06/2023 Maran Estate – JCC meeting last conducted on 19/12/2023. Verified that there was election session conducted due to replacement of former worker's representative. Evidence of vote counted, and workers involved were noted. Carotino Estate – Latest JCC meeting was conducted on 24/11/2023. It was noted that there are 4 new appointed members replacing former members who return to country of origin. Verification of documents and interview with samples of worker indicated that the appointment of new members/representative was freely elected among workers.	
Criterio	n 6.4: Children are not employed or exploited.		
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 -	JC Chang Group has established Child Protection Policy signed by Mr. Tan Swee Kee, Plantation Director dated 20/02/2022 includes company commitment to protect children, include the prohibition against child labour. Field observation, interviewing with workers and verification of workers master list confirmed that there is no child labour hired. For outsource party/contractors appointed, they are required to comply with applicable legal requirements and disallowing child, forced and trafficked labour via Document review on Sustainability	Complied
		- Carotino POM – Pritam Singh Agency Sdn Bhd (CPO Transporter), dated 13/11/2019 & Eng Lee Sing Sdn Bhd (Palm Kernel Transporter, dated 05/12/2019.	

		 Asia Oil Palm Estate 1 with Mr Lim Huat- Grocery Shop, dated 01/07/2023 Maran Estate with Mr Wong Nyuk Lim, Grocery Shop, dated 01/07/2023 Carotino Estate with ELS Truck Tyre Sdn Bhd, FFB Transporter, dated 22/10/2019. 	
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 -	Reviewed the master list in each operating units and interview session with samples, found that no young person was employed. All the workers are above 18 years old. It has been further confirmed during the interview with the workers. Carotino Production unit and supply bases screened their workers' age using NRIC (for Malaysians) and passports (for non-Malaysians) in their personnel files. No individuals under 18 were found working during a site visit, showing compliance with age-related employment regulations.	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 -	It was confirmed that via reviewing the master list in each operating units and interview session with samples, found that no young person was employed.	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 -	 J.C. Chang Group has established Child Protection Policy signed by Mr. Tan Swee Kee, Plantation Director dated 20/02/2022 includes company commitment to protect children, include the prohibition against child labour. Field observation, interviewing with workers and verification of workers master list confirmed that there is no child labour hired. Briefing on sustainability policies has been conducted regularly as below: Pahang Oil Palm Estate 1 – 22/11/2023 Carotino POM- 01/12/2023 for internal stakeholders and 12/06/2023 for external stakeholders. 	Complied

Criterio	on 6.5: There is no harassment or abuse in the workplace, and reproductive	- Asia Oil Palm Estate 1– 18/01/2024 - Maran Estate- 18/09/2023 - Carotino Estate – 20/01/2024	
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 -	J.C. Chang Group has established Sexual Harassment Policy, signed by Mr. Tan Swee Kee, Plantation Director dated 01/07/2012 describes company commitment to prevent sexual and other forms of harassment. In addition, the management also demonstrated their commitment via SOP on Mechanism for the Prevention and Eradication of Sexual Harassment and Violence in the Workplace, Doc. No.: E/003-01/2008 dated 01/10/2008. The procedure describes the responsibility and legal obligation to maintain a workplace free of sexual harassment and aim to provide guidelines to estates and mills on the establishment and implementation of inhouse mechanisms to prevent and eradicate sexual harassment in workplace. Briefing on the policy has been provided to all workforce during muster call where latest recorded as below: - Pahang Oil Palm Estate 1 – 22/11/2023 - Carotino POM – 01/12/2023 - Asia Oil Palm Estate 1 – 18/01/2024 - Maran Estate 0 18/09/2023 - Carotino Estate – 20/01/2024	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 -	J.C. Chang Group has established Reproductive Rights Policy, signed by Mr. Tan Swee Kee, Plantation Director dated 14/11/2019 describes company commitment to protect reproductive rights of all, especially for women in operations. In addition, the management also demonstrated their commitment via Guideline on	Complied

	·	,	1
		Reproductive Right, Doc no.: E/015-02/2015 dated 05/11/2015 which include the right to birth control, freedom from coerced sterilization and contraception, right to access good-quality reproductive healthcare, right to education and access to make free and informed reproductive choices; and right to receive education about sexually transmitted infections and other aspects of sexuality. Briefing on the policy has been provided to all workforce as below:	
		 Pahang Oil Palm Estate 1 – 22/11/2023 Carotino POM – 01/12/2023 Asia Oil Palm Estate 1 – 18/01/2024 Maran Estate – 20/12/2023 Carotino Estate – 20/01/2024 Onsite interviews with workers and gender committee members inform the reproductive rights policy is being implemented where they are not prevented from planning their family. 	
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 -	02/2015 dated 05/11/2015 which include the right to birth control, freedom from coerced sterilization and contraception, right to access good-quality reproductive healthcare, right to education and access to make free and informed reproductive choices; and right to receive education about sexually transmitted infections and other aspects of sexuality. Based on interview session with management and gender	Complied
		 committee, it was concluded that: Pahang Oil Palm Estate 1- No new mother identified within the past year Carotino POM – No new mother identified within the past year 	

6.5.4	A griguance machanism which respects anonymity and protects	 Asia Oil Palm Estate 1– No new mother identified within the past year. Maran Estate – No new mother identified within the past year Carotino Estate- Noted that within past year, there is one (1) new mother identified. Verification on documents and interview session affirmed that consultation with the new mother regards to needs and facilities required was conducted. The new mother confirmed that all plan and action discussed during the consultation session were implemented accordingly. 	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 -	J.C. Chang Group established SOP on Mechanism for Complaints and Grievances is available in Doc. No. E/001-07/2019 dated 12/08/2019 and "SOP on mechanism for the prevention and eradication of sexual harassment and violence in the workplace". Both SOPs respects anonymity and protects complainants when requested especially for sensitive issues regarding on sexual concerns. Interview session with gender committee and female workers confirmed that they are aware and understand on the SOPs and mechanism. Verified latest gender committee meeting conducted on 27/12/2023 for Pahang Oil Palm Estate. While for Asia Oil Palm Estate 1, it was last conducted on 22/12/2023 and 20/12/2023 for Maran Estate. Carotino Estate	Complied
Criterio	n 6.6: No forms of forced or trafficked labour are used.		
6.6.1	 (C) All workers have entered into employment voluntarily and the following are prohibited: Retention of identity documents or passports (except for administration purposes including legalisation and renewal processes) Charging the workers for recruitment fees. 	With regards on documents review such as employment agreement, payslip, passport, works permits, agreement between recruitment agency with headquarters, agreement with contractors, overtime forms and approval as well as interview session with samples of workers, it can conclude that:	Complied

