

**RSPO PRINCIPLE AND CRITERIA
3rd Annual Surveillance Assessment (ASA3_1)
Public Summary Report**

Kulim (Malaysia) Berhad
Head Office: Kulim (Malaysia) Berhad K.B 705 80990 Johor Bahru Johor, Malaysia
Sedenak Palm Oil Mill and Supply Base K.B. 721 80990 Kulai Johor Bahru, Johor Malaysia

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Section 1: Scope of the Certification Assessment

1. Company Details			
RSPO Membership Number	1-0006-04-000-00	Date	Member since: 8 August 2004
Company Name	Kulim (Malaysia) Berhad		
Address	Head Office : K.B 705 80990 Johor Bahru, Johor, Malaysia		
Mill Address	Certification Unit : Sedenak Palm Oil Mill, K.B. 721 80990 Kulai, Johor Bahru, Johor, Malaysia		
Subsidiary of (if applicable)	N/A		
Contact Name	Pn. Salasah Elias		
Website	www.kulim.com.my	E-mail	salasah@kulim.com.my
Telephone	+607 8611611	Facsimile	+607 8631084

2. Certification Information			
Certificate Number	RSPO 537873	Original Certification Date	23/01/2009
		Expiry Date	22/01/2019
Scope of Certification	Production of Palm Oil and Palm Kernel from Sedenak Palm Oil Mill and Supply Base (Sedenak Estate, Ulu Tiram Estate, Kuala Kabong Estate, Basir Ismail Estate and Rengam Estate)		
Other Certifications			
Certificate Number	Standard(s)	Certificate Issued by	Expiry Date
AR 1803	ISO 9001:2008	SIRIM QAS International Sdn Bhd	14/10/2017
A43169	MS 1500:2009	Department of Islamic Development, Malaysia	30/04/2017
EU-ISCC-Cert-DE119-60152022	ISCC	ASG Cert	01/02/2016

3. Location(s) of Mill & Supply Bases			
Name (Mill / Supply Base)	Location [Map Reference #]	GPS	
		Easting	Northing
Sedenak Palm Oil Mill (Mill capacity : 90 mt/hr)	Kulai, Johor, Malaysia	103° 32' 21.97" E	1° 43' 47.41" N
Sedenak Estate	Kulai, Johor, Malaysia	103° 31' 36.24" E	1° 42' 48.79" N
Ulu Tiram Estate	Ulu Tiram, Johor, Malaysia	103° 47' 26.40" E	1° 37' 28.02" N

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Kuala Kabong Estate	Kulai, Johor, Malaysia	103° 26' 00.87" E	1° 41' 20.10" N
Basir Ismail Estate	Kota Tinggi, Johor, Malaysia	103° 54' 52.07" E	1° 37' 47.84" N
Rengam Estate	Simpang Renggam, Johor, Malaysia	103° 24' 49.02" E	1° 53' 21.98" N

4. Description of Supply Base

Estate	Mature (ha)	Immature (ha)	Infras & Other (ha)	HCV (ha)	Total Planted (ha)	Total Hectarage	% of Planted
Sedenak Estate*	2,607.67	0	264.86	3.25	2,607.67	2875.78	90.68
Ulu Tiram Estate**	392.23	118.01	2.24	24.81	510.24	537.29	94.97
Kuala Kabong Estate	1,622.70	0	111.21	2.19	1,622.70	1,736.10	93.47
Basir Ismail Estate***	2,418.51	488.26	247.07	40.08	2,906.77	3,193.92	91.01
Rengam Estate****	1,909.77	431.92	139.23	0	2,341.69	2,480.92	94.39
Total	8,950.88	1,038.19	764.61	70.33	9,989.07	10,824.01	92.29

*Sedenak Estate – area changes due to resurvey by Kulim's Land Department done on October 2016

**Ulu Tiram Estate – area decreased due to surrender of area for development (Tiram Industrial Park)

***Basir Ismail Estate – area changes due to taking over area from REM estate as per management decision

****Rengam Estate – area changes due to resurvey by Kulim's Land Department done on October 2016

5. Plantings & Cycle

Estate	Age (Years)					Tonnage / Year		
	0 - 3	4 - 10	11 - 20	21 - 25	26 - 30	Actual (Nov 2015 – Oct 2016)	Estimated (Nov 2015 – Oct 2016)	Forecast (Nov 2016 – Oct 2017)
Sedenak Estate	0	647.92	1,669.51	240.39	49.85	52,815.50	64,964.00	59,802.00
Ulu Tiram Estate	118.01	214.26	0	63.01	114.96	8,252.96	8,585.00	8,845.00
Kuala Kabong Estate	0	0	1,622.70	0	0	28,502.52	38,955.00	32,861.00
Basir Ismail Estate	488.26	1,435.69	814.11	168.71	0	49,677.26	47,186.00	54,617.00
Rengam Estate	431.92	334.32	992.09	485.23	98.13	42,360.00	41,256.00	47,124.00
Total	1,038.19	2,632.19	5,098.41	957.34	262.94	181,608.24	200,946.00	203,249.00

6. Certified Tonnage of FFB (Own Certified Scope)

Estate	Tonnage / year		
	Actual (Nov 2015 – Oct 2016)	Estimated (Nov 2015 – Oct 2016)	Forecast (Nov 2016 – Oct 2017)
Sedenak Estate	52,815.50	64,964.00	59,802.00

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Ulu Tiram Estate	8,252.96	8,585.00	8,845.00
Kuala Kabong Estate	28,502.52	38,955.00	32,861.00
Basir Ismail Estate	49,677.26	47,186.00	54,617.00
Rengam Estate	42,360.00	41,256.00	47,124.00
Total	181,608.24	200,946.00	203,249.00

7. Non-Certified Tonnage of FFB (outside supplier – excluded from certificate) if applicable*			
Independent FFB Supplier	Tonnage / year		
	Estimated (Nov 15-Oct 2016)	Actual (Nov 15-Oct 2016)	Forecast (Nov 16 – Oct 17)
Siang	-	28,462.14	-
Pasir Panjang	-	890.34	-
Bukit Layang	-	73.39	-
Tunjuk Laut	-	1,049.87	-
Pasir Logok	-	1,549.82	-
Bukit Payung	-	933.65	-
Bukit Kelompok	-	1,208.24	-
Total	-	34,167.45	-

**Above suppliers are own Kulim group of company's estate which is still undergoing RSPO certification.*

8. Non-Certified Tonnage of FFB (outside supplier – excluded from certificate) if applicable**			
Independent FFB Supplier	Tonnage / year		
	Estimated (Nov 15-Oct 2016)	Actual (Nov 15-Oct 2016)	Forecast (Nov 16 – Oct 17)
Asam Bubok	4,873.00	5,675.84	4,779.00
Kebun Sedenak	4,038.80	2,933.76	3,535.20
Ree Fong	14,564.00	7,421.57	9,924.00
Koperasi Pesara	0	97.01	196.00
Peladang Jb	6,230.60	2,326.82	2,702.40
Bukit Siput	17,520.00	17,073.39	19,122.00
Sedenak Bahru	2,706.00	2,240.23	2,317.00
Che Yu Trading	35,018.00	24,031.36	27,927.00
Per Sri Mahtai	10,373.60	7,285.73	10,073.40
Hong Hui	48,400.00	38,882.44	46,963.00
Choon Guan	30,070.00	26,004.25	32,045.00

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Per. Sri Misan	5,233.60	2,583.23	2,775.40
Fong Tak	11,609.80	7,722.10	12,060.20
Keng Ann	17,456.80	10,217.59	12,956.20
R & S	7,570.80	3,617.94	1,123.20
Guan Leng	49,554.00	56,889.58	67,549.00
Sindora Timber	0	3,055.97	3,915.00
Peladang Kulai	0	2,674.66	2,436.00
Jtp Montel	5,080.00	0	960.00
Az Iman	0	3,342.46	1,147.00
Senai	467.00	0	0
Hup Guan	2,200.00	0	0
Total	272,966.00	224,075.93	264,506.00

***Above suppliers are either independent uncertified smallholders or FFB traders*

9. Certified Tonnage

Mill	Actual* (Nov 2015 - Oct 2016)			Estimated** (Nov 2015– Oct 2016)			Forecast*** (Nov 2016 – Oct 2017)		
	FFB	CPO	PK	FFB	CPO	PK	FFB	CPO	PK
Sedenak Palm Oil Mill	181,608.24	36,906.15	9,660.74	200,946.00	42,057.99	11,052.03	203,249.00	42,418.07	11,178.69

**Actual OER: 20.32%; KER: 5.32%*

***Estimated OER: 20.93%; KER: 5.50%*

****Forecasted OER: 20.87%; KER: 5.50%*

Section 2: Assessment Process

Certification Body:

BSI Services Malaysia Sdn Bhd,
(ASI Accreditation Number: RSPO-ACC-19)
Unit 3, Level 10, Tower A
The Vertical Business Suites, Bangsar South
No. 8, Jalan Kerinchi
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BSI is a leading global provider of management systems assessment and certification, with more than 60,000 certified locations and clients in over 100 countries. BSI Standards is the UK's National Standards Body. BSI provides independent, third-party certification of management systems. BSI is ASI Accredited (RSPO-ACC-19) to conduct RSPO assessment since 31/10/2014 with accredited office located at Kuala Lumpur, Malaysia. BSI is accredited for RSPO Supply Chain Certification Systems (SCCS) and Principles & Criteria for Sustainable Palm Oil Production (P&C, Single Site & Group) certification Worldwide.

Assessment Methodology, Programme, Site Visits

This on-site 3rd Annual Surveillance Assessment was conducted from 29 November to 1 December 2016. The audit programme is included as Appendix D. The approach to the audit was to treat the mill and its supply base as an RSPO Certification Unit. Mill was audited together with the sample estates (Kuala Kabong Estate & Basir Ismail Estate). A range of environmental and social factors were covered. This includes consideration of topography, palm age, proximity to areas with HCVs, declared conservation areas and local communities.

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. RSPO P&C MYNI-2014 and RSPO Supply Chain Certification Standard 2014 were used to guide the collection of information to assess compliance. The comments made by external stakeholders were also taken into account in the assessment.

The approach to the audit was to treat the mill and its supply base as an RSPO Certification Unit. The mill was audited together with the estates (or smallholders) of its supply base. The estates sample were determined based on formula $N = 0.8\sqrt{y}$ where y is the number of estates while when applicable, the smallholders sample were determined following the RSPO Certification Requirement for Group Certification Standard 2016. The sampling of smallholders were based on the formula $(0.8\sqrt{y}) \times (z)$; where y is total number of independent group member and where z is the multiplier defined by the risk assessment. The sampled smallholder (when applicable) listed in Appendix J.

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

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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 Appendix E.

All the previous nonconformities are remains closed. The assessment findings for the 2nd Annual Surveillance Assessment are detailed in Section 3.3.

This report is structured to provide a summary of assessment finding as attached in the Appendix A. The assessment was based on random samples and therefore nonconformities may exist that have not been identified.

This report was externally reviewed by RSPO approved Certification Reviewer prior to certification decision by BSI.

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

1. Assessment Program					
Name (Mill / Supply Base)	Year 1 (Recertification)	Year 2 (ASA 1)	Year 3 (ASA 2)	Year 4 (ASA 3)	Year 5 (ASA 4)
Sedenak Palm Oil Mill	✓	✓	✓	✓	✓
Sedenak Estate			✓		
Ulu Tiram Estate		✓ * together with Sungai Papan Estate			✓
Kuala Kabong Estate	✓			✓	
Basir Ismail Estate	✓			✓	
Rengam Estate			✓		✓

Tentative Date of Next Visit: October 30, 2017 – November 2, 2017

Total No. of Mandays: 9 mandays

BSI Assessment Team:

Hafriazhar Mohd Mokhtar – Lead Auditor

Hafriazhar Mohd. Mokhtar is a Chemical Engineer by qualification. He has more than five years of direct work experience in the upstream processes of palm oil within the plantation industry. He is a qualified Lead Auditor for CDM, ISO 14001, ISO 50001 and ISO 9001 and has accumulated more than 500 audit days throughout his current career as the auditor for multiple disciplines covering Malaysia, Indonesia and Thailand. He has been trained in the RSPO P&C and SCCS standards and recently completed his RSPO P&C Lead Assessor training and has been involved in RSPO audits within Malaysia, Papua New Guinea, Solomon Islands and Gabon. During assessment, he covered the mill and estate best practices, legal issues, social issues, workers consultation, stakeholder consultation, environmental and occupational safety & health. He is fluent in Bahasa Malaysia and English languages.

Mohamed Hidhir Zainal Abidin – Team Member

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He holds Bachelor Degree in Chemical Engineering, graduated from National University of Malaysia on 2006. He has 7 years working experience in palm oil industry specifically on palm oil milling for 5 years. He also has the experiences as auditor for several standards including ISO 9001, ISO 140001, OHSAS 18001, MSPO and RSPO in his previous certification body. He completed the ISO 9001 Lead Auditor Course, ISO 14001 Lead Auditor Course and OHSAS 18001 Lead Auditor Course in 2012, Endorsed RSPO P&C Lead Auditor Course in 2013, MSPO Awareness Training in 2014 and Endorsed RSPO SCCS Lead Auditor Course in 2015. He had been involved in RSPO auditing since May 2012 in more than various companies in Malaysia and Gabon. During this assessment, he assessed on the aspects of legal, mill best practices and supply chain elements, safety and health, environmental and workers and stakeholders consultation.

Daniel Francis – Team Member

Daniel Francis is a fulltime employee with BSI Services Malaysia. He holds a Bachelor of Applied Science Degree in Food Science, graduated from Charles Sturt University, Australia. He has over 8 years of working experience in the oil and gas industry and 3 years in the food & beverage industry. He is an experienced auditor for several management system standards including ISO 9001, ISO 14001, OHSAS 18001 and Integrated Management System. He had completed the ISO 9001:2015 Lead Auditor Course and RSPO SCC Lead Auditor Course. He had been involved in the RSPO audits with various companies in Malaysia. During assessment, he covers the legal issues and occupational safety and health.

Accompanying Persons: -

Section 3: Assessment Findings

3.1 Details of audit results

This assessment has been assessed using the following RSPO normative requirements. The assessment details are provided in Appendix A.

- Kulim (Malaysia) Berhad Time Bound Plan
- RSPO Group Certification Standard 2016 Checklist
- RSPO P&C for Smallholders TH-WG 2012 Checklist
- RSPO P&C GN-NIWG 2010 Checklist
- RSPO P&C INA-NIWG 2016 Checklist
- RSPO P&C PNG-NIWG 2016 Checklist
- RSPO P&C SI-NIWG 2010 Checklist
- RSPO P&C MY-NIWG 2014 Checklist
- RSPO P&C TH-WG 2011 Checklist
- RSPO Supply Chain Certification Checklist November 2014
- RSPO P&C 2013 Generic Checklist

3.2 Progress against Time Bound Plan

Kulim (Malaysia) Berhad has disposed interest in New Britain Palm Oil Ltd in 2014. Kulim (Malaysia) Berhad previously managed the Tunjuk Laut Palm Oil Mill and Supply Base but since October 2013 this has been leased to third party operator (Awan Timur Resources) and Kulim (Malaysia) Berhad no longer manages the operations. Siang Estate previously supplies FFB to Siang Palm Oil Mill which was previously certified under Johor Corporation and now managed by third party. It is not within Kulim (Malaysia) Berhad's management control. Pasir Panjang Palm Oil Mill was under Johor Corporation, and acquired under Kulim (Malaysia) Berhad through Mahamurni Plantations Sdn Bhd in 2012. At the same time Kulim (Malaysia) Berhad has acquired Pasir Panjang Palm Oil Mill through Mahamurni Plantation Sdn Bhd in 2012. Pasir Panjang Palm Oil Mill enter time bound plan as per "work plan Kulim / Jcorp estate document and due for certification in 2016. Since March 2015 all Jcorp Estate is now supplied to Pasir Panjang Mill which will enter RSPO Certification 2016. However due to new restructuring starting 1st January 2015, seven (7) estate will be under Kulim (Malaysia) Berhad namely Kuala Kabong, Ulu Tiram, Basir Ismail, REM, Labis Bahru, Mutiara and Sungai Sembrong. All other operating unit will be under Mahamurni Plantation Sdn. Bhd.

Kulim (Malaysia) Berhad has 100% ownership in Mahamurni Plantations Sdn Bhd. Mahamurni Plantations Sdn Bhd have 3 palm oil mills i.e.: Sedenak Palm Oil Mill, Palong Cocoa Palm Oil Mill, and Pasir Panjang Palm Oil Mill. Mahamurni Plantations Sdn Bhd also has 9 estates: Sedenak Estate, Sungai Papan which supply to certified Sedenak Palm Oil Mill; Mungka Estate, Kemedak Estate, Palong Estate, Ladang UMAC which supply to certified Palong Cocoa Palm Oil Mill; Rengam Estate supply to certified Sindora Palm Oil Mill. Pasir Panjang Estate will supply to Pasir Panjang Palm Oil Mill, which due for certification by 2016. Kulim (Malaysia) Berhad has 100% ownership in Kulim Plantations (Malaysia) Sdn Bhd. Kulim Plantations (Malaysia) Sdn Bhd has Tereh Palm Oil Mill and 2 estates i.e. Tereh Utara Estate and Tereh Selatan Estate which supply to certified Tereh Palm Oil Mill. Kulim (Malaysia) Berhad has 100% ownership in Selai Sdn Bhd. Selai Sdn Bhd has Selai Estate and Enggang Estate, both supply to certified Tereh Palm Oil Mill. Kulim (Malaysia) Berhad has 100% ownership in Sindora Berhad. Sindora Berhad has Sindora Estate, supply to certified Sindora Palm Oil Mill and Sungai Tawing Estate, supply to certified Tereh Palm Oil Mill. Kulim (Malaysia) Berhad has 94.49% ownership in Kumpulan Bertam Plantations Berhad. Kumpulan Bertam Plantations Berhad has Sepang Loi Estate supply to certified Palong Cocoa Palm Oil Mill. Kulim (Malaysia) Berhad itself has 7 estates: Basir Ismail Estate, Ulu Tiram Estate, Kuala Kabong Estate supply to certified Sedenak Palm Oil Mill; Sungai Sembrong Estate and Mutiara Estate supply to certified Tereh Palm Oil Mill; REM Estate will supply certified Sindora Palm Oil Mill; Labis Bahru Estate supply to certified Palong Cocoa Palm Oil Mill. BSi concludes that Kulim has completed all of

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the commitments of its Time Bound Plan that relate to company owned and managed Palm Oil Mills and Estates. The progress with the Pasir Panjang Certification planned will be followed up. During the Initial Assessment;

1. There is no any other isolated lapse in Time Bound Plan.
2. No systematic failures to proceed with implementation of the Time Bound Plan since first certified.
3. The changes in the Time bound Plan for Pasir Panjang Palm Oil Mill is acceptable because the company just took over the management control. Kulim (Malaysia) Berhad has recently purchased a property in Indonesia and undergone the RSPO NPP process to develop the land for oil palm. At the time of preparation of this Report, BSI is not aware of any new issues involving:
 - a. Any unresolved significant land disputes;
 - b. Any replacement of primary forest or loss of HCVs;
 - c. Any labour disputes that are not being resolved through an agreed process;
 - d. Any evidence of noncompliance with any law at any of the landholdings. BSI considers that Kulim (Malaysia) Berhad complies with the RSPO requirements for Partial Certification rules.

