

**MALAYSIAN SUSTAINABLE PALM OIL
ANNUAL SURVEILLANCE ASSESSMENT 1
Public Summary Report**

Kulim (Malaysia) Berhad
Head Office: K.B. 705 Ulu Tiram, 81900 Johor Bahru, Johor, Malaysia
Certification Unit: Tereh Palm Oil Mill and Supply Base Location of Certification Unit: K.B. 538, 86009 Kluang Johor, Malaysia

Report prepared by:
Valence Shem (Lead Auditor)

Report Number: 9673735

Assessment Conducted by:
BSI Services Malaysia Sdn Bhd
Suite 29.01 Level 29
The Gardens North Tower
Mid Valley City
Lingkaran Syed Putra
59200 Kuala Lumpur
Tel: +603-9212 9638, Fax: +603-9212 9639
www.bsigroup.com

TABLE of CONTENTS	Page No
Section 1: Executive Summary	3
1.1 Organizational Information and Contact Person	3
1.2 Certification Information	3
1.3 Location of Certification Unit	4
1.4 Plantings & Cycle	4
1.5 FFB Production (Actual) and Projected (tonnage).....	5
1.6 Certified Tonnage	5
1.7 Description of Supply Base.....	5
1.8 Details of Certification Assessment Scope and Certification Recommendation:	6
Section 2: Assessment Process	7
1. Assessment Program	8
Section 3: Assessment Findings	10
3.1 Details of audit results	10
3.2 Details of Nonconformities and Opportunity for improvement.....	10
3.3 Status of Nonconformities Previously Identified and OFI	12
3.4 Issues Raised by Stakeholders	14
3.5 Summary of the Nonconformities and Status.....	15
3.6 Summary of the findings by Principles and Criteria	16
Section 4: Assessment Conclusion and Recommendation	130
Appendix A: Assessment Plan	131
Appendix B: List of Stakeholders Contacted	133
Appendix C: Smallholder Member Details.....	134
Appendix D : Location Map of Tereh Palm Oil Mill and Supply Base.....	135
Appendix E: List of Abbreviations Used.....	139

Section 1: Executive Summary

1.1 Organizational Information and Contact Person			
MPOB License	Tereh POM	: 500048604000	
	Tereh Utara Estate	: 501673102000	
	Tereh Selatan Estate	: 501674902000	
	Selai Estate	: 504229402000	
	Enggang Estate	: 504229402000	
	Mutiara Estate	: 502458002000	
	Sg. Sembrong Estate	: 502457102000	
	Sg. Tawing Estate	: 532878002000	
	Rengam Estate	: 501225502000	
Company Name	Kulim (Malaysia) Berhad		
Address	Head office: K.B. 705 Ulu Tiram, 81900 Johor Bahru, Johor, Malaysia Certification unit: K.B. 538, 86009 Kluang, Johor, Malaysia		
Group name if applicable:	NA		
Subsidiary of (if applicable)	NA		
Contact Person Name	Mdm. Salasah Elias		
Website	www.kulim.com.my	E-mail	salasah@kulim.com.my
Telephone	07-8611611	Facsimile	07-8631084

1.2 Certification Information			
Certificate Number	Mill	: MSPO 698004	
	Estates	: MSPO 698005	
Issue Date	02/04/2019	Expiry date	01/04/2024
Scope of Certification	Mill: Production of Sustainable Palm Oil and Palm Oil Products Estate: Production of Sustainable Oil Palm Fruits		
Stage 1 Date	N/A (RSPO certified)		
Stage 2 / Initial Assessment Visit Date (IAV)	24-27/09/2018		
Continuous Assessment Visit Date (CAV) 1	14-17/10/2019		
Continuous Assessment Visit Date (CAV) 2	N/A		
Continuous Assessment Visit Date (CAV) 3	N/A		
Continuous Assessment Visit Date (CAV) 4	N/A		
Other Certifications			
Certificate Number	Standard(s)	Certificate Issued by	Expiry Date
RSPO 613086	RSPO	BSI Services (M) Sdn Bhd	22.01.2024
EU-ISCC-Cert-DE119-60192023	ISCC	ASG	12.03.2020

MSPO Public Summary Report
Revision 0 (Aug 2017)

A116160	HALAL MS1500:2009	JAKIM	30.06.2021
QMS 00706	ISO 9001:2015	SIRIM QAS International Sdn Bhd	14.10.2020

1.3 Location of Certification Unit

Name of the Certification Unit	Site Address	GPS Reference of the site office	
		Latitude	Longitude
Tereh Palm Oil Mill	K.B. 538, 86009 Kluang, Johor, Malaysia	2° 13' 3.06" N	103° 21' 5.00" E
Tereh Utara Estate	K.B. 536, 86009 Kluang, Johor, Malaysia	2° 13' 3.06" N	103° 21' 5.00" E
Tereh Selatan Estate	K.B. 537, 86009 Kluang, Johor, Malaysia	2° 15' 5.21" N	103° 20' 36.05" E
Selai Estate	K.B. 529, 86009 Kluang, Johor, Malaysia	2° 6' 14.42" N	103° 23' 14.82" E
Enggang Estate	K.B. 503, 86009 Kluang, Johor, Malaysia	2° 16' 12.10" N	103° 25' 36.58" E
Mutiara Estate	P.O. Box 21, Kampung Baru Kahang, 86700 Kahang, Johor, Malaysia	2° 17' 16.62" N	103° 28' 52.13" E
Sg. Sembrong Estate	P.O. Box 21, Kampung Baru Kahang, 86700 Kahang, Johor, Malaysia	2° 18' 54.84" N	103° 27' 49.49" E
Sg. Tawing Estate	K.B. 531, 86009 Kluang, Johor, Malaysia	2° 17' 46.76" N	103° 21' 11.58" E
Rengam Estate	K.B. 104, 86300 Rengam, Johor, Malaysia	1° 53' 21.98" N	103° 24' 49.02" E

1.4 Plantings & Cycle

Estate	Age (Years) - ha					Total (ha)	
	0 - 3	4 - 10	11 - 20	21 - 25	26 - 30	Mature	Immature
Tereh Utara Estate	0	0	2086.70	771.86	0	2858.56	0
Tereh Selatan Estate	264.6	0	1960.85	304.33	0	2265.18	264.6
Selai Estate	0	1039.62	581.44	0	0	1621.06	0
Enggang Estate	0	1216.81	439	0	0	1655.81	0
Mutiara Estate	1049.43	393.37	570.1	49.72	249.3	1262.49	1049.43
Sg Sembrong Estate	0	0	586.72	595.26	0	1181.98	0
Sg Tawing Estate	0	625.09	1259.19	167.79	30.95	2083.02	0
Rengam Estate	672.04	504.47	992.09	0	173.09	1669.65	672.04
Total (ha)	1986.07	3779.36	8476.09	1888.96	453.34	14597.75	1986.07

1.5 FFB Production (Actual) and Projected (tonnage)			
Producer Group	Projected (Sep 18-Aug 19)	Actual production (Sep 18-Aug 19)	Projected production (Sep 19-Aug 20)
Tereh Utara Estate	91,677.30	71,500.18	73,303.00
Tereh Selatan Estate	75,439.00	60,006.06	58,086.00
Selai Estate	44,545.80	38,332.61	36,785.00
Enggang Estate	45,458.40	38,935.65	35,170.00
Mutiara Estate	39,209.30	37,531.15	32,809.00
Sg Sembrong Estate	38,236.90	28,186.23	30,984.00
Sg Tawing Estate	56,127.50	44,762.60	44,190.00
Rengam Estate	54,271.10	37,852.54	39,746.00
Total	444,965.30	357,107.02	351,073.00

1.6 Certified Tonnage			
Mill Capacity: 60 MT/hr	Estimated (Sep 18-Aug 19)	Actual (Sep 18-Aug 19)	Forecast (Sep 19-Aug 20)
	FFB	FFB	FFB
	444,965.30 mt	357,107.02 mt	351,073 mt
SCC Model: SG	CPO (OER: 21.04%)	CPO (OER: 23.29%)	CPO (OER: 22.07%)
	93,621.24	83,190.93 mt	77,474 mt
	PK (KER: 5.50%)	PK (KER: 5.82%)	PK (KER: 5.56%)
	24,480.68	20,819.27 mt	19,532 mt

1.7 Description of Supply Base					
Estate	Total Planted (Mature + Immature) (ha)	HCV (ha)	Infrastructure & Other (ha)	Total Area (ha)	% of Planted
Tereh Utara Estate	2,858.56	73.42	155.39	¹ 3,087.37	92.59
Tereh Selatan Estate	2,529.78	7.36	170.08	¹ 2,707.22	93.45
Selai Estate	1,621.06	32.94	146.17	1,800.17	90.05
Enggang Estate	1,655.81	15.35	63.74	¹ 1,734.90	95.44
Mutiara Estate	2,311.92	24.85	115.53	2,452.30	94.28
Sg Sembrong Estate	1,181.98	7.89	52.89	¹ 1,242.76	95.11
Sg Tawing Estate	2,083.02	28.38	114.37	¹ 2,225.77	93.59
Rengam Estate	2,341.69	14.11	62.44	¹ 2,418.24	96.83
Total	16,583.82	204.30	880.61	17,668.73	93.86

Note: ¹Most of the area statements are different from previous report due to a resurvey was done by the company.

1.8 Details of Certification Assessment Scope and Certification Recommendation:

BSI Services Malaysia Sdn Bhd has conducted the Annual Surveillance 1 Assessment of Kulim (M) Bhd's Tereh Palm Oil Mill and Supply Base which is located in Segamat, Johor comprising Tereh Palm Oil Mill, Tereh Utara Estate, Tereh Selatan Estate, Selai Estate, Enggang Estate, Mutiara Estate, Sg Sembrong Estate, Sg Tawing Estate, Rengam Estate and infrastructure.

The assessment was conducted onsite to assess the compliance of the certification unit against the MS 2530-3:2013 Part 3: General principles for oil palm plantations and organized smallholder, MS 2530-4:2013 Part 4: General principles for palm oil mills and MSPO Guidance. The onsite assessment was conducted on 14-17/10/2019.

Based on the assessment result, Kulim (M) Bhd's Tereh Palm Oil Mill and Supply Base complies with the MS 2530-3:2013 Part 3: General principles for oil palm plantations and organized smallholder, MS 2530-4:2013 Part 4: General principles for palm oil mills and recommended for the certification to be continued.

Section 2: Assessment Process

Certification Body:

BSI Services Malaysia Sdn Bhd
Suite 29.01 Level 29
The Gardens North Tower
Mid Valley City
Lingkaran Syed Putra
59200 Kuala Lumpur
Tel: +603-9212 9638, Fax: +603-9212 9639
Nicholas Cheong: Nicholas.Cheong@bsigroup.com
www.bsigroup.com

BSI is a leading global provider of management systems assessment and certification, with more than 80,000 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.

Assessment Methodology, Programme, Site Visits

This on-site assessment was conducted from 14-17/10/2019. The audit programme is included as Appendix A. The approach to the audit was to treat the Tereh Palm Oil Mill and Supply Base as a MSPO Certification Unit. 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. MS 2530-3:2013 and MS 2530-4:2013 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 estates or smallholders sample were determined based on formula $N = 1.0\sqrt{y}$ where y is the number of estates while when applicable, the smallholders sample were determined following the MSPO Certification Requirement. The sampling of smallholders were based on the formula $(\sqrt{y}) \times (z)$; where z is the risk factor (may defers from 1.0, 1.5 or 2.0 depending on risk), y is total number of group members and where z is the multiplier defined by the risk assessment. The sampled smallholder listed in Appendix C.

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

Structured worker interviews with male and female workers and staff were held in private at the workplace in the mill and the estates. Fieldworkers were interviewed informally in small groups in the field. In addition, the spouses 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 B.

The assessment findings for the assessment are detailed in Section 4.2.

MSP0 Public Summary Report
Revision 0 (Aug 2017)

This report is structured to provide a summary of assessment finding as attached in the Section 3. The assessment was based on random samples and therefore nonconformities may exist that have not been identified.

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 / Plantation / Group smallholders)	Year 1 (Certification)	Year 2 (ASA 1)	Year 3 (ASA 2)	Year 4 (ASA 3)	Year 5 (ASA 3)
Palong Cocoa POM	✓	✓	✓	✓	✓
Tereh Utara Estate			✓		
Tereh Selatan Estate			✓		
Enggang Estate	✓			✓	
Selai Estate	✓		✓		✓
Sg Tawing Estate	✓			✓	
Sg Sembrong Estate		✓		✓	
Rengam Estate		✓			✓
Mutiara Estate		✓			✓

Tentative Date of Next Visit: September 21, 2020 – October 24, 2019

Total No. of Mandays: 8.0

BSI Assessment Team:**Valence Shem – Lead Auditor**

He holds Bachelor Degree in Industrial Technology, graduated from University of Science Malaysia in 1998 and has 9 years working experience in oil palm plantation industry. He has been in the management system auditing line since 2009 for various standards such as ISO 140001, RSPO P&C, RSPO SCCS and SMETA. He completed the ISO 14001 Lead Auditor Course in 2008, ISO 9001 Lead Auditor Course in 2013, Endorsed RSPO P&C Lead Auditor Course in 2011, Endorsed RSPO SCCS Lead Assessor Course in 2012 and MSPO Awareness Training in 2014. He had been involved in RSPO auditing since 2009 in various companies in Malaysia. During this assessment, he assessed on the aspects of workers social and welfare, concerns of interested parties, legal requirements on employees' incomes and transparency. He is able to communicate in Bahasa Malaysia and English.

Amir Bahari - Team Member

He obtained qualification in B.Sc. (Hons) Chemistry USM 1985 & Diploma in Palm Oil Milling Tech/Management MPOB 1996. He has been in the plantations industry for 30 years, among others managing rubber factories, palm oil mills and estates. During the tenure of employment he has been trained as an auditor in ISO 9001, ISO 14001, OHSAS 18001 & also RSPO. He has accumulated 220 man-days in the auditing profession after ending career in the plantation industry. During the assessment he covered mills and estates best practices, workers consultation and occupational safety & health. During this assessment, he assessed on the aspects of legal, environmental & biodiversity, agriculture best practices and the supply chain element. He is fluent in both verbal and writing in Bahasa Malaysia and English.

Section 3: Assessment Findings

3.1 Details of audit results

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

- MSPO MS 2530-2:2013 – General Principles for Independent Smallholders
- MSPO MS 2530-3:2013 – General Principles for Oil Palm Plantations and Organized Smallholders
- MSPO MS 2530-4:2013 – General Principles for Palm Oil Mills

3.2 Details of Nonconformities and Opportunity for improvement

The nonconformity is listed below.

During the Annual Surveillance Assessment 1 (ASA 1) there was only one (1) Major nonconformity raised. The Tereh Cocoa Palm Oil Mill and Supply Base submitted their Corrective Action Plans for the nonconformity. Corrective action plans with respect to the nonconformity were reviewed by the BSI audit team and accepted.

If applicable, 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 its effectiveness and closed accordingly.

Finding Reference	1831668-201906-M1	Certificate Reference	MSPO 698004
Certificate Standard	MS 2530: Part 3	Clause	4.5.5.1
Category	Major		
Area/Process:	Sungai Sembrong Estate		
Statement of non conformance:	The maintenance of buffer zone was not satisfactorily demonstrated.		
Clause requirements	<p>The management shall establish a water management plan to maintain the quality and availability of natural water resources (surface and ground water). The water management plan may include:</p> <p>d) Protection of water courses and wetlands, including maintaining and restoring appropriate riparian buffer zones at or before planting or replanting, along all natural waterways within the estate.</p>		
Objective evidence	During the site visit at Sungai Sembrong Estate’s raw water pond, which is to be treated for potable water, it was observed that there were traces of herbicides spraying within the demarcated buffer zone of the pond.		
Cause	Estate want to retain only grasses in Buffer Zone areas instead of noxious weeds i.e clidemia, melastoma and jungle cripers. Workers were not adequately brief by estate management on buffer zone maintenance. Eradication noxious weed i.e Clidemia and Melastome was done by selective spraying using Class 4 chemical		

(Ally) instead of manual weeding.
Correction / containment
Estate had immediately conducted a re-training during muster briefing for all workers with regards to working (spraying & manuring) at Buffer Zone and water catchment management guides.
Corrective action
Estate will established SOP on buffer zone management. Training will be conducted on Buffer Zone management to mandore and staff. Mandore will be available at all time during spraying work near to buffer zone area.
Assessment conclusion
<p>Evidence submitted:</p> <ul style="list-style-type: none"> • Training records dated 20/10/2019 that shows the workers have been immediately retrained including the content of training and a copy of the "SOP on buffer zone management" as training material. The training material contains the restriction of herbicide and fertiliser application • Pictorial report to show that the perimeter wire mesh fencing has been built to restrict unintentional herbicides spraying. <p>The corrective action and evidence are found to be adequate to close the NCR. The NCR is closed on 16/1/2020. Nonetheless, the continuous effective implementation of the corrective action shall be verified in the next assessment visit.</p>

Noteworthy Positive Comments	
1.	Positive comments from all stakeholders interviewed
2.	All personnel were cooperative during the assessment process

3.3 Status of Nonconformities Previously Identified and OFI

Finding Reference	1689024-201806-M1	Certificate Reference	MSPO 698004
Certificate Standard	MS 2530:2013 Part-3	Clause	4.5.3.2
Category	Major		
Area/Process:	Tereh POM and supply base		
Details:	Waste management plan was not effectively implemented		
Objective evidence:	<p>Observed at Composting workshop;</p> <p>i) Traces of contaminated soil sighted on the floor at GTNSB workshop.</p> <p>ii) Lorry is under repair and parked in front of the workshop. Noted the hydraulic system/hose was leaked and has contaminated soil and soft grasses. Dripping trap is provided however it was not served the purpose.</p> <p>iii) No identification of waste source from contaminated soil.</p>		
Cause			
<p>i) The soil was contaminated by the mineral oil that leaked during the maintenance activities from GTNSB vehicle.</p> <p>ii) The mineral oil leaked and dripped from hose of the breakdown lorry and the dripping tray cannot contain the mineral oil and caused the contamination of soil and grass.</p> <p>iii) Operator and workshop personnel are not adequately trained on scheduled waste management and awareness.</p>			
Correction / containment			
<p>i) Contaminated soil was removed and treated as scheduled waste under code SW408</p> <p>ii) All the contaminated soil was removed and treated as scheduled waste under code SW408.</p> <p>iii) GTNSB has identified contaminated soil as source for scheduled waste under code SW408. GTNSB already registered SW408 with DOE Cawangan Kluang on 8 August 2018 and already update the eswis.</p>			
Corrective action			
<p>i) A designated concreted area has been constructed on site with preventive containment for potential leakages. All repairing and maintenance of vehicle will be done at this designated on concrete area to avoid soil contamination.</p> <p>ii) Training was carried on 12/12/18 by competent person in order to expose and educate GTNSB personnel in scheduled waste management. Fortnightly inspection was carried out by mill and recorded accordingly.</p>			
Verification in this assessment			
<p>Site visit was made to all estates and mill workshop. Floor and working area including the vehicle parking and maintenance bay have been satisfactorily maintained. 5-S system has been implemented with segregation marking made on the concrete floor. There were no traces of oil spillage noted throughout. Training in relation to vehicle/tractor driving and maintenance has been conducted. Refer training records in the audit records. Corrective action plan is found to be effectively implemented. Thus, the NC remains closed.</p>			

Finding Reference	1689024-201806-M2	Certificate Reference	MSPO 698004
Certificate Standard	MS 2530:2013 Part-3	Clause	4.4.5.9
Category	Major		
Area/Process:	Tereh POM and supply base		

MSP0 Public Summary Report
Revision 0 (Aug 2017)

Details:	The monthly payment for the worker on medical leave does not meet the minimum wage requirement.
Objective evidence:	Sampled the payment slip for worker Jasi (Employee# 616776) which was on medical leave for whole month of June 2018 but was being paid the minimum wage of daily RM 38.46/ RM1000 per month as per the contract as the payment on June 2018 was RM 846.90 and daily average pay of RM 28.23.
Cause	
The worker was on medical leave for whole June 2018 and was relocate to General Gang in between the ML. Hence his basic salary been reduced from RM38.46/day to RM 28.23/day. The estate management had overlook of the change in basic salary and requirement of minimum salary pay for the worker.	
Correction / containment	
i) Differ of salary amounting RM 306.90 was paid through sundry petty cash to the respective worker on 30.09.2018. ii) Training on proper handling and preparations of Checkroll was conducted to all estate personnel involved on 30.09.2018 for better understanding.	
Corrective action	
Retraining on the SICK PAY ENTITLEMENT AND MINIMUM SALARY REQUIREMENTS for all NUPW category of workers and CHECKROLL & IPLANT PAYMENT SYSTEM to be conducted to all Managers, AM and respective staff to ensure the understanding of all relevant parties that involves in implementation of the system. The first session was conducted on 30/9/19 for Tereh Complex. The training has been included in the training plan as continuous refresher and workshop for all OUs for improvement.	
Verification in this assessment	
Based on the sampled pay slips at all the visited estates, the wages paid had met the regulated minimum wage. There was no recurrence of non-conformity detected. Thus, the NC remains closed.	