	 Contract substitution Involuntary overtime Lack of freedom of workers to resign Penalty for termination of employment Debt bondage Withholding of wages Critical (Major) compliance - 	 Retention of documents: Workers can keep their passports freely, and the company only holds them when needed for renewal. Charging of recruitment fee: Workers are not charged any recruitment fees. Workers employed by the certification unit are directly hired with no recruitment agents as intermediaries. Involuntary overtime: Based on interviews conducted with the workers, all overtime work were carried out on a voluntary basis. Workers are free to decline any offers for overtime work. Lack of freedom to resign: Workers are free to resign as per stated in their employment contracts. Debt bondage: There is no evidence of any incidence of debt bondage. Withholding of wages: There is no evidence of withholding of wages. Contract substitution: There was no evidence of contract substitution. All workers were directly hired and knew what type of job they would be doing prior to signing their contracts. Interview with the workers confirmed the statement. 	
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 -	Document review on the guideline include legalization of foreign workers, no contract substitution, no discrimination, payment of minimum wages, provision of post-arrival orientation on language, safety, laws, regulations. All workers have been employed permanently by the management in Carotino Production Unit.	Complied
Criterio	on 6.7: The unit of certification ensures that the working environment under	er 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.	appointed by Secretary of Safety and Health Committee. 5 workers	Complied



	- Critical (Major) compliance -	Wong Chun Wei (Sustainability/Admin Manager) as Appointed Letter dated 01/07/2023. Meeting of SHC was conducted regularly for year 2024 planned on 13/03/2024, 13/06/2024, 12/09/2024, 12/12/2014. While for year 2023, meeting was conducted on 13/12/2023, 13/09/2023, 09/06/2023, 09/03/2023, 09/12/2022. Available attendance list for each meeting and minutes discussed OSH issues as required included accident occurred.	
		Carotino POM Sighted Kenny Alvin Ligunjang (Mill Manager) was appointed as PIC for OSH. His contact information found clearly stated in the document. Meeting was conducted on 27/12/2023, 26/09/2023, 21/03/2023, 28/12/2022. Attendance list found recorded according and OSH issues discussed as minuted.	
		Maran Estate For year 2024, Safety and Health Committee meeting planned to be conducted on 19/03/2024, 19/06/2024. 19. 09/2024, 19/12/2024. While in 2023, the SHC meeting was conducted on 19/12/2023, 19/09/2023,11/11/2023 due to accident at workshop (Yadav Suraj) MC 3 days, 19/06/2023, 03/03/2023 due to accident at Workshop (Juhran), 19/12/2023.	
		Carotino Estate Safety and Health Committee Organization Chart established where Chairman is Estate Manager (M. Saufi Salim), Secretary is Admin Officer (Haziratul Qudsiah), Employers Representatives and 6 Employees Representatives. Minutes of Meeting discussing OSH Issues, Accident and workplace inspection was conducted regularly as required on 24/11/2023, 23/08/2023, 24/04/2023, 22/02/2022,	
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	Sighted First Aid Boxes issuance records for Pahang Oil Palm Estate Division 1 (NO. 01-23) 6 units to Field Conductors, 15 units to mandores and 2 to Tractor Drivers. Their roles and responsibility	Complied



language understandable to the workforce. Assigned operatives trained in first aid are present in both field and other operations, and first aid equipment is available at worksites. Records of all accidents are kept and periodically reviewed.

- Minor compliance -

from clearly explained as sampled on documents signed by among others Umar Hamdan (Tractor Driver), Arif Hanif (Mandore), Jasnizam (Tractor Driver). Arif Hanif (Mandore).

As recorded last reported on 23/04/2022 involving loader at Block PM11A02. Consistent with JKKP 6 issued reported to DOSH on 28/04/2022 involving Murit (Indonesian Harvester) occurred on 23/04/2022.

Carotino POM

Accident statistic maintained between 2019-2023. In year 2023 no accident reported or occurred. In 2022 found 3 accidents recorded without permanent disabilities and no fatality recorded.

Maran Estate

First Aid Training for year 2024 was planned as below:

- April 2023: Refresh on contents and handling injury
- August 2024: Treatment of cuts, sting by insects
- October 2024: Handling broken or fracture bones and treatment for fainted worker.
- December 2024: Use of tringular and dislocated.

Carotino Estate

Sighted Namelist First Aid Holder. Serial No. CRE 001-A -CRE 028-B issued to Manager, Asst Managers, Field Conductors, Mandores, Chemical Store etc. Prepared by HA (Noorhafini Che Amat. Roles and Responsibility were clearly stated and issued to all members. Monthly inspection conducted as sighted record for each First Aid Boxes on 25/01/2024 and the whole months of 2023. Sighted Monthly Accident Statistics for Year 2023. 29 cases of accident (minor) except one case with 10 days mc (Mandal Ajay Kumar/Gen Worker). 04/04/2023. Report to SOCSO and DOSH (JKKP 6). Slash on palm. JKKP 6 issued to DOSH on 10/04/2023. SHC Meeting not

		having a meeting and minutes. Accident Investigation Report was conducted on 05/04/2023 reviewed by Estate Manager. Under Seksyen 6: Corrective action: Inform all other workers on safety aspect. Hirarc no reviewed accordingly.	
6.7.3	(C) Workers use appropriate personal protective equipment (PPE), which is provided free of charge to all workers at the place of work to cover all potentially hazardous operations, such as pesticide application, machine operations, land preparation, and harvesting. Sanitation facilities for those applying pesticides are available, so that workers can change out of PPE, wash and put on their personal clothing. - Critical (Major) compliance -	Sighted and observed during site visit Pahang Oil Palm Estate 1, Asia Oil Palm Estate 1, Maran Estate and Carotino Estate,: Harvester: Helmet, Safety boots, cotton gloves and helmet provided and used. Sprayer (Mechanise) Tractor Driver: Helmet, Cartridge Mask, Goggle, Apron, Nitrile Glove, Safety Boots, Ear plugs. Request for Demo among tractor drivers doing spray in wearing ear plugs found method to insert into the ears were not effectively applied. The Noise training conducted can be further improved. No issue of workers not wearing PPE as observed during site visit in all estates and Carotino POM. Records of issuance maintained as verified. Visit to the sprayers' sanitation facilities provided by management near the chemical store and chemical mixing area found that proper	Complied
		shower and washing facilities available including individual locker for replacement clothing.	
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 -	SOCSO contribution in Pahang Oil Palm Estate 1 made as sampled from Form 8A for month of: December 2023: 164 workers (RM 5,665.60) June 2023: 163 workers (RM 4,076.60) January 2023: 113 workers (RM 3.289.20) Carotino POM January 2023: 94 workers (RM 5,3359.70) June 2023: 101 workers (RM 5,279.80)	Complied



		September 2023:	107 workers (RM 5,649.50)			
metrics Minor compliance -		Form JKKP 8 was of year 2022. For 'down for statistic Total of Manday I LTA Rate recorded	Complied			
		Carotino POM				
		Form JKKP 8 was occupational accident				
		Carotino Estate				
			Available and maintained LTA Rate with Trend of Monitoring Accident (2011-2023). Rate for 2023 is 92.65. Form JKKP 8 was sent to DOSH on 16/01/2024.			
Principl	e 7: Protect, conserve and enhance ecosystems and the environm	ent				
Criterio	n 7.1: Pests, diseases, weeds and invasive introduced species are effective	ly managed using a	appropriate Integrated Pest Management (IPM) tec	hniques.		
7.1.1	(C) IPM plans are implemented and monitored to ensure effective pest	IPM Plan establish	Complied			
	control.	Target Pest	Treatment			
	- Critical (Major) compliance -	Rat	Establish ban owl boxes for attracting Tyto Alba. Census done every 6 month. Ratio 1:10 Ha			
		Ganoderma	Census will be carried out to monitor the percentage of infected palms.			
		Leaf Eating Carterpillar	Cultivate beneficial plants: Cassia Cabanesis, Antigonon Leptosus, Tunera Sabulata.			