Time Bound Plan		
Requirement	Remarks	Compliance
Summary of the Time Bound Plan		
Does the plan include all subsidiaries, estates and mills?	<p><u>Malaysia</u></p> <p>The time bound plan includes all Operating Units (OUs) in Malaysia,</p> <p>The Kulim OUs have 32 units, 21 units successfully certified and 6 units currently in progress.</p> <p><u>Indonesia</u></p> <p>For the Indonesia operations, under the subsidiary company i.e. PT Wisea Inspirasi Nusantara (PT WIN) 3 plantations were planned to be certified in 2019 namely PT Harapan Barito Sejahtera (PT HBS), PT Sawit Sumber Rejo (PT SSR) and PT Wahana Semesta Kharisma (PT WSK). These plantations were completed and approved its NPP and in-progress of planting.</p> <p>Earlier in the year 2016, Kulim has proposed an acquisition of 95% equity interest each in 4 Indonesia-based plantation estates i.e. PT Nusa Persada Indonesia (PT NPI), PT Surya Panen Subur (PT SPS), PT Tempirai Palm Resources (PT TPR) and PT Rambang Agro Jaya (PT RAJ) in March 2016. These plantations are the subsidiaries of PT Agro Maju Raya (PT AMARA), PT Mitra Plantation (PT Mitra) and PT Agri Capital Resources (PT ACR) with PT AMARA as the current main shareholder. Acquisition process was still on-going and these estates will be included in TBP upon completion of acquisition which is expected to be in 2017.</p>	Yes
Is the time bound plan challenging?	Kulim (Malaysia) Berhad has in 2015 continued to operate in a dynamic and volatile environment,	Yes

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<ul style="list-style-type: none"> • Age of plantations. • Location. • POM development • Infrastructure. • Compliance with applicable law. 	<p>characterised by abundant of supplies and lower price of CPO globally.</p> <p>Being one of the lowest price for the commodity, this much affected its plantation margins. The industry was also impacted by growing strength of US Dollar adding the downward pressure of the price</p> <p>The divestment from New Britain (NBPOL) was completed on 26 February 2016, operationally at the year ended 31 December 2016, Kulim have plantation operations in Peninsular Malaysia and Central Kalimantan Indonesia for a total of 50 999 ha in Malaysia and 40 646 ha of land in Indonesia. The planting of new palm is ongoing albeit at a slower pace, Kulim have some 307 ha been planted.</p> <p>Age profile ranging from 0 – 23 years of age. The group remains committed to improving the age profile, during which a total of 1155 ha been replanted. Average age profile has improved to 11.72 years.</p> <p>The group has acquired Pasir Panjang Palm Oil Mill through Mahamurni Plantation Sdn Bhd in March 2015. And has since planned and prepared the mill for certification program for end of 2016</p>	
<p>Have there been any changes since the last audit? Are they justified?</p>	<p>No changes of TBP as to date. However it is noted that the TBP will be change upon completion of the process of Indonesian site acquisition. This will be followed-up in the next audit.</p>	<p>Yes</p>
<p>If there have been changes, what circumstances have occurred?</p>	<p>KULIM is now corporatized under Johor Corporation but at the same time both are still members of RSPO.</p>	<p>Yes</p>
<p>Have there been any stakeholder comments?</p>	<p>So far there no comments received.</p>	<p>Yes</p>
<p>Have there been any newly acquired subsidiaries?</p>	<p>After successfully acquired PT WIN in central Kalimantan, Kulim has again trying their best to acquire PT AMARA which is still in progress with expected completion in 2017.</p>	<p>Yes</p>
<p>Have there been any isolated lapses in implementation of the plan?</p>	<p>There is no isolated lapse in Time Bound Plan except for smallholder proposed certification program that halted due to unstable supply to Kulim’s mill.</p>	<p>Yes</p>
<p>Un-Certified Units or Holdings</p>		
<p>Did the company conduct an internal audit? If so, has a positive assurance statement been produced?</p>	<p>Internal audit was conducted on periodical basis for all operating units with positive assurance statement been produced. For Indonesia operations (PT HBS, PT SSR & PT WSK), AMDAL report had been completed and report already submitted to RSPO for Public Notification. RSPO has approved the NPP and planting in progress.</p>	<p>Yes</p>
<p>No replacement after dates defined in NIs Criterion 7.3:</p> <ul style="list-style-type: none"> • Primary forest. • Any area identified as containing High Conservation Values 	<p>So far no new planting that replaced primary forest.</p>	<p>Yes</p>

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(HCVs). • Any area required to maintain or enhance HCVs in accordance with RSPO criterion 7.3.		
Any new plantings since January 1 st 2010 must comply with the RSPO New Plantings Procedure.	No new planting activities within uncertified unit.	Yes
Any Land conflicts are being resolved through a mutually agreed process, e.g. RSPO Grievance procedure or Dispute Settlement Facility, in accordance with RSPO criteria 6.4, 7.5 and 7.6.	No land conflict	Yes
Any Labor disputes are being resolved through a mutually agreed process, in accordance with RSPO criterion 6.3.	No labour dispute	Yes
Did the company conduct an internal audit? If so, has a positive assurance statement been produced?	RSPO internal audit assessment for all certified units been conducted and the report had been submitted to all unit for improvement plan.	Yes
Any Legal non- compliance is being resolved in accordance with the legal requirements, with reference to RSPO criteria 2.1 and 2.2.	No legal non compliance	Yes

3.3 Details of findings

The nonconformity is listed below. The summary report of the assessment by criteria is listed in Appendix A.

During the 3rd Annual Surveillance Assessment there were four (4) Major nonconformities raised. The Sedenak Palm Oil Mill Certification unit submitted Corrective Action Plans for the nonconformity. Corrective action plans with respect to the nonconformity was reviewed by the BSI audit team and accepted.

The implementation of the corrective action plans to address the minor nonconformity will be followed up during the next surveillance assessment. The implementation of the Corrective Actions for the Major Nonconformity(ies) has been verified for it effectiveness and closed accordingly.

Non-Conformity		
NCR #	Description	Category (Major / Minor)
1408821M1	Requirements: Indicator 2.1.1 Evidence of compliance with legal requirements	Major

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	<p>Evidence of Nonconformity: The general exhaust ventilation system at the Sedenak Palm Oil Mill (SPOM) was not examined and tested by a registered Hygiene Technician. USECHH 2000 Regulation 17 - Engineering control equipment, stipulated that any engineering control equipment has to be inspected at an interval not longer than one (01) month and has to be examined and tested by Hygiene Technician at an interval not longer than twelve (12) months</p> <p>Statement of Nonconformity: No inspection and approval by a registered hygiene technician for the general exhaust ventilation system. Legal compliance review was not effectively implemented.</p> <p>Root Cause Analysis The equipment was not examine / tested by qualified Hygiene Technician instead of internal inspection was carried out monthly since there was confusion from management regarding the requirement of GEV since the PEL of nhexane was below the limit as per chemical Exposure Monitoring result in May 2016</p> <p>Immediate Corrections Mill to engage registered Hygiene Technician grade 11 to carry out the inspection as per USECHH 2000 Part 5 Regulation 17 on Engineering control equipment as to verify the suitability of current GEV. The letter of appointment and inspection schedule to be submitted to SSD</p> <p>Corrective Actions Mill management (Engineering Dept.) to initiate the list of monitoring of ALL related inspection to all the mills in accordance to OSHA 1994, FMA and DOE (EQA) and other relevant regulations</p> <p>Assessment Conclusion: Based on the submitted evidence, it was found that the NC is effectively closed with the sufficient evidence of immediate corrections and corrective actions. On site major NC close-out is not required since although the nature of NC is process related, actual implementations can still be verified through documented evidences i.e. communications record and related documents. Hence, major nonconformity has been satisfactory close on 27/1/2017.</p>	
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Non-Conformity		
NCR #	Description	Category (Major / Minor)
1408821M2	<p>Requirements: Indicator 5.2.2 Where rare, threatened or endangered (RTE) species, or HCVs, are present or are affected by plantation or mill operations, appropriate measures that are expected to maintain and/or enhance them shall be implemented through a management plan</p>	Major
	<p>Evidence of Nonconformity: Basir Ismail Estate It was noted that 2 hotspot areas @ HCV (RBA, HSR_09 & HSR_08) field P11R/02 which previously under REM Estate was not included in the management plan for further monitoring.</p>	
	<p>Statement of Nonconformity: HCV management plan was not effectively implemented</p>	

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	<p>Root Cause Analysis Estate overlooked to include hotspot area in the HCV management plan since these hotspot area was previously under the management of REM Estate.</p> <p>Immediate Corrections All the hotspot areas within the estate were included under LBI HCV management plan. LBI to set immediate action plan accordingly and also monitor the long term management strategies for the area HCV map of LBI to be updated and submitted to SSD</p> <p>Corrective Actions All HCV monitoring to be done twice monthly and to be recorded in HCV monitoring book. LBI to communicate/conduct HCV awareness/training with regards to the inclusion of new HCV area to all employees.</p>	
	<p>Assessment Conclusion: Based on the submitted evidence, it was found that the NC is effectively closed with the sufficient evidence of immediate corrections and corrective actions. On site major NC close-out is not required since although the nature of NC is process related, actual implementations can still be verified through documented evidences i.e. photos and related records as well as documents.</p> <p>Hence, major nonconformity has been satisfactory close on 27/1/2017.</p>	

Non-Conformity		
NCR #	Description	Category (Major / Minor)
1408821M3	<p>Requirements: Indicator 5.3.3</p> <ul style="list-style-type: none"> i) A waste management and disposal plan to avoid or reduce pollution shall be documented and implemented. ii) Kulim Plantation Sustainability Waste and Pollution Management Plan dated January 2016 	Major
	<p>Evidence of Nonconformity: Kuala Kabong Estate: Clinical waste was not handling as per waste management plan where evidence shown waste was selftransported to another group estate. This indicator was escalated into major nonconformity since minor nonconformity has been raised in previous year audit on similar issue.</p>	
	<p>Statement of Nonconformity: Waste management plan was not effectively implemented</p>	
	<p>Root Cause Analysis Clinical waste was transported to designated estate due to centralization of clinical waste collection since the amount is too small and costly for estate to dispose on their own.</p> <p>Immediate Corrections Estate to arranged for a competent/licensed SW Collector to collect the clinical waste</p> <p>Corrective Actions Estate management to monitor the disposal of clinical waste by the appointed collector. All relevant records will be kept</p>	

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	<p>Assessment Conclusion: Based on the submitted evidence, it was found that the NC is effectively closed with the sufficient evidence of implementation. On site major NC close out is not required as the nature of NC is non-process related and can be verified with documented evidences. Continuous implementation of the corrective action taken will be further verified in the next audit.</p> <p>Hence, the Major NC was closed on 27/1/2017.</p>	
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Non-Conformity		
NCR #	Description	Category (Major / Minor)
1408821M4	<p>Requirements: Indicator 6.9.2 A policy to protect the reproductive rights of all, especially of women, shall be implemented and communicated to all levels of the workforce.</p> <p>Evidence of Nonconformity: Evidence sighted in paragraph 6. (vii) of workers Work Contract Agreement shown contradicting implementation and communication of policy to protect the reproductive rights of all, especially women.</p> <p>Statement of Nonconformity: Policy to protect the reproductive rights of all, especially of women, was implemented and communicated to all levels of the workforce contradictorily.</p> <p>Root Cause Analysis The reproductive right was not properly documented though there's the employees' right mentioned in company's People Policy</p> <p>Immediate Corrections Review to be carried out to ensure the inclusion of reproductive right in the respective policy. Submission of improvement time line has been approved by KULIM 236 EXCO Meeting. The workers work agreement to be reviewed as to ensure no contradicting statement with reproductive right</p> <p>Corrective Actions The policy' review to be communicated to all OUs, Road show and training to be carried out to all level of employees and this will be included in the yearly training programme</p> <p>Assessment Conclusion: Based on the submitted evidence, it was found that the NC is effectively closed with the sufficient evidence of implementation. On site major NC close out is not required as the nature of NC is non-process related and can be verified with documented evidences. Furthermore, phone interview was conducted upon receipt of evidence to a sample of the women employee whom confirmed understood the company's policy to protect the reproductive rights. Continuous implementation of the corrective action taken will be further verified in the next audit.</p> <p>Hence, the Major NC was closed on 27/1/2017.</p>	Major

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Observation	
OBS #	Description
Nil	Nil

Positive Findings	
PF #	Description
1	Stakeholder interview – positive feedbacks
2	Optimization of biogas usage projects at mill
3	Good establishment & implementation of IPM within estate field
4	Excellent logistics arrangement and hospitality
5	Kuala Kabong Estate – Clear and visible expiry date on fire extinguisher signage. Easy to monitor.

Issues raised by Stakeholders	
<p>Stakeholder consultation involved internal and external stakeholders. External stakeholders were contacted by telephone to arrange meetings at a location convenient to them to discuss Sedenak Palm Oil Mill Certification Unit’s environmental and social performance, legal and any known dispute issues.</p> <p>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. These have been incorporated into the assessment findings.</p> <p>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 Appendix E.</p>	
IS #	Description
1	<p>Issues: Union representatives – Regular meeting and discussion with estate and mill management done on periodical basis. No labour issues.</p> <p>Management Responses: Comments noted.</p> <p>Audit Team Findings: No further issue.</p>
2	<p>Issues: Material and spare parts supplier – No issue in supplying service to estate. Received invitation the recent stakeholder meeting conducted on October but unable to attend.</p> <p>Management Responses: Comments noted.</p> <p>Audit Team Findings: No further issue.</p>
3	<p>Issues: School representatives - Received invitation and attended the recent stakeholder meeting conducted on October by estate management. Thanks the management for contributions to school.</p>

	<p>Management Responses: Comments noted.</p> <p>Audit Team Findings: No further issue.</p>
4	<p>Issues: Village representatives - Received invitation and attended the recent stakeholder meeting conducted on October by estate management. Thanks the management for contributions and involvement in village activities.</p> <p>Management Responses: Comments noted.</p> <p>Audit Team Findings: No further issue.</p>
5	<p>Issues: FFB suppliers - No issue in dealing FFB supply business with Sedenak POM. Received invitation and attended the recent stakeholder meeting conducted November.</p> <p>Management Responses: Comments noted.</p> <p>Audit Team Findings: No further issue.</p>

3.3.1 Status of Nonconformities Previously Identified and Observations

Non-Conformity		
NCR #	Description	Category (Major / Minor)
1270178N1	<p>Requirements: Indicator 5.3.3</p> <ul style="list-style-type: none"> i) A waste management and disposal plan to avoid or reduce pollution shall be documented and implemented. ii) Kulim Plantation Sustainability Waste and Pollution Management Plan dated 1/8/14 <p>Evidence of Nonconformity: Sedenak Estate</p> <ul style="list-style-type: none"> i) Sighted during site review at estate and contractor’s workshop, cotton rags and gloves were mixed together with domestic waste in the black bin. <p>Statement of Nonconformity: Waste management plan was not effectively implemented</p> <p>Corrective Action: Immediate correction: Sedenak Estate has assigned a person-in-charge to closely monitor the waste segregation at all working station including contractor’s workshop. All scheduled waste found stored in domestic waste bin has been removed and stored in scheduled waste store Corrective action: Kulim’s Sustainability Department combined with Kulim Safety Training and Services will conduct refresher training on waste segregation to respective operator and person-in-charge are to ensure the scheduled waste handling are done accordingly</p>	Minor

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	<p>Assessment Conclusion: The immediate correction taken and corrective action plan to be implemented deemed satisfactory. However further verification on the effectiveness of the corrective action plan implementation done during this audit found recurrence of issue which fall under the same indicator. Hence issue has been escalated into major nonconformity as above.</p>	
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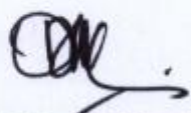
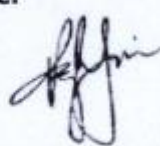
Observation	
OBS #	Description
Nil	Nil

3.3.2 Summary of the Nonconformities and Status

CAR Ref.	CLASS	ISSUED	STATUS
CR02	Minor	24/07/2008	Closed on 21/01/2010
CR03	Minor	27/07/2008	Closed on 21/01/2010
CR08	Minor	10/12/2013	Closed on 25/01/2014
CR09	Major	11/12/2013	Closed on 25/01/2014
1123523M1	Major	12/11/2014	Closed on 10/01/2015
1123523M2	Major	12/11/2014	Closed on 10/01/2015
1270178N1 – 5.3.3	Minor	25/11/2015	Escalated to major on 2/12/2016
1408821M1 – 2.1.1	Major	01/12/2016	Closed on 27/1/2017
1408821M2 – 5.2.2	Major	01/12/2016	Closed on 27/1/2017
1408821M3 – 5.3.3	Major	01/12/2016	Closed on 27/1/2017
1408821M4 – 6.9.2	Major	01/12/2016	Closed on 27/1/2017

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Assessment Conclusion and Recommendation:

<p>Based on the findings during the assessment Sedenak Palm Oil Mill Certification Unit and supply base complies with the RSPO P&C Malaysian National Interpretation (MY-NI 2014) and the RSPO Supply Chain Certification Standard (Nov 2014) for CPO Mill. It is recommended that the certification of Sedenak Palm Oil Mill Certification Unit is approved and continued.</p>	
Acknowledgement of Assessment Findings	Report Prepared by
<p>Name: Pn. Salasah Elias</p>	<p>Name: En. Hafriazhar Mohd. Mokhtar</p>
<p>Company name: Kulim (Malaysia) Berhad Sedenak Palm Oil Mill</p>	<p>Company name: BSI Services Malaysia Sdn. Bhd.</p>
<p>Title: Head of Sustainability Department</p>	<p>Title: Lead Auditor</p>
<p>Signature:</p>  <p>Date: 27 FEBRUARY 2017</p>	<p>Signature:</p>  <p>Date: 23 February 2017</p>