3.4 Issues Raised by Stakeholders

IS #	Description
1	<p>Issues: <u>Surrounding schools</u> Relationship with the operating units was good. The estates have also actively participate in many of the schools' programmes.</p> <p>Management Responses: NA</p> <p>Audit Team Findings: No further issue.</p>
2	<p>Issues: <u>Contractors</u> Pricing mechanism was fair and transparent. Payments were also delivered in timely manner. Company's policies and mechanism to launch complaints have been communicated through stakeholders' meeting.</p> <p>Management Responses: NA</p> <p>Audit Team Findings: No further issue.</p>
3	<p>Issues: <u>NUPW</u> Relationship with the company was good all the while and good cooperation is given especially in contract agreement negotiation.</p> <p>Management Responses: NA</p> <p>Audit Team Findings: No further issue.</p>
4	<p>Issues: <u>Jabatan Perhilitan</u> No activity of the company has affected the agency's affair so far. Received 2 to 3 reports about human conflict with elephant. Relationship has been good and meeting with stakeholders was also attended by the department representatives.</p> <p>Management Responses: NA</p> <p>Audit Team Findings: No further issue</p>
5	<p>Issues: <u>Jabatan Tenaga Kerja</u> Conducted audit once in every 2 years covering wages and estate inspection. The company has given good cooperation to the department and no complication was faced so far.</p> <p>Management Responses: NA</p> <p>Audit Team Findings: No further issue</p>

3.5 Summary of the Nonconformities and Status

CAR Ref.	CLASS	ISSUED	STATUS
1689024-201806-M1	Major	27/09/2018	Closed on 24/12/2018
1689024-201806-M2	Major	27/09/2018	Closed on 24/12/2018
1831668-201906-M1	Major	17/10/2019	Closed on 16/01/2020

3.6 Summary of the findings by Principles and Criteria

A) MS 2530-3:2013 Malaysian Sustainable Palm Oil (MSPO) Part 3: General principles for Plantations and Organized Smallholders

Criterion / Indicator		Assessment Findings	Compliance
4.1 Principle 1: Management commitment & responsibility			
Criterion 4.1.1 – Malaysian Sustainable Palm Oil (MSPO) Policy			
4.1.1.1	A policy for the implementation of MSPO shall be established. - Major compliance -	Kulim Malaysia Berhad has established an MSPO Policy dated 01/5/2018 signed by the Executive Director. The Policy among others emphasised commitment to implement all Principles and Criteria set out by the MSPO.	Complied
4.1.1.2	The policy shall also emphasize commitment to continual improvement. - Major compliance -	Kulim Malaysia Berhad in the Policy will make every effort to achieve the balance between People, Planet, and Profit in all management decisions and operations through continual program	Complied
Criterion 4.1.2 – Internal Audit			
4.1.2.1	Internal audit shall be planned and conducted regularly to determine the strong and weak points and potential area for further improvement. - Major compliance -	The procedure documented the process to conduct internal audit. The internal audit checklist is available to cover all the required MSPO requirements. The internal audit schedule for 2019 has been planned and communicated by SQD to the respective Regional Offices Estate and Mills. Each estate will be audited twice in a year. The procedure is documented in <i>doc no SQD/SMS/5.0</i> dated 01/7/18.	Complied
4.1.2.2	The internal audit procedures and audit results shall be documented and evaluated, followed by the identification of	The Internal Audit Procedure is stated in <i>doc no SQD/SMS/5.0</i> dated 01/7/18. Therein providing details relating to the following;	Complied

**MSPO Public Summary Report
Revision 0 (Aug 2017)**

Criterion / Indicator	Assessment Findings	Compliance																																										
<p>strengths and root causes of nonconformities, in order to implement the necessary corrective action.</p> <p>- Major compliance -</p>	<p>a) Aim/Responsibility b) Documentation c) Procedure Month / Areas d) Frequency at 1x/year e) Reporting format f) NCR reporting</p> <p>The procedure documented the process to conduct internal audit. The internal audit checklist is available to cover all the required MSPO requirements. The internal audit schedule for 2019 has been planned and communicated by SQD to the respective Regional Offices Estate and Mills.</p> <p>An internal audit for the Tereh CU has been conducted as per the following. SQD performs twice /year for each estate/mill</p> <table border="1" data-bbox="1048 938 1845 1265"> <thead> <tr> <th></th> <th>Estate</th> <th>Audit Date</th> <th colspan="2">NCR</th> <th>OFI</th> </tr> </thead> <tbody> <tr> <td>1</td> <td>Renggam</td> <td>12/9/19</td> <td>Nil</td> <td>Nil</td> <td>/</td> </tr> <tr> <td></td> <td></td> <td>14/4/19</td> <td>Nil</td> <td>Nil</td> <td></td> </tr> <tr> <td>2</td> <td>Mutiara</td> <td>05/9/19</td> <td>Nil</td> <td>Nil</td> <td>To update signage</td> </tr> <tr> <td></td> <td></td> <td>29/4/19</td> <td>Nil</td> <td>Nil</td> <td>Nil</td> </tr> <tr> <td>3</td> <td>Sg Sembrong</td> <td>29/8/19</td> <td>Nil</td> <td>Nil</td> <td>To update signage</td> </tr> <tr> <td></td> <td></td> <td>12/6/19</td> <td>Nil</td> <td>Nil</td> <td></td> </tr> </tbody> </table> <p>Notification was delivered to the estates/Mill via email dated 13/8/19 from SQD.</p>		Estate	Audit Date	NCR		OFI	1	Renggam	12/9/19	Nil	Nil	/			14/4/19	Nil	Nil		2	Mutiara	05/9/19	Nil	Nil	To update signage			29/4/19	Nil	Nil	Nil	3	Sg Sembrong	29/8/19	Nil	Nil	To update signage			12/6/19	Nil	Nil		
	Estate	Audit Date	NCR		OFI																																							
1	Renggam	12/9/19	Nil	Nil	/																																							
		14/4/19	Nil	Nil																																								
2	Mutiara	05/9/19	Nil	Nil	To update signage																																							
		29/4/19	Nil	Nil	Nil																																							
3	Sg Sembrong	29/8/19	Nil	Nil	To update signage																																							
		12/6/19	Nil	Nil																																								

MSPO Public Summary Report
Revision 0 (Aug 2017)

Criterion / Indicator		Assessment Findings	Compliance																
4.1.2.3	Report shall be made available to the management for their review. - Major compliance -	Reports are made available and retained for min 10 years. All reports are circulated to the Estate management, Regional Office KMB <i>Exco</i> HQ relevant personnel. There is a monthly SQD meeting at HQ level to review the reports' findings and performance raised in both internal and external audit.	Complied																
Criterion 4.1.3 – Management Review																			
4.1.3.1	The management shall periodically review the continuous suitability, adequacy and effectiveness of the requirements for effective implementation of MSPO and decide on any changes, improvement and modification. - Major compliance -	<p>The Estates held their management review respectively chaired by the Managers. Attendance from both estates executives and staff were noted and the members discussed issues relating to the MSPO progress and issues;</p> <table border="1"> <thead> <tr> <th></th> <th>Estate</th> <th>Date</th> <th>Attendees</th> </tr> </thead> <tbody> <tr> <td>1</td> <td>Renggam</td> <td>26/9/19</td> <td>14</td> </tr> <tr> <td>2</td> <td>Mutiara</td> <td>10/9/19</td> <td>15</td> </tr> <tr> <td>3</td> <td>Sg Sembrong</td> <td>20/9/19</td> <td>11</td> </tr> </tbody> </table> <p>a) Introduction b) Follow-up from previous meeting c) Presentation / discussion of internal and external audit d) Findings and corrective action plan. e) Performance & effectiveness of sustainable management system f) Continual improvement plan</p> <p>The meeting made a conclusive statement on the suitability, effectiveness of the MSPO implementation.</p>		Estate	Date	Attendees	1	Renggam	26/9/19	14	2	Mutiara	10/9/19	15	3	Sg Sembrong	20/9/19	11	Complied
	Estate	Date	Attendees																
1	Renggam	26/9/19	14																
2	Mutiara	10/9/19	15																
3	Sg Sembrong	20/9/19	11																

Criterion / Indicator		Assessment Findings	Compliance
Criterion 4.1.4 – Continual Improvement			
4.1.4.1	<p>The action plan for continual improvement shall be based on consideration of the main social and environmental impact and opportunities of the company.</p> <p>- Major compliance -</p>	<p>The Estates in Tereh CU had plan to introduce semi mechanized method for; the following operations.</p> <ul style="list-style-type: none"> a) Expansion of area MB – Harvesting and Collection in Renggam with provision 3 units equivalent to 450 ha b) Introduction of Euphorbia in the serial of the existing Beneficial Plant C.A.T in all estates c) Mutiara Estate having 2 units of scissor lifts for the FFB collection mechanisation introduced in Aug 2019. <p>The introduction is aimed to reduce work force and improved the work method for a better coverage. The BP growth to minimise usage of chemicals in eradicating pest attack to the palms.</p>	Complied
4.1.4.2	<p>The company shall establish a system to improve practices in line with new information and techniques or new industry standards and technology (where applicable) that are available and feasible for adoption.</p> <p>- Major compliance -</p>	<p>This is being made upon confirmation of any new projects. Employees were briefed of any new development in basic understanding during the weekly briefings. The management team will be informed of such development during the monthly management meetings. Dissemination of information by the RC and the Estates Dept are transacted during the monthly Managers meetings and emails.</p>	Complied
4.1.4.3	<p>An action plan to provide the necessary resources including training, to implement the new techniques or new industry standard or technology (where applicable) shall be established.</p> <p>- Major compliance -</p>	<p>Where introduction of new machines and new work method, all level of employees will be trained to handle /implement the new techniques and work changes. Monitoring is made by the Estate Managers and Assistants throughout the on-the-job training and familiarisation.</p>	Complied

Criterion / Indicator	Assessment Findings	Compliance	
4.2 Principle 2: Transparency			
Criterion 4.2.1 – Transparency of information and documents relevant to MSPO requirements			
4.2.1.1	<p>The management shall communicate the information requested by the relevant stakeholders in the appropriate languages and forms, except those limited by commercial confidentiality or disclosure that could result in negative environmental or social outcomes.</p> <p>- Major compliance -</p>	<p>Kulim has issued “Communication and Consultation Management Guidelines” that define the responsibilities and actions required for receiving, recording and responding to enquiries and requests from internal and external stakeholders. The visited estates are committed to implement the “Communication and Consultation Management guidelines”. Records of request (in “Enquiry Register Book”) were well maintained. There has been no request from any stakeholders since the last assessment.</p>	<p>Complied</p>
4.2.1.2	<p>Management documents shall be publicly available, except where this is prevented by commercial confidentiality or where disclosure of information would result in negative environmental or social outcomes.</p> <p>- Major compliance -</p>	<p>There is no restriction imposed by Kulim to present its management documents to the public. Guided by SPO Transparency Program (ver. 2.0), among the documents which are publicly available upon request are:</p> <ul style="list-style-type: none"> - Land titles/user right - Health & safety plan - Plans and impact assessments relating to environmental and social impacts - Pollution prevention plans - Details of complaints and grievances - Negotiation procedures 	<p>Complied</p>

Criterion / Indicator		Assessment Findings	Compliance
		<ul style="list-style-type: none"> - Continuous improvement plan - Biodiversity plans - Policy documents 	
Criterion 4.2.2 – Transparent method of communication and consultation			
4.2.2.1	<p>Procedures shall be established for consultation and communication with the relevant stakeholders.</p> <p>- Major compliance -</p>	<p>Kulim has a handbook called "Sustainability Handbook" dated June 2007 that details the company's environmental and social policies and grievance procedure. "Communication and Consultation Management Guidelines" (Ver. 2.0) describes the responsibilities and actions required for receiving, recording and responding to enquiries and requests from internal and external stakeholders.</p>	Complied
4.2.2.2	<p>A management official should be nominated to be responsible for issues related to Indicator 1 at each operating unit.</p> <p>- Minor compliance -</p>	<p>Guided by its "Communication and Consultation Management Guidelines, first issue", each manager of Kulim mills and estates is responsible to handle issues related to social, OHS and environmental issues from internal and external stakeholders.</p>	Complied
4.2.2.3	<p>List of stakeholders, records of all consultation and communication and records of action taken in response to input from stakeholders should be properly maintained.</p> <p>- Major compliance -</p>	<p>Lists of stakeholders were made available at the visited estates and last updated in September 2019. Among the stakeholders included in the lists were government agencies, contractors, suppliers, surrounding communities and NGOs. Stakeholder consultation is conducted once a year. Minutes of meeting were available for verification.</p>	Complied
Criterion 4.2.3 – Traceability			

Criterion / Indicator		Assessment Findings	Compliance
4.2.3.1	The management shall establish, implement and maintain a standard operating procedure to comply with the requirements for traceability of the relevant product(s). - Major compliance -	The Traceability Procedure (Doc. # SQD/SMS/1.2; Issue # 1; Rev. # 4; Dated: 20/9/2019) was established to establish traceability of the FFB from the field (block) to load and transport all harvested FFB from roadside platforms to the mill within the shortest possible time, usually within 24 hours.	Complied
4.2.3.2	The management shall conduct regular inspections on compliance with the established traceability system. - Major compliance -	The regular inspection on compliance with the traceability system was mainly done through internal audit as mentioned in Criterion 4.1.2.	Complied
4.2.3.3	The management should identify and assign suitable employees to implement and maintain the traceability system. - Minor compliance -	Based on the company's traceability procedure, the overall personal in charge for the traceability is the head of operating unit, i.e. in this case, the Estate Managers. The responsibility descriptions were also mentioned in the procedure.	Complied
4.2.3.4	Records of sales, delivery or transportation of FFB shall be maintained. - Major compliance -	Deliveries of FFB to mill is recorded in the crop book, which has the information about: <ul style="list-style-type: none"> - date of delivery - transporter identity no. - dispatch ticket no. - mill weighbridge ticket no. - field no. (origin of the FFB) - weight delivered (mt) All the data will be registered in the estate's accounting system for compilation	Complied

Criterion / Indicator	Assessment Findings	Compliance	
4.3 Principle 3: Compliance to legal requirements			
Criterion 4.3.1 – Regulatory requirements			
4.3.1.1	<p>All operations are in compliance with the applicable local, state, national and ratified international laws and regulations.</p> <p>- Major compliance -</p>	<p>All the Estates within the Tereh CU continued to comply with legal requirements as per the indicator. Compliance to each applicable law and regulation is monitored by the operating units and the sustainability team SQD. The CU had obtained and renewed license and permits as required by the law. The licenses/permit viewed among others as per the details shown in 4.3.1.2. Among the evidence of compliance verified were:</p> <ul style="list-style-type: none"> - Pay deduction permit for water supplied by SAJ #PP3/29/269/2011 dated 24/10/2011 - Pay deduction permit for electricity supplied by TNB #TK(NJ)U-23 dated 21/3/2017 - Pay deduction permit for Skim Khairat Keluarga Perbadanan Johor #TK(NJ)U-23 dated 31/3/2017 - Pay deduction permit for electricity supplied by generator set #PP3/1703/10-4(88)130/2000 - MPOB License #502458002000, valid until 31/10/2020, Licensee: Kulim (M) Bhd, Ladang Mutiara, Area: 2,283.60 Ha - MPOB License #502457102000, valid until 31/10/2020, Licensee: Kulim (M) Bhd, Ladang Sg Sembrong, Area: 1,187.42 Ha 	<p>Complied</p>
4.3.1.2	<p>The management shall list all laws applicable to their operations in a legal requirements register.</p>	<p>Tereh CU continued to comply with legal requirements. Compliance to each applicable law and regulation is monitored by the operating</p>	<p>Complied</p>