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 -	CABI.org int	As sampled and verified found no invasive species listed in the CABI.org introduced in the estate. All estate has conducted assessment on list of species invasiveness used for biological control.				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 -	As observed during site visit, found no evidence and records of fire usage for pest control at all estate visited.					Complied	
Criterio	on 7.2: Pesticides are used in ways that do not endanger health of workers,	families, comi	munities or th	ne 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 -	Pesticides, Fi 02/08/2019. selected pest disease clear mentioned wi (Hrs) also for document ti	Sighted a document No. B/008-15/2019 titled Justification for Pesticides, Fungicides and Rodenticide Usage under IPM, dated 02/08/2019. The document provided guidance for all usage of selected pesticides and application methods. Specific target pest or disease clearly mentioned. Each active ingredient also clearly mentioned with rate of application. Re-entry period for area applied (Hrs) also found clearly stated as guidance. Also available another document titled Justification For Weedicides Usage (B/009-12/2018) dated 19/04/2018.					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	Pahang Oil Palm Estate 1 has established Chemical Usage records up to January 2024.					Complied	
	number of applications) are provided Critical (Major) compliance -	Туре	Chemicals	a.i	%	Class	LD50 (rat)	
			Glitz 41SL	Glyphosate IPA	41	III	5000 mg/kg	
		Weedicide	Garlon 250 EC	Triclopyr, Butoxyethyl ester	32.1	III	2500 mg/kg	



	Ally 20DF	Metsulfuron methyl	20	IV	5000 mg/kg
Togodisidos	Lipel SP	Bacillus Thuringienis	-	IV	5050 mg/kg
Insecticides	Kencis	Cypermethrin	5.5	III	2000 mg/kg
Doobioidos	STORM	Flocoumafen	0.00 5	IV	500 mg/kg
Pesticides	NUPOL WA	Nonylphenol ethoxylate	30	IV	1602 mg/kg

Available a data showing Monitoring of Pesticides Usage 2023/2024 (unit Per Ha, Ton FFB and Per Ton Oil).

Maran Estate

Established Chemical Usage records up to December 2023.

Туре	Chemicals	a.i	%	Class	LD50 (rat)
	Glitz 41SL	Glyphosate IPA	41	III	5000 mg/kg
Weedicide	Garlon 250 EC	Triclopyr, Butoxyethyl ester	32.1	III	2500 mg/kg
	Ally 20DF	Metsulfuron methyl	20	IV	5000 mg/kg
	Amine 60%	Dimenthylamm onium (60%)	60		2000 mg/kg
Pesticides	STORM	Flocoumafen	0.00 5	IV	500 mg/kg



			Nupol	Alkylphenol ethoxylate	30	III	1602 mg/kg	
7.2.3	(C) Any use of pesticides is minimised as part of a plan, eliminated where	IPM Plan established by Pahang Oil Palm Estate Division 1 as below:						Complied
	possible, in accordance with IPM plans Critical (Major) compliance -	Target Pest	Treat	ment				
		Rat		olish ban owl bo Census done ev				
		Ganoderma		us will be carri entage of infecte			onitor the	
		Leaf Ea Caterpillar		vate beneficial p onon Leptosus,				
	Maran Estate							
		IPM Plans to	reduce pest	icides in place a	s below	<i>I</i> :		
		Target Pest	Treat	ment				
	Rat		Owl Boxes with rase to 1:10 Ha.	atio of	1:20 Ha	gradually		
		Leaf Ea Caterpillar	Antig biolo	rate beneficial p onon Leptosus, gical control of g caterpillar.	, Tune	era Sab	ulata for	
		Rhinoceros Beetle		omone traps er dary.	ected	along tl	ne estate	
		Action to red	uce chemica	al usage:				

7.2.4	There is no prophylactic use of pesticides, unless in exceptional	No Prophylactic Used of pesticides due to impact on soils pollution. Action by using rotor slasher to maintain soft grasses at interrow of the field. Used biological control to pest attack as mentioned in above table.	Complied
7.2.4	circumstances, as identified in national best practice guidelines. - Minor compliance -	As verified in Chemicals Store and Spraying activity, there was no prophylactic use of pesticides in the estates. The application of pesticides was based on level of attack severity which was normally obtained through census.	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 -	Pesticides that are categorised as World Health Organisation Class 1A or 1B, or that are listed by the Stockholm or Rotterdam Conventions, are not used, unless in exceptional circumstances, as validated by a due diligence process, or when authorised by government authorities for pest outbreaks. No paraquat used in all estate and as sampled in Chemical Store.	Complied
7.2.6	(C) Pesticides are only handled, used or applied by persons who have completed the necessary training and are always applied in accordance with the product label. All precautions attached to the products are properly observed, applied, and understood by workers (see Criteria 3.6). Personnel applying pesticides must show evidence of regular updates on the knowledge about the activity they carry out.		Complied

	- Critical (Major) compliance -	Premix, Triple Rinse, Spraying, Handling, SDS Training was conducted on 12/06/2023 and attended by 6 workers (field conductor, drivers, Sprayers. Storekeeper was trained for handling, storage, premix, SDS, Triple Rinse, PPE and Hirarc on 01/08/2023. Maran Estate Training on handling of pesticides was conducted on 17/04/2023 that included mixing, triple rinse and classification of chemicals. Attended by3 workers (storekeeper, Driver and Solehadir)	
7.2.7	(C) Storage of all pesticides is in accordance with recognised best practices Critical (Major) compliance -		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 -	Triple rinse SOP and practices found applied. Used container than punctured for disposal purposes. For sample, Asia Oil Palm Estate 1 has established Triple Rinse Procedure (with Pictogram steps). All estate practicing triple rinse and punctured before being disposed as verified during site visits.	Complied

	circumstances where no other viable alternatives are available. This requires prior government authority approval. All relevant information is provided to affected local communities at least 48 hours prior to application of aerial spraying. - Critical (Major) compliance -	site visit at Block 97B1 Pahang Oil Palm Estate 1 and other estates in Carotino operating unit.	
7.2.10	(C) Specific annual medical surveillance for pesticide operators, and documented action to treat related health conditions, is demonstrated. - Critical (Major) compliance -	Pahang Oil Palm Estate 1 According to Medical Surveillance Report conducted by My Health Clinic conducted on 26/10/2023. OHD Dr. Mohd Haminuddin B. Hassan (JKKP HQ/19/DOC/00/00305). 29 workers attended for exposure to Garlon 250 EC (Herbicides) Asia Oil Palm Estate 1 Medical Surveillance was conducted on 26/10/2023 by My Health Clinic under Dr. Mohd Haminuddin b. Hassan (JKKP HQ/19/DOC/00/0035, where 29 workers sent for chemical name Trichloroethylene Maran Estate Medical Surveillance was conducted by My Health Clinic conducted on 26/10/2023. OHD Dr. Mohd Haminuddin B. Hassan (JKKP HQ/19/DOC/00/00305). 29 workers attended for exposure to Garlon 250 EC (Herbicides).	Complied
7.2.11	(C) No work with pesticides is undertaken by persons under the age of 18, pregnant or breastfeeding women or other people that have medical restrictions and they are offered alternative equivalent work. - Critical (Major) compliance -	No work with pesticides involving pregnant and breastfeeding ladies as interviewed and observed. This was observed in all estates.	Complied