Appendix A: Summary of Findings

Criterion / Indicator	Assessment Findings	Compliance	
Principle 1: Commitment to Transparency			
Criterion 1.1:			
Growers and millers provide adequate information to relevant stakeholders on environmental, social and legal issues relevant to RSPO Criteria, in appropriate languages and forms to allow for effective participation in decision making.			
1.1.1	There shall be evidence that growers and millers provide adequate information on (environmental, social and/or legal) issues relevant to RSPO Criteria to relevant stakeholders for effective participation in decision making. - Minor compliance -	Adequate information covering on environmental, social and legal issues which are relevant to RSPO Criteria and relevant to stakeholders is shared for effective participation and decision making. Information on environmental, social and legal issues relevant to RSPO Criteria was made available to relevant stakeholders for effective participation in decision making. Publicly available documents such as land title, OSH plan, HCV documents, negotiation procedure, complaint records, RSPO public summary reports, and EIA, Management Plans & Continuous Improvement Plans and company policies are available.	Complied
1.1.2	Records of requests for information and responses shall be maintained. -Major compliance	All operating units maintain records of information request and response as Enquiry Register Records. Request for information are attended promptly and confirmed by stakeholders interviewed. Environmental compliance audit by DOE Johor whom visited Sedenak POM on 21/03/2016. Issues of concern related to license compliance schedule requirements was noted raised by DOE officer through its Field Citation form (JAS/ATOP1/08/2015). Response was provided by the mill on 27/3/2016 with action taken on issues raised. Issue on Scheduled Waste inventory, POME piping leakage and boiler stack CEMS has been made good accordingly to ensure compliance against the license requirements.	Complied
Criterion 1.2:			
Management documents are publicly available, except where this is prevented by commercial confidentiality or where disclosure of information would result in negative environmental or social outcomes.			
1.2.1	Publicly available documents shall include, but are not necessary limited to: • Land titles/user rights (Criterion 2.2); • Occupational health and safety plans (Criterion 4.7); • Plans and impact assessments relating to environmental and social impacts (Criteria 5.1, 6.1, 7.1 and 7.8); • HCV documentation (Criteria 5.2 and 7.3); • Pollution prevention and reduction plans (Criterion 5.6); • Details of complaints and grievances (Criterion 6.3); • Negotiation procedures (Criterion 6.4); • Continual improvement plans (Criterion 8.1);	Publicly available management documents covers Land titles, OHS plans, EIA, SIA, HCV documentation, Pollution prevention and reduction plans, records of complaints and grievances, negotiation procedures, RSPO Public Summary Report, company policies and Continual improvement plans. All operating units have individual documents and records to demonstrate compliance to this indicator. RSPO Public summary reports are publicly available on request at each certification unit and at the head office.	Complied

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	<ul style="list-style-type: none"> Public summary of certification assessment report; Human Rights Policy (Criterion 6.13). <p>- Major compliance –</p>		
Criteria 1.3:			
Growers and millers commit to ethical conduct in all business operations and transactions.			
1.3.1	<p>There shall be a written policy committing to a code of ethical conduct and integrity in all operations and transactions, which shall be documented and communicated to all levels of the workforce and operations.</p> <p>-Minor compliance</p>	<p>Policy committing to a code of ethical conduct and integrity established as ethical policy (dated 1/1/2008) no gift and entertainment policy (dated 1/2/2015). This has been documented and published in public notice boards as well as communicated among all employees.</p>	Complied
Principle 2: Compliance with applicable laws and regulations			
Criterion 2.1:			
There is compliance with all applicable local, national and ratified international laws and regulations.			
2.1.1	<p>Evidence of compliance with relevant legal requirements shall be available.</p> <p>- Major compliance -</p>	<p><u>Sedenak POM:</u></p> <ul style="list-style-type: none"> MPOB license no.: 500058304000 (validity period 1/1/2016 – 31/12/2016) for processing capacity limit of 420,000mt DOE Licence: JPKKS 002161 (validity period 1/7/2015 - 30/6/2016) for 90mt/hr and method of POME discharge is land application with BOD final discharge limit <5000mg/l. Quarterly report was submitted to DOE as per legal requirement where recent submission for 2nd and 3rd quarter 2015 was submitted on 18/7/2016 & 13/10/2016 respectively. Competent Person Certified Environment Professional in the Treatment of Palm Oil Mill Effluent – Pond Processes (CEPPOME) serial no.: CePPOME/16027 (validity 15/8/2016 – 15/8/2017) Competent Person Certified Environmental Professional in Scheduled Waste Management (CePSWaM) serial no.: CePSWaM/16253 (validity 1/6/2016 – 1/6/2017) DOE written approval for biogas engine of methane capture plant; Ref.: AS(B)J 31/152/000/054 (SK04); Cert. #: APB/2014/018; Approval date: 17/14/2014 Badan Kawalselia Air Johor (BAKAJ) river water abstract or divert license no.: 08/A/KJ/051; Valid until 31/12/2016; Max abstract capacity: 2000m³/day Diesel Permit # J026839, ref KPDNKK.J-JB/26/5A/11/1057(P/D)(P9) (16/01/2016 – 15/01/2017) Quantity: 19,100 liter. Energy commission license no: 2016/00041; serial no: 14666 (validity period 12/01/2016 – 11/01/2017) for 250 kW installation capacity. Electrical Charge-man A0, PJ-T-1-B-1982-1999. Steam engineer - JKJ 19 - #146/2005 (1st Grade) Engine Driver - JKJ 18 – J112/85 (1st Grade) Certificate of Fitness for Unfired Pressure Vessels (JKT15- 	Major nonconformance

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		<p>Pin. 1/87 PMT-JH 125976) - PMT 48071 (valid till 03/04/2017).</p> <ul style="list-style-type: none"> • Authorized Entrant & Standby Person For Confined Space NW-HQ-AE-1952-O (valid till 18/04/2018). • Authorized Gas Tester and Entry Supervisor For Confined Space NW-NJHR-AGT-0150-N (valid till 15/04/2017). <p><u>Kuala Kabong Estate:</u></p> <ul style="list-style-type: none"> • MPOB license no.: 503896302000 (validity period 1/4/2016 – 31/3/2017) • Diesel Permit #J027239, ref KPDNKK.J-JB/26/5A/11/851 (P/D) (P9) (10/05/2016 – 09/05/2017) Quantity: Diesel 8,000 liter and Petrol 400 liter. • Certificate of Fitness for Unfired Pressure Vessels (JKT15-Pin. 1/87 PMT-JH 117890) - JH PMT 22737 (valid till 03/01/2017). • Royal Custom Malaysia Windfall Profit Levy Act 1998 – Serial#008119, Registration#J31-200800000134 File#KE.JB(101)009/20/BS/01/134. <p><u>Basir Estate:</u></p> <ul style="list-style-type: none"> • MPOB license no.: 501258102000 (validity period 1/4/2016 – 31/3/2017) • Diesel permit serial no.: J020698; ref. KPDNKK.J.KTG/PERMIT 0153 (PD) validity period 24/2/2016 – 23/2/2017 for storage capacity of 10,000liter • Certificate of Fitness for Unfired Pressure Vessels (JKT15-Pin. 1/87 PMT-JH 1600039) – JH PMT 24676 (valid till 14/02/2018). <p>It was found that no inspection and approval by a registered hygiene technician for the general exhaust ventilation system. Legal compliance review was not effectively implemented. The general exhaust ventilation system at the Sedenak Palm Oil Mill (SPOM) was not examined and tested by a registered Hygiene Technician. USECHH 2000 Regulation 17 - Engineering control equipment, stipulated that any engineering control equipment has to be inspected at an interval not longer than one (01) month and has to be examined and tested by Hygiene Technician at an interval not longer than twelve (12) months.</p> <p>Hence, a major noncompliance has been raised.</p>	
2.1.2	<p>A documented system, which includes written information on legal requirements, shall be maintained. - Minor compliance -</p>	<p>All operating units maintain documented system for identifying, evaluating, reviewing and updating applicable regulations and other requirements. Documented legal register dated 1/8/2016 was sighted. <u>Sedenak Estate:</u> Additional legal requirements covered – Animals Act 1953, Doctor Veterinary Act 1974 & Akta Lembaga Kemajuan Ternakan Negara (Pembubaran)</p>	Complied
2.1.3	<p>A mechanism for ensuring compliance shall be implemented.</p>	<p>Sustainability department and appointed safety company to monitor compliance.</p>	Complied

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	- Minor compliance -	Evaluation of legal requirements and compliance status with legal requirement is monitored by operating units, Sustainability Team, OHS Department and Head Office Audit Department.	
2.1.4	A system for tracking any changes in the law shall be implemented. - Minor compliance -	Tracking system available to identify changes in the relevant regulations through head office, website information and the information are communicated from the Head Office. On the site verification, interviews with office personnel and records indicate that the system is appropriate to the operations. New change identified was Minimum Wages Order 2016.	Complied
Criterion 2.2: The right to use the land is demonstrated, and is not legitimately contested by local people who can demonstrate that they have legal, customary or user rights.			
2.2.1	Documents showing legal ownership or lease, history of land tenure and the actual legal use of the land shall be available. - Major compliance -	Land ownership such as land title and land lease documents is available. There is no change in the land ownership. <u>Kuala Kabong estate:</u> Lease hold title of 99 years until 2081 no. HSD 41938 for Lot no.: PTD 10294 <u>Basir Ismail estate:</u> Holds 29 titles i.e., Grant No. G29320 for lot no.: 1519, grant no.: 22664 for lot no.: 1419, grant no.: 22665 for lot no.: 1421 and etc.	Complied
2.2.2	Legal boundaries shall be clearly demarcated and visibly maintained. - Minor compliance -	During the field visit it was noted that legal boundaries are clearly demarcated and visibly maintained throughout the estate. Boundary map available for Kuala Kubong Estate. Boundary marker clearly demarcated and visible at visited area i.e Felda Bukit Batu (Peg#LKK/03) and Espek RISDA (peg#LKK/42)	Complied
2.2.3	Where there are or have been disputes, additional proof of legal acquisition of title and evidence that fair compensation has been made to previous owners and occupants shall be available, and that these have been accepted with free, prior and informed consent (FPIC). - Minor compliance -	There is no land dispute in the certification unit and supply base at the time of audit. The land belongs to Kulim (Malaysia) Berhad. Land ownership documents verified.	Complied
2.2.4	There shall be an absence of significant land conflict, unless requirements for acceptable conflict resolution processes (see Criteria 6.3 and 6.4) are implemented and accepted by the parties involved. -Major compliance	There is no land dispute in the certification unit and supply base at the time of audit. The land belongs to Kulim (Malaysia) Berhad. Land ownership documents verified.	Complied
2.2.5	For any conflict or dispute over the land, the extent of the disputed area shall be mapped out in a participatory way with involvement of affected parties (including neighbouring communities where applicable). -Minor compliance	There is no land dispute in the certification unit and supply base at the time of audit. The land belongs to Kulim (Malaysia) Berhad. Land ownership documents verified.	Complied

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2.2.6	To avoid escalation of conflict, there shall be no evidence that palm oil operations have instigated violence in maintaining peace and order in their current and planned operations. -Major compliance	There is no land dispute in the certification unit and supply base at the time of audit. The land belongs to Kulim (Malaysia) Berhad. Land ownership documents verified.	Complied
Criterion 2.3: Use of the land for oil palm does not diminish the legal rights, customary or user right of other users without their free, prior and informed consent.			
2.3.1	Maps of an appropriate scale showing the extent of recognized legal, customary or user rights (Criteria 2.2, 7.5 and 7.6) shall be developed through participatory mapping involving affected parties (including neighbouring communities where applicable, and relevant authorities).. - Major compliance -	The estate lands are legally owned and leased by the company. The existing estates are not encumbered by any customary land rights. Interview with the surrounding communities and stakeholders confirm no disputes	Complied
2.3.2	Copies of negotiated agreements detailing the process of free, prior and informed consent (FPIC) (Criteria 2.2, 7.5 and 7.6) shall be available and shall include: a) Evidence that a plan has been developed through consultation and discussion with all affected groups in the communities, and that information has been provided to all affected groups, including information on the steps that shall be taken to involve them in decision making; b) Evidence that the company has respected communities' decisions to give or withhold their consent to the operation at the time that this decision was taken; c) Evidence that the legal, economic, environmental and social implications for 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 company's title, concession or lease on the land. - Minor compliance -	The estate lands are legally owned by the company and no other users were identified within the land area.	Complied
2.3.3	All relevant information shall be available in appropriate forms and languages, including assessments of impacts, proposed benefit sharing, and legal arrangements. -Minor compliance	The estate lands are legally owned by the company and no other users were identified within the land area.	Complied
2.3.4	Evidence shall be available to show that communities are represented through institutions or representatives of their own choosing, including legal counsel. -Major compliance	The estate lands are legally owned by the company and no other users were identified within the land area.	Complied

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Principle 3: Commitment to long-term economic and financial viability			
Criterion 3.1:			
There is an implemented management plan that aims to achieve long-term economic and financial viability.			
3.1.1	A business or management plan (minimum three years) shall be documented that includes, where appropriate, a business case for scheme smallholders. - Major compliance -	Annual business plan in the form of annual budget and the projection for 5 years prepared as guidance for future planning. The business plan contains FFB yield, CPO, OER, and KER, costs of production, etc. sighted Sedenak Palm Oil Mill 2017 Budget with the inclusion of crop projection from 2017 – 2022.	Complied
3.1.2	An annual replanting programme projected for a minimum of five years (but longer where necessary to reflect the management of fragile soils, see Criterion 4.3), with yearly review, shall be available. - Minor compliance -	Kulim (Malaysia) Berhad has prepared a long range replanting plan until 2041 and reviewed on yearly basis. Latest review was done on 9 April 2016.	Complied
Principle 4: Use of appropriate best practices by growers and millers			
Criterion 4.1:			
Operating procedures are appropriately documented, consistently implemented and monitored.			
4.1.1	Standard Operating Procedures (SOPs) for estates and mills are documented - Major compliance -	Palm Mill holds SOP: Mill Operation Manual includes mill SOP and work instruction as a guidance document to operate the mill. Estates have a separate SOP and Estate Manual covers land preparation, planting material, upkeep, harvesting, transport etc. OSH Guidelines for Estate and SOP. Estate operation SOPs, Rat Baiting, Harvesting (MB), FFB Evacuation, Transporting, P&D spray etc.	Complied
4.1.2	A mechanism to check consistent implementation of procedures shall be in place. - Minor compliance -	Mill Advisor and Plantation Inspectorate make regular visit to evaluate the performance of the mill and estates. General Manager visits the estates on quarterly basis to review estate performance against Kulim Sustainability standard. Latest Plantation Inspectorate visit in Kuala Kabong Estate was made on 20/6/2016 (Report No.: SS/LKK/2/2016). As for the mill, latest visit by Mill Advisor was on 24/10/2016 (Ref. No.: MJAB/SDM/5/2016). The on-site managers develop Action Plans from the Advisory Reports for improvement of the operations. Review of Advisory Reports, Action Plans and site inspections confirmed consistent records of implementation of SOPs.	Complied
4.1.3	Records of monitoring and any actions taken shall be maintained and available, as appropriate. - Minor compliance -	Mill Internal audit by sustainability team on 22/8/2016. Kuala Kabong Estate Internal audit by sustainability team on 22/8/2016. Agronomist visit on 12&17/4/2016. Quarterly return via Online Environmental Reporting (OER) and monthly effluent analysis Latest quarter, July – September 2016, submitted on 13/10/16. 1 st , 5 th and 9 th week analysis results were submitted no off-limit parameter recorded. Latest monitoring by UTCL Laboratory, dated 25/9/16, report ref#EI/1609/1036-1029. Sampling date 14/9/16. 10 parameter tested (BOD, COD, AN, TN, SS, TS, pH, O&G, VFA and DO) is within the regulatory limit under mill's compliance	Complied

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		<p>schedule. Final discharge limit taken from anaerobic #7 is 100 and below compliance limit of 5000 mg/l.</p> <p>Boundary noise monitoring, quarterly (night: 55 dBA, day: 65 dBA)</p> <p>Latest boundary noise monitoring for Q3 2016 by Kulim Engineering on 31/10/16. 10 points selected for monitoring. Result is within 55 dBA (night) and 65 dBA (day)</p> <p>3rd party environmental compliance audit – every 6 monthly by EHS Alliance Sdn Bhd, appointed consultant for compliance audit. Plan on 13/12/16 for Sedenak POM.</p> <p>LOA: SSD/ADMIN/030/16 dated 4/11/16 to EHS Alliance Sdn Bhd.</p> <p>Untreated and domestic water analysis by Lotus Laboratory Services (M) Sdn Bhd. Refer to report dated 22/11/16, report ref# LS/W/E9279/16 and ref# LS/W/E9280/16. 2 sampling points selected for testing (raw and treated). Results comply with DWQS.</p> <p>Drinking water analysis carried out for SPAN report submission every 6 monthly. Refer to report submitted to SPAN dated 31st May 2016, report ref# LW/579/16.</p> <p>Boundary noise monitoring for 3rd quarter 2016, refer to report prepared by Engineering Department under Kulim (M) Berhad. 11 monitoring points was selected including biogas plant (point# 8,9,10 & 11). Noise emission from boundary is within the recommendation limit under Sedenak Mill’s compliance schedule.</p>	
4.1.4	<p>The mill shall record the origins of all third-party sourced Fresh Fruit Bunches (FFB).</p> <p>- Major compliance -</p>	<p>The Palm Oil Mill maintains a daily record of all FFB received. The records show the origin, weight, transporters details and etc of the FFB received.</p>	Complied
<p>Criterion 4.2: Practices maintain soil fertility at, or where possible improve soil fertility to, a level that ensures optimal and sustained yield.</p>			
4.2.1	<p>There shall be evidence that good agriculture practices, as contained in Standard Operating Procedures (SOPs), are followed to manage soil fertility to a level that ensures optimal and sustained yield, where possible.</p> <p>- Minor compliance -</p>	<p>Good agriculture practices which follows the group agriculture manual contains Standard Operating Procedures to ensure soil fertility is managed to a level that ensures optimal and sustained yield. The implementation of SOPs is checked during daily inspection by staff as well as by internal audits. SOP – Kulim (M) Berhad Agriculture Manual dated July 2013 verified. Content of ARM comprises of:</p> <ul style="list-style-type: none"> i) Replanting ii) Roads, Drains, Bridges, Culverts and Fences iii) Construction of Estate Buildings iv) Manuring v) Harvesting vi) Pruning and ablation vii) Soil Conservation viii) Justification of Chemical Use ix) Weeds Management x) Integrated Pest Management xi) Plant Management 	Complied

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4.2.2	Records of fertiliser inputs shall be maintained. - Minor compliance -	Records of fertiliser inputs were maintained in both Kuala Kabong and Basir Ismail estates where fertilizers were applied as per agronomist recommendation. Based on sampled records of fertilizer recommendation by agronomist under EPA Management Sdn Bhd, R&D Division for 2016, it was noted that the recommendation for Geo mico area/peat area was as following: Recommendation: 8 ml per palm (Geo Mico) It was noted that completed application of Geo Mico for P00/06 in Kuala Kabong Estate. Total of 80 liter applied for the month of August 2016. Application in Basir Ismail was still on-going.	Complied
4.2.3	There shall be evidence of periodic tissue and soil sampling to monitor changes in nutrient status. - Minor compliance -	Leaf analysis result which shows the nutrient level was used as guidance for the fertilizer recommendation. As per leaf and soil sampling guidance notes, leaf analysis frequency is once per year and soil sampling for every 5 years. For both Kuala Kabong and Basir Ismail estates following reports were sighted: Soil sampling was done on 30/8/2016 by Kulim Research and development department (UTCL Laboratory) (Report No.: SI/1609/0256-259) dated 20/9/16. Leaf sampling was done on 9-19/9/16. Report dated 20/9/16, Report No.: LI/1609/KK/1187-1196).	Complied
4.2.4	A nutrient recycling strategy shall be in place, and may include use of Empty Fruit Bunches (EFB), Palm Oil Mill Effluent (POME), and palm residues after replanting. - Minor compliance -	Nutrient recycling strategy sighted in place for both Kuala Kabong and Basir Ismail estate with the use of Bio-compost application. Sampled 1 programme for 2016 with a total of 559.42 Ha covered under block P66 in Kuala Kabong Estate.	Complied
Criterion 4.3: Practices minimise and control erosion and degradation of soils.			
4.3.1	Maps of any fragile soils shall be available. - Major compliance -	All the estates hold copies of soil map. Soil maps and field visit confirm that there is no fragile soil on the estates. <u>Kuala Kabong Estate</u> Soil map prepared by R&D Department under EPA Management Sdn Bhd. Department of Agriculture, Reconnaissance Soil Map 2010. Majority: 78%, Gambut Dalam , Gajah Mati: 11% Rengam: 7% <u>Basir Ismail Estate</u> Agronomy advisory and services, Kulim (M) Sdn Bhd 29/11/16. Majority : Renggam Bungor : 46%, renggam: 15%, Tai tak: 7%	Complied
4.3.2	A management strategy shall be in place for plantings on slopes above a certain limit (this needs to be soil and climate specific). - Minor compliance -	Planting terraces had been constructed where slope >10°. Fields are established with cover crops such as mucuna and soft grasses and ferns.	Complied