Criterion / Indicator	Assessment Findings	Compliance																					
<p>- Major compliance -</p>	<p>units and SQD sustainability team. SQD Department, based at Head Office is responsible to track changes in the law and the information was disseminated to all of its plantations and mills. The identified legal among others includes;</p> <ul style="list-style-type: none"> a) Pesticides Act 1974 and Regulations, b) Environmental Quality Act and Regulations 1974, c) Factories and Machinery Act and Regulations, 1967 d) Weights and Measures Regulations 1981 e) Electricity Regulations 1994 f) Immigration Act 1959 g) Occupational Safety and Health Act 1994 h) Employment Act 1955 i) Aboriginal Peoples Act 1954 j) Industrial Relations Act 1967 k) Children and Young Persons (Employment) Act 1966 l) MPOB Regulations (Licensing) 2005, EQ (Prescribed Premise) (Crude Palm Oil) Regulations 1977 m) SOCSO Amendment on 1st Schedule No 2/18 (1/1/19) <p>The CU had obtained and renewed license and permits as required by the law. The licenses/permit viewed among others were:</p> <table border="1" data-bbox="1048 1150 1850 1390"> <thead> <tr> <th colspan="3">Renggam Estate</th> </tr> <tr> <th></th> <th>License / Permit / Regulatory Requirement</th> <th>Validity</th> </tr> </thead> <tbody> <tr> <td>1</td> <td>MPOB No 50122550-2000</td> <td>31/3/20</td> </tr> <tr> <td>2</td> <td>KPDNKK – Diesoline storage -Permit 0027SK</td> <td>23/2/20</td> </tr> <tr> <td>3</td> <td>Air compressor JH PMY 24154</td> <td>11/02/20</td> </tr> <tr> <td>4</td> <td>Weighbridge License Metrology Sdn Bhd.</td> <td>06/3/20</td> </tr> <tr> <td>5</td> <td>JTK – Permit Potongan Gaji Pekerja – AIR</td> <td>Eff 24/10/11</td> </tr> </tbody> </table>	Renggam Estate				License / Permit / Regulatory Requirement	Validity	1	MPOB No 50122550-2000	31/3/20	2	KPDNKK – Diesoline storage -Permit 0027SK	23/2/20	3	Air compressor JH PMY 24154	11/02/20	4	Weighbridge License Metrology Sdn Bhd.	06/3/20	5	JTK – Permit Potongan Gaji Pekerja – AIR	Eff 24/10/11	
Renggam Estate																							
	License / Permit / Regulatory Requirement	Validity																					
1	MPOB No 50122550-2000	31/3/20																					
2	KPDNKK – Diesoline storage -Permit 0027SK	23/2/20																					
3	Air compressor JH PMY 24154	11/02/20																					
4	Weighbridge License Metrology Sdn Bhd.	06/3/20																					
5	JTK – Permit Potongan Gaji Pekerja – AIR	Eff 24/10/11																					

MSPO Public Summary Report
Revision 0 (Aug 2017)

Criterion / Indicator		Assessment Findings		Compliance
		6	JTK – Permit Potongan Gaji Pekerja - API	Eff 02/9/84
			Mutiara Estate	
			License / Permit / Regulatory Requirement	Validity
		1	MPOB No 50245800-2000	31/10/20
		2	KPDNKK – Diesoline storage -Permit JO36380	28/1/20
		3	Air compressor JH PMT 22738	01/3/20
		4	Air Compressor JH PMT 22740	01/3/20/
		5	Weighbridge License Metrology S Bhd. B1448429	02/5/19
		6	JTK – Permit Potongan Gaji Pekerja – Electricity	01/12/00
		7	SPAN – Own Water Treatment – 800-4(1)/9/14	25/8/20
		8	BAKAJ – Abstraksi – 07/A/KLG/052	31/12/19
		9	S/Jaya Tenaga--3 units of Gen-set 100/160/200 kW	02/6/20
		10	S/Jaya Tenaga - 36601 - 1 unit of Gen-set 88 kW	03/6/20
			Sg Sembrong Estate	
			License / Permit / Regulatory Requirement	Validity
		1	MPOB No 50245710-2000	31/10/20
		2	KPDNKK – Diesoline storage -Permit JO2585	27/3/20
		3	Air compressor JH PMT 17290	11/9/20
		5	Weighbridge License Metrology S Bhd. B1448441	09/5/20
		6	JTK – Permit Potongan Gaji Pekerja – Electricity	Eff 02/5/19
		7	SPAN – Own Water Treatment – 800-4(1)/9/14	25/8/20
		8	BAKAJ – Abstraksi – 334/300/05/07/07/24	31/12/19
		9	S/Jaya Tenaga—35025 1 unit of Gen-set 230kW	18/4/20
		10	S/Jaya Tenaga – 39204 - 1 unit of Gen-set 128 kW	19/10/20

Criterion / Indicator	Assessment Findings	Compliance
<p>4.3.1.3</p> <p>The legal requirements register shall be updated as and when there are any new amendments or any new regulations coming into force.</p> <p>- Major compliance -</p>	<p>SQD unit, which is based in Head Office <i>Ulu Tiram Estate</i> is responsible for tracking any changes to the Acts and Regulations. In addition, the RC of respective Region also played a role in disseminating new Acts & Regulations to all the mills and estates in the Region.</p> <ul style="list-style-type: none"> a) This was made via communication with the publisher of the documents. b) This mechanism was outlined in its procedure. c) The updating of the legal register is made on a periodical basis. d) Changes in the legal register if any are communicated to the respective CU/ Regional Office. <p>The CU had entirely adopted the KMB established documented system for identifying, tracking, accessing and updating the legal requirements. It had ensured that all applicable legal requirements pertaining to MSPO are established, implemented and maintained. Among others the identified applicable laws and regulations relevant to its operations included the;</p> <ul style="list-style-type: none"> a) Environmental Quality Act 1974 and its Regulations, b) Factories and Machinery Act 1967 and its Regulations, c) Occupational Safety and Health Act 1994 and its Regulations, d) Pesticides Act, 1974, e) Worker’s Min Standards of Housing & Amenities Act, 1990. f) SOCSO Amendment on 1st Schedule No 2/18 (1/1/19) 	<p>Complied</p>
<p>4.3.1.4</p> <p>The management should assign a person responsible to monitor compliance and to track and update the changes in regulatory requirements.</p> <p>- Minor compliance -</p>	<p>The person in charge is the Executive - Regional Controller Sindora/Sedenak Complex appointed via letter dated 27/8/18 and 27/6/18 for the Sindora Complex signed by KMB Head of Audit. The Estate level PIC is an Assistant Manager letter issued by the Manager dated 01/4/18. Job responsibilities among others include the</p>	<p>Complied</p>

Criterion / Indicator		Assessment Findings	Compliance																								
		following; a) Identify and assess compliance b) Monitoring of compliance action plan c) Prepare & report compliance status to RMC dept. d) Maintain highest alert on both internal and external activities of consequences to KMB.																									
Criterion 4.3.2 – Lands use rights																											
4.3.2.1	The management shall ensure that their oil palm cultivation activities do not diminish the land use rights of other users. - Major compliance -	The estates have planted the lands with oil palm. This is in line with the conditions stipulated in the land titles i.e. to be planted with oil palm.	Complied																								
4.3.2.2	The management shall provide documents showing legal ownership or lease, history of land tenure and the actual use of the land. - Major compliance -	The estates were able to demonstrate their land titles to show their legal ownership and right to use their lands. Renggam Estate has 2 land titles with 2,418.2378 Ha, Mutiara Estate has 6 land titles with 2,538.9042 Ha and Sg Sembrong Estate has 3 land titles with 1,242.763 Ha.	Complied																								
4.3.2.3	Legal perimeter boundary markers should be clearly demarcated and visibly maintained on the ground where practicable. - Major compliance -	The Estates have maps showing the locations of boundary stones/pegs that have been physically located and marked. Inspection of boundary stones during the field visit confirmed that they were clearly marked and maintained. <table border="1" style="margin-top: 10px;"> <thead> <tr> <th></th> <th>Estate</th> <th>Boundary site</th> <th>Neighboring properties</th> </tr> </thead> <tbody> <tr> <td>1</td> <td>Renggam</td> <td>P013/Block 3</td> <td>Petronas Gas Pipeline</td> </tr> <tr> <td></td> <td></td> <td>P17/Block 2</td> <td>Hutan Pocket</td> </tr> <tr> <td></td> <td></td> <td>P05/Block 3</td> <td>Sembrong Estate</td> </tr> <tr> <td>2</td> <td>Mutiara</td> <td>PR19/Block 1</td> <td>Ldg Zamrud -</td> </tr> <tr> <td></td> <td></td> <td>P16 Block 2</td> <td>RISDA Sg Chales</td> </tr> </tbody> </table>		Estate	Boundary site	Neighboring properties	1	Renggam	P013/Block 3	Petronas Gas Pipeline			P17/Block 2	Hutan Pocket			P05/Block 3	Sembrong Estate	2	Mutiara	PR19/Block 1	Ldg Zamrud -			P16 Block 2	RISDA Sg Chales	Complied
	Estate	Boundary site	Neighboring properties																								
1	Renggam	P013/Block 3	Petronas Gas Pipeline																								
		P17/Block 2	Hutan Pocket																								
		P05/Block 3	Sembrong Estate																								
2	Mutiara	PR19/Block 1	Ldg Zamrud -																								
		P16 Block 2	RISDA Sg Chales																								

Criterion / Indicator		Assessment Findings				Compliance
		2	Sg Sembrong	P04/Block 3	Ladang Pegawai Koperasi	
				P04/Block 3	Kahang Estate IOI	
				P04/Block 1	Ladang Pegawai Koperasi	
		Guidelines on the placement of boundary markers are provided by the Group Estates Dept via letter dated 12/11/07				
4.3.2.4	Where there are, or have been, disputes, documented proof of legal acquisition of land title and fair compensation that have been or are being made to previous owners and occupants; shall be made available and that these should have been accepted with free prior informed consent (FPIC). - Minor compliance -	There were no land disputes at Tereh Management unit was noted as the estate has the legal ownership documents.				Complied
Criterion 4.3.3 – Customary rights						
4.3.3.1	Where lands are encumbered by customary rights, the company shall demonstrate that these rights are understood and are not being threatened or reduced. - Major compliance -	There is no customary land or negotiated agreements at Tereh Management Unit.				NA
4.3.3.2	Maps of an appropriate scale showing extent of recognized customary rights land, if any, should made available. - Minor compliance -	There is no customary land or negotiated agreements at Tereh Management Unit.				NA
4.3.3.3	Negotiation and FPIC shall be recorded and copies of negotiated agreements should be made available. - Major compliance -	There is no customary land or negotiated agreements at Tereh Management Unit.				NA

Criterion / Indicator	Assessment Findings	Compliance	
4.4 Principle 4: Social responsibility, health, safety and employment condition			
Criterion 4.4.1: Social Impact Assessment (SIA)			
4.4.1.1	<p>Social impact should be identified and plans are implemented to mitigate the negative impacts and promote the positive ones.</p> <p>- Minor compliance -</p>	<p>The Social Impact Assessment for Tereh certification unit for all operating units was conducted internally by Kulim’s internal auditors and register the impacts in “Daftar Impak Social Kulim (Malaysia) Berhad 2019”. In the register there is information about type of issue, level of severity, recommendation for improvement and person responsible.</p> <p>At the operating unit level, “Cadangan Penambahbaikan Sosial bagi Ladang/Kilang XX 2019” where information about issue, recommendation for improvement, actions to be taken, person in-charge and comments from internal auditors.</p> <p>Apart from that the positive impacts were also registered in the “Cadangan Penambahbaikan Sosial bagi Ladang/Kilang XX 2019” where action to promote them are spelt out.</p>	<p>Complied</p>
Criterion 4.4.2: Complaints and grievances			
4.4.2.1	<p>A system for dealing with complaints and grievances shall be established and documented.</p> <p>- Major compliance -</p>	<p>Kulim has established the procedure (SPO Grievances Procedure 2007) to deal with complaints and grievances by using the complaint form. Verified some of the complaint forms where most complaints were about housing defects (e.g. structure, wiring and piping) which was recorded in the “Borang Aduan/Cadangan” file. Verification of the forms showed that the issues have been timely and appropriately handled.</p>	<p>Complied</p>

Criterion / Indicator		Assessment Findings	Compliance
4.4.2.2	<p>The system shall be able to resolve disputes in an effective, timely and appropriate manner that is accepted by all parties.</p> <p>- Major compliance -</p>	<p>The complaint and grievances are open to affected parties which includes internal and external stakeholders. The time to process the complaints or grievances is depending on the severity of the complaint.. Mostly the complaints received were about housing maintenance & repair by the employees. They were recorded in a log book which has the information about date, complainant, details of complain and status. There was no complaint from external stakeholders ever since the last assessment.</p>	Complied
4.4.2.3	<p>A complaint form should be made available at the premises, where employees and affected stakeholders can make a complaint.</p> <p>- Minor compliance -</p>	<p>The operating unit managements have maintained its "Borang Aduan/Cadangan" file to record any complaints or grievances from stakeholders. The complaints lodged related to housing repair were resolved accordingly and it was acknowledged by the complaints after the action has been taken.</p>	Complied
4.4.2.4	<p>Employees and the surrounding communities should be made aware that complaints or suggestions can be made any time.</p> <p>- Minor compliance -</p>	<p>Employees and surrounding communities were made aware on the complaints and grievances through various ways such as meeting, training and briefing. Meetings between the operating units and their relevant stakeholders were conducted from time to time. Minutes of meeting were available for verification.</p>	Complied
4.4.2.5	<p>Complaints and resolutions for the last 24 months shall be documented and made available to affected stakeholders upon request.</p> <p>- Major compliance -</p>	<p>All the visited estates maintained their records of complaint in a complain file. Records for more than 24 months ago were still kept in the file.</p>	Complied
<p>Criterion 4.4.3: Commitment to contribute to local sustainable development</p>			

Criterion / Indicator		Assessment Findings	Compliance
4.4.3.1	<p>Growers should contribute to local development in consultation with the local communities.</p> <p>- Minor compliance -</p>	<p>Tereh complex has continued to make appropriate contributions to local communities in the form of donations and assistance to schools and places of worship and donations for religious festivals and provide work opportunity for the locals which has been verified through documentation evidence and interviewed with respective stakeholders.</p>	Complied
Criterion 4.4.4: Employees safety and health			
4.4.4.1	<p>An occupational safety and health policy and plan shall be documented, effectively communicated and implemented.</p> <p>- Major compliance -</p>	<p>The Group Occupational Safety & Health Management Policy had been established and implemented. The policy was signed by the Executive Director of Kulim (Malaysia) Berhad on 01 May 2015 and displayed prominently on notice boards in English and local language Bahasa Malaysia. The Policy is implemented through the OSH activities by the SQD Executives and monitored by SQ Department at Head Office. Included in the policy is the commitment of the Company to;</p> <ul style="list-style-type: none"> a) Comply or where practicable exceed applicable OSH legislation, regulations and codes of practices. b) Regularly review and audit the OSH management systems to ensure that they remain relevant and appropriate. c) Effective communication of this policy to all employees and other affected parties d) Regularly and continuously conduct education, training and awareness program on OSH to all parties concerned. e) The implementation of OSH plan was monitored by internal audits conducted by OSH executives from SQ Department band Regional Office. 	Complied

Criterion / Indicator	Assessment Findings	Compliance																																				
<p>4.4.4.2 The occupational safety and health plan shall cover the following:</p> <ul style="list-style-type: none"> a) A safety and health policy, which is communicated and implemented. b) The risks of all operations shall be assessed and documented. c) An awareness and training programme which includes the following requirements for employees exposed to pesticides: <ul style="list-style-type: none"> i. all employees involved shall be adequately trained on safe working practices ii. all precautions attached to products shall be properly observed and applied d) The management shall provide the appropriate PPE at the place of work to cover all potentially hazardous operations as identified in the risk assessment and control such as Hazard Identification, Risk Assessment and Risk Control (HIRARC). e) The management shall establish Standard Operating Procedure for handling of chemicals to ensure proper and safe handling and storage in accordance to Occupational Safety Health (Classification Packaging and Labeling) Regulation 1997 and Occupational Safety Health (Use and Standard of Exposure of Chemical Hazardous to Health) Regulation 2000. f) The management shall appoint responsible person(s) for workers' safety and health. The appointed person(s) of trust 	<p>The OSH policy is communicated through training session and also during muster. Ad hoc training is also being carried in a smaller group of employees. <i>Reference training 4.4.6.1.</i> The estates had identified and reviewed significant hazards and risks and determined appropriate risk control measures. The hazard identification, risk assessment and risk control (HIRARC) records, as well as CHRA reports were verified during the assessment. The HIRARC among others covered activities as follows;</p> <table border="1" data-bbox="1128 751 1789 1169"> <thead> <tr> <th>No</th> <th>Activity</th> <th>No</th> <th>Activity</th> </tr> </thead> <tbody> <tr> <td>1</td> <td>Office</td> <td>9</td> <td>Harvesting-MB system</td> </tr> <tr> <td>2</td> <td>Security</td> <td>10</td> <td>Manuring</td> </tr> <tr> <td>3</td> <td>Weeding</td> <td>11</td> <td>Replanting</td> </tr> <tr> <td>4</td> <td>P&D – rat baiting</td> <td>12</td> <td>Waste Management</td> </tr> <tr> <td>5</td> <td>Boundary & census</td> <td>13</td> <td>Workshop</td> </tr> <tr> <td>6</td> <td>Road bridges</td> <td>14</td> <td>Nursery</td> </tr> <tr> <td>7</td> <td>Drainage & culverts</td> <td>15</td> <td>Break time</td> </tr> <tr> <td>8</td> <td>transportation</td> <td>16</td> <td>Weighbridge</td> </tr> </tbody> </table> <p>Full review for the HIRARC was conducted by the ESH committee dated Sept 2019 and no major changes were observed in term of hierarchy to determine appropriate control measures. They are made on annual basis or whenever a situation deemed necessary in event of accident or new machinery / work process. All HIRARC prepared</p>	No	Activity	No	Activity	1	Office	9	Harvesting-MB system	2	Security	10	Manuring	3	Weeding	11	Replanting	4	P&D – rat baiting	12	Waste Management	5	Boundary & census	13	Workshop	6	Road bridges	14	Nursery	7	Drainage & culverts	15	Break time	8	transportation	16	Weighbridge	<p>Complied</p>
No	Activity	No	Activity																																			
1	Office	9	Harvesting-MB system																																			
2	Security	10	Manuring																																			
3	Weeding	11	Replanting																																			
4	P&D – rat baiting	12	Waste Management																																			
5	Boundary & census	13	Workshop																																			
6	Road bridges	14	Nursery																																			
7	Drainage & culverts	15	Break time																																			
8	transportation	16	Weighbridge																																			