7.3.1	A waste management plan which includes reduction, recycling, reusing, and disposal based on toxicity and hazardous characteristics, is	Carotino POM and its supply base (Carotino Production Unit – CPU) has identified all wastes and sources of pollution based on waste	Complied
	documented and implemented.	category and its characteristics as following:	
	- Minor compliance -	- Scheduled waste - Spent IPA, hexane, filter, lubricants, hydraulic oil, grease, used batteries	
		- Domestic waste - rubbish from the mill/estate complex and employees' quarters	
		- Industrial waste - Fiber, palm kernel shell, boiler ash, scrap iron	
		- Sewage - Sewage from housing/office complex	
		Source of pollution from the mill and estate activities identified as following:	
		- Black smoke - Emission from Boilers/vehicles/engines	
		- Odor & gases - Activities from the effluent treatment	
		- Leakage of lubricant - Storage & vehicle maintenance	
		Management plan established on individual operating units as per sample Waste Management Plans; Doc. Ref. # F/001-02/2009; Date: 5/7/2009 and Waste Products Identification; Doc. Ref. #F/006-01/2010; Date: 3/9/2010;	
		Guideline on Wastes and Waste Products Identification and Disposal Plan for Estates and Mills; Doc. Ref. #F/007-06/2016; Date: 22/12/2016	
		POP 1 Estate:	
		PT Waste Recycling Industry Purchased Statement Ref. # PV-020; Date: 18/1/2024; Purchased items:	
		- Item # 017 - Plastic; Qtty: 45 kg	



		- Item # 021 - Paper; Qtty: 48 kg - Item # 01 - Aluminium; Qtty: 20 kg	
7.3.2	Proper disposal of waste material, according to procedures that are fully understood by workers and managers, is demonstrated. - Minor compliance -	The operating units has established and documented Guidelines on Garbage Disposal; Doc. Ref. # F/006/06/2016 dated 21/12/2016. Based on the guidelines, the visit confirmed that Correct labels were used for all scheduled wastes (SW) stored in the SW store such as SW305 Spent lubricant oil.	Complied
		Records of weekly monitoring checklist by competence person for samples dated on 27/03/2023, 26/06/2023, 25/09/2023 and 26/12/2023. Records of regular briefing and training of SW handling for sample dated 26/12/2023. Verified records of latest SW disposal as per sample as following:	
		POP 1 Estate schedule waste disposal:	
		- Consignment notes # 2024010415YV1H7M; Date: 4/1/2024; Type: SW410; Weight: 0.09MT; Contractor: Pentas Flora (Kuantan) Sdn. Bhd.	
		- Consignment notes # 2024010420E3YXHL; Date: 4/1/2024; Type: SW305; Weight: 0.60MT; Contractor: Pentas Flora (Kuantan) Sdn. Bhd.	
		- Consignment notes # 2024011820H073FA; Date: 18/1/2024; Type: SW409; Weight: 0.198MT; Contractor: Pentas Flora (Kuantan) Sdn. Bhd.	
		- Consignment notes # 2023121515Q16MP8; Date: 15/12/2023; Type: SW404; Weight: 0.0016MT; Contractor: Kualiti Alam Sdn. Bhd. (Kemudahan Pengangkutan) (PYDT BT)	
		Maran Estate schedule waste disposal:	

7.3.3	The unit of certification does not use open fire for waste disposal. - Minor compliance -	 Consignment notes # 20240111113F7H4Y; Date: 11/1/2024; Type: SW305; Weight: 1.00MT; Contractor: Pentas Flora (Kuantan) Sdn. Bhd. Consignment notes # 2024011111L59P4R; Date: 11/1/2024; Type: SW410; Weight: 0.30MT; Contractor: Pentas Flora (Kuantan) Sdn. Bhd. Consignment notes # 2024011210FJLHEQ; Date: 12/1/2024; Type: SW404 (Pathological); Weight: 0.0002MT; Contractor: Cenviro Recycling and Recovery Sdn. Bhd. Consignment notes # 2024011213DQ52YO; Date: 12/1/2024; Type: SW404 (Sharps); Weight: 0.0002MT; Contractor: Cenviro Recycling and Recovery Sdn. Bhd. Inventory (5th Schedule; File Ref. # JAS.CHQ600-3/4/419; Date: 31/12/2023 No open burning (Including domestic wastes) is allowed under group policy. Landfill was the method used by the estates for domestic waste disposal. Refer Guidelines on Garbage Disposal, 	Complied
		F/006-06/2016 dated 21/12/2016. fire was noted use and sightings at field and line site confirm no burnt marks sighted. Sample of landfill were observed and found in order.	
Criterio	n 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 -	All estates within CPU implemented good agricultural practices based on the established SOP as following: - Methods of nutrient assessment for oil palm fertilizer recommendation - B/012-02/2012 - Guidelines for Compost Application - B/028-01/2017 - Guidelines for Semi-Decomposed EFB Application - B/030-01/2019	Complied



		Soil analys Agronomis maintain t fertilizers, accordance procedure	- SOP-Soil and water conservation - C/002-01/2008) Soil analysis and foliar analysis are monitored on yearly basis by Agronomist. The recommendations for improvements are given to maintain the sustainable practices. They include use of chemical fertilizers, EFB and decanter cake. The visited estates operate in accordance with the Agriculture Manual and standard operating procedures. The practices are consistently monitored by estate operation management and Regional Controller.					
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 -	Agronomy recommer analysis requireme Advisory F	Foliar and soil sampling was carried out by Internal Agronomist from Agronomy Advisory and Services Department prior to the fertilizer recommendation for the next financial year. Leaf and soil nutrient analysis are commonly used in the diagnosis of fertilizer requirements in oil palms. Verified the sample records of Agronomic Advisory Report Pahang Oil Palm Estate Div. 1; Date of visit: 12-14/4/2023; Agronomist: Yong Kian Keong.					Complied
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.	document	ed Meth	ods of Nutr	y in place wa ient Assessme 12-02/2012 a	ent for Oil Pa		Complied
	- Minor compliance -	Fertilizer	AS	AC	ERP	МОР	Kiesrite	
		Kg/palm/yr	4.43-5	5.58 3.72-4.	69 0.93-1.23	3.50-4.13	1.79-2.30	
		Verified sample of implementation for Pahang Oil Palm Estate 1 for December 2023 as following:						
		Field	Block	HA done	HA todate	MT done	MT todate	
		PM02A	4	7.65	16.53	267.86	578.39	
		PM06A	1	5.47	5.47	191.33	191.33	
		PM09A	2	8.75	32.04	306.12	1121.94	