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4.3.3	A road maintenance programme shall be in place. - Minor compliance -	Estate has implemented annual road maintenance programme. Example of programme checked at estates shows the map indicating road repairs and maintenance for the whole estate roads includes grading, compacting and stone application to strengthen the road surface <u>Kuala Kabong Estate</u> Road Upkeep programme and drain desilting. Example: Plan September 2016 – completed in September 2016 for P00/02 (94.17 Ha)	Complied												
4.3.4	Subsidence of peat soils shall be minimised and monitored. A documented water and ground cover management programme shall be in place. - Minor compliance -	Subsidence of peat soils monitored every 6 month interval as stipulated in Kulim’s ARM, A19: Monitoring Subsidence of Peat Soil. Temporary Bench Marks (TBM): indicated mean sea levels shall be installed at mineral soils or nearer possible to the monitoring level of peat by the certified surveyor. 50 cm - 1 m initial years after reclamation. Subsequent decrease less than 6 cm per year. Visited measurement point at field P01/02. Records of peat soil subsidence available as follows: <table border="1" data-bbox="662 974 1300 1187"> <thead> <tr> <th>Date</th> <th>Subsidence level</th> <th>Subsidence level</th> </tr> </thead> <tbody> <tr> <td></td> <td>A - 5 cm(front stacking)</td> <td>B - 2.5 cm (harvesting)</td> </tr> <tr> <td>30/12/15</td> <td>15.80 cm</td> <td>13.90 cm</td> </tr> <tr> <td>17/8/16</td> <td>19.30 cm (+3.7 cm)</td> <td>16.20 (+ 2.3 cm)</td> </tr> </tbody> </table> Water and ground cover management programme available dated October 2016. Peat management focus to monitor water table by recording daily water level and peat subsidence every 6 month interval. Refer to Kulim’s ARM, A-18: Water Management Plan in Peat Area.	Date	Subsidence level	Subsidence level		A - 5 cm(front stacking)	B - 2.5 cm (harvesting)	30/12/15	15.80 cm	13.90 cm	17/8/16	19.30 cm (+3.7 cm)	16.20 (+ 2.3 cm)	Complied
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17/8/16	19.30 cm (+3.7 cm)	16.20 (+ 2.3 cm)													
4.3.5	Drainability assessments shall be required prior to replanting on peat to determine the long-term viability of the necessary drainage for oil palm growing. - Minor compliance -	No replanting programme for the next five 5 years in Kuala Kabong Estate. Thus, drainability assessment was not required.	Complied												
4.3.6	A management strategy shall be in place for other fragile and problem soils (e.g. sandy, low organic matter, acid sulphate soils). - Minor compliance -	There is no peat soil or soil categorised as problematic or fragile soil at all estates visited.	Complied												

Criterion 4.4:
Practices maintain the quality and availability of surface and ground water.

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<p>4.4.1</p>	<p>An implemented water management plan shall be in place. - Minor compliance -</p>	<p>Sedenak certification unit monitored water quality of outgoing waters to identify any adverse effect from the mill and estate activities. There is an Integrated Water Management Plan for 2016 which has been implemented. The plan takes into account the efficient use of resources, ensure amongst other that the use of water did not impact on other users, avoid contamination of ground and surface water, and appropriate treatment of mill effluent.</p> <p>Frequency of water quality analysis as per water management plan:</p> <table border="1" data-bbox="662 683 1292 1220"> <thead> <tr> <th>Source</th> <th>Frequency</th> <th>Records of compliance</th> </tr> </thead> <tbody> <tr> <td>River water monitoring</td> <td>Once per every license period</td> <td>3rd party @ UTCL report</td> </tr> <tr> <td>Domestic/drinking water</td> <td>SPAN requirement (6 monthly)</td> <td>3rd party accredited lab</td> </tr> <tr> <td>POME</td> <td>Monthly monitoring as per Compliance Schedule</td> <td>3rd party accredited lab</td> </tr> <tr> <td>Field drain/catchment /buffer zone</td> <td>After completion of manuring programme</td> <td>3rd party accredited lab</td> </tr> </tbody> </table> <p>Sedenak mill has maintained monitoring records of water usage which recorded every day and summarised on monthly basis including the monitoring of rainfall water, which has been an alternative source of water as mitigation plan during draught season. Rainfall data for period from Jan to Oct 2016 recorded at 1488.00mm. Rainfall recorded for the whole year 2015 was 1691.00mm. Rainfall data for Kuala Kubong Estate recorded at 1518 mm.</p>	Source	Frequency	Records of compliance	River water monitoring	Once per every license period	3 rd party @ UTCL report	Domestic/drinking water	SPAN requirement (6 monthly)	3 rd party accredited lab	POME	Monthly monitoring as per Compliance Schedule	3 rd party accredited lab	Field drain/catchment /buffer zone	After completion of manuring programme	3 rd party accredited lab	<p>Complied</p>
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		<p>Monitoring of upstream and downstream of Sg Johor as per Compliance Schedule. Latest monitoring by UTCL Laboratory, dated 9/10/16, report ref# EI/1610/1114-1116 Inlet and outlet water monitoring carried out after completion of manuring programme. Refer report dated 24/8/16, WI/1608/0660-0663.</p>																

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<p>4.4.2</p>	<p>Protection of water courses and wetlands, including maintaining and restoring appropriate riparian and other buffer zones (refer to national best practice and national guidelines) shall be demonstrated. - Major compliance -</p>	<p>Sedenak certification unit monitored water quality of outgoing waters to identify any adverse effect from the mill and estate activities. There is an Integrated Water Management Plan for 2016 which has been implemented. The plan takes into account the efficient use of resources, ensure amongst other that the use of water did not impact on other users, avoid contamination of ground and surface water, and appropriate treatment of mill effluent.</p> <p>Frequency of water quality analysis as per water management plan:</p> <table border="1" data-bbox="662 683 1292 1220"> <thead> <tr> <th>Source</th> <th>Frequency</th> <th>Records of compliance</th> </tr> </thead> <tbody> <tr> <td>River water monitoring</td> <td>Once per every license period</td> <td>3rd party @ UTCL report</td> </tr> <tr> <td>Domestic/drinking water</td> <td>SPAN requirement (6 monthly)</td> <td>3rd party accredited lab</td> </tr> <tr> <td>POME</td> <td>Monthly monitoring as per Compliance Schedule</td> <td>3rd party accredited lab</td> </tr> <tr> <td>Field drain/catchment /buffer zone</td> <td>After completion of manuring programme</td> <td>3rd party accredited lab</td> </tr> </tbody> </table> <p>Sedenak mill has maintained monitoring records of water usage which recorded every day and summarised on monthly basis including the monitoring of rainfall water, which has been an alternative source of water as mitigation plan during draught season. Rainfall data for period from Jan to Oct 2016 recorded at 1488.00mm. Rainfall recorded for the whole year 2015 was 1691.00mm. Rainfall data for Kuala Kubong Estate recorded at 1518 mm.</p> <p>Monitoring of upstream and downstream of Sg Johor as per Compliance Schedule. Latest monitoring by UTCL Laboratory, dated 9/10/16, report ref# EI/1610/1114-1116 Inlet and outlet water monitoring carried out after completion of manuring programme. Refer report dated 24/8/16, WI/1608/0660-0663.</p>	Source	Frequency	Records of compliance	River water monitoring	Once per every license period	3 rd party @ UTCL report	Domestic/drinking water	SPAN requirement (6 monthly)	3 rd party accredited lab	POME	Monthly monitoring as per Compliance Schedule	3 rd party accredited lab	Field drain/catchment /buffer zone	After completion of manuring programme	3 rd party accredited lab	<p>Complied</p>
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<p>4.4.3</p>	<p>Appropriate treatment of mill effluent to required levels and regular monitoring of discharge quality, especially Biochemical Oxygen Demand (BOD), shall be in compliance with national regulations (Criteria 2.1 and 5.6). - Minor compliance -</p>	<p>Treatment of mill effluent carried out as per SOP and DOE license requirements with regular monitoring of discharge quality; especially Biochemical Oxygen Demand (BOD) is monitored. The mill effluent has been analysed for BOD on monthly basis in a ISO 17025 accredited laboratory and the result found was found complied to the DOE permit of <5000mg/L. Sampled report checked for Oct 2016 were 126mg/L (report # EI/1610/1110-1113; dated 19/10/2016) and 100mg/L (report # EI/1609/1036-1039; dated 14/9/2016) respectively analyse by UTCL Laboratory of Mahamurni Plantations Bhd.</p>	<p>Complied</p>															

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4.4.4	Mill water use per tonne of Fresh Fruit Bunches (FFB) (see Criterion 5.6) shall be monitored. - Minor compliance -	Average water consumption based on activities i.e. mill use & domestic use varies from 1.14m ³ – 1.49m ³ per tonne FFB processed with the average water usage of 1.30m ³ per tonne FFB processed for the period from Jan to Oct 2016. This was higher than the targeted consumption at 1.10 m ³	Complied
Criterion 4.5: Pests, diseases, weeds and invasive introduced species are effectively managed using appropriate Integrated Pest Management techniques.			
4.5.1	Implementation of Integrated Pest Management (IPM) plans shall be monitored. - Major compliance -	IPM Plan includes the planting of beneficial plants and control of damage by rodents. Beneficial plants such as Cassia cobanensis (60%), Turnera subulata (30%), antigonan (10%) are grown in the estates. Planting of new areas and maintenance of existing areas of beneficial plants and location maps are available. Records of rat baiting and barn owl census are available. For Kuala Kabong Estate occupancy rate recorded at 78.21 %. No reported infestation by other pests (bagworms and Rhinoceros Beetle).	Complied
4.5.2	Training of those involved in IPM implementation shall be demonstrated. - Minor compliance -	IPM training is given by the Agronomist and plantation executives with qualification in agriculture. Interview with the staff confirm their understanding of the Kulim's IPM practices. Sample of IPM training verified at visited estates: <u>Kuala Kabong Estate</u> IPM training, BOB census training 10/8/16. <u>Basir Ismail Estate</u> IPM training (BOB censuses etc) 28/1/16	Complied
Criterion 4.6: Pesticides are used in ways that do not endanger health or the environment			
4.6.1	Justification of all pesticides used shall be demonstrated. The use of selective products that are specific to the target pest, weed or disease and which have minimal effect on non-target species shall be used where available. - Major compliance -	Written justification of all agrochemicals used available under Kulim's ARM, H01: Justification of Chemical Used Selected products are specific to the target pest, weed and disease. The selection is also evaluated by the agronomist during his visit to the estate. ARM – weed management, P&D etc.	Complied
4.6.2	Records of pesticides use (including active ingredients used and their LD50, area treated, amount of active ingredients applied per ha and number of applications) shall be provided. - Major compliance -	Records of pesticides and their active ingredients used, LD50, area treated, amount of a.i. applied per ha, and number of applications was maintained. Sample of Ai/ha records: <u>Kuala Kubong Estate</u> To date Oct 2016 Ai/Ha : Sodium Chlorate: 0.9487, Ally – 0.0201, Glyphosate - 0.6493 <u>Basir Ismail Estate</u> Ai/Ha for to date October 2016 Ranger (Tryclopvr) : 0.3 Ai/Ha Glyphosate: 0.13 Ai/Ha	Complied
4.6.3	Any use of pesticides shall be minimised as part of a plan, and in accordance with Integrated Pest	The quantity of agrochemicals required for various field conditions are documented and justified in Kulim's Agriculture Manual. The implementation in the field is	Complied

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	Management (IPM) plans. There shall be no prophylactic use of pesticides, except in specific situations identified in national Best Practice guidelines. - Major compliance -	consistent with the manual. There is no prophylactic use of pesticides.	
4.6.4	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, except in specific situations identified in national Best Practice guidelines. The use of such pesticides shall be minimised and eliminated as part of a plan, and shall only be used in exceptional circumstances. - Minor compliance -	Kulim has stopped paraquat usage since February 2015. Alternatives such as Glyphosate were used. Verified during site visit and chemical register, there was no class 1A and 1B kept in the inventory.	Complied
4.6.5	Pesticides shall only be handled, used or applied by persons who have completed the necessary training and shall always be applied in accordance with the product label. Appropriate safety and application equipment shall be provided and used. All precautions attached to the products shall be properly observed, applied, and understood by workers (see Criterion 4.7). - Major compliance -	Pesticide operators given training on the safe handling and application of the pesticides. Suitable personal protective equipment's and application equipment provided to the operators. All precautions attached to the products explained to operators and understood by them. This was noted during the interview with workers at the visit work units (field operation, workshop and chemical store)	Complied
4.6.6	Storage of all pesticides shall be according to recognised best practices. All pesticide containers shall be properly disposed of and not used for other purposes (see Criterion 5.3). - Major compliance -	The operating units comply with Regulation 9 of the Pesticides Act 1974 requiring balance of remaining solution to be kept under lock and key. During visit it was noted that all the remaining pesticides are kept in the store and securely locked and comply with regulation. Agrochemical containers recycled for premix agrochemical.	Complied
4.6.7	Application of pesticides shall be by proven methods that minimise risk and impacts. - Minor compliance -	The quantity of agrochemicals required for various field conditions are documented and justified through agronomist advisory.	Complied
4.6.8	Pesticides shall be applied aerially only where there is documented justification. Communities shall be informed of impending aerial pesticide applications with all relevant information within reasonable time prior to application. - Major compliance -	No aerial spraying method used at the visited estates.	Complied
4.6.9	Maintenance of employee and associated smallholder knowledge and skills on pesticide handling shall be demonstrated, including provision of appropriate information materials (see Criterion 4.8). - Minor compliance -	No associated smallholders. Employees demonstrate knowledge and skills on pesticide handling. MSDS was displayed in local Bahasa Malaysia language at the agrochemical store for each chemical stored as well as a Work Instruction on safe handling for the easy understanding of the agrochemical handlers	Complied
4.6.10	Proper disposal of waste material, according to procedures that are fully	Proper disposal of waste material are carried out as per the company procedures. The procedures are fully understood	Complied

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	understood by workers and managers shall be demonstrated (see Criterion 5.3). - Minor compliance -	by workers and managers. Workers interview reveal that they are aware of the zero burning policy including domestic waste are not allowed to be burned. Management dispose waste material as per regulation for schedule waste and domestic waste.	
4.6.11	Specific annual medical surveillance for pesticide operators, and documented action to treat related health conditions, shall be demonstrated. - Major compliance -	<p><u>Sedenak Palm Oil Mill (SPOM)</u></p> <p>Medical surveillance carried out once a year for all chemical handlers. Last medical check-up was conducted on 24/04/2016 by DOSH Registered doctor No.: HQ/11/DOC/00/235 for 22 workers. Biological monitoring was conducted on 06 workers. All 22 workers were found fit based on the medical results.</p> <p><u>Kuala Kabong Estate</u></p> <p>Medical surveillance carried out once a year for all chemical handlers. Medical check-up was conducted on 22/04/2016 by DOSH Registered doctor No.: HQ/11/DOC/00/235 Report No. KSTS/0014-OSH/0716. Biological monitoring was conducted on 15 workers and X-ray test conducted on 07 fertilizers handlers. All 24 workers were found fit based on the medical results.</p> <p><u>Basir Ismail Estate</u></p> <p>Medical surveillance carried out once a year for all chemical handlers. Medical check-up was conducted on 11/06/2016 by DOSH Registered doctor No.: HQ/08/DOC/00/666 Report No. KSTS/0032-OSH/1016. Biological monitoring was conducted on 41 workers. 82 workers were found fit based on the medical results. 01 worker (AT305788) repeated test (25/10/16) and was found fit to work by OHD NIOSH (HQ/11/DOC/00/235).</p>	Complied
4.6.12	No work with pesticides shall be undertaken by pregnant or breast-feeding women. - Major compliance -	<p><u>SPOM</u></p> <p>The female workers confirmed knowledge of the policy of transfer to alternative duties if wished to continue working when pregnancy was confirmed or breast-feeding.</p> <p><u>Kuala Kabong Estate</u></p> <p>The female workers confirmed knowledge of the policy of transfer to alternative duties if they wished to continue working when pregnancy was confirmed or breast-feeding.</p> <p><u>Basir Ismail Estate</u></p> <p>The female workers confirmed knowledge of the policy of transfer to alternative duties if they wished to continue working when pregnancy was confirmed or breast-feeding.</p> <p>Policy on no work with pesticides for confirmed pregnant and breast-feeding women is continuously implemented.</p>	Complied
Criterion 4.7:			
An occupational health and safety plan is documented, effectively communicated and implemented. The health and safety plan shall cover the following:			
4.7.1	A health and safety policy shall be in place. A health and safety plan covering all activities shall be documented and implemented, and its effectiveness monitored.	The Occupational Safety & Health Policy had been established and implemented. The policy was signed by the Managing Director of Kulim (Malaysia) Berhad on 1 January	Complied

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	<p>- Major compliance -</p>	<p>2008 and is displayed prominently on notice boards in Bahasa Malaysia.</p> <p><u>SPOM – Annual & Baseline Audiometric Testing</u></p> <p>Annual audiometric testing completed on 29/05/2016 by Industrial Safety Management Services, JKJ IH 127/5/3-1(NO38). Total of 48 workers were sent for the annual testing. Baseline audiograms tested on 30 workers and Annual audiograms tested on 18 workers. Total of 02 workers with hearing impairment and 03 workers with standard threshold shift.</p> <p><u>Chemical Health Risk Assessment (CHRA)</u></p> <p>SPOM - CHRA conducted on 19/02/2013 by registered assessor JKPP HIE 127/171-2(154). Based on the CHRA, a total of 17 findings/recommendations reported.</p> <p>CHRA for SPOM (Bio Gas Plant) was conducted on 11/03/2015 by registered assessor JKPP HIE 127/171-2(322). Based on the CHRA, a total of 08 findings/recommendations reported.</p> <p>Kuala Kabong Estate - CHRA was conducted on 18/02/2013 by registered assessor JKPP HIE 127/171-2(154). Based on the CHRA, a total of 19 findings/recommendations reported.</p> <p>Basir Ismail Estate - CHRA was conducted on 04/02/2013 by registered assessor JKPP HIE 127/171-2(154). Based on the CHRA, a total of 19 findings/recommendations reported.</p> <p>The action plan was established through the recommendation from the assessor.</p> <p><u>Chemical Exposure Monitoring</u></p> <p>SPOM - The personal and area chemical exposure monitoring was conducted on 27/05/2016 (CEM/1605/013) by JKPP HIE 127/171-3/1(164) for the laboratory was observed.</p> <p>Total of 04 personal chemical exposures and 01 area chemical exposure sampling was collected. The results showing that all the personal and area exposure levels of n-hexane in the Laboratory were detected but BELOW the permissible exposure level limit as per DOSH requirement.</p> <p>Kuala Kabong & Basir Ismail Estate - The personal chemical exposure monitoring was conducted on 28/06/2016 (CEM/1606/011) by JKPP HIE 127/171-3/1(164) at the fertilizer store was observed.</p> <p>The monitoring results for the exposure to Crystalline Silica (Quartz) from the fertilizer revealed that the exposure levels based on 8hrs-TWA for all the monitored parameters did not exceed the permissible exposure limit.</p>	
4.7.2	<p>All operations where health and safety is an issue shall be risk assessed, and procedures and actions shall be documented and implemented to address the identified</p>	<p>Kulim (Malaysia) Berhad had identified and reviewed significant hazards and risks and determined appropriate risk control measures. The hazard identification, risk assessment</p>	<p>Complied</p>