Criterion / Indicator	Assessment Findings	Compliance																																													
<p>must have knowledge and access to latest national regulations and collective agreements.</p> <p>g) The management shall conduct regular two-way communication with their employees where issues affecting their business such as employee’s health, safety and welfare are discussed openly. Records from such meeting are kept and the concerns of the employees and any remedial actions taken are recorded.</p> <p>h) Accident and emergency procedures shall exist and instructions shall be clearly understood by all employees.</p> <p>i) Employees trained in First Aid should be present at all field operations. A First Aid Kit equipped with approved contents should be available at each worksite.</p> <p>j) Records shall be kept of all accidents and be reviewed periodically at quarterly intervals.</p> <p>- Major compliance -</p>	<p>were adequate to address any situation of the risk management. All HIRARC were verified and approved accordingly.</p> <p>The estates provide training to the workers and staff exposed to pesticides and chemicals. The following training sessions were recorded.</p> <table border="1" data-bbox="1048 655 1861 1059"> <thead> <tr> <th>No</th> <th>Subject</th> <th>RE</th> <th>ME</th> <th>SSE</th> </tr> </thead> <tbody> <tr> <td>1</td> <td>Spraying Calibration</td> <td>03/3/19</td> <td>24/8/19</td> <td>01/7/19</td> </tr> <tr> <td>2</td> <td>Fertiliser/chemical Handling.</td> <td>05/9/19</td> <td>15/5/19</td> <td>27/6/19</td> </tr> <tr> <td>3</td> <td>Fertiliser sampling/handling</td> <td>12/6/19</td> <td>25/9/19</td> <td>016/4/19</td> </tr> <tr> <td>4</td> <td>Chemical handling calibration</td> <td>10/5/19</td> <td>20/8/19</td> <td>21/4/19</td> </tr> <tr> <td>5</td> <td>First aid CPR</td> <td>08/9/19</td> <td>30/6/19</td> <td>10/5/19</td> </tr> <tr> <td>6</td> <td>Triple Rinsing Chemical store</td> <td>12/7/19</td> <td>13/9/19</td> <td>19/3/19</td> </tr> <tr> <td>7</td> <td>Spill containment</td> <td>12/7/19</td> <td>10/7/19</td> <td>-</td> </tr> <tr> <td>8</td> <td>PPE usage</td> <td>11/2/19</td> <td>29/7/19</td> <td>04/3/19</td> </tr> </tbody> </table> <p>Details of other training are available 4.4.6.1 (<i>training and competency</i>). OSH programs are also included. Common programs are initiated from HQ level e.g. OSH meeting, workplace inspection, inspection on PPE, training on MSPO/RSPO etc.</p> <p>The estates provide PPE to the employees relevant to the work handled by the workers. The list of PPE that were provided by the estates are as below:</p>	No	Subject	RE	ME	SSE	1	Spraying Calibration	03/3/19	24/8/19	01/7/19	2	Fertiliser/chemical Handling.	05/9/19	15/5/19	27/6/19	3	Fertiliser sampling/handling	12/6/19	25/9/19	016/4/19	4	Chemical handling calibration	10/5/19	20/8/19	21/4/19	5	First aid CPR	08/9/19	30/6/19	10/5/19	6	Triple Rinsing Chemical store	12/7/19	13/9/19	19/3/19	7	Spill containment	12/7/19	10/7/19	-	8	PPE usage	11/2/19	29/7/19	04/3/19	
No	Subject	RE	ME	SSE																																											
1	Spraying Calibration	03/3/19	24/8/19	01/7/19																																											
2	Fertiliser/chemical Handling.	05/9/19	15/5/19	27/6/19																																											
3	Fertiliser sampling/handling	12/6/19	25/9/19	016/4/19																																											
4	Chemical handling calibration	10/5/19	20/8/19	21/4/19																																											
5	First aid CPR	08/9/19	30/6/19	10/5/19																																											
6	Triple Rinsing Chemical store	12/7/19	13/9/19	19/3/19																																											
7	Spill containment	12/7/19	10/7/19	-																																											
8	PPE usage	11/2/19	29/7/19	04/3/19																																											

MSPO Public Summary Report
Revision 0 (Aug 2017)

Criterion / Indicator		Assessment Findings	Compliance												
		<table border="1"> <thead> <tr> <th></th> <th>Workers category</th> <th>Type of PPE</th> </tr> </thead> <tbody> <tr> <td>1</td> <td>Harvesters</td> <td>Safety Helmet, Sickle Cover, Hand Glove, Wellington Boots</td> </tr> <tr> <td>2</td> <td>Sprayers</td> <td>Respirator, Nitrile Glove Goggles, Wellington Boots, Apron</td> </tr> <tr> <td>3</td> <td>Fertiliser applicators</td> <td>Apron, Wellington Boots, Dust Mask</td> </tr> </tbody> </table> <p>Records of PPE issuance for the estates were sighted. During the site visit workers were observed to be in their respective PPE.</p> <p>The estates have established SOP for chemical handling. This is available in Agriculture manual and SOP provided in the Company's documents - Operational Control Procedure under subject Chemical Safety Management. This includes compliance related to;</p> <ul style="list-style-type: none"> - Conduct/reassess CHRA - Review of chemical register - Chemical management assessment review - Conduct health surveillance. <p>The document was sighted and verified. Training relating to bagworm treatment using class 1 <i>monocrotophos</i> has been made on 27/2/19 and 13/8/19 by the KMB Agronomist and <i>Supplier Hextar Chemical</i> attended by Personnel from Estates within Tereh CU.</p> <p>All the Estates Managers and Senior Manager respectively were appointed as the Chairman of the ESH committee via letter renewed dated 22/9/19 renewed superseding the earlier letters. The letters of appointment for the Managers is signed by the Chairman ESH based at Head Office.</p>		Workers category	Type of PPE	1	Harvesters	Safety Helmet, Sickle Cover, Hand Glove, Wellington Boots	2	Sprayers	Respirator, Nitrile Glove Goggles, Wellington Boots, Apron	3	Fertiliser applicators	Apron, Wellington Boots, Dust Mask	
	Workers category	Type of PPE													
1	Harvesters	Safety Helmet, Sickle Cover, Hand Glove, Wellington Boots													
2	Sprayers	Respirator, Nitrile Glove Goggles, Wellington Boots, Apron													
3	Fertiliser applicators	Apron, Wellington Boots, Dust Mask													

Criterion / Indicator	Assessment Findings	Compliance																				
	<p>All the Estates Managers and Senior Manager respectively were appointed as the Chairman of the ESH committee. The Managers subsequently assigned duties of ESH coordinators to the Assistants for the down line implementation of ESH practices in the estates. Similar appointment was made for all the estates and the mill. All identified Executives were officially given a letter for such an appointment. The estates management conduct regular two-way communication with their employees through the quarterly ESH meeting. The dates of meeting held are recorded below.</p> <table border="1" data-bbox="1048 831 1805 1018"> <thead> <tr> <th>Estate</th> <th>1st</th> <th>2nd</th> <th>3rd</th> <th>4th</th> </tr> </thead> <tbody> <tr> <td>Renggam</td> <td>27/12/18</td> <td>19/3/19</td> <td>18/6/19</td> <td>25/9/19</td> </tr> <tr> <td>Mutiara</td> <td>31/7/19</td> <td>20/3/19</td> <td>25/12/18</td> <td>24/9/18</td> </tr> <tr> <td>S Sembrong</td> <td>25/9/19</td> <td>26/6/19</td> <td>21/3/19</td> <td>27/12/18</td> </tr> </tbody> </table> <p>The minutes of meeting respectively were sighted selectively and verified. Workers during the meeting participated in the discussion mainly on housing and safety. The agenda as discussed during the meeting among others includes the following;</p> <ul style="list-style-type: none"> a) Introduction / Matters arising b) Internal Audit Report c) Presentation from Head Section d) PPE adherence e) Training safety f) HIRARC / Feedback from Members 	Estate	1 st	2nd	3rd	4th	Renggam	27/12/18	19/3/19	18/6/19	25/9/19	Mutiara	31/7/19	20/3/19	25/12/18	24/9/18	S Sembrong	25/9/19	26/6/19	21/3/19	27/12/18	
Estate	1 st	2nd	3rd	4th																		
Renggam	27/12/18	19/3/19	18/6/19	25/9/19																		
Mutiara	31/7/19	20/3/19	25/12/18	24/9/18																		
S Sembrong	25/9/19	26/6/19	21/3/19	27/12/18																		

Criterion / Indicator		Assessment Findings	Compliance																															
		<p>g) Scheduled Waste Management h) Accident Statistics i) Other matters.</p> <p>Accident and emergency procedures are available in the SOP. The estates had procedures emergencies situation as listed below in the table. There was formation of ERP Team & ERP for all the identified incidences. The organisation chart for the ERP team was established and displayed for information of the employees. The important telephone contact numbers were also provided therein. Procedures guidelines were issued by SQD and amended to tailor to the situation differences in the estates and mills.</p> <table border="1"> <thead> <tr> <th></th> <th>Emergencies Situation</th> <th>Mill</th> <th>Estate</th> </tr> </thead> <tbody> <tr> <td>1</td> <td>Fire Hazard</td> <td>/</td> <td>/</td> </tr> <tr> <td>2</td> <td>Injury At Site</td> <td>/</td> <td>/</td> </tr> <tr> <td>3</td> <td>Dieseline /chemical spillage</td> <td>/</td> <td>/</td> </tr> </tbody> </table> <p>ERT members received training and practice in emergency procedures appropriate to their respective workplace and degree of risk. The trainings are conducted by an accredited or qualified organisation who can demonstrate their suitability to provide training. Among others the training held are as follows;</p> <table border="1"> <thead> <tr> <th>No</th> <th>Subject</th> <th>RE</th> <th>ME</th> <th>SSE</th> </tr> </thead> <tbody> <tr> <td>1</td> <td>Emergency Respond Plan</td> <td>10/9/19</td> <td>09/4/19</td> <td>02/5/19</td> </tr> <tr> <td>2</td> <td>Fire drill training ERP</td> <td>12/4/19</td> <td>15/2/19</td> <td>02/5/19</td> </tr> </tbody> </table>		Emergencies Situation	Mill	Estate	1	Fire Hazard	/	/	2	Injury At Site	/	/	3	Dieseline /chemical spillage	/	/	No	Subject	RE	ME	SSE	1	Emergency Respond Plan	10/9/19	09/4/19	02/5/19	2	Fire drill training ERP	12/4/19	15/2/19	02/5/19	
	Emergencies Situation	Mill	Estate																															
1	Fire Hazard	/	/																															
2	Injury At Site	/	/																															
3	Dieseline /chemical spillage	/	/																															
No	Subject	RE	ME	SSE																														
1	Emergency Respond Plan	10/9/19	09/4/19	02/5/19																														
2	Fire drill training ERP	12/4/19	15/2/19	02/5/19																														

MSPO Public Summary Report
Revision 0 (Aug 2017)

Criterion / Indicator		Assessment Findings				Compliance	
		3	First aid CPR	08/9/19	30/6/19	10/5/19	
		4	MSPO/R awareness contractor	03/4/19	30/7/19	14/8/19	
		5	MSPO/R briefing stakeholders	05/9/19	03/9/19	14/8/19	
		6	Spill containment	12/7/19	10/7/19	-	
		<p>The estates trained their nominated employees for First Aid mainly those involved in the field operations. A training program Basic Occupational First Aider & CPR was organised by KSTS at Head Office level attended by employees nominated by the Estates/Mill. This was sighted in the training session 8-9/8/18 recorded for both estates in indicator 4.4.6.1 A First Aid Kit equipped with approved 16 items were available and replenished on a weekly basis. Distribution of the 1st Aid Kit are made at the following places/personnel among others;</p> <ul style="list-style-type: none"> a) Office/AP Post b) Chemical Store/Fertiliser Store c) Workshop / d) Field staff /Mandores. <p>The boxes kept by the mandores were sighted during the field visit. The estates had regular briefing to the 1st Aid Kit holders on the management of the content and usage. The sessions were conducted by the respective HA/MA.</p> <p>Records of all accidents are kept in both estates for a min of 7 years. Accident incidences are reviewed during safety meetings. Records in 2018 as extracted from the JKPP 8 of respective units as shown below;</p>					

MSPO Public Summary Report
Revision 0 (Aug 2017)

Criterion / Indicator		Assessment Findings					Compliance																				
		<table border="1"> <thead> <tr> <th>Estate</th> <th>No of cases</th> <th>LTI</th> <th>Non LTI</th> <th>JKKP 8 Submission</th> </tr> </thead> <tbody> <tr> <td>Renggam</td> <td>5</td> <td>47</td> <td>0</td> <td>28/1/19</td> </tr> <tr> <td>Mutiara</td> <td>30</td> <td>103</td> <td>0</td> <td>13/1/19</td> </tr> <tr> <td>S Sembrong</td> <td>14</td> <td>99</td> <td>0</td> <td>15/01/19</td> </tr> </tbody> </table>					Estate	No of cases	LTI	Non LTI	JKKP 8 Submission	Renggam	5	47	0	28/1/19	Mutiara	30	103	0	13/1/19	S Sembrong	14	99	0	15/01/19	
Estate	No of cases	LTI	Non LTI	JKKP 8 Submission																							
Renggam	5	47	0	28/1/19																							
Mutiara	30	103	0	13/1/19																							
S Sembrong	14	99	0	15/01/19																							
		<table border="1"> <thead> <tr> <th>Estate</th> <th>cases</th> <th>LTI</th> <th>Description</th> </tr> </thead> <tbody> <tr> <td>Renggam</td> <td>5</td> <td>47</td> <td>There is 1 case having LTI of 41 days involving 1 carpenter injured while painting work ON 10/12/18. Investigation was made dated 17/12/18. HIRARC was reviewed accordingly amending the risk level.</td> </tr> <tr> <td>Mutiara</td> <td>30</td> <td>103</td> <td>The estate had an incidence on 22/3/18 of LTI of 20 days involving a ramp attendant injured his fingers while manning an MB.</td> </tr> <tr> <td>Sg Sembrong</td> <td>14</td> <td>99</td> <td>An incident on 10/4/18 involving a harvester injured upon cut by harvesting while adjusting the harvesting pole slippery due to wet weather LTI of 76 days . Reminders to all harvester made on precautionary measures while performing harvesting work.</td> </tr> </tbody> </table>					Estate	cases	LTI	Description	Renggam	5	47	There is 1 case having LTI of 41 days involving 1 carpenter injured while painting work ON 10/12/18. Investigation was made dated 17/12/18. HIRARC was reviewed accordingly amending the risk level.	Mutiara	30	103	The estate had an incidence on 22/3/18 of LTI of 20 days involving a ramp attendant injured his fingers while manning an MB.	Sg Sembrong	14	99	An incident on 10/4/18 involving a harvester injured upon cut by harvesting while adjusting the harvesting pole slippery due to wet weather LTI of 76 days . Reminders to all harvester made on precautionary measures while performing harvesting work.					
Estate	cases	LTI	Description																								
Renggam	5	47	There is 1 case having LTI of 41 days involving 1 carpenter injured while painting work ON 10/12/18. Investigation was made dated 17/12/18. HIRARC was reviewed accordingly amending the risk level.																								
Mutiara	30	103	The estate had an incidence on 22/3/18 of LTI of 20 days involving a ramp attendant injured his fingers while manning an MB.																								
Sg Sembrong	14	99	An incident on 10/4/18 involving a harvester injured upon cut by harvesting while adjusting the harvesting pole slippery due to wet weather LTI of 76 days . Reminders to all harvester made on precautionary measures while performing harvesting work.																								
		JKKP 6 was submitted to DOSH with the committee investigated the																									

Criterion / Indicator		Assessment Findings	Compliance
		cause and prevention measures to be taken. Submission of JKPP 6 & 8 to DOSH was submitted under the legislative requirement.	
Criterion 4.4.5: Employment conditions			
4.4.5.1	<p>The management shall establish policy on good social practices regarding human rights in respect of industrial harmony. The policy shall be signed by the top management and effectively communicated to the employees.</p> <p>- Major compliance -</p>	<p>Kulim has established a policy on good social ethics with regards to human rights such as Human Policy, Ethic Policy, Prevention of Sexual Harassment in the Workplace Policy, Right of Employees Policy, and etc. dated 1/5/2018. All the policies were signed off by Executive Director.</p> <p>The policies were communicated through display at the strategic location, induction & training, memo and meeting.</p>	Complied
4.4.5.2	<p>The management shall not engage in or support discriminatory practices and shall provide equal opportunity and treatment regardless of race, colour, sex, religion, political opinion, nationality, social origin or any other distinguishing characteristics.</p> <p>- Major compliance -</p>	<p>Kulim has established Core Labour Standard policy, where it commits not to engage any form of discrimination based on race, colour, sex, religion, political opinion, nationality, social origin or any other distinguishing characteristics. Interviews with the workers showed that no evidence of discrimination occurred in the workplace.</p>	Complied
4.4.5.3	<p>Management shall ensure that employees' pay and conditions meet legal or industry minimum standards and as per agreed Collective Agreements. The living wage should be sufficient to meet basic needs and provide some discretionary income based on minimum wage.</p> <p>- Major compliance -</p>	<p>Employment contracts for workers were available for verification. Pay and conditions are documented and in line with the Minimum Wage Order 2018. Sampled of employment contracts confirmed that terms and conditions are clearly outlined and have been signed by the worker. Below were the sampled workers ID number whom payslips for June and February, 2019 were verified:</p> <p><u>Renggam:</u></p>	Complied

MSPO Public Summary Report
Revision 0 (Aug 2017)

Criterion / Indicator		Assessment Findings	Compliance
		<p>Employee numbers: 613948, 613455, 613864, 614061, 613898, 614044, 614043, 613887, 613908, 614053</p> <p><u>Mutiara:</u></p> <p>Employee numbers: 606693, 606985, 607090, 606613, 607114, 607047, 607058, 607004, 606944, 606404</p> <p><u>Sungai Sembrong:</u></p> <p>Employee numbers: 607616, 607504, 607608, 607515, 607584, 607477, 607401, 607572, 607588, 607257.</p>	
4.4.5.4	<p>Management should ensure employees of contractors are paid based on legal or industry minimum standards according to the employment contract agreed between the contractor and his employee.</p> <p>- Minor compliance -</p>	<p>The contractors have signed on the contract agreement prior commencement of work in the estate. In the agreement, it was clearly stated that the contractors shall ensure their workers are paid according to legal requirements.</p> <p>Interview with the contractors confirmed that they understood the terms and conditions stated in the contract. Their workers were paid according to Minimum Wage Order 2018 based on the pay slips prepared by the contractors.</p>	Complied
4.4.5.5	<p>The management shall establish records that provide an accurate account of all employees (including seasonal workers and subcontracted workers on the premises). The records should contain full names, gender, date of birth, date of entry, a job description, wage and the period of employment.</p> <p>- Major compliance -</p>	<p>The employees that recruited by the estates are of local, Indonesia, Bangladesh and India. Most of them are under direct employment to the estates and have signed the employment contract prior to commencement of work. Information about duration of contract, type of work offered, wages, annual leave, allowances and etc. was stated in the employment contract. Sampled of employment contracts as below:</p> <p><u>Renggam:</u></p>	Complied

MSPO Public Summary Report
Revision 0 (Aug 2017)

Criterion / Indicator		Assessment Findings	Compliance
		<p>Employee numbers: 613948, 613455, 613864, 614061, 613898, 614044, 614043, 613887, 613908, 614053</p> <p><u>Mutiara:</u></p> <p>Employee numbers: 606693, 606985, 607090, 606613, 607114, 607047, 607058, 607004, 606944, 606404</p> <p><u>Sungai Sembrong:</u></p> <p>Employee numbers: 607616, 607504, 607608, 607515, 607584, 607477, 607401, 607572, 607588, 607257.</p>	
4.4.5.6	<p>All employees shall be provided with fair contracts that have been signed by both employee and employer. A copy of employment contract is available for each and every employee indicated in the employment records.</p> <p>- Major compliance -</p>	<p>The employment contract is available and signed by both employee and employer. Verification of the terms and conditions showed that they are in line with the MAPA/NUPW latest agreement [MAPA Circular No. 12/2019 dated 2/4/2019].</p> <p>Those workers whom are employed by contractors appointed by the company have their own contract agreements with their employers.</p>	Complied
4.4.5.7	<p>The management shall establish a time recording system that makes working hours and overtime transparent for both employees and employer.</p> <p>- Major compliance -</p>	<p>Using i-plant where workers are given scan card to tag at the scanner which linked to company's computer system.</p>	Complied
4.4.5.8	<p>The working hours and breaks of each individual employee as indicated in the time records shall comply with legal regulations and collective agreements. Overtime shall be mutually agreed and shall always be compensated at the rate applicable and shall meet the applicable legal requirement.</p>	<p>Interviewed with the workers confirmed that they have rest time in between of the working hours. Overtimes were paid according to the rate stated in the agreement and regulatory requirements.</p>	Complied