7.4.4	Records of fertiliser inputs are maintained Minor compliance -	Records of fertiliser inputs are maintained as per sample Pahang Oil Palm 1 Fertiliser Program Financial Year 2023/2024 as following:							Complied
		Field	Block	Month	Туре		Rat	e (kg/palm)	
		01A	1	Dec 23	Ammoni	ium Sulphate	2.50	0 - Round 2	
		02B	1	Jan 24	CCPD 10)-4.1-21-4+0).4B 3.00	0 - Round 3	
		06A	12	Mar 24	CCPD 10	0-4.1-21-4+0).4B 2.50) – Round 4	
		24A	A1	May 24	13-8-19	-3+0.4B+Azo	onite 1.00) – Round 5	
Criterio	on 7.5: Practices minimise and control erosion and degradation of soils.								
7.5.1	(C) Maps identifying marginal and fragile soils, including steep terrain, are available.- Critical (Major) compliance -	Soil maps are available in all estates within CPU. Notwithstanding, there is no marginal and fragile soils such as podzols and acid sulphate soils in all estates within CPU. Some steep terrain also included entitled the slope maps as provided by the AASD (Agronomy Advisory Service Dept).					Complied		
7.5.2	No replanting on steep slopes (above 25 degrees) unless approved by state governments. In case of replanting is permitted, no replanting in	Based on Environmental and Social Improvement Plan Carotino Estate; Doc. Ref. # N/009-01/2019; Date: 29/6/2022						Non- compliance	
	contiguous area of steep terrain (greater than 25 degrees) larger than 25 Ha within the Unit of Certification.	Aspect identified					Action	Further	
	- Minor compliance -		ed ic	dentified	Solution	Method	plan review	action	
		Steep	L	andslide	Identify and map out steep slope >25° (if >25°, will not be planted, if planted, minimum maintenan ce will be	Area with steep slope >25° and >25ha will not be planted until the next replanting programm e	and the area will	Steep slope area has been earmark based on Jabatan Pertanian soil analysis report	



		car out	ried :)				
	Sighted too relevant reports as following: - Letter of Perkara: Pemberitahuan Berkenaan Projek Penanam Semula Ladang Carotino Seluas 748.69 ha; Date: 17/7/2023; Ex-PM90A Block 8						
	Mukim	Kesesuaian Ta Bera, Daerah 80/4/6(36); Da	Bera, Pah	ang Da		•	
	Bera, D Semena Sumber BPTh/K	- Peta Tanah Teren Carotino Sdn. Bhd. Hwa Li Estet Div. 2 Mukim Bera, Daerah Bera, Pahang Darul Makmur; Jabatan Pertanian Semenanjung Malaysia Unit Pengurusan Dan Pemuliharaan Sumber Tanah Kuantan Pahang; No. rujukan peta: BPTh/KTN/005/2011; 25/11/2011. Petunjuk Untuk Unit Pemetaan					
	Symbol	Nama Tanah	Kelas Tera	in Kelu	asan		
				На	(%	
	STP\7	Curam	Curam (>30°)	10.0	08	0.60	
	TNH PH Kesesua Div. 2; Tidak se tersanga	Kesesuaian T IG (K) 207/680 Jian Tanah Tan Mukim: Bera; Esuai untuk ke Jiat curam dan ri Kawasan ini di	0/4/6 (36); aman; Kav Daerah B giatan pert siko hakisa	Tujuan vasan: L Bera Rec anian ke n yang te	Rancanga ot 6408, Fommenda erana kece erlalu tingg	in: Laporan Iwa Li Estet tion (Syor): runan yang	



Notwithstanding, visit in Field # PR23 (Previous Field # PM90A Block 8) found there was a replanting for steep area of about 4 ha which based on the contour map indicated slope >25 degree area.

Based on the letter to Jabatan Pertanian Negeri Pahang "Perkara: Pemberitahuan Berkenaan Projek Penanam Semula Ladang Carotino Seluas 748.69 ha; Date: 17/7/2023"; The approval documents by the Jabatan Pertanian was insufficient.

Based on the earlier Peta Tanah Teren Carotino Sdn. Bhd. Hwa Li Estate Div. 2 Mukim Bera, Daerah Bera, Pahang Darul Makmur; Jabatan Pertanian Semenanjung Malaysia Unit Pengurusan Dan Pemuliharaan Sumber Tanah Kuantan Pahang; No. rujukan peta: BPTh/KTN/005/2011; 25/11/2011. Petunjuk Untuk Unit Pemetaan STP\7 Curam Curam (>30o) 10.08 0.60.

The recommendations were "Laporan Kesesuaian Tanah (Soil Suitability Report); Ref. # JP TNH PHG (K) 207/680/4/6 (36); Tujuan Rancangan: Laporan Kesesuaian Tanah Tanaman; Kawasan: Lot 6408, Hwa Li Estate Div. 2; Mukim: Bera; Daerah Bera Recommendation (Syor): Very unsuitable for agricultural activities due to so steep slope and very high risk of erosion. Recommended this area maintained as forest (Tidak sesuai untuk kegiatan pertanian kerana kecerunan yang tersangat curam dan risiko hakisan yang terlalu tinggi. Disyorkan bahawa kawasan ini dikekalkan sebagai hutan)."

This indicated that the state governments approval documents for replanting on steep slopes in Field # R23 (Previous Field # PM90A Block 8) was insufficient.

Hence a nonconformity has been raised.



7.5.3	There is no new planting of oil palm on steep terrain Minor compliance -	Except for the replanting issue highlighted in indicator above, no new planting of oil palm conducted on steep terrain as verified through site visit and interview at all estates visited.	Complied		
	Criterion 7.6: Soil surveys and topographic information are used for site planning in the establishment of new plantings, and the results are incorporated in perations.				
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 -	Except for the replanting issue highlighted in indicator 7.5.2 above, no new planting of oil palm conducted on steep terrain as verified through site visit and interview at all estates visited.	Complied		
7.6.2	Extensive planting on marginal and fragile soils, is avoided, or, if necessary, done in accordance with the soil management plan for best practices. - Minor compliance -	Except for the replanting issue highlighted in indicator 7.5.2 above, no new planting of oil palm conducted on steep terrain as verified through site visit and interview at all estates visited. There are also no peat soils in all estates within CPU.	Complied		
7.6.3	Soil surveys and topographic information guide the planning of drainage and irrigation systems, roads and other infrastructure. - Minor compliance -	Soil surveys are made and available in a soil map at all estates. Topographic contour map is also available which are both used to manage the drainage and road works in the estates.	Complied		
Criterio	on 7.7: No new planting on peat, regardless of depth after 15 November 20	018 and all peatlands are managed responsibly.			
7.7.1	(C) There is no new planting on peat regardless of depth after 15 November 2018 in existing and new development areas. - Critical (Major) compliance -	There is no peat soil or soil categorized as marginal or fragile soil in all estates visited. There was also no new planting in the estates.	Not Applicable		
7.7.2	Areas of peat within the managed areas are inventoried, documented and reported (effective from 15 November 2018) to RSPO Secretariat. PROCEDURAL NOTE: Maps and other documentation of peat soils are provided, prepared and shared in line with RSPO Peatland Working Group (PLWG) audit guidance (see Procedural Note for 7.7.5 below).	There is no peat soil or soil categorized as marginal or fragile soil in all estates visited. There was also no new planting in the estates.	Not Applicable		