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	<p>issues. All precautions attached to products shall be properly observed and applied to the workers. - Major compliance -</p>	<p>and risk control (HIRADC) records, as well as CHRA reports were verified during the assessment.</p> <p><u>SPOM</u></p> <p>CHRA conducted on 19/02/2013 by registered assessor JKPP HIE 127/171-2(154). Based on the CHRA, a total of 17 findings/recommendations reported.</p> <p>CHRA for SPOM (Bio Gas Plant) was conducted on 11/03/2015 by registered assessor JKPP HIE 127/171-2(322). Based on the CHRA, a total of 08 findings/recommendations reported.</p> <p>HIRARC was reviewed on October 2016 and approved by the Senior Manager. Revision was made for the Bio-compost plant –bio-compost productions (Semai Alam).</p> <p><u>Kuala Kabong Estate</u></p> <p>CHRA was conducted on 18/02/2013 by registered assessor JKPP HIE 127/171-2(154). Based on the CHRA, a total of 19 findings/ recommendations reported.</p> <p>HIRARC was reviewed on 30/09/2016 and approved by the Estate manager.</p> <p><u>Basir Ismail Estate</u></p> <p>CHRA was conducted on 04/02/2013 by registered assessor JKPP HIE 127/171-2(154). Based on the CHRA, a total of 19 findings/recommendations reported.</p> <p>HIRARC was reviewed on 22/07/2016 and approved by the Estate manager.</p> <p>Monitoring is carried out for all the best practices and checklists maintained to ensure the implementation and practicality.</p>	
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<p>4.7.3</p>	<p>All workers involved in the operation shall be adequately trained in safe working practices (see Criterion 4.8). Adequate and appropriate protective equipment shall be available to all workers at the place of work to cover all potentially hazardous operations, such as pesticide application, machine operations, and land preparation, harvesting and, if it is used, burning. - Minor compliance -</p>	<p>Awareness and training program had been carried out. All workers involved had been adequately trained in safe working practices. The objective was to ensure all workers involved have been adequately trained in understanding MSDS, safe working practices and the correct use of PPE.</p> <ol style="list-style-type: none"> 1. SPOM Annual Training Program 2016 was established and approved. 2. Kuala Kabong Estate Training Program (OSH, RSPO & ISCC) Year 2016 was established and approved by the Estate Manager. 3. Basir Ismail Estate Training Program 2016 was established and approved by the Manager. <p>Suitable PPE has been provided to the workers based on the information in the MSDS and CHRA assessor's recommendation.</p> <p>List of Personal Protective Equipment (PPE) Provided – identifies the type of PPE for the respective activities.</p> <ol style="list-style-type: none"> i. Boiler/Engine operator – Safety Helmet, Semi leather Hand Glove, Cotton Gloves, Safety Shoes, Safety Vest and Ear Muff. ii. Field workers (sprayer, manure & harvester) – N95 respirator, anti-mist goggles, wellington boots, apron and sickle cover. <p>During the site visit, it was noted that the company provides a complete PPE set for each and every workers depends on their work requirements. When the PPE was damaged due to normal wear and tear or was due for replacement, the company with replace it at company's cost. In case PPE lost/misplaced, the workers need to purchase a replacement on their own as a penalty imposed by company.</p> <p>The chemical store was found to be adequately organized, properly labelled, secured and person in charge understands the OSH procedures. MSDS was placed at the chemical stores and is available. The person in charge understands the information written in MSDS.</p>	<p>Complied</p>
<p>4.7.4</p>	<p>The responsible person/persons shall be identified. There shall be records of regular meetings between the responsible person/s and workers. Concerns of all parties about health, safety and welfare shall be discussed at these meetings, and any issues raised shall be recorded. - Major compliance -</p>	<p>The OSH policy is well briefed to all workers. Interview with workers reveal that they understand the policy and the importance of safety at work.</p> <p>SPOM</p> <p>OSH/ESH meeting conducted on quarterly basis and last meeting conducted on 29/08/2016 attended by 16 persons.</p> <p>The work place inspection conducted on 28/08/2016 and review of accident record was discussed during the OSH meeting. No any unresolved safety and health issues noted.</p> <p><u>OSH Committee Members for 2016/2017</u></p> <p>Chairman – En Wan Adlin Bin Wan Mahmood (appointment letter dated 04/09/2016). Appointment letters for other OSH committee members dated 01/08/2016, 01/03/2016 & 15/01/2016.</p>	<p>Complied</p>

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		<p>OSH/EHS meeting: 29/08/2016, 27/05/2016 and 06/03/2016.</p> <p><u>Kuala Kabong Estate</u></p> <p>OSH meeting conducted on quarterly basis and last meeting conducted on 04/10/2016 attended by 18 persons.</p> <p>The work place inspection conducted on 03/10/2016 and review of accident record was discussed during the OSH meeting. No any unresolved safety and health issues noted.</p> <p><u>OSH Committee Members for 2016/2017</u></p> <p>Chairman – En Samsudin Bin Abdullah (appointment letter dated 04/09/2016). Appointment letters for other OSH committee members dated 27/03/2016 & 04/10/2016.</p> <p>OSH meeting: 04/10/2016, 27/06/2016 and 30/03/2016.</p> <p><u>Basir Ismail Estate</u></p> <p>OSH meeting conducted on quarterly basis and last meeting conducted on 17/11/2016 attended by 23 persons.</p> <p>The work place inspection conducted on 10/11/2016 and review of accident record was discussed during the OSH meeting. No any unresolved safety and health issues noted.</p> <p><u>OSH Committee Members for 2016/2017</u></p> <p>Chairman – En Zazry Bin Zainon (appointment letter dated 04/09/2016). Appointment letters for other OSH committee members dated 19/06/2015 and 13/06/2016.</p> <p>OSH meeting: 17/11/2016, 26/08/2016, 27/05/2016 and 15/02/2016.</p>	
4.7.5	<p>Accident and emergency procedures shall exist and instructions shall be clearly understood by all workers. Accident procedures shall be available in the appropriate language of the workforce. Assigned operatives trained in First Aid should be present in both field and other operations, and first aid equipment shall be available at worksites. Records of all accidents shall be kept and periodically reviewed.</p> <p>- Minor compliance -</p>	<p>Accident and emergency procedures have been communicated to employees, contractors and visitors.</p> <ol style="list-style-type: none"> 1. SPOM - Fire evacuation drill was last conducted on 01/11/2016 to test the state of readiness during emergency situation. 2. Kuala Kabong Estate – Fire evacuation drill was last conducted on 05/08/2016 to test the state of readiness during emergency situation. 3. Basir Ismail estate - Fire evacuation drill was last conducted on 03/01/2016 to test the state of readiness during emergency situation. <p>Accident and emergency procedures are in Bahasa Malaysia and this is understood by the responsible workers, staff or executives involved in the operation. Good understanding level observed among the workers.</p> <ol style="list-style-type: none"> 1. Training for First Aid is conducted in annually. Sufficient first aiders trained. 2. First aid equipment is available at worksites. During the site visit there is evident that First Aid Box is available at the relevant area with sufficient contents and in good condition. 	Complied

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		<p>3. Fire extinguisher (ABC Powder) assessed during the site observation are available and within the expiry date.</p> <p>4. Portable emergency eye wash facility available at chemical store and laboratory. Both are in good working condition.</p> <p>Quarterly review on accident cases carried out during OSH quarterly meeting.</p> <p>SPOM</p> <p>04 accidents reported. JKPP 6 was sent to DOSH on 03/07/2016. JKPP 8 was sent to DOSH on 06/01/2016.</p> <p>DOSH visits (03/04/2016) been recorded in the DOSH log book and comments highlighted by DOSH was noted and action taken accordingly.</p> <p><u>Kuala Kabong Estate</u></p> <p>80 accidents reported. No JKPP 6 available. JKPP 8 was sent to DOSH on 03/01/2016.</p> <p>No DOSH visit for year 2016. Last DOSH visits (04/01/2015) been recorded in the DOSH log book and comments highlighted by DOSH was noted.</p> <p><u>Basir Ismail Estate</u></p> <p>12 accidents reported. No JKPP 6 available. JKPP 8 was sent to DOSH on 04/01/2016.</p> <p>DOSH visits (28/11/2016) been recorded in the DOSH log book and noted comments highlighted by DOSH.</p>	
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<p>4.7.6</p>	<p>All workers shall be provided with medical care, and covered by accident insurance. - Minor compliance -</p>	<p>Medical care is provided to all the employees. Reviewed on workers profile records found that all workers are covered by the accident insurances. Malaysian workers are covered by SOCSO or Perkeso (Pertubuhan Keselamatan Sosial). Refer to form 8A, "Jadual Caruman" for October 2016.</p> <p>Foreign workers are covered by Foreign Workers Compensation Scheme Certificate of Insurance.</p> <table border="1" data-bbox="659 593 1297 1263"> <thead> <tr> <th>Insurance</th> <th>Period</th> <th>Remark</th> </tr> </thead> <tbody> <tr> <td>MSIG (JB-09611899-FWC)</td> <td>12/08/2016 – 11/08/2017</td> <td>SPOM</td> </tr> <tr> <td>MSIG (JB-09566686-FWC)</td> <td>19/05/2016 – 18/05/2017</td> <td></td> </tr> <tr> <td>Berjaya Sampo Insurance Berhad (16DJBEEWWCZ0 0906)</td> <td>09/08/2016 - 08/08/2017</td> <td>Kuala Kabong Estate</td> </tr> <tr> <td>(16DJBEEWWCZ0 0907)</td> <td>12/08/2016 – 11/08/2017</td> <td></td> </tr> <tr> <td>Berjaya Sampo Insurance Berhad (16DJBEEWWCZ0 0901)</td> <td>16/08/2016 – 15/08/2016</td> <td>Basir Ismail Estate</td> </tr> <tr> <td>(16DJBEEWWCZ0 0900)</td> <td>11/08/2016 – 10/08/2016</td> <td></td> </tr> </tbody> </table>	Insurance	Period	Remark	MSIG (JB-09611899-FWC)	12/08/2016 – 11/08/2017	SPOM	MSIG (JB-09566686-FWC)	19/05/2016 – 18/05/2017		Berjaya Sampo Insurance Berhad (16DJBEEWWCZ0 0906)	09/08/2016 - 08/08/2017	Kuala Kabong Estate	(16DJBEEWWCZ0 0907)	12/08/2016 – 11/08/2017		Berjaya Sampo Insurance Berhad (16DJBEEWWCZ0 0901)	16/08/2016 – 15/08/2016	Basir Ismail Estate	(16DJBEEWWCZ0 0900)	11/08/2016 – 10/08/2016		<p>Complied</p>
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<p>4.7.7</p>	<p>Occupational injuries shall be recorded using Lost Time Accident (LTA) metrics - Minor compliance -</p>	<p>Accident records are found to be updated. All records on Lost Time Accident (LTA) metrics are maintained.</p> <p>Samples of accident statistic as shown below :</p> <table border="1" data-bbox="659 1406 1297 1603"> <thead> <tr> <th>Year (to-date)</th> <th>SPOM</th> <th>Kuala Kabong Estate</th> <th>Basir Ismail Estate</th> </tr> </thead> <tbody> <tr> <td>2015</td> <td>3 (334 LTA)</td> <td>58 (111 LTA)</td> <td>24 (53 LTA)</td> </tr> <tr> <td>2016</td> <td>4 (194 LTA)</td> <td>80 (123 LTA)</td> <td>12 (79 LTA)</td> </tr> </tbody> </table> <p>*LTA is equivalent to lost man days (MC)</p> <p>SPOM recorded LTI as at January 2016 – 441,792. Based on the records of accident investigations, accident cases increased due to workers depraved attitude towards safety. Objective evidence viewed was the work place inspection which was conducted on 03/10/2016 and reviews of the accident record was discussed during the OSH meetings. The company has provided additional awareness through morning briefing and classroom trainings to reduce the LTA.</p> <p>Kuala Kabong Estate recorded LTI as at January 2016 – 391,200. Kuala Kabong Estate had established the Training Program (OSH, RSPO & ISCC) Year 2016 and was approved by the Estate Manager. A total of 28 training needs/requirements Kuala Kabong Estate Training Program</p>	Year (to-date)	SPOM	Kuala Kabong Estate	Basir Ismail Estate	2015	3 (334 LTA)	58 (111 LTA)	24 (53 LTA)	2016	4 (194 LTA)	80 (123 LTA)	12 (79 LTA)	<p>Complied</p>									
Year (to-date)	SPOM	Kuala Kabong Estate	Basir Ismail Estate																					
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		<p>(OSH, RSPO & ISCC) Year 2016 was identified for various categories of operating units.</p> <p>Basir Ismail recorded LTI as at January 2016 – 732,000. Basir Ismail Estate had established the Training Program (OSH, RSPO & ISCC) Year 2016 and was approved by the Estate Manager. A total of 19 training needs/requirements Basir Ismail Estate Training Program (OSH, RSPO & ISCC) Year 2016 was identified for various categories of operating units.</p>																
<p>Criterion 4.8: All staff, workers, smallholders and contract workers are appropriately trained.</p>																		
4.8.1	<p>A formal training programme shall be in place that covers all aspects of the RSPO Principles and Criteria, and that includes regular assessments of training needs and documentation of the programme.</p> <p>- Major compliance -</p>	<p>Kulim (Malaysia) Berhad has established an annual training program that covers all aspects of the RSPO Principles and Criteria.</p> <ul style="list-style-type: none"> i) SPOM – Annual Training Program 2016. Implementation is still on-going. ii) Kuala Kabong Estate - Training Program (OSH, RSPO & ISCC) Year 2016. Implementation is still on-going. iii) Basir Ismail Estate – Training Program 2016. Implementation is still on-going. <p><u>Training Needs</u></p> <ul style="list-style-type: none"> i) 44 training needs/requirements for SPOM Annual Training Program 2016 identified for various categories of operating units. ii) 28 training needs/requirements Kuala Kabong Estate Training Program (OSH, RSPO & ISCC) Year 2016 identified for various categories of operating units. iii) 38 training needs/requirements Basir Ismail Estate – Training Program 2016 identified for various categories of operating units. 	Complied															
4.8.2	<p>Records of training for each employee shall be maintained.</p> <p>- Minor compliance -</p>	<p>Training records for employees available and maintained at the office. Records are verified on a sampling basis which covers all aspect of training and RSPO P&C requirement. Samples of training record for 2016 as follows:</p> <p><u>Sedenak Palm Oil Mill (SPOM):</u></p> <table border="1"> <thead> <tr> <th>Date</th> <th>Training</th> <th>Trainer</th> </tr> </thead> <tbody> <tr> <td>23/11/16</td> <td>Refresher ISO9001:2008, ISCC & RSPO</td> <td>En Amir Muslimim</td> </tr> <tr> <td>13/11/16</td> <td>LOTO Training</td> <td>KSTS</td> </tr> <tr> <td>10/11/16</td> <td>First Aider Training</td> <td>En Chandran</td> </tr> <tr> <td>27/10/16</td> <td>Permit to Work Training (LOTO, Confined Space, Hot work & Working at Height)</td> <td>En Wan Adlin Bin Wan Mahmood</td> </tr> </tbody> </table>	Date	Training	Trainer	23/11/16	Refresher ISO9001:2008, ISCC & RSPO	En Amir Muslimim	13/11/16	LOTO Training	KSTS	10/11/16	First Aider Training	En Chandran	27/10/16	Permit to Work Training (LOTO, Confined Space, Hot work & Working at Height)	En Wan Adlin Bin Wan Mahmood	Complied
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		28/09/16	Retraining on Effluent Lab Testing	AM – En Mohd Radzi
		30/05/16	PPE Training & SOP Works.	AM – Mohd Saiful
		23/05/16	Chemical Safety Handling	AM – Mohd Radzi
		17/03/16	Sexual Harassment Awareness	AM – Mohd Radzi
Kuala Kabong Estate				
		Date	Training	Trainer
		27/11/16	Hazardous Chemical Training	En. Yakob
		08/11/16	Spill Kit Training	En Anuar
		03/11/16	Water Sampling Training	En Hassanulariffin
		10/08/16	First Aid & CPR Training	Tn Samsudin
		25/07/16	Harvester Safety & PPE Training	En Anuar Talman
Basir Ismail Estate				
		Date	Training	Trainer
		24/10/16	Chemical Handling Training	En Mohd Khairulamiin
		22/08/16	Spraying Training	En Md Nizam
		01/06/16	STORM Training	En Abdul Razak
		07/04/16	Chemical mixing, Triple rinse and Store Training	En Mohd Hanafi
		18/01/16	Schedule Waste Training	En Md Nizam

Principle 5: Environmental responsibility and conservation of natural resources and biodiversity

Criterion 5.1:

Aspects of plantation and mill management, including replanting, that have environmental impacts are identified, and plans to mitigate the negative impacts and promote the positive ones are made, implemented and monitored, to demonstrate continual improvement.