MSPO Public Summary Report
Revision 0 (Aug 2017)

Criterion / Indicator		Assessment Findings	Compliance
	- Major compliance -		
4.4.5.9	<p>Wages and overtime payment documented on the pay slips shall be in line with legal regulations and collective agreements.</p> <p>- Major compliance -</p>	<p>Sample payslips checked found the wages and overtime/ Rest day payments are documented in line with the employee contract & agreement and complies with Minimum Wage Order 2018 requirement of RM 1,100 monthly/ Daily RM42.31 and rate stated in the / collective agreement NUPW/ MAPA. Sampled Workers checked for wages:</p> <p><u>Renggam:</u></p> <p>Employee numbers: 613948, 613455, 613864, 614061, 613898, 614044, 614043, 613887, 613908, 614053</p> <p><u>Mutiara:</u></p> <p>Employee numbers: 606693, 606985, 607090, 606613, 607114, 607047, 607058, 607004, 606944, 606404</p> <p><u>Sungai Sembrong:</u></p> <p>Employee numbers: 607616, 607504, 607608, 607515, 607584, 607477, 607401, 607572, 607588, 607257.</p>	Complied
4.4.5.10	<p>Other forms of social benefits should be offered by the employer to employees, their families or the community such as incentives for good work performance, bonus payment, professional development, medical care and health provisions.</p> <p>- Minor compliance -</p>	<p>Among the benefits offered by the company:</p> <ul style="list-style-type: none"> • Subsidies for electricity and water • Medical treatment at estates' clinics • Free transportation to hospital • Loose fruits collection allowance (Loose fruits IDEAS) • Ravine area allowance • Tall palm allowance 	Complied
4.4.5.11	In cases where on-site living quarters are provided, these	The basic amenities and facilities at the quarters provided by the company to its workers. For Renggam Estate, electricity and potable	Complied

MSPO Public Summary Report
Revision 0 (Aug 2017)

Criterion / Indicator		Assessment Findings	Compliance
	<p>quarters shall be habitable and have basic amenities and facilities in compliance with the Workers' Minimum Standards Housing and Amenities Act 1990 (Act 446) or any other applicable legislation.</p> <p>- Major compliance -</p>	<p>water are obtained from the public utilities whereas Sg Sembrong and Mutiara estates from own generator set and water treatment plant. If the supplies are from public utilities, the bills are borne by the workers themselves with some subsidies from the company.</p> <p>Generally, the workers quarters were in very good condition. In addition, line-site inspection was done by the medical or hospital assistants and reports were documented in accordance to the Workers' Minimum Standards Housing and Amenities Act 1990. The inspection reports were verified by the managers. Drinking water test is done twice a year by accredited laboratory (e.g. SMM No. 146). Verified two latest report at Mutiara Estate i.e. LW/871/18 dated 12/12/2018 and LW/419/19 dated 10/6/2019 and Sg Sembrong Estate i.e. LW/869/18 dated 12/12/2018 and LW/417/19 dated 10/6/2019. Among the parameters tested were pH, Turbidity, Al, Cl₂, total Coliform and E. Coli. Based on the test report, the analysis results were within the limit set in Drinking Water Quality Standard, Ministry of Health Malaysia; Engineering Services Division, Year 2010.</p>	
4.4.5.12	<p>The management shall establish a policy and provide guidelines to prevent all forms of sexual harassment and violence at the workplace.</p> <p>- Major compliance -</p>	<p>Kulim has implemented sexual harassment & domestic violence in the workplace policy where the management is committed to develop and apply a policy to prevent sexual harassment and other forms of violence against women and to protect their reproductive rights. Gender Committee was established to monitor and take care of the welfare of female workers to ensure no case of sexual harassment or violence happened. Awareness campaign is conducted time to time through various methods such as briefing and meetings.</p>	Complied
4.4.5.13	<p>The management shall respect the right of all employees to form or join trade union and allow workers own</p>	<p>All visited operating units continued to implement Kulim's Core Labour Standard dated 1/5/2018 where the management is</p>	Complied

Criterion / Indicator		Assessment Findings	Compliance															
	<p>representative(s) to facilitate collective bargaining in accordance with applicable laws and regulations. Employees shall be given the freedom to join a trade union relevant to the industry or to organize themselves for collective bargaining. Employees shall have the right to organize and negotiate their work conditions. Employees exercising this right should not be discriminated against or suffer repercussions.</p> <p>- Major compliance -</p>	<p>committed and respect the rights of all personnel to form and join trade unions of their choice. Union Meetings at all the visited estates were regularly held and minutes of meeting were maintained. Interview with the workers from different nationalities confirmed that they are allowed to join Union freely without any restriction.</p>																
4.4.5.14	<p>Children and young persons shall not be employed or exploited. The minimum age shall comply with local, state and national legislation. Work by children is acceptable on family farms, under adult supervision, and when not interfering with their education programmes. Children shall not exposed to hazardous working conditions.</p> <p>- Major compliance -</p>	<p>All visited operating units continued to implement Kulim’s Core Labour Standard dated 1/5/2018 where the management is committed not to engage or support the use of Child Labour as defined by Malaysian law. Through document reviewed on the Employee Master Listing confirmed that no employee under 18 years was recruited by the company. Interview with the workers and contractors also found that no child labour was practice in the estates.</p>	Complied															
Criterion 4.4.6: Training and competency																		
4.4.6.1	<p>All employees, contractors and relevant smallholders are appropriately trained. A training programme (appropriate to the scale of the organization) that includes regular assessment of training needs and documentation, including records of training shall be kept.</p> <p>- Major compliance -</p>	<p>Trainings were provided during musters and also in session held in the estate community hall/mill compound. The following trainings made for the employees were recorded as follows. Subjects extracted were mainly related to ESH, SOPs, and pesticide handlings.</p> <table border="1" data-bbox="1048 1289 1863 1382"> <thead> <tr> <th>No</th> <th>Subject</th> <th>RE</th> <th>ME</th> <th>SSE</th> </tr> </thead> <tbody> <tr> <td>1</td> <td>Manuring & PPE adherence</td> <td>26/2/19</td> <td>17/3/19</td> <td>02/7/19</td> </tr> <tr> <td>2</td> <td>Harvesting and Collection</td> <td>04/3/19</td> <td>25/9/19</td> <td>07/7/19</td> </tr> </tbody> </table>	No	Subject	RE	ME	SSE	1	Manuring & PPE adherence	26/2/19	17/3/19	02/7/19	2	Harvesting and Collection	04/3/19	25/9/19	07/7/19	Complied
No	Subject	RE	ME	SSE														
1	Manuring & PPE adherence	26/2/19	17/3/19	02/7/19														
2	Harvesting and Collection	04/3/19	25/9/19	07/7/19														

MSPO Public Summary Report
Revision 0 (Aug 2017)

Criterion / Indicator		Assessment Findings				Compliance
		3	Spraying Calibration	03/3/19	24/8/19	01/7/19
		4	Policies Awareness	02/1/19	10/1/19	02/7/9
		5	Fertiliser/chemical Handling.	05/9/19	15/5/19	27/6/19
		6	Scheduled waste handling	12/7/19	26/9/19	20/6/19
		7	Water treatment/sampling	23/4/19	25/9/19	11/2/19
		8	Weighbridge ramp & grading	11/10/19	15/4/19	15/8/19
		9	Fertiliser sampling/handling	12/6/19	25/9/19	016/4/19
		10	Chemical handling calibration	10/5/19	20/8/19	21/4/19
		11	Emergency Respond Plan	10/9/19	09/4/19	02/5/19
		12	Fire drill training ERP	12/4/19	15/2/19	02/5/19
		13	First aid CPR	08/9/19	30/6/19	10/5/19
		14	Tractor/lorry/MB safe driving	22/7/19	29/6/19	29/6/19
		15	Pollution Cleaning Device	05/4/19	19/5/9	25/8/19
		16	Triple Rinsing Chemical store	12/7/19	13/9/19	19/3/19
		17	Fogging / Grass cutting	15/4/19	08/5/19	30/6/19
		18	Rat Baiting/PPE adherence	19/3/19	22/9/19	27/6/19
		19	HCV/Buffer Zone	03/3/19	28/7/19	20/6/19
		20	MSPO/R awareness contractor	03/4/19	30/7/19	14/8/19
		21	MSPO/R briefing stakeholders	05/9/19	03/9/19	14/8/19
		22	Bag worm treatment	03/5/19	27/2/19	27/2/19
		23	IPM barn owl census	26/8/19	27/2/19	-
		24	IPM beneficial plant	21/6/19	13/3/19	16/8/19
		25	Zero burning / HIRARC	27/6/19	15/8/19	20/6/19
		26	Skid tank management /diesel	13/3/19	23/5/19	25/6/19
		27	Fertilizer application spreader	8/10/19	19/8/19	02/7/19
		28	Spill containment	12/7/19	10/7/19	-
		29	Landfill management	27/2/19	23/7/19	05/7/19
		30	Workshop management /PCD	03/5/19	11/4/19	25/8/19
		31	PPE usage	11/2/19	29/7/19	04/3/19
		32	Gender Reproductive Rights	18/3/19	27/1/19	30/8/29
		33	Bio Compost /EFB	-	23/8/19	-

MSPO Public Summary Report
Revision 0 (Aug 2017)

Criterion / Indicator		Assessment Findings					Compliance					
		34	Gen-set operation	-	24/7/19	25/6/19						
		35	Replanting /nursery	-	19/9/19	-						
		36	Electric fencing management	-	10/9/19	-						
			Induction Program	-	-	12/8/19						
4.4.6.2	<p>Training needs of individual employees shall be identified prior to the planning and implementation of the training programmes in order to provide the specific skill and competency required to all employees based on their job description.</p> <p>- Major compliance -</p>	<p>Similar method for identifying the training needs are used in the operating units. The training needs for Tereh CU 2019 training program has been established. The details of the training needs include categories of;</p> <ul style="list-style-type: none"> a) job descriptions, b) sections, c) and employees' group. <p>Included in this program are subjects related to;</p> <ul style="list-style-type: none"> a) environment e.g. environmental, safety & health policy, b) scheduled waste management, c) environmental responsibility, HCV & Biodiversity training, d) field activities/operations, e) equipment handling, vehicles maintenance etc 					Complied					
4.4.6.3	<p>A continuous training programme should be planned and implemented to ensure that all employees are well trained in their job function and responsibility, in accordance to the documented training procedure.</p> <p>- Minor compliance -</p>	<p>Formal training program for 2019 that covered aspects of the MSPO indicators as well as other salient requirement of the estates operations. Regular assessments of training needs were available for all the audited sites. Training Plan was for each operating unit were established. A training need identification matrix has been established with target dates for the training identified. The training program among others includes the following subjects.</p> <table border="1" style="width: 100%; margin-top: 10px;"> <tr> <td>Subjects</td> <td>J-M</td> <td>A-J</td> <td>J-S</td> <td>O-D</td> </tr> </table>					Subjects	J-M	A-J	J-S	O-D	Complied
Subjects	J-M	A-J	J-S	O-D								

MSPO Public Summary Report
Revision 0 (Aug 2017)

Criterion / Indicator		Assessment Findings						Compliance
		1	Manuring & PPE adherence	/			/	
		2	Harvesting and Collection	/	/	/		
		3	Spraying Calibration		/		/	
		4	Spill containment		/		/	
		5	Fertiliser & Chemical Handling.	/				
		6	Scheduled waste		/			
		7	Water treatment / water sampling			/	/	
		8	Ramp & grading		/			
		9	Fertiliser sampling & handling	/	/	/		
		10	Chemical handling	/			/	
		11	Emergency Respond Plan		/		/	
		12	Fire drill training		/		/	
		13	First aid		/		/	
		14	Tractor /lorry / MB safe driving			/		
		15	Pollution Cleaning Device PCD		/			
		16	Triple Rinsing		/			
		17	Fogging	/			/	
		18	Rat Baiting & PPE adherence	/			/	
		19	HCV/Buffer Zone Waste Management			/		
		20	MSPO/RSPO Awareness			/		
		21	GHG calculations		/			
		21	Bag worm treatment		/			
<p>J-M, A-J, J-S & O-D denote Jan to Mac, April to June, July to Sept & Oct to Dec respectively.</p>								
<p>4.5 Principle 5: Environment, natural resources, biodiversity and ecosystem services</p>								

Criterion / Indicator		Assessment Findings	Compliance																				
Criterion 4.5.1: Environmental Management Plan																							
4.5.1.1	<p>An environmental policy and management plan in compliance with the relevant country and state environmental laws shall be developed, effectively communicated and implemented.</p> <p>- Major compliance -</p>	<p>There is an Environmental Management Policy issued on Group level signed by the Executive Director dated in 01 May 2018. Kulim Malaysia Berhad is committed to the creation through team effort of a quality environment as key factor in the continuous success of business. Among others the organisation shall;</p> <ul style="list-style-type: none"> a) Adhere to and comply with relevant environmental legislations of the country. b) Strive for continual improvement on our environmental performance. c) Undertake to communicate our Environmental Policy to all stakeholders and educate the employees to practice and uphold the business commitment on caring for the environment. d) Continue to explore and implement cost effective technology in environmental Policy and the achievement of environmental objectives and targets. e) Review, adopt and implement Good Management Practices currently established in the industry. <p>Communications to the employees were through training session and briefing at muster grounds. Sighted training relating to the environmental subjects among others as described below.</p> <table border="1"> <thead> <tr> <th>No</th> <th>Subject</th> <th>RE</th> <th>ME</th> <th>SSE</th> </tr> </thead> <tbody> <tr> <td>1</td> <td>Policies Awareness</td> <td>02/1/19</td> <td>10/1/19</td> <td>02/7/9</td> </tr> <tr> <td>2</td> <td>Fertiliser/chemical Handling.</td> <td>05/9/19</td> <td>15/5/19</td> <td>27/6/19</td> </tr> <tr> <td>3</td> <td>Scheduled waste handling</td> <td>12/7/19</td> <td>26/9/19</td> <td>20/6/19</td> </tr> </tbody> </table>	No	Subject	RE	ME	SSE	1	Policies Awareness	02/1/19	10/1/19	02/7/9	2	Fertiliser/chemical Handling.	05/9/19	15/5/19	27/6/19	3	Scheduled waste handling	12/7/19	26/9/19	20/6/19	Complied
No	Subject	RE	ME	SSE																			
1	Policies Awareness	02/1/19	10/1/19	02/7/9																			
2	Fertiliser/chemical Handling.	05/9/19	15/5/19	27/6/19																			
3	Scheduled waste handling	12/7/19	26/9/19	20/6/19																			

MSPO Public Summary Report
Revision 0 (Aug 2017)

Criterion / Indicator		Assessment Findings				Compliance	
		4	Water treatment/sampling	23/4/19	25/9/19	11/2/19	
		5	Pollution Cleaning Device	05/4/19	19/5/9	25/8/19	
		6	Triple Rinsing Chemical store	12/7/19	13/9/19	19/3/19	
		7	HCV/Buffer Zone	03/3/19	28/7/19	20/6/19	
		8	MSPO/R awareness contractor	03/4/19	30/7/19	14/8/19	
		9	MSPO/R briefing stakeholders	05/9/19	03/9/19	14/8/19	
		10	Skid tank management /diesel	13/3/19	23/5/19	25/6/19	
		11	Spill containment	12/7/19	10/7/19	-	
		12	Landfill management	27/2/19	23/7/19	05/7/19	
		13	Workshop management /PCD	03/5/19	11/4/19	25/8/19	
4.5.1.2	<p>The environmental management plan shall cover the following:</p> <ul style="list-style-type: none"> a) An environmental policy and objectives; b) The aspects and impacts analysis of all operations. <p>- Major compliance -</p>	<p>The EMP policy is available as specified in 4.5.1.1 above. The objectives, target and duration are shown in the Environmental Management program (EMP) incorporating the action plan to be initiated by the estates. The EMP for the estates was sighted. Details of the objectives were also mentioned in 4.5.4.1. Kulim (Malaysia) Berhad have conducted the annual Environmental Risk Assessment.</p> <ul style="list-style-type: none"> a) The last review was dated July 2019. The Environmental Risk Assessment was conducted by Kulim SPO team and operating units (e.g. mill & estate). b) The Environmental Risk Assessment is annually reviewed and accepted to conclude that proper environmental management has been considered prior any activities. c) There is no new EIA required as there is no expansion of mill activities or expansion of new land planting. <p>The EAI as detailed in the estates register covers all estates</p>				Complied	

Criterion / Indicator		Assessment Findings	Compliance																																				
		<p>activities/operations. Among others the significant environmental aspects related to the estate operation including the activities from;</p> <table border="1"> <thead> <tr> <th>No</th> <th>Activity</th> <th>No</th> <th>Activity</th> </tr> </thead> <tbody> <tr> <td>1</td> <td>Community</td> <td>9</td> <td>Road maintenance</td> </tr> <tr> <td>2</td> <td>Harvesting / collection</td> <td>10</td> <td>Use of chemicals</td> </tr> <tr> <td>3</td> <td>Machine maintenance</td> <td>11</td> <td>use of hydrocarbons</td> </tr> <tr> <td>4</td> <td>Pest and Disease</td> <td>12</td> <td>Scheduled waste storage</td> </tr> <tr> <td>5</td> <td>Replanting</td> <td>13</td> <td>Store handlings</td> </tr> <tr> <td>6</td> <td>Fertilizer application</td> <td>14</td> <td>Office activities</td> </tr> <tr> <td>7</td> <td>Nursery</td> <td>15</td> <td>Generating Power</td> </tr> <tr> <td>8</td> <td>vehicle maintenance</td> <td>16</td> <td>Dispensary operations</td> </tr> </tbody> </table> <p>Documents are maintained, sighted and verified.</p>	No	Activity	No	Activity	1	Community	9	Road maintenance	2	Harvesting / collection	10	Use of chemicals	3	Machine maintenance	11	use of hydrocarbons	4	Pest and Disease	12	Scheduled waste storage	5	Replanting	13	Store handlings	6	Fertilizer application	14	Office activities	7	Nursery	15	Generating Power	8	vehicle maintenance	16	Dispensary operations	
No	Activity	No	Activity																																				
1	Community	9	Road maintenance																																				
2	Harvesting / collection	10	Use of chemicals																																				
3	Machine maintenance	11	use of hydrocarbons																																				
4	Pest and Disease	12	Scheduled waste storage																																				
5	Replanting	13	Store handlings																																				
6	Fertilizer application	14	Office activities																																				
7	Nursery	15	Generating Power																																				
8	vehicle maintenance	16	Dispensary operations																																				
4.5.1.3	<p>An environmental improvement plan to mitigate the negative impacts and to promote the positive ones, shall be developed, effectively implemented and monitored.</p> <p>- Major compliance -</p>	<p>All the estates maintained its documented environmental impact assessment.</p> <ul style="list-style-type: none"> a) The information of environmental impact assessment contained in the Environmental Aspect Identification (EAI) and Environmental Impact Evaluation Risk Assessment Register (RA) register. b) The documents included the identification and evaluation of environmental aspects covering mill and plantation operation, including replanting. Renggam and Mutiara Estates had a replanting in progress phase of planting work for field no 	Complied																																				