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	- Minor compliance -		
7.7.3	(C) Subsidence of peat is monitored, documented and minimised Critical (Major) compliance -	There is no peat soil or soil categorized as marginal or fragile soil in all estates visited. Hence, this is not applicable.	Not Applicable
7.7.4	(C) A documented water and ground cover management programme is in place Critical (Major) compliance -	There is no peat soil or soil categorized as marginal or fragile soil in all estates visited. Hence, this is not applicable.	Not Applicable
7.7.5	(C) For plantations planted on peat, drainability assessments are conducted following the RSPO Drainability Assessment Procedure, or other RSPO recognised methods, at least five years prior to replanting. The assessment result is used to set the timeframe for future replanting, as well as for phasing out of oil palm cultivation at least 40 years, or two cycles, whichever is greater, before reaching the natural gravity drainability limit for peat. When oil palm is phased out, it is replaced with crops suitable for a higher water table (paludiculture) or rehabilitated with natural vegetation. This is subject to transitional (5 years: 2019 to 2024) arrangement stated in the Drainability Assessment Procedure. Within 12 months initial implementation period, company could submit other alternate methodologies to be considered by RSPO for recognition. - Critical (Major) compliance -	There is no peat soil or soil categorized as marginal or fragile soil in all estates visited. Hence, this is not applicable.	Not Applicable
7.7.6	(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. Hence, this is not applicable.	Not Applicable
7.7.7	(C) All areas of unplanted and set-aside peatlands in the managed area (regardless of depth) are protected as "peatland conservation areas"; new drainage, road building and power lines by the unit of certification on peat soils is prohibited; peatlands are managed in accordance with the	There is no peat soil or soil categorized as marginal or fragile soil in all estates visited. Hence, this is not applicable.	Not Applicable

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Criterio	`RSPO BMPs for Management and Rehabilitation of Natural Vegetation Associated with Oil Palm Cultivation on Peat', version 2 (2019) and associated audit guidance. - Critical (Major) compliance - pn 7.8: Practices maintain the quality and availability of surface and ground	water.	
7.8.1	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. - Minor compliance -	Water management plan was established and incorporated under Environmental and Social Improvement Plan – West Pahang, doc. ref. N/009-2/2019 dated 23/06/2022. The plan includes the following: - Waterways/water source - Water for household consumption - Wastewater from operational activities (Chemical) - Rainfall - Flood - Riparian buffer zone Water quality analysis has been conducted at estates and mill. Water sampling points were maintained and completed with proper signage. Water management plan has included the availability of water sources and to avoid negative impacts on other users in the catchment. No restriction of access to clean water or contribute to pollution of water used by communities. Access to clean water is adequately provided to workers for household consumption with sample permits and volume for AOP Estate 1 as following: - SPAN Suruhanjaya Perkhidmatan Air Negara; Jadual Kelima; Akta Industri Perkhidmatan Air 2006; Peraturan-peraturan Industri Perkhidmatan Air 2006; License Class # LK/3/23/01677; Service license: Water distribution & water treatment; System	Complied

		7/11/2026 - Domestic water usage populati Domestic wate usage Jan 2023 315.61 litres/person	on 2023: Population: 250 person; 3: 2446 m³; Water usage/person: person = 365.15 liter/person/day	
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 -	Protection of water courses and we restoring appropriate riparian buf the 2 Estates and mill catchment. Fidentified and demarcated. No chobserved been used in their Guatemala grass / Vertivar sp we Guidelines of the width of the riprotected have been specified Establishment of Riparian Buffer Z Date: 16/2/2009. The buffer zone	Figure 1 at Riparian buffer Regions have been nemicals and fertilizer application maintenance. In certain areas are planted along the riverbanks. Fivers and natural courses to be d in the Guidelines on the cone; Doc. Ref. # C/001-02/2009;	Complied
		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 zones are protected and wa are taken for phosphate and r fertilizer application effect to the records of sampling analysis as fo	nitrate analysis for detection of water courses. Sighted sample	

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7.8.3	Mill effluent is treated to be in compliance with national regulations. Discharge quality of mill effluent, especially Biochemical Oxygen Demand (BOD), is regularly monitored. - Minor compliance -	 Water Analysis Test Report # IE1409/2023; Date: 30/10/2023; Sample: Sg. Bekapor & Sg. Ketapi; Inlet, Midstream & Outlet; pH, BOD, COD, SS, AN & DO – Result complied. Certificate of Analysis; Ref. # 23-348800; Date: 6/1/2024 The effluent was treated in compliance with DOE license requirement of POME final discharge quality. Visit to the effluent pond found no overflow was observed, and flow meter reading was recorded daily. The mill monitoring the effluent and submits to DOE via Online Environmental Reporting (OER) system. Results from final discharge were compliance within parameter limit as per recent records of POME Final Discharge sample test report # EI/2023/09/149; Date Tested: 7-14/9/2023; Date Reported: 21/9/2023; Analysis by Central Analytical Laboratory; BOD result: 	Complied
7.8.4	Mill water use per tonne of FFB is monitored and recorded. - Minor compliance -	21/9/2023; Analysis by Central Analytical Laboratory; BOD result: 71 mg/L. Carotino POM water use per tonne of FFB was monitored and recorded with latest records of POM water consumption records as following: - 2024: 0.64 m³/MT FFB todate January 2024 - 2023: 0.97 m³/MT FFB	Complied
Criterio	n 7.9: Efficiency of fossil fuel use and the use of renewable energy is optir		
7.9.1	A plan for efficiency of the use of fossil fuels and to optimise renewable energy is implemented, monitored and documented. - Minor compliance -	A plan for improving the efficiency of the use of fossil fuels is in place and has been incorporated into the Environmental Aspect and Impact activities report for 2023. The Environment Management Plan for efficiency of fossil fuel usage includes the following: - AOP1: 13 poles of solar streetlights installed since October 2023 - AOP1 Vehicles diesel: 2023/2024: 661,094.5 liters; FFB production: 123,064.05 mt; Consumption: 6.26 liters/mt FFB	Complied