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<p>5.1.1</p>	<p>An environmental impact assessment (EIA) shall be documented. - Major compliance -</p>	<p><u>Sedenak Palm Oil Mill (SPOM):</u> Documented Environmental Aspects and Impacts Register (Form No.: EPA-POM-2015; Activity code: ER001–ER017; Rev. 1/2016) available. Register dated 1st August 2016 verified. Among activities observed during site visit and current year project : i)Biogas engine/scrubber & flare operation and anaerobic digester tank, ER 018 ii)Bio-compost plant operation, ER 019 iii)Pond Desludging, ER020</p> <p><u>Kuala Kubong Estate:</u> Documented Environmental Aspects and Impacts Register (Form No.: EPA-LKK-2016; Activity code: ER001–ER014; Rev. 1/2016) available. The review was done on annual basis. For the year 2016, review done on 31/7/16.</p> <p>Peat management/water table (normal & emergency) Open burning from neighbouring estate (pineapple farm) Fima Estate has been incorporated, dated 31/8/16 under activity code ER015</p> <p><u>Basir Ismail Estate:</u> Documented Environmental Aspects and Impacts Register (Form No.: EPA-LBI-2016; Activity code: ER001–ER014; Rev. 1/2016) available. The review was done on annual basis. For the year 2016, review done on 25/7/16.</p>	<p>Complied</p>
<p>5.1.2</p>	<p>Where the identification of impacts requires changes in current practices, in order to mitigate negative effects, a timetable for change shall be developed and implemented within a comprehensive management plan. The management plan shall identify the responsible person/persons. - Minor compliance -</p>	<p>Environmental management plan for 2016 available. Significant environmental issues identified:</p> <ul style="list-style-type: none"> i) Emission of dark smoke ii) Emission of noise iii) Emission of dust/ashes particle iv) Emission of air pollutant v) POME vi) Water (cleaning, production area, lubricant store, workshop, wash down, line site etc. <p>Assistant manager has been appointed to monitor the overall implementation of the management plan.</p>	<p>Complied</p>
<p>5.1.3</p>	<p>This plan shall incorporate a monitoring protocol, adaptive to operational changes, which shall be implemented to monitor the effectiveness of the mitigation measures. The plan shall be reviewed as a minimum every two years to reflect the results of monitoring and where there are operational changes that may have positive and negative environmental impacts. - Minor compliance -</p>	<p>An environmental improvement plan was implemented to monitor the effectiveness of the mitigation measures. This plan incorporated a monitoring protocol, which is adaptive to operational changes and is reviewed every year to reflect the results of monitoring operational changes that may have positive and negative environmental impacts.</p> <p>The latest online monitoring protocol was used for reporting to DOE via eSwis (schedule waste), CEMS for smoke emission and OER @ Online Environmental Reporting for POME results and in line with mil’s compliance schedule requirements.</p>	<p>Complied</p>
<p>Criterion 5.2:</p>			

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<p>The status of rare, threatened or endangered species and other High Conservation Value habitats, if any, that exist in the plantation or that could be affected by plantation or mill management, shall be identified and operations managed to best ensure that they are maintained and/or enhanced.</p>			
5.2.1	<p>Information shall be collated in a High Conservation Value (HCV) assessment that includes both the planted area itself and relevant wider landscape-level considerations (such as wildlife corridors).</p> <p>- Major compliance -</p>	<p><u>Kuala Kabong Estate</u></p> <p>The initial HCV assessment was conducted in 2009 by consultant. Report " Rapid Biodiversity Assessment of Oil Palm Plantations – A.J.F.M Dekker Consultant, Biodiversity January 2008.</p> <p><u>Basir Ismail Estate</u></p> <p>Rapid Biodiversity Assessment Fact Sheet, dated 4/9/07 for Basir Ismail Estate. There was an appropriate consultation process for identification, management and monitoring of HCVs.</p>	Complied
5.2.2	<p>Where rare, threatened or endangered (RTE) species, or HCVs, are present or are affected by plantation or mill operations, appropriate measures that are expected to maintain and/or enhance them shall be implemented through a management plan.</p> <p>- Major compliance -</p>	<p>Survey of birds and bats in Kulim Plantations dated 16 November 2011 prepared by Wildlife Conservation Society-Malaysia Program. The report has covered the area which for Sedenak certification unit. Management plan has been incorporated based on the recommendation made by the Wildlife Conservation Society-Malaysia Programme.</p> <p>It was noted that 2 hotspot areas (RBA, HSR_09 & HSR_08) which previously under REM Estate was not included in the management plan for further monitoring.</p> <p>Specific field P11R/02 – hotspot R8 & R9 (2.22 Ha)</p> <p>Thus, major NC was issued.</p>	Major nonconformance
5.2.3	<p>There shall be a programme to regularly educate the workforce about the status of these RTE species, and appropriate disciplinary measures shall be instigated in accordance with company rules and national law if any individual working for the company is found to capture, harm, collect or kill these species.</p> <p>- Minor compliance -</p>	<p>Evidence to continuously prevent and discourage illegal or hunting, fishing or collecting activities were maintained and implemented. Signages as well as routine patrolling activities were utilised as part of creating awareness among employees and maintain HCVs. The latest_HCV and Bio-D awareness was carried out on 15/1/16.</p>	Complied
5.2.4	<p>Where a management plan has been created there shall be ongoing monitoring:</p> <ul style="list-style-type: none"> • The status of HCV and RTE species that are affected by plantation or mill operations shall be documented and reported; • Outcomes of monitoring shall be fed back into the management plan. <p>- Minor compliance -</p>	<p>Bio-diversity management/improvement plan 2016 available. Action plan categorized under immediate and long term measure for the identified area based on HCV report.</p>	Complied
5.2.5	<p>Where HCV set-asides with existing rights of local communities have been identified, there shall be evidence of a negotiated agreement that optimally safeguards both the HCVs and these rights.</p> <p>- Minor compliance –</p>	<p>There was no HCV set-aside that needs any negotiation process with the local communities.</p>	Complied
<p>Criterion 5.3:</p>			

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Waste is reduced, recycled, re-used and disposed of in an environmentally and socially responsible manner.			
5.3.1	<p>All waste products and sources of pollution shall be identified and documented.</p> <p>- Major compliance -</p>	<p>Sedenak certification unit has established Waste & Pollution Management Action Plan for 2016 Few type of waste has been identified i.e. Scheduled Waste, Domestic Waste and Industrial Waste.</p> <p>The source of these wastes were mainly located at mechanical/electrical workshop, chemical store, scheduled waste store, line site, office, mill effluent pond.</p> <p><u>Sedenak POM</u></p> <p>Notification of scheduled waste, 2nd schedule</p> <p>Refer to notification, 20150818117CND97Q dated 3/9/15. Type of scheduled waste generated: SW102, SW305, SW306, SW307, SW409 and SW410. Latest notification dated 11/11/16 to include SW 110, ref# 2016111115NP80IE.</p> <p>Inventory of scheduled waste, 5th schedule, ref# 2015081812XJ4HZ102016 dated 7/10/16. Physical stock available for SW 305: 1.1286 mt, SW409: 0.1102 mt, SW410: 0.034 mt.</p> <p><u>Kuala Kabong Estate</u></p> <p>Notification of scheduled waste, 2nd schedule sighted available. Refer to notification, 2015112916938TVW dated 29/11/15. Type of scheduled waste generated: SW305, SW409 and SW410. 5th schedule available dated 24/11/6.</p> <p><u>Basir Ismail Estate</u></p> <p>Notification of scheduled waste, 2nd schedule sighted available. Type of scheduled waste generated: SW409 and SW410. 5th schedule available updated as of 31/10/6.</p>	Complied
5.3.2	<p>All chemicals and their containers shall be disposed of responsibly.</p> <p>- Major compliance -</p>	<p>All chemical containers are disposed as per the company procedures. Most of the agrochemical containers are recycled for pre-mixing agrochemicals. Recycling is only for the same purpose. As example, at Kuala Kabong Estate practice triple rinsing and punctured of used chemical and disposed it through G-Planter Sdn. Bhd.</p>	Complied
5.3.3	<p>A waste management and disposal plan to avoid or reduce pollution shall be documented and implemented.</p> <p>- Minor compliance -</p>	<p>Waste management and disposal plan was implemented and verified during assessment. Records disposal were made available for a few disposal arrangement as follows:</p> <p><u>Sedenak POM</u></p> <p>Scheduled waste disposal records available. Refer to latest 6th schedule @ consignment note dated 24/11/16 disposed by license contractor, Kualiti Alam Sdn Bhd.</p> <p>Consignment# 20161124126PVENX for SW410 (0.1160 mt), consignment# 2016112412709BXZ for SW305 (1.15 mt), consignment# 2016112412U7XA6J for SW307 (2.04 mt), consignment# 20161124128TZKM2 for SW409 (0.2122 mt)</p> <p><u>Kuala Kabong Estate</u></p>	Major nonconformance

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		<p>Scheduled waste disposal records available. Refer to latest 6th schedule @ consignment note dated 28/8/16 disposed by license contractor, Kualiti Alam Sdn Bhd.</p> <p>Consignment# 2016082912J78XNQ for SW410 (0.05 mt), consignment# 2016082912IAQELJ for SW305 (0.05 mt), <u>Basir Ismail Estate</u></p> <p>Clinical waste disposed by license contractor , Kualiti Alam Sdn Bhd: SW404 - 8/11/16 (2.5 kg)</p>	
<p>Criterion 5.4: Efficiency of fossil fuel use and the use of renewable energy is optimised.</p>			
5.4.1	<p>A plan for improving efficiency of the use of fossil fuels and to optimise renewable energy shall be in place and monitored. - Minor compliance -</p>	<p>Sedenak mill production output records and the renewable energy used were monitored monthly. The Mill monitors and reports energy usage monthly to head office through monthly report. The company has optimized the use of renewable energy. The energy usage varies depending on the FFB supplied by the estates. During low crop there is a slight increase in use of diesel fuel for processing. Power generation summary as follows:</p> <ul style="list-style-type: none"> i) Diesel engine @ fossil fuel (200 kW, 250 kW & 650 kW) 959,760 kWh to date October 2016 ii) Turbine and biogas engine @ renewable energy (7,534,329 kW) to date October 2016. <p>Fossil fuel usage is 11.3% over the total power generation/consumption.</p>	Complied
<p>Criterion 5.5: Use of fire for preparing land or replanting is avoided, except in specific situations as identified in the ASEAN guidelines or other regional best practice.</p>			
5.5.1	<p>There shall be no land preparation by burning, other than in specific situations as identified in the 'Guidelines for the Implementation of the ASEAN Policy on Zero Burning' 2003, or comparable guidelines in other regions. - Major compliance -</p>	<p>Zero open burning policy as per SOP Section B2 - Felling/Land Clearing & Land Preparation dated November 2008. Management complying with the Malaysian environmental law –EQA and Regulations 1974 and in-line with ASEAN guidelines for zero burning. No open burning noted during the field visit and facility visit.</p>	Complied
5.5.2	<p>Where fire has been used for preparing land for replanting, there shall be evidence of prior approval of the controlled burning as specified in 'Guidelines for the Implementation of the ASEAN Policy on Zero Burning' 2003, or comparable guidelines in other regions. - Minor compliance -</p>	<p>No use of fire for land preparation during replanting.</p>	Complied
<p>Criterion 5.6: Plans to reduce pollution and emissions, including greenhouse gases, are developed, implemented and monitored.</p>			
5.6.1	<p>An assessment of all polluting activities shall be conducted, including gaseous emissions, particulate/soot emissions and effluent (see Criterion 4.4). - Major compliance -</p>	<p>Ambient air quality monitoring carried out every quarter as per Compliance Schedule, 002161. Monitoring has been carried out for the latest quarter on 19-20/9/16 and 20-21/6/16 by Spectrum Laboratories (Johore) Sdn. Bhd (Report Ref. No.: ETD/A/SPOM/2016-09/14725 &</p>	Complied

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		<p>ETD/A/SPOM/2016-06/14278). Parameter tested is within regulatory limit of 260 TSP ug/m3.</p> <p>Stack sampling carried out twice per year for 2016. Stack# 4: 10th March 2016, refer to report, ETD/SPOM/2016/03/13853 dated 1st April 2016, by Spectrum Laboratories (Johore) Sdn. Bhd</p> <table border="1" data-bbox="662 593 1300 801"> <thead> <tr> <th>Parameter</th> <th>Result</th> </tr> </thead> <tbody> <tr> <td>Solid particle, g/Nm3 @ 12% CO2</td> <td>0.017</td> </tr> <tr> <td>NOx emission, g/Nm3</td> <td><0.0001 vs limit of 2</td> </tr> <tr> <td>SOx emission, g/Nm3</td> <td>-</td> </tr> </tbody> </table> <p>Stack# 3: 23rd September 2015, refer to report, ETD/SPOM/SE/2015 dated 19th October 2015, Spectrum Laboratories (Johore) Sdn. Bhd</p> <table border="1" data-bbox="662 963 1300 1171"> <thead> <tr> <th>Parameter</th> <th>Result</th> </tr> </thead> <tbody> <tr> <td>Solid particle, g/Nm3 @ 12% CO2</td> <td>0.010</td> </tr> <tr> <td>NOx emission, g/Nm3</td> <td>0.023 vs limit of 2</td> </tr> <tr> <td>SOx emission, g/Nm3</td> <td>-</td> </tr> </tbody> </table> <p>Parameters checked were complied with the limit of the Malaysian Recommended Air Quality Guidelines and Environmental Quality (Clean Air) Regulation, 1978.</p> <p>The mill currently are planning to upgrade its facilities in-line with the new requirements of EQ (Clean Air) Reg. 2014 which has been spelt out in the DOE license to be comply latest by June 2019</p>	Parameter	Result	Solid particle, g/Nm3 @ 12% CO2	0.017	NOx emission, g/Nm3	<0.0001 vs limit of 2	SOx emission, g/Nm3	-	Parameter	Result	Solid particle, g/Nm3 @ 12% CO2	0.010	NOx emission, g/Nm3	0.023 vs limit of 2	SOx emission, g/Nm3	-	
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SOx emission, g/Nm3	-																		
5.6.2	<p>Significant pollutants and greenhouse gas (GHG) emissions shall be identified, and plans to reduce or minimise them implemented. - Major compliance</p>	<p>Significant pollutants and greenhouse gas (GHG) emissions were identified includes methane from effluent, smoke and fertilizer usage have been documented. Implementation and monitoring of GHG emissions is carried out and submitted to RSPO. GHG report, using palm GHG version 2.1.1 was made available during audit.</p>	Complied																
5.6.3	<p>A monitoring system shall be in place, with regular reporting on progress for these significant pollutants and emissions from estate and mill operations, using appropriate tools. - Minor compliance -</p>	<p>Kulim has published Carbon footprint report. Calculation was based on PalmGHG tools, version 2.1.1. Reporting date to RSPO dated 8/3/16 was verified during audit.</p> <p>Tools and systems used to monitor significant pollutants includes the DOE CEMS monitoring system for air emissions, water quality at discharge points as per DOE regulations and Scheduled Waste disposal as per the DOE requirements via E-Swis.</p> <p>POME is treated using aerobic and anaerobic ponds. Effluent waste-water samples were taken as per DOE requirement</p>	Complied																

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		and quarterly reports sent to DOE via the latest "OER" @ Online Environmental Reporting.	
Principle 6: Responsible consideration of employees and of individuals and communities affected by growers and millers.			
Criterion 6.1: Aspects of plantation and mill management that have social impacts, including replanting, are identified in a participatory way, and plans to mitigate the negative impacts and promote the positive ones are made, implemented and monitored, to demonstrate continual improvement.			
6.1.1	A social impact assessment (SIA) including records of meetings shall be documented. - Major compliance -	A social impact assessment (SIA) analysis records updated on 5/10/2016. Records of stakeholder meeting conducted on 13/11/2016.	Complied
6.1.2	There shall be evidence that the assessment has been done with the participation of affected parties. - Major compliance -	Assessment also covered Social Amenities, Environment, Road Users, Employee Changes, Safety and Health Issues, Surrounding Communities, Government Official, Police, Labour Department, Health Department, Contractors and Suppliers. Periodical stakeholder consultation meeting has been conducted for Sedenak mill, latest done on 13/11/2016. Basir Ismail stakeholder meeting done on 21/10/2016	Complied
6.1.3	Plans for avoidance or mitigation of negative impacts and promotion of the positive ones, and monitoring of impacts identified, shall be developed in consultation with the affected parties, documented and timetabled, including responsibilities for implementation. - Major compliance -	Based on the SIA findings and recommendation from the sustainability executives, a timetable with responsibilities for mitigation and monitoring of the social impacts were developed and reviewed as necessary. The Assistant Manager is responsible for the social issues and communication with the stakeholders.	Complied
6.1.4	The plans shall be reviewed as a minimum once every two years and updated as necessary, in those cases where the review has concluded that changes should be made to current practices. There shall be evidence that the review includes the participation of affected parties. - Minor compliance -	Annual SIA improvement plans reviewed yearly. The assessment was through meeting with the effected parties and stakeholders conducted by the Kulim Sustainability executives.	Complied
6.1.5	Particular attention shall be paid to the impacts of smallholder schemes (where the plantation includes such a scheme). - Minor compliance -	No smallholder schemes at Sedenak Certification Unit.	Not applicable
Criterion 6.2: There are open and transparent methods for communication and consultation between growers and/or millers, local communities and other affected or interested parties.			

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6.2.1	Consultation and communication procedures shall be documented. - Major compliance -	Documented consultation and communication procedures "Communication and Consultation Management Guidelines" SOP as well as "Grievance Procedure" was established and available since 7/3/2008.	Complied
6.2.2	A management official responsible for these issues shall be nominated. - Minor compliance -	The responsibility to ensure effective implementation of the SOP is the respective Mill and Estate Managers assisted by assistant managers. These executives of the respective operating unit handle social issues of the mill and estates. It was also sighted a latest circular by HQ dated 26/10/2016 notifying that the Executive Regional Controller of each complex shall automatically appointed as Social Person In-Charge	Complied
6.2.3	A list of stakeholders, records of all communication, including confirmation of receipt and that efforts are made to ensure understanding by affected parties, and records of actions taken in response to input from stakeholders, shall be maintained. - Minor compliance -	Stakeholder list has been updated which including all the stakeholders with the contact persons and detail which include government agency NGO, supplier, and contractor. Several internal and external stakeholders have been conducted separately with different stakeholder. Mill Stakeholder meeting 13/11/2016. Basir Ismail stakeholder meeting done on 21/10/2016.	Complied
Criterion 6.3:			
There is a mutually agreed and documented system for dealing with complaints and grievances, which is implemented and accepted by all effected parties.			
6.3.1	The system, open to all affected parties, shall resolve disputes in an effective, timely and appropriate manner, ensuring anonymity of complainants and whistleblowers, where requested. - Major compliance -	A documented dispute resolution procedure is available in Mill and Estate which is effective, timely, and appropriate and open to any affected parties. The complaint and grievances is open to effected parties including internal and external stakeholders.	Complied
6.3.2	Documentation of both the process by which a dispute was resolved and the outcome shall be available. - Major compliance -	SOP to resolve social disputes established as SPO Grievance Procedure Program; Ref.: SPO-Grievance; Dated 7/3/2008 sighted available. Stakeholder meetings are held regularly to identify and give opportunity to stakeholders to complaint or raise disputes. Issues are discussed and consensual agreements reached during stakeholder meetings. Follow-up actions had timelines, responsibilities, and details of actions and monitored by managers for satisfactory conclusion. Minutes of meetings are maintained and reviewed.	Complied
Criterion 6.4:			
Any negotiations concerning compensation for loss of legal, customary or user rights are dealt with through a documented system that enables indigenous peoples, local communities and other stakeholders to express their views through their own representative institutions.			
6.4.1	A procedure for identifying legal, customary or user rights, and a procedure for identifying people entitled to compensation, shall be in place. - Major compliance -	SOP to identify legal and customary rights as well as people entitled to compensation has been established. There have been no issues related to loss of legal customary rights with indigenous peoples, local communities and other stakeholders.	Complied