Criterion / Indicator		Assessment Findings	Compliance																																																												
		<p>2018 and 2019 respectively.</p> <p>c) Relevant environmental aspects and impacts (particularly potential soil erosion from land clearing) were identified and mitigated (planting LCC to prevent erosion).</p> <p>All the Estates/Mill Executives has been assigned to ensure the action plan are effectively implemented within the stipulate time frame. They were assisted by the respective supervisors/staff.</p>																																																													
4.5.1.4	<p>A programme to promote the positive impacts should be included in the continual improvement plan.</p> <p>- Minor compliance -</p>	<p>The mitigation measures to manage the significant environmental impact were defined in the <i>Estate – Pollution & Emission Plan</i> endorsed on 01/8/19. Details as provided therein among others;</p> <table border="1"> <thead> <tr> <th colspan="4">Renggam / Mutiara / Sg Sembrong Estate</th> </tr> <tr> <th></th> <th>Emission</th> <th>Source</th> <th>Frequency</th> </tr> </thead> <tbody> <tr> <td>1</td> <td>Dark smoke</td> <td>Running vehicles</td> <td>Daily</td> </tr> <tr> <td>2</td> <td>Noise</td> <td>Diesel engine</td> <td>Operational hours</td> </tr> <tr> <td></td> <td></td> <td>Running vehicles</td> <td>Daily</td> </tr> <tr> <td>3</td> <td>Air pollution</td> <td>Diesel engine</td> <td>Operational hours</td> </tr> <tr> <td></td> <td></td> <td>Running vehicles</td> <td>Operational hours</td> </tr> <tr> <td>4</td> <td>Waste water</td> <td>PCD</td> <td>Scheduled inspection</td> </tr> <tr> <td></td> <td></td> <td>Septic tank spillage</td> <td>Weekly inspection</td> </tr> </tbody> </table> <table border="1"> <thead> <tr> <th></th> <th>Emission</th> <th>Action Plan</th> <th>PIC</th> </tr> </thead> <tbody> <tr> <td>1</td> <td>Dark smoke</td> <td>Inspection of vehicle condition</td> <td>Exec/staff</td> </tr> <tr> <td>2</td> <td>Noise</td> <td>Scheduled maintenance</td> <td>Exec/staff</td> </tr> <tr> <td></td> <td></td> <td>Inspection of vehicle inspection</td> <td>Exec/staff</td> </tr> <tr> <td>3</td> <td>Air pollution</td> <td>Routine maintenance</td> <td>Exec/staff</td> </tr> <tr> <td></td> <td></td> <td>Inspection of vehicle condition</td> <td>Exec/staff</td> </tr> </tbody> </table>	Renggam / Mutiara / Sg Sembrong Estate					Emission	Source	Frequency	1	Dark smoke	Running vehicles	Daily	2	Noise	Diesel engine	Operational hours			Running vehicles	Daily	3	Air pollution	Diesel engine	Operational hours			Running vehicles	Operational hours	4	Waste water	PCD	Scheduled inspection			Septic tank spillage	Weekly inspection		Emission	Action Plan	PIC	1	Dark smoke	Inspection of vehicle condition	Exec/staff	2	Noise	Scheduled maintenance	Exec/staff			Inspection of vehicle inspection	Exec/staff	3	Air pollution	Routine maintenance	Exec/staff			Inspection of vehicle condition	Exec/staff	Complied
Renggam / Mutiara / Sg Sembrong Estate																																																															
	Emission	Source	Frequency																																																												
1	Dark smoke	Running vehicles	Daily																																																												
2	Noise	Diesel engine	Operational hours																																																												
		Running vehicles	Daily																																																												
3	Air pollution	Diesel engine	Operational hours																																																												
		Running vehicles	Operational hours																																																												
4	Waste water	PCD	Scheduled inspection																																																												
		Septic tank spillage	Weekly inspection																																																												
	Emission	Action Plan	PIC																																																												
1	Dark smoke	Inspection of vehicle condition	Exec/staff																																																												
2	Noise	Scheduled maintenance	Exec/staff																																																												
		Inspection of vehicle inspection	Exec/staff																																																												
3	Air pollution	Routine maintenance	Exec/staff																																																												
		Inspection of vehicle condition	Exec/staff																																																												

MSPO Public Summary Report
Revision 0 (Aug 2017)

Criterion / Indicator		Assessment Findings				Compliance
		4	Waste water	Inspection of PCD for functional Adherence to SW guidelines	Exec/staff/foreman	
				Weekly line site inspection		
				Appropriate action on spillage		
		<p>Records of periodical reporting of each of the above items were evident to support that the plans have been monitored. The plans were reviewed annually.</p> <p>The environmental improvement plans are identified <i>Estate – Pollution & Emission Plan</i> endorsed on 01/8/19 having details of mitigation of the negative impacts. They are summarized and shown below;</p>				
			Activities	Impacts	Mitigation plan	
		1	harvesting	Promote positive impact to soil structure through biomass frond & EFB mulching.	Practice proper frond stacking. EFB applied to improve nutrient & biomass	
		2	weeding	Negative impact as polluting the soil with usage of chemicals.	Dosage of chemicals is monitored & calibrated. Cattle integration introduced to reduce reliance of chemical.	
		3	Manuring	Over usage of chemical & fertilizer affecting soil toxicity causing leaching /wash off.	Identify buffer zones and to prevent leaching of fertilizer and chemicals. Application along frond	

Criterion / Indicator		Assessment Findings				Compliance																									
					stacking rows.																										
		4	Road upkeep	Damages through grading and chambering	Water collected at drain pits is collected to maximize moisture of nearest palm.																										
		5	Loading Bay	FFB transportation of lorries in minimizing leakages of fuel	Education to drivers and monitoring of vehicles movements.																										
		6	Workshop	Spillage to prevent pollution	Availability of spill kit and health surveillance for welding personnel. q																										
4.5.1.5	<p>An awareness and training programme shall be established and implemented to ensure that all employees understand the policy and objectives of the environmental management and improvement plans and are working towards achieving the objectives.</p> <p>- Major compliance -</p>	<p>A training program is available in the respective operating units Training Program updated on a yearly basis or revised as per the management requirement. Included in this program are subjects related to environment e.g. environmental, safety & health policy, scheduled waste management, environmental responsibility, HCV & Biodiversity training. Guidance was provided by the SQD & Regional Office prior to the approval and implementation by the estates. Trainings conducted in relation to environmental and its improvement plan are shown as follows;</p> <table border="1"> <thead> <tr> <th>No</th> <th>Subject</th> <th>RE</th> <th>ME</th> <th>SSE</th> </tr> </thead> <tbody> <tr> <td>1</td> <td>Policies Awareness</td> <td>02/1/19</td> <td>10/1/19</td> <td>02/7/9</td> </tr> <tr> <td>2</td> <td>Fertiliser/chemical Handling.</td> <td>05/9/19</td> <td>15/5/19</td> <td>27/6/19</td> </tr> <tr> <td>3</td> <td>Scheduled waste handling</td> <td>12/7/19</td> <td>26/9/19</td> <td>20/6/19</td> </tr> <tr> <td>4</td> <td>Water treatment/sampling</td> <td>23/4/19</td> <td>25/9/19</td> <td>11/2/19</td> </tr> </tbody> </table>				No	Subject	RE	ME	SSE	1	Policies Awareness	02/1/19	10/1/19	02/7/9	2	Fertiliser/chemical Handling.	05/9/19	15/5/19	27/6/19	3	Scheduled waste handling	12/7/19	26/9/19	20/6/19	4	Water treatment/sampling	23/4/19	25/9/19	11/2/19	Complied
No	Subject	RE	ME	SSE																											
1	Policies Awareness	02/1/19	10/1/19	02/7/9																											
2	Fertiliser/chemical Handling.	05/9/19	15/5/19	27/6/19																											
3	Scheduled waste handling	12/7/19	26/9/19	20/6/19																											
4	Water treatment/sampling	23/4/19	25/9/19	11/2/19																											

MSPO Public Summary Report
Revision 0 (Aug 2017)

Criterion / Indicator		Assessment Findings					Compliance
		5	Pollution Cleaning Device	05/4/19	19/5/9	25/8/19	
		6	Triple Rinsing Chemical store	12/7/19	13/9/19	19/3/19	
		7	HCV/Buffer Zone	03/3/19	28/7/19	20/6/19	
		8	MSPO/R awareness contractor	03/4/19	30/7/19	14/8/19	
		9	MSPO/R briefing stakeholders	05/9/19	03/9/19	14/8/19	
		10	Skid tank management /diesel	13/3/19	23/5/19	25/6/19	
		11	Spill containment	12/7/19	10/7/19	-	
		12	Landfill management	27/2/19	23/7/19	05/7/19	
		13	Workshop management /PCD	03/5/19	11/4/19	25/8/19	
4.5.1.6	<p>Management shall organize regular meetings with employees where their concerns about environmental quality are discussed.</p> <p>- Major compliance -</p>	<p>Similar forum is used by the mill and the estates in discussing concerns on environmental performance and issues. The forum used in the estates is the annual environmental meeting and dialogues during the muster. The former emphasized more on issues on water management plan, electricity use, diesel consumption, waste management, EMP, renewable energy, aspect/impact. The estates held the meetings on the following dates;</p> <ul style="list-style-type: none"> a) Renggam Estate – 22/7/2019 b) Mutiara Estate -31/7/19 c) Sg Sembrong Estate – 17/7/19 <p>The meetings were chaired by the respective Managers. Minutes were sighted and adequate in discussing the environmental issues. The agenda discussed as follows;</p> <ul style="list-style-type: none"> a) Chairman’s Introduction. b) Issues from audit report 					Complied

Criterion / Indicator		Assessment Findings	Compliance																																																							
		c) Compliance to legal requirement d) EIA – discussion e) Compliance to environmental issue (Water/Air/Land/ f) HCV / Biodiversity g) Training / Other matters The Head Office organize am similar meeting at a higher level namely “Environmental Regulatory Compliance Monitoring Committee (ERCMC) Meeting discussing an overall performance by Group Palm Oil Mill and supply base. The minutes of meeting in 27/8/19 was sighted and verified.																																																								
Criterion 4.5.2: Efficiency of energy use and use of renewable energy																																																										
4.5.2.1	Consumption of non-renewable energy shall be optimized and closely monitored by establishing baseline values and trends shall be observed within an appropriate timeframe. There should be a plan to assess the usage of non-renewable energy including fossil fuel, electricity and energy efficiency in the operations over the base period. - Major compliance -	This has been established. Data for 2019 to date is provided below; <table border="1"> <thead> <tr> <th rowspan="2"></th> <th colspan="3"><i>Renggam Estate</i></th> <th colspan="3"><i>Mutiara Estate</i></th> </tr> <tr> <th><i>FFB</i></th> <th><i>Diesel</i></th> <th><i>D/FFB</i></th> <th><i>FFB</i></th> <th><i>Diesel</i></th> <th><i>D/FFB</i></th> </tr> </thead> <tbody> <tr> <td>Jan</td> <td>3516</td> <td>9583</td> <td>2.73</td> <td>3606</td> <td>21645</td> <td>6.00</td> </tr> <tr> <td>Feb</td> <td>3076</td> <td>9960</td> <td>3.24</td> <td>3027</td> <td>18763</td> <td>6.20</td> </tr> <tr> <td>Mac</td> <td>3069</td> <td>13369</td> <td>4.36</td> <td>2887</td> <td>22552</td> <td>7.81</td> </tr> <tr> <td>Apr</td> <td>3117</td> <td>14768</td> <td>4.74</td> <td>2766</td> <td>18350</td> <td>6.63</td> </tr> <tr> <td>May</td> <td>3057</td> <td>10445</td> <td>3.42</td> <td>2935</td> <td>23810</td> <td>8.11</td> </tr> <tr> <td>June</td> <td>2531</td> <td>8967</td> <td>3.54</td> <td>2551</td> <td>23370</td> <td>9.16</td> </tr> </tbody> </table>		<i>Renggam Estate</i>			<i>Mutiara Estate</i>			<i>FFB</i>	<i>Diesel</i>	<i>D/FFB</i>	<i>FFB</i>	<i>Diesel</i>	<i>D/FFB</i>	Jan	3516	9583	2.73	3606	21645	6.00	Feb	3076	9960	3.24	3027	18763	6.20	Mac	3069	13369	4.36	2887	22552	7.81	Apr	3117	14768	4.74	2766	18350	6.63	May	3057	10445	3.42	2935	23810	8.11	June	2531	8967	3.54	2551	23370	9.16	Complied
	<i>Renggam Estate</i>			<i>Mutiara Estate</i>																																																						
	<i>FFB</i>	<i>Diesel</i>	<i>D/FFB</i>	<i>FFB</i>	<i>Diesel</i>	<i>D/FFB</i>																																																				
Jan	3516	9583	2.73	3606	21645	6.00																																																				
Feb	3076	9960	3.24	3027	18763	6.20																																																				
Mac	3069	13369	4.36	2887	22552	7.81																																																				
Apr	3117	14768	4.74	2766	18350	6.63																																																				
May	3057	10445	3.42	2935	23810	8.11																																																				
June	2531	8967	3.54	2551	23370	9.16																																																				

**MSPO Public Summary Report
Revision 0 (Aug 2017)**

Criterion / Indicator		Assessment Findings						Compliance																																																
		July	3004	13124	4.37	2507	21300	8.49																																																
		Aug	3145	11531	3.67	2785	24630	8.84																																																
		Sept	3210	11562	3.60	2780	21550	7.75																																																
		Tot	27728	103309	3.73	25847	195969	7.58																																																
		<table border="1"> <thead> <tr> <th colspan="4"><i>S Sembrong Estate</i></th> </tr> <tr> <th></th> <th><i>FFB</i></th> <th><i>Diesel</i></th> <th><i>D/FFB</i></th> </tr> </thead> <tbody> <tr> <td>Jan</td> <td>2784</td> <td>12317</td> <td>4.42</td> </tr> <tr> <td>Feb</td> <td>2441</td> <td>11836</td> <td>4.85</td> </tr> <tr> <td>Mac</td> <td>2418</td> <td>11911</td> <td>4.93</td> </tr> <tr> <td>Apr</td> <td>2657</td> <td>10625</td> <td>4.00</td> </tr> <tr> <td>May</td> <td>2511</td> <td>13649</td> <td>5.43</td> </tr> <tr> <td>June</td> <td>2188</td> <td>12247</td> <td>5.60</td> </tr> <tr> <td>July</td> <td>2232</td> <td>12098</td> <td>5.42</td> </tr> <tr> <td>Aug</td> <td>1923</td> <td>11787</td> <td>6.13</td> </tr> <tr> <td>Sept</td> <td>2007</td> <td>12590</td> <td>6.27</td> </tr> <tr> <td>Tot</td> <td>21163</td> <td>109060</td> <td>5.15.</td> </tr> </tbody> </table>						<i>S Sembrong Estate</i>					<i>FFB</i>	<i>Diesel</i>	<i>D/FFB</i>	Jan	2784	12317	4.42	Feb	2441	11836	4.85	Mac	2418	11911	4.93	Apr	2657	10625	4.00	May	2511	13649	5.43	June	2188	12247	5.60	July	2232	12098	5.42	Aug	1923	11787	6.13	Sept	2007	12590	6.27	Tot	21163	109060	5.15.	
<i>S Sembrong Estate</i>																																																								
	<i>FFB</i>	<i>Diesel</i>	<i>D/FFB</i>																																																					
Jan	2784	12317	4.42																																																					
Feb	2441	11836	4.85																																																					
Mac	2418	11911	4.93																																																					
Apr	2657	10625	4.00																																																					
May	2511	13649	5.43																																																					
June	2188	12247	5.60																																																					
July	2232	12098	5.42																																																					
Aug	1923	11787	6.13																																																					
Sept	2007	12590	6.27																																																					
Tot	21163	109060	5.15.																																																					
		<p>Performance variation in view of several factors i.e.</p> <ul style="list-style-type: none"> a) infrastructure of estates, b) community size / no of gen-sets, 																																																						

Criterion / Indicator		Assessment Findings	Compliance														
		c) no of vehicles / age of machine. d) Weather interference / crop production volume															
4.5.2.2	The oil palm premises shall estimate the direct usage of non-renewable energy for their operations, including fossil fuel, and electricity to determine energy efficiency of their operations. This shall include fuel use by contractors, including all transport and machinery operations. - Major compliance -	This is provided in the annual budget under EVIT (Engine/vehicle/Tractor) running account. The budget was sighted. The Contractors maintained their own requirement for their set of fleet.	Complied														
4.5.2.3	The use of renewable energy should be applied where possible. - Minor compliance -	Mainly such practices are made in the mills whereby fibres and shell are used as fuel in the boiler for steam production thereafter for power generation. There is no opportunity for the estates to capitalize the utilization of fibre/shell as part of their energy production in replacement of fossil fuel with the current technology limitation.	Complied														
Criterion 4.5.3: Waste management and disposal																	
4.5.3.1	All waste products and sources of pollution shall be identified and documented. - Major compliance -	The estates and the mill had identified all the waste products and sources of pollution related to the respective activities. Details as provided below; <table border="1" style="margin-left: 20px;"> <thead> <tr> <th></th> <th>Type of waste</th> <th>Description</th> <th>Location</th> </tr> </thead> <tbody> <tr> <td>1</td> <td>Domestic waste</td> <td>Rubbish</td> <td>Line sites, office, workshop, store,</td> </tr> <tr> <td rowspan="2">2</td> <td rowspan="2">Industrial waste</td> <td>Fertilizer bags</td> <td>Empty bags store</td> </tr> <tr> <td>Scrap metal</td> <td>workshop</td> </tr> </tbody> </table>		Type of waste	Description	Location	1	Domestic waste	Rubbish	Line sites, office, workshop, store,	2	Industrial waste	Fertilizer bags	Empty bags store	Scrap metal	workshop	Complied
	Type of waste	Description	Location														
1	Domestic waste	Rubbish	Line sites, office, workshop, store,														
2	Industrial waste	Fertilizer bags	Empty bags store														
		Scrap metal	workshop														