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	Criterion 7.10: Plans to reduce pollution and emissions, including greenhouse gases (GHG), are developed, implemented and monitored and new developments are designed to minimise GHG emissions.					
7.10.1	(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.	CPU has identified emission of greenhouse gas (GHG) from their operations such as emission from their farm tractor and gen set operation.	Complied			
	- Critical (Major) compliance -	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. The commitment demonstrated with Letter of Appointment as Sustainability Biogas Plant; Chandran a/I Kannan (Assistant Mill Manager); By Kenny Alvin Ligunjang (Mill Manager); Date: 15/7/2019.				
		The plan implemented based on the documented Pollution Mitigation Plans; Doc. Ref. # F/002-02/2010; Date: 11/7/2010.				
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 -	CPU has calculated the GHG using RSPO Palm GHG calculator and the calculation option used is Option 1. There is no new development within the estates audited.	Complied			
7.10.3	(C) Other significant pollutants are identified and plans to reduce or minimise them implemented and monitored. - Critical (Major) compliance -	Other significant pollutants such as soil erosion, wastes water from operational activities (chemical) have been identified and documented in Environmental and Social Improvement Plan, doc. ref. N/009-02/2019 dated 21/11/2019. Implementation of plan is being monitored by appointed person in charge with target of time frame for completion.	Complied			
		The mill is implementing its Continuous Emission Monitoring System (CEMS) as required by the DOE through the license compliance				

		schedule. The monitoring system is an online link with the DOE centre.	
Criterio	on 7.11: Fire is not used for preparing land and is prevented in the manage	ed area	
7.11.1	(C) Land for new planting or replanting is not prepared by burning Critical (Major) compliance -	Based on the visit at the replanting areas, there was no sign of fire being used for preparing the land.	Complied
7.11.2	The unit of certification establishes fire prevention and control measures for the areas directly managed by the unit of certification. - Minor compliance -	Fire prevention and control measures process is documented under Guidelines on Fire Prevention, Control and Stakeholder Engagement [doc. no.: M/017-03/2020 dated 17/01/2020.	Complied
7.11.3	The unit of certification engages with adjacent stakeholders on fire prevention and control measures. - Minor compliance -	The unit of certification engages with adjacent stakeholders on fire prevention and control measures during latest stakeholder consultation meeting dated on 12/06/2023.	Complied
	on 7.12: Land clearing does not cause deforestation or damage any area roprest. HCVs and HCS forests in the managed area are identified and protectors.		gh 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	Based on the HCV assessment report i.e. "Final A Conservation Assessment of Carotino's Peninsular Malaysia Estates; Conservation Values & Recommendations"; A Report Prepared by Wild Asia; Wild Asia's Sustainable Agriculture Initiative; Report Dated: 22/1/2008, no HCV presence within CPU.	Complied
	document Critical (Major) compliance -	Notwithstanding, the conservation assessor has recommended some programmes which are considered not only biodiversity protection within the identified key conservation areas, but also within the plantation landscape and areas beyond plantation boundaries. In general, among the recommendations were:	
		- Setting objectives – Building Conservation Plan	
		Conservation of Natural AreasEnhancing local biodiversity within plantations	

		Assessing plantation policiesEducation and awareness	
7.12.2	 (C) HCVs, HCS forests and other conservation areas are identified as follows: a) For existing plantations with an HCV assessment conducted by an RSPO-approved assessor and no new land clearing after 15 November 2018, the current HCV assessment of those plantations remains valid. b) Any new land clearing (in existing plantations or new plantings) after 15 November 2018 is preceded by an HCV-HCS assessment, using the HCSA Toolkit and the HCV-HCSA Assessment Manual. This will include stakeholder consultation and take into account wider landscape-level considerations. 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 - 	Based on the original HCV assessor recommendations, a documented Guidelines on Biodiversity Conservation Management Plan for Estates – WM; Doc. Ref. # C/006-01/2009; Doc. Date: 20/2/2009 were established. Based on the guidelines, implementation conducted as per sample as following: - Asia Oil Palm Estate 1 Anti-Hunting & Fishing Signboard: PM 00B, PM 99D, PM 95B, PM 97A, PM 98A, PM07A	Complied
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 CPU (refer 7.3.1 to 7.4.2).	Complied

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7.12.5	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 -	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 CPU (refer 7.3.1 to 7.4.2).	Complied
7.12.6	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 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, elephants and monkeys occasionally sighted. The appropriate measures that are expected to maintain and/or enhance them were implemented through an action plan reviewed annually. Despite the slope of the area, this forest is classed as a" production forest" since it has been mined and no wildlife is reported sighted. Stated in the estate's management plan, among the protection measures established were create Biodiversity awareness, through regular training to workforce, put up warning signage at strategic boundary line "No Hunting, No Fishing, No Trapping or Collecting of Wild Species" and regular monitoring of animal sightings. Awareness training had been conducted on and regular reminders were normally given to all workforce during muster call. Records of training were well maintained by the operating units. Based on interview with workers, it was noted that they have a good understanding on the protection of RTE. Animal sightings has been recorded.	Complied
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.	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 Carotino Certification Units Estates (refer 7.3.1 to 7.4.2). Monitoring of these areas are made through the daily field	Complied

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	- Minor compliance -	supervision by the field staff and executives. There were also visits by the Plantation Controller and also personnel from the Sustainability unit. Sighting of RTE are made and recorded if any.	
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 **Carotino POM** and supply base was calculated using the PalmGHG Calculator version 3.0.1. The assessment team had verified the data input in the PalmGHG Calculator against operations records. PalmGHG Calculation Options selected 'Full version' and 'Exclude LUC Emission' calculation option is not applied. The records verified includes:

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

The summary of the Net GHG emitted in in **2023** for **Carotino POM** and supply base are as following:

Emission per product	tCO ₂ e/tProduct
СРО	0.91
РКО	0.91

Extraction	%
OER	18.81
KER	4.44

Production	t/yr
FFB Process	94,063.73
CPO Produced	17,693.79
PKO Produced	4,173.67

Land Use		На
OP Planted Area		9,015.88
OP Planted on peat		ı
Conservation (forested)		20.22
Conservation (non-forested)		198.01
	Total	9,234.11

Summary of Field Emission and Sink

	Own Crop*		Group		3 rd Party		Total	
	tCO ₂ e	tCO₂e / FFB	tCO ₂ e	tCO₂e / FFB	tCO ₂ e	tCO₂e / FFB	tCO₂e	tCO₂e / FFB
Emission								
Land Conversion	63,512.04	0.68	-	-	-	-	63,512.04	0.68
CO ₂ Emission from fertilizer	7,579.29	0.08	-	-	-	-	7,579.29	0.08
NO ₂ Emission	4,698.67	0.05	-	-	-	-	4,698.67	0.05
Fuel Consumption	1,227.16	0.01	-	-	-	-	1,227.16	0.01
Peat Oxidation	-	1	-	-	-	-	ı	1
Sink								
Crop Sequestration	-57,648.80	-0.61	-	-	-	-	-57,648.80	-0.61
Conservation Sequestration	-	-	-	-	-	-	-	1
Total	19,368.36	0.21	-	-	-	-	19,368.36	0.21

*Note: Includes both estates and smallholders



Summary of Mill Emission and Credit

	tCO₂e	tCO₂e/tFFB
Emission		-
POME	2,295.22	0.02
Fuel Consumption	210.32	-
Grid Electricity Utilization	-	-
Credit	·	
Export of Grid Electricity	-	-
Sales of PKS	-2,012.34	-0.02
Sales of EFB	-	-
Total	493.20	0.01

Summary of Kernel Crusher Emission and Credit (if applicable)

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

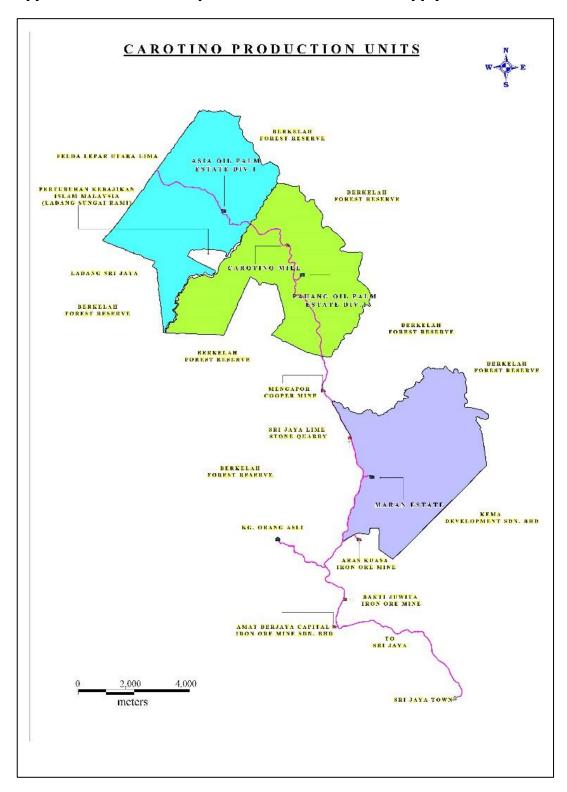
^{*}This mill has no kernel crusher operation.