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6.4.2	A procedure for calculating and distributing fair compensation (monetary or otherwise) shall be established and implemented, monitored and evaluated in a participatory way, and corrective actions taken as a result of this evaluation. This procedure shall take into account: gender differences in the power to claim rights, ownership and access to land; differences of transmigrants and long-established communities; and differences in ethnic groups' proof of legal versus communal ownership of land. - Minor compliance -	SOP is as per in 6.3.2 above.	Complied
6.4.3	The process and outcome of any negotiated agreements and compensation claims shall be documented, with evidence of the participation of affected parties, and made publicly available. - Major compliance -	No issues related to loss of legal customary rights with indigenous peoples, local communities and other stakeholders to date.	Complied
Criterion 6.5: Pay and conditions for employees and for contract workers always meet at least legal or industry minimum standards and are sufficient to provide decent living wages.			
6.5.1	Documentation of pay and conditions shall be available. - Major compliance -	Documentation of pay and conditions such as pay slips showed gross pay, net pay, leave, medical leave pay etc. are maintained by the company. Minimum wage is paid to workers and no complaint was received during interview with workers.	Complied
6.5.2	Labour laws, union agreements or direct contracts of employment detailing payments and conditions of employment (e.g. working hours, deductions, overtime, sickness, holiday entitlement, maternity leave, reasons for dismissal, period of notice, etc.) shall be available in the languages understood by the workers or explained carefully to them by a management official. - Major compliance -	Extended employment contract for foreign workers were not available for those extended their employment with the operating units. Extended employment contract for the following employees sighted available as following. Mill workers sample: <ul style="list-style-type: none"> • Workers ID: 615532 - Malaysian • Workers ID: 615516 – Indonesian • Workers ID: 615489 – Indonesian Kuala Kabong Estate workers sample: <ul style="list-style-type: none"> • Workers ID: 604636 - Malaysian • Workers ID: 604435 – Indonesian • Workers ID: 604444 – Indonesian • Workers ID: 604434 – Indonesian • Contractor Workers (FFB Transporter) Passport #: AS 052766 – Indonesian Basir Ismail Estate: <ul style="list-style-type: none"> • Workers ID: 602733 – Malaysian • Workers ID: 602744 – Indonesian • Workers ID: 602848 - Bangladeshi 	Complied

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6.5.3	Growers and millers shall provide adequate housing, water supplies, medical, educational and welfare amenities to national standards or above, where no such public facilities are available or accessible. - Minor compliance –	Palm Oil Mill and estates provide adequate housing, water supplies, medical, educational and welfare amenities in accordance with Workers’ Minimum Standard of Housing and Amenities Act 1990 (Act 446). The Mill has completed the new housing project for workers. Water is supplied to workers housing through piping. The water tanks are provided for storage purpose. Fortnightly inspection was done by HA on workers housing area as per record of inspection.	Complied
6.5.4	Growers and millers shall make demonstrable efforts to monitor and improve workers’ access to adequate, sufficient and affordable food. - Minor compliance –	Accesses to food for the workers are considered adequately and sufficiently.	Complied
Criterion 6.6: The employer respects the rights of all personnel to form and join trade unions of their choice and to bargain collectively. Where the right to freedom of association and collective bargaining are restricted under law, the employer facilitates parallel means of independent and free association and bargaining for all such personnel.			
6.6.1	A published statement in local languages recognising freedom of association shall be available. - Major compliance -	Notis pemberitahuan by Kuala Kabong Estate Manager “Tiada Larangan Untuk Menyertai Union” dated 21/4/2016	Complied
6.6.2	Minutes of meetings with main trade unions or workers representatives shall be documented. - Minor compliance -	Mill union meeting latest 26/9/2016. Kuala Kabong Union meeting latest 4/11/2016. Basir Ismail Union meeting done on 15/11/2016	Complied
Criterion 6.7: Children are not employed or exploited.			
6.7.1	There shall be documentary evidence that minimum age requirements are met. - Major compliance -	Based on records of employee lists, operating units are complied with the minimum age requirement. No employees below the age of 18.	Complied
Criterion 6.8: Any form of discrimination based on race, caste, national origin, religion, disability, gender, sexual orientation, union membership, political affiliation, or age, is prohibited.			
6.8.1	A publicly available equal opportunities policy including identification of relevant/affected groups in the local environment shall be documented. - Major compliance -	A human policy in combination of on equal opportunity available and displayed at the offices along with the other policies.	Complied
6.8.2	Evidence shall be provided that employees and groups including local communities, women, and migrant workers have not been discriminated against. - Major compliance -	Migrant workers are recruited with 2 years contract. Local workers are on a long term employment. No any kind of discrimination was noted. Job opportunities and amenities such as free housing, water and electricity supplies, medical care are given to all employees without discrimination. All employees are aware of the grievance procedures through the various Committees such as Gender Committee for women, Foreign Workers Representation and Union Committee to highlight their concerns and grievances if any. No grievances were highlighted to the audit team by internal and external stakeholders.	Complied
6.8.3	It shall be demonstrated that recruitment selection, hiring and promotion are based on skills,	Recruitment selection, hiring and promotion are based on skills, capabilities, qualities, and medical fitness necessary for the jobs available. It was noted during the audit that	Complied

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	capabilities, qualities, and medical fitness necessary for the jobs available. - Minor compliance -	there is no discrimination based on nationality, race, gender, age, etc.	
Criterion 6.9: There is no harassment or abuse in the work place, and reproductive rights are protected.			
6.9.1	Policy to prevent sexual and all other forms of harassment and violence shall be implemented and communicated to all levels of the workforce. - Major compliance -	Policy on protection against Sexual Harassment and other forms of harassment available and implemented. There is no any reported case of harassment in the operating units. Gender committee namely "WOW" (Women Onwards) has been established in all operating units and guided by quality department from HQ. Latest meeting for WOW on Sedenak complex level that involved all operating unit was conducted on 26/10/2016. For Mill WOW meeting 24/8/2016, while Basir Ismail WOW meeting done on 19/10/2016.	Complied
6.9.2	A policy to protect the reproductive rights of all, especially of women, shall be implemented and communicated to all levels of the workforce. - Major compliance -	Reproductive rights of the female workers are protected. Female employees are aware that they are entitled for two months paid maternity leave. Based on the interview and records evidence, the policy to protect the reproductive rights of all, especially of women, was not implemented and communicated to all levels of the workforce. No evidence of implementation and communication of policy to protect the reproductive rights of all, especially of women, to all levels of the workforce. Hence, a major noncompliance has been raised.	Major nonconformance
6.9.3	A specific grievance mechanism which respects anonymity and protects complainants where requested shall be established, implemented, and communicated to all levels of the workforce. - Minor compliance -	Existing grievance procedure to handle grievances from internal and external stakeholders contains flow chart and available in the local language. Grievances and complaints are treated as confidential and not discussed in public.	Complied
Criterion 6.10: Growers and mills deal fairly and transparently with smallholders and other local businesses.			
6.10.1	Current and past prices paid for Fresh Fruit Bunches (FFB) shall be publicly available. - Minor compliance -	Current and past prices paid for FFB was sighted publicly available at the mill. It was noted that Pricing mechanism for FFB is based on Malaysian Palm Oil Board pricing published in the MPOB website.	Complied
6.10.2	Evidence shall be available that growers/millers have explained FFB pricing, and pricing mechanisms for FFB and inputs/services shall be documented (where these are under the control of the mill or plantation). - Major compliance -	The palm oil mill management have explained FFB pricing, and pricing mechanisms for FFB and inputs/services and documented. The FFB suppliers interviewed understand the pricing calculation methods. Details were documented in the "Purchase of FFB" agreement between the mill and FFB supplier. As per sample purchase agreement as following: Date: 30/11/2015 valid until 31/12/2016 with Ree Fong Agriculture Sdn Bhd	Complied
6.10.3	Evidence shall be available that all parties understand the contractual agreements they enter into, and that contracts are fair, legal and transparent. - Minor compliance -	Evidence available through the sampled agreement which has been signed appropriately between the mill and FFB supplier.	Complied

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6.10.4	Agreed payments shall be made in a timely manner. - Minor compliance -	Review on payment records found all payment was made in timely manner for all FFB suppliers as well as other vendors. This was further verified during interviews with the respective stakeholders that were contractors, re-planters, transportations, spare-parts, hardware.	Complied
Criterion 6.11: Growers and millers contribute to local sustainable development where appropriate.			
6.11.1	Contributions to local development that are based on the results of consultation with local communities shall be demonstrated. - Minor compliance –	Contributions are regularly made to school activities and community activities. This was confirmed by school teachers and local community during interview. Company also allow access to local community to access through the estate roads. Consultations with the local communities are held to encourage them to highlight and suggest any activities for local community development. Among evidence of contributions sighted were including, school sports day contributions, villagers community programs contributions and etc.	Complied
6.11.2	Where there are scheme smallholders, there shall be evidence that efforts and/or resources have been allocated to improve smallholder productivity. - Minor compliance –	No scheme smallholders involved within Sedenak certification unit.	Not applicable
Criterion 6.12: No forms of forced or trafficked labour are used.			
6.12.1	There shall be evidence that no forms of forced or trafficked labour are used. - Major compliance -	Workers, staff and stakeholder interview confirm that there is no any form of forced labour or trafficked labour in the operating units. All employees have employment contract and paid the agreed national minimum wages.	Complied
6.12.2	Where applicable, it shall be demonstrated that no contract substitution has occurred. - Minor compliance –	No contract substitution was noted.	Complied
6.12.3	Where temporary or migrant workers are employed, a special labour policy and procedures shall be established and implemented. - Major compliance -	Equal opportunity and non-discriminatory policy is implemented. No temporary workers. Migrant workers are treated equally as per the locals.	Complied
Criterion 6.13: Growers and millers respect human rights.			
6.13.1	A policy to respect human rights shall be documented and communicated to all levels of the workforce and operations (see Criteria 1.2 and 2.1). - Major compliance -	The existing policy covers the necessary aspects of human rights. Employees are aware of their rights and workers and staff union monitor to ensure no violations.	Complied
6.13.2	As long as children of foreign workers in Sabah and Sarawak are ineligible to attend government school, the plantation companies should engage in a process to secure these children access to education as a moral obligation.	Indicator relevant to Sabah and Sarawak. Not applicable for Peninsular Malaysia.	Not applicable
Principle 7: Responsible development of new plantings Sedenak Palm Oil Mill Certification Unit and supply base did not carry out any new plantings after November 2005. Therefore, the requirement of Principle 7 is not applicable during this surveillance assessment.			

Principle 8: Commitment to continual improvement in key areas of activity			
Criterion 8.1:			
Growers and millers regularly monitor and review their activities, and develop and implement action plans that allow demonstrable continual improvement in key operations.			
8.1.1	<p>The action plan for continual improvement shall be implemented, based on a consideration of the main social and environmental impacts and opportunities of the grower/mill, and shall include a range of Indicators covered by these Principles and Criteria.</p> <p>As a minimum, these shall include, but are not necessarily be limited to:</p> <ul style="list-style-type: none"> • Reduction in use of pesticides(Criterion 4.6); • Environmental impacts (Criteria 4.3, 5.1 and 5.2); • Waste reduction (Criterion 5.3); • Pollution and greenhouse gas (GHG) emissions (Criteria 5.6 and 7.8); • Social impacts (Criterion 6.1); <ul style="list-style-type: none"> • Optimising the yield of the supply base. <p>- Major compliance -</p>	<p>New capital investment budget:</p> <ul style="list-style-type: none"> i) New boiler ash storage unit and 100mt shell bunker ii) Biogas plant optimization– reduction of pome in cooling pond from 55°C to 35°C 	Complied

Appendix B: Approved Time Bound Plan

Project	Estate	Plan
Indonesia: PT Wisea Inspirasi Nusantara (PT WIN)	PT Harapan Barito Sejahtera (PT HBS)	2019
	PT Sawit Sumber Rejo (PT SSR)	
	PT Wahana Semesta Karisma (PT WSK)	
Indonesia: PT Agro Maju Raya (PT AMARA)	PT Nusa Persada Indonesia (PT NPI)	To be included in TBP upon completion of acquisition (expected completion in 2017)
	PT Surya Panen Subur (PT SPS)	
	PT Tempirai Palm Resources (PT TPR)	
	PT Rambang Agro Jaya (PT RAJ)	
Malaysia Trader	Eng Lee Heng	2018

List of Estate Manage by Kulim (Malaysia) Berhad

Mill Base	Kulim / Jcorp Estate	Estate	Status
Tereh Mill	Kulim Estate	Tereh Utara	Certified RSPO
		Tereh Selatan	
		Selai	
		Enggang	
		Mutiara	
		Sg Sembrong	
		Sg Tawing	
Sedenak Mill		Sedenak	
		Rengam	
		Basir Ismail	
		Ulu Tiram	
Sindora Mill		Kuala Kabong	
		REM/Pasak	
		Sindora	
Palong Mill		Sungai Papan	
	Sepang Loi		
	UMAC		

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		Labis Bahru	
		Mungka	
		Kemedak	
		Palong	
Pasir Panjang Mill	Kulim Estate	Pasir Panjang	In progress
		Siang	
	Jcorp Estate	Bukit Kelompok	
		Tunjuk Laut	
		Pasir Logok	
		Bukit Payung	

Appendix C: Certification Unit RSPO Certificate Details

Kulim (Malaysia) Berhad
Sedenak Palm Oil Mill
KB. 721 80990 Kulai
Johor Bahru, Johor, Malaysia

RSPO membership number: 1-0006-04-000-00

BSI RSPO Certificate No. : RSPO 537873

Date of Initial Certificate Issued: 23/01/2009

Date of Expiry: 22/01/2019

Applicable Standards: RSPO P&C MYNI 2014; RSPO Certification System June 2007 (revised March 2011); RSPO P&C MY-NIWG 2010; RSPO Supply Chain Certification Standard 21 November 2014 Module E - CPO Mills: Mass Balance)

Sedenak Palm Oil Mill and supply base						
Location Address	Sedenak Palm Oil Mill, K.B 721 80990 Kulai, Johor Bahru, Johor, Malaysia					
GPS Location	103° 32' 21.971" E; 1° 43' 47.414" N					
CPO Tonnage Total	97,620.47 mt					
PK Tonnage Total	25,726.53 mt					
CPO Claimed for Certification*	42,418.07 mt					
PK Claimed for Certification *	11,178.69 mt					
Own estates FFB Tonnage	203,249.00 mt					
Scheme Smallholder FFB Tonnage	- mt					
Independent Smallholder/FFB Trader	264,506.00 mt					
Estates	Production Area		Other use (ha)	HCV (ha)	Certified Area / Total land lease (ha)	Annual FFB Production (mt)
	Mature (ha)	Immature (ha)				
Sedenak Estate	2,607.67	0	264.86	3.25	2875.78	59,802.00
Ulu Tiram Estate	392.23	118.01	2.24	24.81	537.29	8,845.00
Kuala Kabong Estate	1,622.70	0	111.21	2.19	1,736.10	32,861.00
Basir Ismail Estate	2,418.51	488.26	247.07	40.08	3,193.92	54,617.00
Rengam Estate	1,909.77	431.92	139.23	0	2,480.92	47,124.00
Total	8,950.88	1,038.19	764.61	70.33	10,824.01	203,249.00

Appendix D: Assessment Plan

Date	Time	Subjects	Hafri	Hidhir	Daniel
Monday 28/11/2016	PM	Audit Team travelling to site	✓	✓	✓
Tuesday 29/11/2016 Sedenak Palm Oil Mill	0830 - 0900	Opening meeting: <ul style="list-style-type: none"> • Presentation by Audit team leder • Confirmation of assessment scope and finalize audit plan (including stakeholder's consultation) 	✓	✓	✓
	0900 - 1200	Sedenak Palm Oil Mill Inspection: FFB receiving, warehouse, workshop, wastes management & Landfill, Effluent Ponds, OSH & ERP, Environment issues, POME application, water treatment, staff, workers and contractor interview, housing and facility inspection, clinic, etc.	✓	✓	✓
	1200 -1300	Lunch	✓	✓	✓
	1300 - 1630	Sedenak Palm Oil Mill Visit to laboratory, weighbridge and palm product storage area. Document Review P1 – P8: SOPs, Supply chain for CPO mill, SCCS, Review on SEIA documents and records, wage records, employee data, training records, legal permits, mill inspection and internal monitoring records, CIP & implementation etc. Verify previous nonconformities.	✓	✓	✓
	1630 - 1700	Interim Closing Briefing	✓	✓	✓
Wednesday 30/11/2016 Kuala Kabong Estate	0830 - 1200	Kuala Kabong 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.	✓	✓	✓
	0900 - 1200	Meeting with Stakeholders (village rep, workers leader, contractor etc)	-	-	✓
	1200 - 1300	Lunch	✓	✓	✓
	1300 - 1630	Kuala Kabong Estate Document review P1 – P8: (General Documentation e.g. Legal, Manual and Procedure, production & monitoring records, IPM & HCV records, SEIA documents & records, OSH records, review pay documents, records of communication with stakeholder/workers representatives, new planting, CIP and implementation etc).	✓	✓	✓
	1630 - 1700	Interim closing briefing	✓	✓	✓

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Date	Time	Subjects	Hafri	Hidhir	Daniel
Thursday 01/12/2016 Basir Ismail Estate	0830 - 1200	Basir Ismail 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.	✓	✓	✓
	1200 -1300	Lunch	✓	✓	✓
	1300 - 1600	Basir Ismail Estate Document review P1 – P8: (General Documentation e.g. Legal, Manual and Procedure, production & monitoring records, IPM & HCV records, SEIA documents & records, OSH records, review pay documents, records of communication with stakeholder/workers representatives, new planting, CIP and implementation etc).	✓	✓	✓
	1600 - 1630	Verify any outstanding issues & Preparation for closing Meeting	✓	✓	✓
	1630 - 1730	Closing Meeting	✓	✓	✓
Friday 02/12/2016	AM	Audit team traveling back to KL	✓	✓	✓

Appendix E: Stakeholders Contacted

INTERNAL STAKEHOLDERS

Managers and Assistants Male Mill Staff/Workers Female Mill Staff/Workers Foreign Worker Field workers Nursery workers	Male and Female Estate workers Hospital Assistant Union Representatives Gender Committee Secretary Boiler operators	Engine room operators Store clerk Staff and Welder at workshop Press station worker Weighbridge Staff
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EXTERNAL STAKEHOLDERS

Government Departments Labour Department	NGOs and others National Union of Plantation Workers All Malaysia Estate Staff Union Malayan Agricultural Producers Association Contractors & Consultants Mechanical Contractor Electrical Contractor Mechanical Parts Supplier General Supplier	Local Communities Head of the Village Neighboring Estate Mosque Committee
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Appendix F: Sedenak Palm Oil Mill Supply Chain Assessment Report (Module E – CPO Mills – Mass Balance)