Criterion / Indicator		Assessment Findings			Compliance								
			POME	ETP									
		3	Sewage waste	sewage housing toilets & office									
		4	Scheduled Waste	SW 404 Clinical waste clinic									
				SW rags, plastics, filters workshop									
				Spent lubricant & hydraulic oil workshop									
				Disposed containers, bags, equipment contaminated with chemicals, pesticides, SW store									
		The pollution from the estates activities as illustrated below;											
			Environmental Issue	Details									
		1	Leakage of pesticides	Activities during chemical mixing and transportation									
		2	Lubricant spillage	Maintenance work at the workshop for estates vehicles									
		3	POME	Spillages during application / pipe leakages									
4.5.3.2	<p>A waste management plan to avoid or reduce pollution shall be developed and implemented. The waste management plan should include measures for:</p> <p>a) Identifying and monitoring sources of waste and pollution</p> <p>b) Improving the efficiency of resource utilization and recycling of potential wastes as nutrients or converting them into value-added by-products</p> <p>- Major compliance -</p>	<p>Details of the management plan as described below. This is a continuation of the 4.5.3.1 above.</p> <table border="1"> <thead> <tr> <th></th> <th>Type of waste</th> <th>Description</th> <th>Action</th> </tr> </thead> <tbody> <tr> <td>1</td> <td>Domestic waste</td> <td>Rubbish</td> <td>Collection/disposal min 2x-3x /week internally. Establish landfill/collection SOP Establish collection schedule & PIC Create awareness on hygiene Monitoring of line site</td> </tr> </tbody> </table>				Type of waste	Description	Action	1	Domestic waste	Rubbish	Collection/disposal min 2x-3x /week internally. Establish landfill/collection SOP Establish collection schedule & PIC Create awareness on hygiene Monitoring of line site	Complied
	Type of waste	Description	Action										
1	Domestic waste	Rubbish	Collection/disposal min 2x-3x /week internally. Establish landfill/collection SOP Establish collection schedule & PIC Create awareness on hygiene Monitoring of line site										

MSPO Public Summary Report
Revision 0 (Aug 2017)

Criterion / Indicator		Assessment Findings				Compliance
		2	Industrial waste	Fertilizer bags	Inventory of bags, reuse for LF collection, sell to appointed contractor	
				Scrap metal	Inventory maintained, tender at zone level for sale to licensed contractor.	
				POME	Daily monitoring of application at designated field P00.	
		3	Sewage waste	sewage	To monitor during housing inspection and residents' complaints. Engagement with licensed contractor for sewage management.	
		4	Scheduled Waste	SW 404 Clinical waste	Inventory maintained. Storage in sharp bin in clinic. Disposal to <i>Kualiti Alam Sdn Bhd.</i>	
				SW rags, plastics, filters	Inventory maintained. Storage in scheduled waste store. Disposal to licensed contractor.	
				Spent lubricant & hydraulic oil	Collection by licensed vendor. Inventory maintained.	
				Disposed containers, bags, equipment contaminated with chemicals, pesticides, SW,	Inventory maintained. Storage in SW store. All containers are labelled. Empty containers collected by authorized vendor G-Planter	
4.5.3.3	The management shall establish Standard Operating Procedure for handling of used chemicals that are classified under Environment Quality Regulations (Scheduled Waste) 2005,	The procedures for handling used chemicals classified under Environment Quality Regulation (Scheduled Waste) 2005, Environmental Quality Act, 1974 are available prepared on Group level by SQD and implemented in all estates and mills for all the				Complied

Criterion / Indicator	Assessment Findings	Compliance																																														
<p>Environmental Quality Act, 1974 to ensure proper and safe handling, storage and disposal.</p> <p>- Major compliance -</p>	<p>applicable practices. The operational control procedures provide guidelines as follows;</p> <ul style="list-style-type: none"> a) Management of class 2 (and higher) chemical containers b) Management of fertilizer bags <p>This document entitled SNPOM/WI/14 with latest review on 01/1/19 and remains effective for practice in all estates and mills.</p> <p>Kulim (Malaysia) Berhad adopted the guidelines provided by the Agriculture Department on the empty chemicals containers management. All empty chemical containers in both estates and mill were triple rinsed, and disposed through approved licensed contractor <i>G-Planter Sdn Bhd</i>. The DOE licensed contractor <i>Kualiti Alam Sdn Bhd</i> caters the collection of scheduled wastes for both mill and estates within Tereh Supply Base Complex. Sighted record of disposal made as follows by the estates/mill;</p> <table border="1" data-bbox="1048 1023 1767 1278"> <thead> <tr> <th rowspan="2"></th> <th rowspan="2">Chemical containers</th> <th colspan="3">Estate/Quantity</th> </tr> <tr> <th>Renggam</th> <th>Mutiara</th> <th>S Sembrong</th> </tr> </thead> <tbody> <tr> <td></td> <td>Date</td> <td>30/8/19</td> <td>21/2/19</td> <td>-</td> </tr> <tr> <td>1</td> <td>20 L containers</td> <td>-</td> <td>74</td> <td>-</td> </tr> <tr> <td>2</td> <td>4 L containers</td> <td>167</td> <td>229</td> <td>-</td> </tr> <tr> <td>3</td> <td>Rat Bait Boxes</td> <td>93</td> <td>-</td> <td>-</td> </tr> <tr> <td>4</td> <td>Ally bottles</td> <td>110</td> <td>142</td> <td>-</td> </tr> </tbody> </table> <table border="1" data-bbox="1048 1326 1767 1393"> <thead> <tr> <th rowspan="2"></th> <th rowspan="2">Scheduled Waste</th> <th colspan="3">Estate/Quantity</th> </tr> <tr> <th>Renggam</th> <th>Mutiara</th> <th>S Sembrong</th> </tr> </thead> <tbody> <tr> <td></td> <td></td> <td></td> <td></td> <td></td> </tr> </tbody> </table>		Chemical containers	Estate/Quantity			Renggam	Mutiara	S Sembrong		Date	30/8/19	21/2/19	-	1	20 L containers	-	74	-	2	4 L containers	167	229	-	3	Rat Bait Boxes	93	-	-	4	Ally bottles	110	142	-		Scheduled Waste	Estate/Quantity			Renggam	Mutiara	S Sembrong						
	Chemical containers			Estate/Quantity																																												
		Renggam	Mutiara	S Sembrong																																												
	Date	30/8/19	21/2/19	-																																												
1	20 L containers	-	74	-																																												
2	4 L containers	167	229	-																																												
3	Rat Bait Boxes	93	-	-																																												
4	Ally bottles	110	142	-																																												
	Scheduled Waste	Estate/Quantity																																														
		Renggam	Mutiara	S Sembrong																																												

Criterion / Indicator		Assessment Findings				Compliance	
			Date	19/9/19	19/3/19	23/9/19	
		1	SW306	-	0.086	-	
		2	SW102	-	-	0.0300	
		3	SW305	0.250	0.102	0.0550	
		4	SW307	0.175	0.046	0.003	
		5	SW408	-	-	0.002	
		6	SW409	-	0.468	0.016	
		7	SW410	0.040	-	-	
		8	SW404	-	-	<i>Shared with Mutiara</i>	
		<p>ME storage at 7TH month due to diversion from <i>M/s Kualiti Alam Sdn Bhd</i> to <i>M/s Pentas Flora Sdn Bhd</i> (DOE licence no 004702 valid till 30/4/20) after an event of fire reported in the former. Notification being made to DOE IN June 19. All correspondence in emails were sighted and verified.</p>					
4.5.3.4	<p>Empty pesticide containers shall be punctured and disposed in an environmentally and socially responsible way, such that there is no risk of contamination of water sources or to human health. The disposal instructions on manufacturer's labels should be adhered to. Reference should be made to the national programme on recycling of used HDPE pesticide containers.</p> <p>- Major compliance -</p>	<p>Under the operational control procedure established as given in 4.5.3.3 above the guideline and practice for handling empty pesticides containers are as follows;</p> <ul style="list-style-type: none"> a) All class 1, 2 and above containers are tripled rinsed and holes punctured at the bottom only if the waste generator is to dispose as non-scheduled waste. b) Containers to be disposed as scheduled waste need not go the triple rinsing and hole punctured process. <p>These guidelines are based on Department of Agriculture <i>ref 91/120/038/014 dated 7/11/2002</i>. During the site visit this has been adhered mainly containers are tripled rinsed and holes punctured at the container base. Items were collected to G-Planter as authorized</p>					Complied

Criterion / Indicator		Assessment Findings	Compliance																				
		<p>by Dept Of Agriculture via letter dated 16/1/16.</p> <p>Training relating to bagworm treatment using class 1 <i>monocrotophos</i> has been made on 27/2/19 and 13/8/19 by the KMB Agronomist and <i>Supplier Hextar Chemical</i> attended by Personnel from Estates within Tereh CU.</p>																					
4.5.3.5	<p>Domestic waste should be disposed as such to minimize the risk of contamination of the environment and watercourses.</p> <p>- Minor compliance -</p>	<p>The estates used the inhouse facilities available in the respective estates. The estate of Tereh Utara manages the same landfill for Tereh Mill. Sites were visited and concluded maintained clean and tidy with proper signage displayed.</p> <table border="1"> <thead> <tr> <th></th> <th>Estate</th> <th>Landfill location</th> </tr> </thead> <tbody> <tr> <td>1</td> <td>Renggam</td> <td>P00 Block 1</td> </tr> <tr> <td>2</td> <td>Mutiara</td> <td>P16 Block 3</td> </tr> <tr> <td>3</td> <td>Sg Sembrong</td> <td>P00 Block 1 Main Div</td> </tr> </tbody> </table>		Estate	Landfill location	1	Renggam	P00 Block 1	2	Mutiara	P16 Block 3	3	Sg Sembrong	P00 Block 1 Main Div	Complied								
	Estate	Landfill location																					
1	Renggam	P00 Block 1																					
2	Mutiara	P16 Block 3																					
3	Sg Sembrong	P00 Block 1 Main Div																					
Criterion 4.5.4: Reduction of pollution and emission																							
4.5.4.1	<p>An assessment of all polluting activities shall be conducted, including greenhouse gas emissions, scheduled wastes, solid wastes and effluent.</p> <p>- Major compliance -</p>	<p>The assessment of all polluting activities is defined in <i>the Estate – Pollution & Emission Plan</i> endorsed on 01/8/19. Details as provided therein among others as given below;</p> <table border="1"> <thead> <tr> <th></th> <th colspan="3">Estates</th> </tr> <tr> <th></th> <th>Emission</th> <th>Source</th> <th>Frequency</th> </tr> </thead> <tbody> <tr> <td>1</td> <td>Dark smoke</td> <td>Running vehicles</td> <td>Daily</td> </tr> <tr> <td>2</td> <td>Noise</td> <td>Diesel engine</td> <td>Operational hours</td> </tr> <tr> <td></td> <td></td> <td>Running vehicles</td> <td>Daily</td> </tr> </tbody> </table>		Estates				Emission	Source	Frequency	1	Dark smoke	Running vehicles	Daily	2	Noise	Diesel engine	Operational hours			Running vehicles	Daily	Complied
	Estates																						
	Emission	Source	Frequency																				
1	Dark smoke	Running vehicles	Daily																				
2	Noise	Diesel engine	Operational hours																				
		Running vehicles	Daily																				

MSPO Public Summary Report
Revision 0 (Aug 2017)

Criterion / Indicator		Assessment Findings				Compliance																																						
		3	Air pollution	Diesel engine	Operational hours																																							
				Running vehicles	Operational hours																																							
		4	Waste water	PCD	Scheduled inspection																																							
				Septic tank spillage	Weekly inspection																																							
4.5.4.2	An action plan to reduce identified significant pollutants and emissions shall be established and implemented. - Major compliance -	Details of action plan for identified pollutants as shown below and is a continuation from the 4.5.4.1 above. <table border="1" style="width: 100%; margin-top: 10px;"> <thead> <tr> <th></th> <th>Emission</th> <th>Action Plan</th> <th>PIC</th> </tr> </thead> <tbody> <tr> <td>1</td> <td>Dark smoke</td> <td>Inspection of vehicle condition</td> <td>Exec/staff</td> </tr> <tr> <td>2</td> <td>Noise</td> <td>Scheduled maintenance</td> <td>Exec/staff</td> </tr> <tr> <td></td> <td></td> <td>Inspection of vehicle inspection</td> <td>Exec/staff</td> </tr> <tr> <td>3</td> <td>Air pollution</td> <td>Routine maintenance as schedule</td> <td>Exec/staff</td> </tr> <tr> <td></td> <td></td> <td>Inspection of vehicle condition</td> <td>Exec/staff</td> </tr> <tr> <td>4</td> <td>Waste water</td> <td>Inspection of PCD for functional</td> <td rowspan="3">Exec/staff/ foreman</td> </tr> <tr> <td></td> <td></td> <td>Adherence to SW guidelines</td> </tr> <tr> <td></td> <td></td> <td>Weekly line site inspection</td> </tr> <tr> <td></td> <td></td> <td></td> <td>Appropriate action on spillage</td> </tr> </tbody> </table>					Emission	Action Plan	PIC	1	Dark smoke	Inspection of vehicle condition	Exec/staff	2	Noise	Scheduled maintenance	Exec/staff			Inspection of vehicle inspection	Exec/staff	3	Air pollution	Routine maintenance as schedule	Exec/staff			Inspection of vehicle condition	Exec/staff	4	Waste water	Inspection of PCD for functional	Exec/staff/ foreman			Adherence to SW guidelines			Weekly line site inspection				Appropriate action on spillage	Complied
	Emission	Action Plan	PIC																																									
1	Dark smoke	Inspection of vehicle condition	Exec/staff																																									
2	Noise	Scheduled maintenance	Exec/staff																																									
		Inspection of vehicle inspection	Exec/staff																																									
3	Air pollution	Routine maintenance as schedule	Exec/staff																																									
		Inspection of vehicle condition	Exec/staff																																									
4	Waste water	Inspection of PCD for functional	Exec/staff/ foreman																																									
		Adherence to SW guidelines																																										
		Weekly line site inspection																																										
			Appropriate action on spillage																																									
Criterion 4.5.5: Natural water resources																																												
4.5.5.1	The management shall establish a water management plan to maintain the quality and availability of natural water resources (surface and ground water). The water management plan may include: a. Assessment of water usage and sources of supply. b. Monitoring of outgoing water which may have negative impacts into the natural waterways at a frequency that	The water management plan has been established with the recent review made on 01/8/2019. Among others the plan therein has emphasized on the following initiatives. <ul style="list-style-type: none"> a) rain water harvesting for cleaning purposes, b) water from pond and treated for human consumption c) continual training for workers on water efficiency consumption, d) The action plan in event of draught/water pollution and 				Non-conformance																																						

Criterion / Indicator		Assessment Findings				Compliance	
	<p>reflects the estate's current activities.</p> <p>c. Ways to optimize water and nutrient usage to reduce wastage (e.g. having in place systems for re-use, night application, maintenance of equipment to reduce leakage, collection of rainwater, etc.).</p> <p>d. Protection of water courses and wetlands, including maintaining and restoring appropriate riparian buffer zones at or before planting or replanting, along all natural waterways within the estate.</p> <p>e. Where natural vegetation in riparian areas has been removed, a plan with a timetable for restoration shall be established and implemented.</p> <p>f. Where bore well is being use for water supply, the level of the ground water table should be measured at least annually.</p> <p>- Major compliance -</p>	In summary the details as tabulated below;					
			Source	Activity	Threat	Action Plan	
		1	Reservoir/ pond/ SAJ/Rain	Chemical mixing	Pollution Draught Wastage	Enforcement of buffer zone as non-spraying activities.	
				General Upkeep	Pollution Draught Wastage	Follow WI & SOP to avoid water pollution. Follow SW SOP to avoid pollution caused from SW.	
				Line site	Pollution Draught Wastage	Every house is supplied with containers. To schedule water supply to avoid wastage. Awareness on water usage efficiency. Outsource from neighboring estates.	
				Drain upkeep	Interrupti on water flow at drainage system.	Periodic desilting Building of sand bags at specific points to contain water (weirs)	
			Water pollution	Prohibit workers from activities at water source			

Criterion / Indicator		Assessment Findings				Compliance																		
					<p>Drinking water analysis.</p> <p>Monitor condition of septic tank</p> <p>Adhere SW management procedure to avoid pollution caused by SW.</p>																			
		<p>Protection of water courses and wetlands, including maintaining and restoring appropriate riparian buffer zones has been verified at the estates where available. Riparian buffer zones have been identified and demarcated. Generally, no chemicals and fertilizer application observed been used in their maintenance. However, during the site visit at Sungai Sembrong Estate’s raw water pond, which is to be treated for potable water, it was observed that there were traces of herbicides spraying within the demarcated buffer zone of the pond. Thus, a non-conformity report was assigned due to this lapse. In some areas Guatemala grass were planted along the river banks. Guidelines of the width of the rivers and natural courses to be protected have been illustrated in the SOP revised dated 01/11/2018. The buffer zones established are as following:</p> <table border="1"> <thead> <tr> <th></th> <th>River width</th> <th>Buffer zone</th> </tr> </thead> <tbody> <tr> <td>1</td> <td>>40 meters</td> <td>50 meters</td> </tr> <tr> <td>2</td> <td>20 - 40 meters</td> <td>40 meters</td> </tr> <tr> <td>3</td> <td>10 - 20 meters</td> <td>20 meters</td> </tr> <tr> <td>4</td> <td>5 - 10 meters</td> <td>10 meters</td> </tr> <tr> <td>5</td> <td>< 5 meters</td> <td>5 meters</td> </tr> </tbody> </table>					River width	Buffer zone	1	>40 meters	50 meters	2	20 - 40 meters	40 meters	3	10 - 20 meters	20 meters	4	5 - 10 meters	10 meters	5	< 5 meters	5 meters	
	River width	Buffer zone																						
1	>40 meters	50 meters																						
2	20 - 40 meters	40 meters																						
3	10 - 20 meters	20 meters																						
4	5 - 10 meters	10 meters																						
5	< 5 meters	5 meters																						

MSPO Public Summary Report
Revision 0 (Aug 2017)