Palm Oil Mill Effluent (POME) Treatment:		
Divert to Compost (%)	0	
Divert to anaerobic diversion (%)	100	

POME Diverted to Anaerobic Digestion:			
Divert to anaerobic pond (%)	100		
Divert to methane captured (flaring) (%)	0		
Divert to methane captured (energy generation) (%)	0		



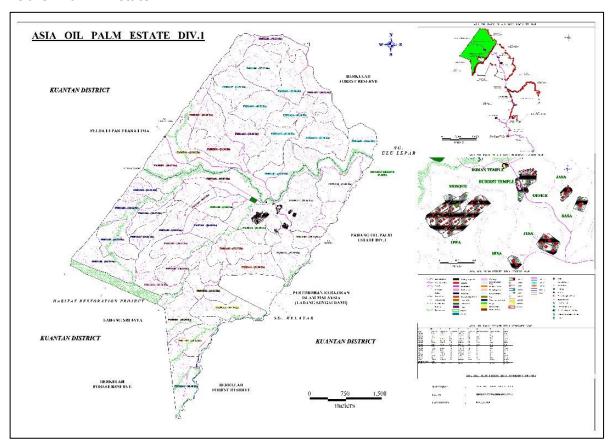
Appendix C: Location Map of Certification Unit and Supply bases





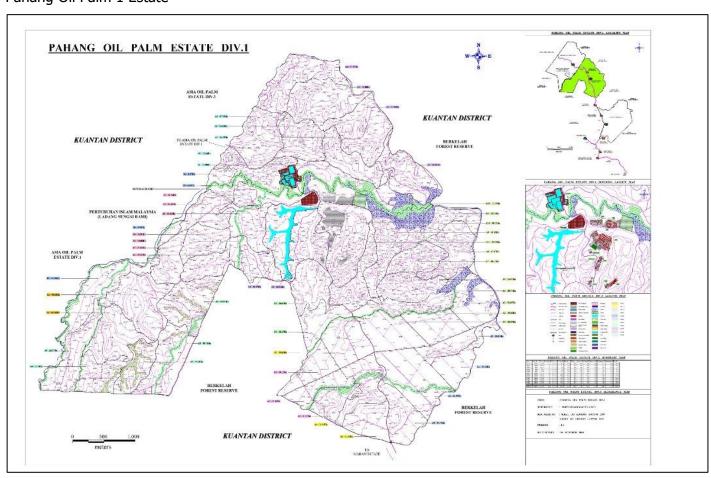
Appendix D: Estate Field Map

Asia Oil Palm 1 Estate





Pahang Oil Palm 1 Estate

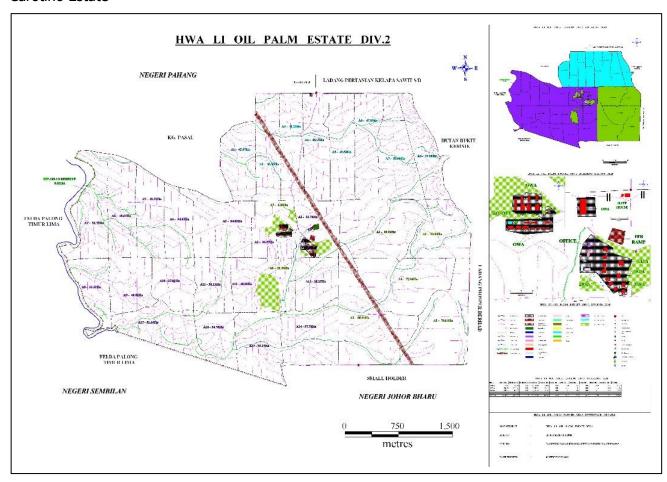


...making excellence a habit."

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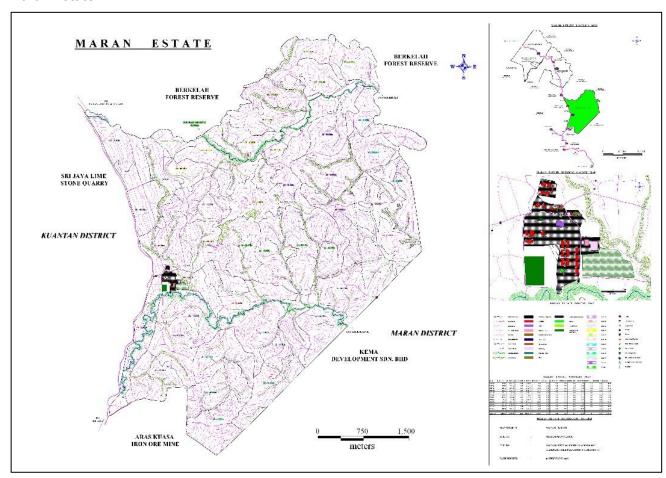
RSPO P&C Public Summary Report Revision 15 (Nov 2023)

Carotino Estate





Maran Estate

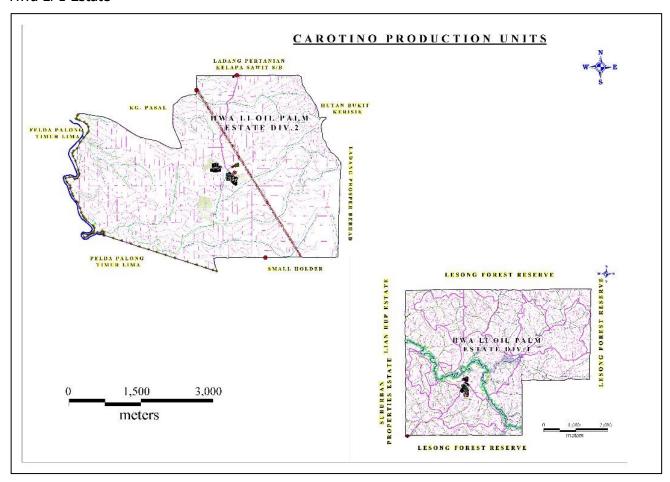


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Hwa Li 1 Estate





Appendix E: List of Smallholder Registered and/or sampled

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

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

CPU Carotino Production Unit 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