Requirements	Compliance
E.1 Definition	
<p>E.1.1 Certification for CPO mills is necessary to verify the volumes of certified and uncertified FFB entering the mill and volume sales of RSPO certified producers. A mill may be taking delivery of FFB from uncertified growers, in addition to those from its own certified land base. In that scenario, the mill can claim only the volume of oil palm products produced from processing of the certified FFB as MB.</p>	<p>The Palm Oil Mill receives and process both certified and non-certified FFB. Therefore, it uses the Mass Balance supply chain system and module. During the P&C assessment, the audit team verified the volumes and sources of certified and non-certified FFB entering the mill, the implementation of processing controls and volume sales of RSPO certified Products.</p>
E.2 Explanation	
<p>E.2.1 The estimated tonnage of CPO and PK products that could potentially be produced by the certified mill must be recorded by the CB in the public summary of the P&C certification report. This figure represents the total volume of certified palm oil product (CPO and PK) that the certified mill is allowed to deliver in a year. The actual tonnage produced should then be recorded in each subsequent annual surveillance report.</p>	<p>The estimated tonnage of CPO and PK products that could potentially be produced by the certified mill is recorded in this public summary report.</p>
<p>E.2.2 The mill must also meet all registration and reporting requirements for the appropriate supply chain through the RSPO supply chain managing organization (RSPO IT platform or book and claim).</p>	<p>The mill has met all registration and reporting requirements for the appropriate supply chain through the RSPO supply chain managing organization (RSPO IT platform or book and claim).</p>
E.3 Documented procedures	
<p>E.3.1 The site shall have written procedures and/or work instructions to ensure the implementation of all the elements specified in these requirements. This shall include at minimum the following:</p> <ul style="list-style-type: none"> a) Complete and up to date procedures covering the implementation of all the elements in these requirements; b) The name 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 site procedures for the implementation of this standard. 	<p>The Palm Oil Mill has procedures for the incoming FFB, processing and outgoing Crude Palm Oil and Palm Kernel for the traceability with Mass Balance model covering certified and non-certified FFB received.</p> <p>The mill manager and assistant manager have awareness of the supply chain system. The manager has overall responsibility for and authority over the implementation of these requirements and compliance with all applicable requirements.</p>
<p>E.3.2 The site shall have documented procedures for receiving and processing certified and non-certified FFBs.</p>	<p>The Palm Oil Mill has documented procedures for the incoming FFB, processing and outgoing palm products (CPO and PK). System available to make marking on the receiving documents to differentiate the certified and non-certified FFB received.</p>
E.4 Purchasing and goods in	
<p>E.4.1 The site shall verify and document the volumes of certified and non-certified FFBs received.</p>	<p>Daily records are prepared at the entry point at the weighbridge. Daily summary and monthly summary documented for all the certified and non-certified FFB. Records verified by internal and external audit.</p>
<p>E.4.2 The site shall inform the CB immediately if there is a projected overproduction.</p>	<p>The facilities aware of this procedure.</p>

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E.5 Record keeping	
<p>E.5.1 a) The site shall record and balance all receipts of RSPO certified FFB and deliveries of RSPO certified CPO and PK on a three-monthly basis.</p> <p>(b) All volumes of palm oil and palm kernel oil that are delivered are deducted from the material accounting system according to conversion ratios stated by RSPO.</p> <p>c) The site can only deliver Mass Balance sales from a positive stock. Positive stock can include product ordered for delivery within three months. However, a site is allowed to sell short.(ie product can be sold before it is in stock.)</p>	<p>Daily records are prepared at the entry point at the weighbridge. Daily summary and monthly summary documented for all the certified and non-certified FFB. Computerized system in place. Records verified by internal and external audit.</p> <p>Computerized system in place with the delivery deducted accordingly.</p> <p>The Mill aware that only positive stock can be delivered. No short selling.</p>
<p>E.5.2 In cases where a mill outsources activities to an independent palm kernel crush, the crush still falls under the responsibility of the mill and does not need to be separately certified. The mill has to ensure that the crush is covered through a signed and enforceable agreement</p>	<p>No outsourcing activities.</p>

Actual Tonnage Certified Palm Production- 01 Nov 2015 – 31 Oct 2016 (ASA3 1)

MILL	CAPACITY	CPO	PK
Sedenak Palm Oil Mill	90 mt/hr	36,905.74	9,660.74

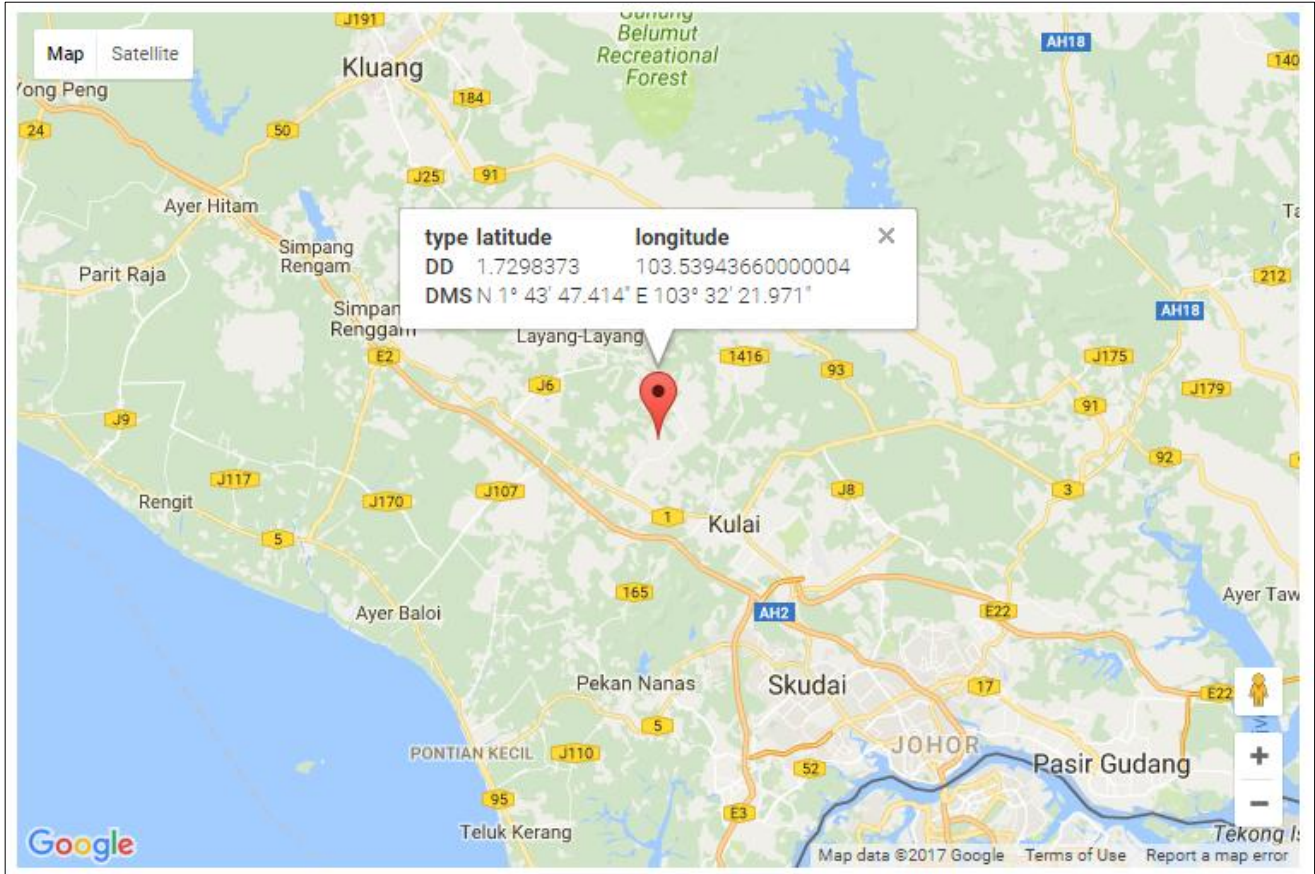
Actual Sales of Certified Palm Products - 01 Nov 2015 – 31 Oct 2016 (ASA3 1)

	CPO (Certified)	PK (Certified)	Remarks
TOTAL	17,644	9,686	Verified from mill records and eTrace online transaction reports

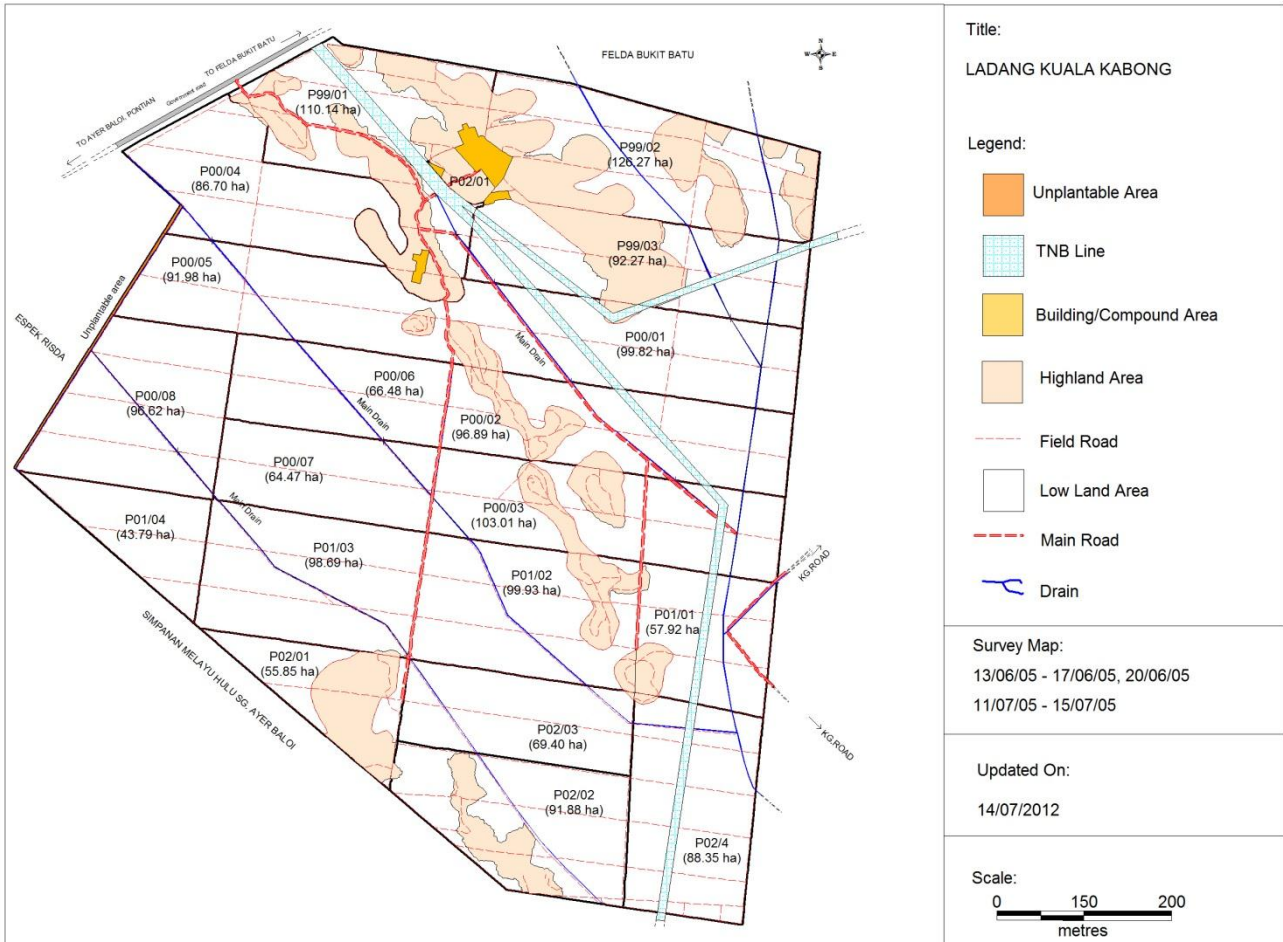
Actual Tonnage Certified FFB Received Monthly by the mill - - 01 Nov 2015 – 31 Oct 2016 (ASA3)

Month	Certified Supply Base (from own & group certificate scope) (mt)												Total FFB/Month (mt)
	Sedenak Estate	Ulu Tiram Estate	Kuala Kabong Estate	Basir Ismail Estate	Renggam Estate	Pasir Panjang Estate ***	Siang Estate	Sungai Papan Estate*	Tunjuk Laut Estate	Pasir Logok Estate	Bukit Kelompok Estate	Bukit Payung Estate	
Nov 2015	4,838.44	752.02	3,025.94	3,654.38	4,161.48	-	-	-	-	-	-	-	16,432.26
Dec 2015	4,264.41	645.97	2,675.81	3,040.37	3,993.26	-	-	-	-	-	-	-	14,619.82
Jan 2016	3,043.88	535.16	1,708.00	2,502.34	2,988.19	-	-	-	-	-	-	-	10,777.57
Feb 2016	3,069.75	710.57	2,042.19	2,639.06	2,663.17	-	-	-	-	-	-	-	11,124.74
Mar 2016	2,979.60	743.31	2,064.74	2,835.73	2,765.45	-	-	-	-	-	-	-	11,388.83
Apr 2016	3,121.57	795.96	1,958.29	3,778.77	2,832.50	-	-	-	-	-	-	-	12,487.09
May 2016	3,993.80	816.31	1,735.39	4,804.77	3,055.68	-	-	-	-	-	-	-	14,405.95
Jun 2016	4,750.41	708.33	1,460.96	4,098.00	2,802.69	-	-	-	-	-	-	-	13,820.39
Jul 2016	5,199.50	617.92	2,346.90	5,219.80	3,731.68	-	-	-	-	-	-	-	17,115.80
Aug 2016	5,711.84	587.05	2,827.08	5,739.98	4,083.01	-	-	-	-	-	-	-	18,948.96
Sep 2016	5,945.99	676.18	3,405.43	5,983.37	4,627.31	-	-	-	-	-	-	-	20,638.28
Oct 2016	5,896.31	664.18	3,251.79	5,380.69	4,655.58	-	-	-	-	-	-	-	19,848.55
Total	52,815.80	8,252.96	28,502.52	49,677.26	42,360.00	14,590.74	42,650.44	-	28,322.10	42,362.44	35,027.00	17,354.57	181,608.24

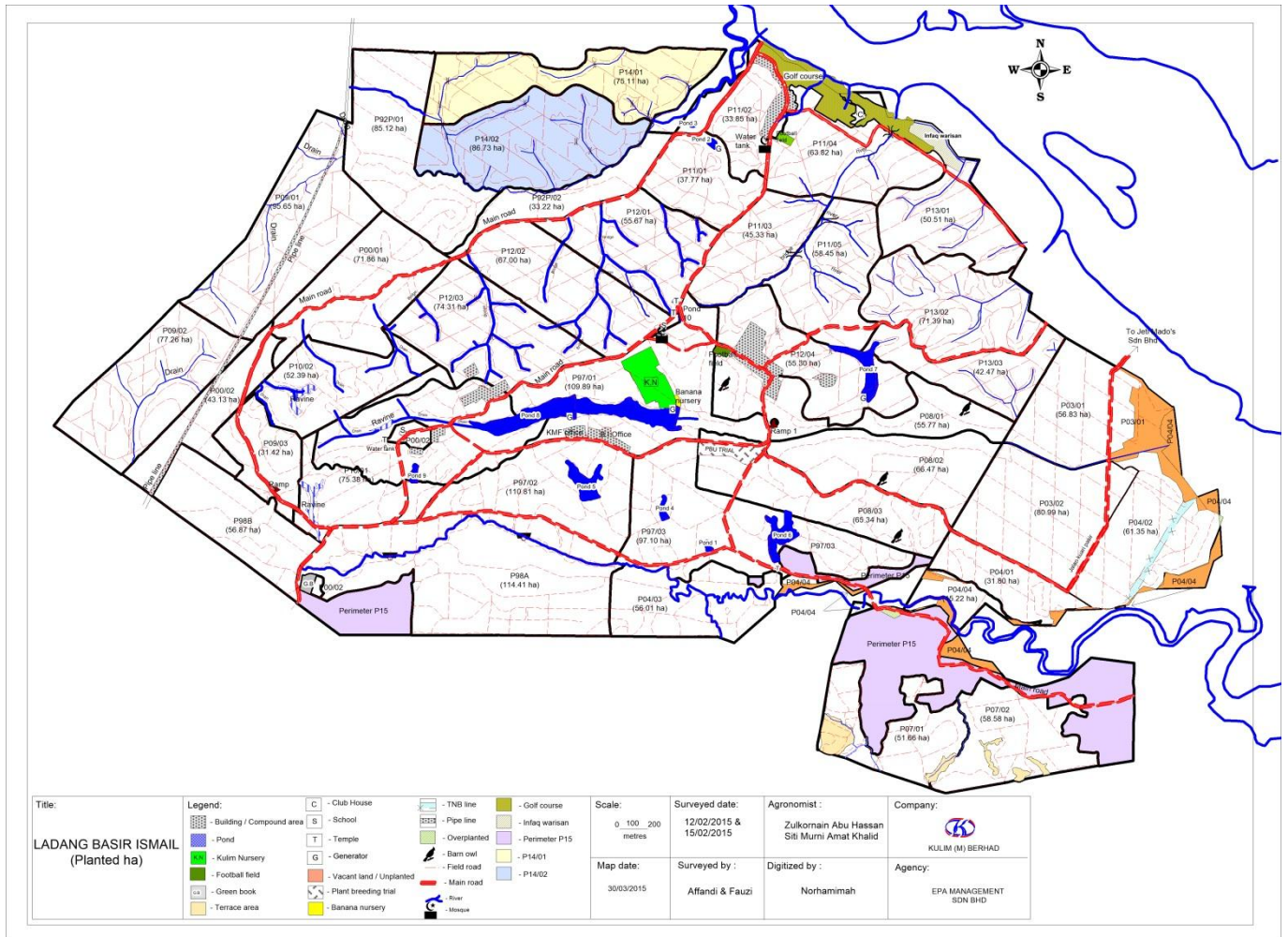
Appendix G: Map of Sedenak Palm Oil Mill Certification Unit and Supply bases



Appendix H: Kuala Kabong Estate Field Map



Appendix I: Basir Ismail Estate Field Map



Appendix J: List of Smallholder Sampled

Not applicable

Appendix K: List of Abbreviations Used

AN	Ammoniacal Nitrogen
ANPN	National Park Agency Gabon
BOD	Biological Oxygen Demand
CHRA	Chemical Health Risk Assessment
CPO	Crude Palm Oil
DGEPN	Environmental Protection Agency Gabon
DOSH	Department of Occupational Safety & Health
EFB	Empty Fruit Bunch
EMS	Environmental Management System
FFB	Fresh Fruit Bunch
FGV LP	Felda Ladang Paloh
GMP	Good Manufacturing Practice
HCV	High Conservation Value
IAV	Initial Assessment Visit
IPM	Integrated Pest Management
ISCC	International Sustainable Carbon Certification
MAPA	Malayan Agricultural Producers Association
MSDS	Material Safety Data Sheet
O&G	Oil and Grease
PK	Palm Kernel
PPE	Personal Protective Equipment
PSQM	Plantation Sustainability and Quality Management
PQR	Performance Quality Rating
RC	Re-Certification
RED	Renewable Energy Directive
RSPO P&C	Roundtable on Sustainable Palm Oil Principle & Criteria
SCCS	Supply Chain Certification Standard
SEIA	Social & Environmental Impact Assessment
SIA	Social Impact Assessment
SOP	Standard Operating Procedure
SPOM	Sedenak Palm Oil Mill
SS	Suspended Solids
TN	Total Nitrogen
TS	Total Solids
VFA	Volatile Fatty Acids