Criterion / Indicator		Assessment Findings				Compliance																																																																					
		<p>Buffer zones were protected. Areas visited for both the estates as tabled below;</p> <table border="1"> <thead> <tr> <th></th> <th>Estates</th> <th>Location</th> <th colspan="2">Field no</th> </tr> </thead> <tbody> <tr> <td>1</td> <td>Renggam</td> <td>Anak Sg Renggam</td> <td colspan="2">P03</td> </tr> <tr> <td>2</td> <td>Mutiara</td> <td>Sg Chales</td> <td colspan="2">PR18</td> </tr> <tr> <td>3</td> <td>Sg Sembrong</td> <td>Water catchment</td> <td colspan="2">P04 Block 1</td> </tr> </tbody> </table> <p>Water samples from the intake point are taken for phosphate and nitrate analysis for detection of fertilizer application effect to the water courses. Extracted record of the estates with details below;</p> <table border="1"> <thead> <tr> <th colspan="7"><i>Renggam Estate 29/8/19</i></th> </tr> <tr> <th></th> <th>Parameter</th> <th>unit</th> <th>Pt A</th> <th>Pt B</th> <th>Pt A</th> <th>-</th> </tr> </thead> <tbody> <tr> <td>1</td> <td>Phosphate</td> <td>mg PO4/L</td> <td>0.42</td> <td>0.38</td> <td><0.20</td> <td>-</td> </tr> <tr> <td>2</td> <td>Nitrate N</td> <td>mg NO3N/L</td> <td>0.41</td> <td>0.04</td> <td>0.74</td> <td>-</td> </tr> </tbody> </table> <table border="1"> <thead> <tr> <th colspan="7"><i>Mutiara Estate 16/7/19</i></th> </tr> <tr> <th></th> <th>Parameter</th> <th>unit</th> <th>Pt A</th> <th>Pt B</th> <th>Pt A</th> <th>Pt B</th> </tr> </thead> <tbody> <tr> <td>1</td> <td>Phosphate</td> <td>mg PO4/L</td> <td><0.2</td> <td><0.2</td> <td>1.37</td> <td>1.10</td> </tr> </tbody> </table>					Estates	Location	Field no		1	Renggam	Anak Sg Renggam	P03		2	Mutiara	Sg Chales	PR18		3	Sg Sembrong	Water catchment	P04 Block 1		<i>Renggam Estate 29/8/19</i>								Parameter	unit	Pt A	Pt B	Pt A	-	1	Phosphate	mg PO4/L	0.42	0.38	<0.20	-	2	Nitrate N	mg NO3N/L	0.41	0.04	0.74	-	<i>Mutiara Estate 16/7/19</i>								Parameter	unit	Pt A	Pt B	Pt A	Pt B	1	Phosphate	mg PO4/L	<0.2	<0.2	1.37	1.10	
	Estates	Location	Field no																																																																								
1	Renggam	Anak Sg Renggam	P03																																																																								
2	Mutiara	Sg Chales	PR18																																																																								
3	Sg Sembrong	Water catchment	P04 Block 1																																																																								
<i>Renggam Estate 29/8/19</i>																																																																											
	Parameter	unit	Pt A	Pt B	Pt A	-																																																																					
1	Phosphate	mg PO4/L	0.42	0.38	<0.20	-																																																																					
2	Nitrate N	mg NO3N/L	0.41	0.04	0.74	-																																																																					
<i>Mutiara Estate 16/7/19</i>																																																																											
	Parameter	unit	Pt A	Pt B	Pt A	Pt B																																																																					
1	Phosphate	mg PO4/L	<0.2	<0.2	1.37	1.10																																																																					

MSPO Public Summary Report
Revision 0 (Aug 2017)

Criterion / Indicator		Assessment Findings						Compliance																																										
		2	Nitrate N	mg NO3N/L	0.60	3.56	3.13	2.92																																										
		<table border="1"> <thead> <tr> <th colspan="7"><i>Sg Sembrong Estate 17/9/19</i></th> </tr> <tr> <th></th> <th>Parameter</th> <th>unit</th> <th>Pt A</th> <th>Pt B</th> <th>Pt A</th> <th>-</th> </tr> </thead> <tbody> <tr> <td>1</td> <td>Phosphate</td> <td>mg PO4/L</td> <td>8.96</td> <td>7.58</td> <td>0.27</td> <td>0.42</td> </tr> <tr> <td>2</td> <td>Nitrate N</td> <td>mg NO3N/L</td> <td><0.04</td> <td><0.04</td> <td>0.07</td> <td><0.04</td> </tr> </tbody> </table>						<i>Sg Sembrong Estate 17/9/19</i>								Parameter	unit	Pt A	Pt B	Pt A	-	1	Phosphate	mg PO4/L	8.96	7.58	0.27	0.42	2	Nitrate N	mg NO3N/L	<0.04	<0.04	0.07	<0.04															
<i>Sg Sembrong Estate 17/9/19</i>																																																		
	Parameter	unit	Pt A	Pt B	Pt A	-																																												
1	Phosphate	mg PO4/L	8.96	7.58	0.27	0.42																																												
2	Nitrate N	mg NO3N/L	<0.04	<0.04	0.07	<0.04																																												
		<p>The limit for phosphate and nitrate is 0.2 ppm and 7 ppm respectively.</p> <p>Drinking water samples of Mutiara and Sg Sembrong Estate being own water treatment are taken twice a year. Sampled the following analysis. All results conform to the specification.</p>																																																
		<table border="1"> <thead> <tr> <th colspan="7"><i>Mutiara Estate 10/6/19</i></th> </tr> <tr> <th></th> <th>P/meter</th> <th>unit</th> <th>results</th> <th>Regulation raw water</th> <th>Std drinking water</th> <th>Results</th> </tr> </thead> <tbody> <tr> <td>1</td> <td>PH</td> <td>-</td> <td>5.6</td> <td>5.5-9.0</td> <td>7.3</td> <td>7.2</td> </tr> <tr> <td>2</td> <td>Turbidity</td> <td>NTU</td> <td>11.3</td> <td>1000</td> <td>0.5</td> <td>0.80</td> </tr> <tr> <td>3</td> <td>Al</td> <td>Mg/L</td> <td>ND</td> <td>-</td> <td><0.2</td> <td>ND</td> </tr> <tr> <td>4</td> <td>Chorine</td> <td>mg/L</td> <td>-</td> <td>-</td> <td>0.9</td> <td>1.0</td> </tr> </tbody> </table>						<i>Mutiara Estate 10/6/19</i>								P/meter	unit	results	Regulation raw water	Std drinking water	Results	1	PH	-	5.6	5.5-9.0	7.3	7.2	2	Turbidity	NTU	11.3	1000	0.5	0.80	3	Al	Mg/L	ND	-	<0.2	ND	4	Chorine	mg/L	-	-	0.9	1.0	
<i>Mutiara Estate 10/6/19</i>																																																		
	P/meter	unit	results	Regulation raw water	Std drinking water	Results																																												
1	PH	-	5.6	5.5-9.0	7.3	7.2																																												
2	Turbidity	NTU	11.3	1000	0.5	0.80																																												
3	Al	Mg/L	ND	-	<0.2	ND																																												
4	Chorine	mg/L	-	-	0.9	1.0																																												

MSPO Public Summary Report
Revision 0 (Aug 2017)

Criterion / Indicator		Assessment Findings						Compliance	
		5	Coli form	mg/L	2100	5000	<10	<10	
		6	E coli	MPN/ml	ND	5000	<10	<10	
		<i>Sg Sembrong Estate 20/5/19</i>							
			P/meter	unit	results	Regulation raw water	Std drinking water	Results	
		1	PH	-	5.9	5.5-9.0	7.3	7.1	
		2	Turbidity	NTU	1.7	1000	0.5	0.4	
		3	Al	Mg/L	0.2	-	<0.2	0.2	
		4	Chorine	mg/L	-	-	0.9	0.2-5	
		5	Coli form	mg/L	45	5000	<10	Nil	
		6	E coli	MPN/ml	<10	5000	<10	Nil	
4.5.5.2	No construction of bunds, weirs and dams across main rivers or waterways passing through an estate. - Minor compliance -	During the field visit there was no construction of such observed.						Complied	
4.5.5.3	Water harvesting practices should be implemented (e.g. water from road-side drains can be directed and stored in conservation terraces and various natural receptacles). - Minor compliance -	During the site visit practices of water harvesting are noted mainly constructed on flat areas in both estates. There was construction of MCP = Moisture Conservation Pit at interval of every 40 ft & every 2 palms. Road side pits were also available at every 3 palm rows, to divert in event of water overflowing and to benefit the nearest palm at the pit end to obtain additional moisture. This is part of the common practices introduced within the Agriculture Procedures.						Complied	

Criterion / Indicator	Assessment Findings	Compliance	
Criterion 4.5.6: Status of rare, threatened, or endangered species and high biodiversity value			
<p>4.5.6.1</p>	<p>Information shall be collated that includes both the planted area itself and relevant wider landscape-level considerations (such as wildlife corridors). This information should cover:</p> <ul style="list-style-type: none"> a) Identification of high biodiversity value habitats, such as rare and threatened ecosystems, that could be significantly affected by the grower(s) activities. b) Conservation status (<i>e.g.</i> The International Union on Conservation of Nature and Natural Resources (IUCN) status on legal protection, population status and habitat requirements of rare, threatened, or endangered species), that could be significantly affected by the grower(s) activities. <p>- Major compliance -</p>	<p>There is no RTE found the entire Tereh Complex as recorded, with exception of silvered leaf monkey in patches of pieces of forest. As a standard practice where there is no other sighted RTE, animal sighting is continued at all the estates especially at the boundary areas. The assessment as according to the Rapid Biodiversity Assessment by A.J.F.M Dekker dated Sept 7 2007, identified;</p> <ul style="list-style-type: none"> a) that there is potential Asian Elephant. b) That the Silvered Leaf Monkeys are still able to be sighted within the estates. This is currently rare as land outside of the boundary are already been developed into plantation base. c) Summary of record of animal sightings spotting wild boars, monkeys and squirrels among others. <p>The management conducted a regular patrol of HCV areas, access and boundary of estates. Signage, such as "No Hunting", "No Fishing", "Buffer Zone" were available. No use of chemicals observed been applied in the buffer zone as prohibited.</p>	<p>Complied</p>
<p>4.5.6.2</p>	<p>If rare, threatened or endangered species, or high biodiversity value, are present, appropriate measures for management planning and operations should include:</p> <ul style="list-style-type: none"> a) Ensuring that any legal requirements relating to the protection of the species are met. b) Discouraging any illegal or inappropriate hunting, fishing or collecting activities; and developing responsible measures to resolve human-wildlife conflicts. 	<p>There is not RTE recorded. Evidence to continuously prevent and discourage illegal or hunting, fishing or collecting activities were maintained and implemented.</p> <ul style="list-style-type: none"> a) Signage as well as routine patrolling activities were utilized as part of creating awareness among employees and maintain HCVs. b) The estates established a Biodiversity Improvement Plan 2019 such as briefing/training to workers on protection of river buffers for all existing and designated natural watercourses to all employees, contractors and suppliers that 	<p>Complied</p>

Criterion / Indicator		Assessment Findings	Compliance																				
	- Major compliance -	encroachment and hunting are not allowed.																					
4.5.6.3	A management plan to comply with Indicator 1 shall be established and effectively implemented, if required. - Major compliance -	<p>The Biodiversity Improvement Plan dated 01/08/2019 had identified the plan. Among others;</p> <ul style="list-style-type: none"> a) to continue educating the workers regarding RTE. Workers interviewed confirmed that they are aware of no hunting is permitted in and within the estate. b) Regular educating the employees via morning muster briefing about the need to protect the RTE species. c) Appropriate disciplinary measures will be taken if found violated. d) Information pertaining RTE and relevant CU policies were displayed at the display boards. e) Training in relation to the RTE/Biodiversity has been organized in the following sessions. <table border="1"> <thead> <tr> <th>No</th> <th>Subject</th> <th>RE</th> <th>ME</th> <th>SSE</th> </tr> </thead> <tbody> <tr> <td>1</td> <td>Policies Awareness</td> <td>02/1/19</td> <td>10/1/19</td> <td>02/7/9</td> </tr> <tr> <td>2</td> <td>Water treatment/sampling</td> <td>23/4/19</td> <td>25/9/19</td> <td>11/2/19</td> </tr> <tr> <td>3</td> <td>HCV/Buffer Zone</td> <td>03/3/19</td> <td>28/7/19</td> <td>20/6/19</td> </tr> </tbody> </table>	No	Subject	RE	ME	SSE	1	Policies Awareness	02/1/19	10/1/19	02/7/9	2	Water treatment/sampling	23/4/19	25/9/19	11/2/19	3	HCV/Buffer Zone	03/3/19	28/7/19	20/6/19	Complied
No	Subject	RE	ME	SSE																			
1	Policies Awareness	02/1/19	10/1/19	02/7/9																			
2	Water treatment/sampling	23/4/19	25/9/19	11/2/19																			
3	HCV/Buffer Zone	03/3/19	28/7/19	20/6/19																			
Criterion 4.5.7: Zero burning practices																							
4.5.7.1	Use of fire for waste disposal and for preparing land for oil palm cultivation or replanting shall be avoided except in specific situations, as identified in regional best practice. - Major compliance -	The Group practices of "Zero open burning" is enforced since the National The operating units adhered to the policy of " <i>Zero open burning</i> " for any replanting. From field visits and interviews with the workers there is no open burning being practiced in the estates. Both estates had replanting program spanned over the forthcoming years.	Complied																				

Criterion / Indicator		Assessment Findings	Compliance
		Refer details in 4.6.2.2.	
4.5.7.2	A special approval from the relevant authorities shall be sought in areas where the previous crop is highly diseased and where there is a significant risk of disease spread or continuation into the next crop. - Major compliance -	N/A. Details in 4.5.7.1 above	Complied
4.5.7.3	Where controlled burning is allowed, it shall be carried out as prescribed by the Environmental Quality (Declared Activities) (Open Burning) Order 2003 or other applicable laws. - Major compliance -	N/A. Details in 4.5.7.1 above	Complied
4.5.7.4	Previous crops should be felled or mowed down, chipped and shredded, windrowed or pulverized or ploughed and mulched. - Minor compliance -	This is included in the specification of work orders in event of land preparation during a replanting. It is a standard practice in Kulim Malaysia Berhad. However, there are variation of practices between inland and coastal estates. Trunk are felled and chipped without having to shred and windrowed in certain conditions. Adjustment of work requirement are finalised from the directive of the replanting unit and the Head/Regional Office.	Complied
4.6 Principle 6: Best Practices			
Criterion 4.6.1: Site Management			
4.6.1.1	Standard operating procedures shall be appropriately documented and consistently implemented and monitored.	The standard operation procedure for the estates / mill operations are available which is prepared on Group basis. There are levels of the documentation identified as follows; a) Level 1 Estate Manual	Complied

Criterion / Indicator		Assessment Findings	Compliance
	- Major compliance -	<ul style="list-style-type: none"> b) Level 2 standard operating procedure/SPO OHS c) Level 3 work instruction d) Level 4 records. <p>Amendments are made should there be requirement to suit the local issues/situation.</p>	
4.6.1.2	<p>Where oil palm is grown within permitted levels on sloping land, appropriate soil conservation measures shall be implemented to prevent both soil erosion as well as siltation of drains and waterways. Measures shall be put in place to prevent contamination of surface and groundwater through runoff of either soil, nutrients or chemicals.</p> <p>- Major compliance -</p>	<p>Guidelines and practices are available in the Agriculture Manual and SOP.</p> <ul style="list-style-type: none"> a) The estates construct terraces at slope area of more than 6 degree. Planting of cover crop are made to retain the soil structure and conservation. b) Road side pit are made to divert water at slope areas to prevent road erosion and surface damage. c) Terraces are constructed inclined towards the terrace wall. d) Slope of more than 25 degrees are avoided in the planting areas due to the Policy of the Company forecasting several issues during the crop recovery on maturity. This is also to comply along with the RSPO guidelines <p>Variations if any are subject to approval from the Estate Department and Regional Office.</p>	Complied
4.6.1.3	<p>A visual identification or reference system shall be established for each field.</p> <p>- Major compliance -</p>	<p>All fields are marked and identified. Information like year planting (field no) and the total hectare is shown in all markers. There are both stencilled at the palm trees and also displayed in signage at the boundary/corners of every field. This is observed during the field visit in the estate.</p>	Complied
Criterion 4.6.2: Economic and financial viability plan			

Criterion / Indicator		Assessment Findings	Compliance																												
4.6.2.1	<p>A documented business or management plan shall be established to demonstrate attention to economic and financial viability through long-term management planning.</p> <p>- Major compliance -</p>	<p>The annual business plan is available as per the Group Financial Procedure. & Guidelines. Both estates and the mill had a similar format i.e. in the form of annual budget with a 3-year projection. This business plan is prepared as guidance for future planning. The budget contains the following among others;</p> <ul style="list-style-type: none"> a) palm year of planting, age categories, and FFB production. b) Component of operating expenditure includes Administration, harvesting & collection, field upkeep, transportation, road and bridges, labour overhead, EVIT (running accounts for engines, vehicles, implements & tractors. c) Inclusive in the business plan is also Capital Expenditure (CAPEX) among others replacement / upgrading of building, vehicles replacement, workers amenities etc. the budget for 2019 for all the estates was sighted and verified. 	Complied																												
4.6.2.2	<p>Where applicable, an annual replanting programme shall be established. Long term replanting programme should be established and review annually, where applicable every 3-5 years.</p> <p>- Major compliance -</p>	<p>All the estates maintained record of replanting program until the year 2031. For purpose of auditing record the horizon is limited to 5 years. Figures in ha otherwise stated.</p> <table border="1"> <thead> <tr> <th>Estate</th> <th>2019</th> <th>2020</th> <th>2021</th> <th>2022</th> <th>2023</th> <th>2024</th> </tr> </thead> <tbody> <tr> <td>Renggam</td> <td>257.95</td> <td>173.09</td> <td>0</td> <td>0</td> <td>0</td> <td>221.96</td> </tr> <tr> <td>SSembrong</td> <td>0</td> <td>0</td> <td>280.67</td> <td>314.59</td> <td>0</td> <td>0</td> </tr> <tr> <td>Mutiara</td> <td>279.56</td> <td>292.27</td> <td>0</td> <td>0</td> <td>0</td> <td>258.75</td> </tr> </tbody> </table> <p>Sizes of fields identified for replanting varies subject to factors i.e. hilly, yield etc. All replanting program and planning in all the Group</p>	Estate	2019	2020	2021	2022	2023	2024	Renggam	257.95	173.09	0	0	0	221.96	SSembrong	0	0	280.67	314.59	0	0	Mutiara	279.56	292.27	0	0	0	258.75	Complied
Estate	2019	2020	2021	2022	2023	2024																									
Renggam	257.95	173.09	0	0	0	221.96																									
SSembrong	0	0	280.67	314.59	0	0																									
Mutiara	279.56	292.27	0	0	0	258.75																									

Criterion / Indicator		Assessment Findings	Compliance
		Estates are monitored by the Plantation Inspectorate, Regional Controller & Estates Department. Assistance and audit are performed as and when required and necessary.	
4.6.2.3	<p>The business or management plan may contain:</p> <ul style="list-style-type: none"> a) Attention to quality of planting materials and FFB b) Crop projection: site yield potential, age profile, FFB yield trends c) Cost of production : cost per tonne of FFB d) Price forecast e) Financial indicators : cost benefit, discounted cash flow, return on investment <p>- Major compliance -</p>	<p>All the estates audited possessed a similar budget format. Inclusive is a 3-year budget/forecast financial plan allocating categories among others;</p> <ul style="list-style-type: none"> a) Crop yielding area b) Mature cost c) General charges/upkeep/collection/depreciation d) Cost/ha & cost /mt FFB e) CAPEX <p>Separately the cost of immature areas is also shown which among others comprises of the following items;</p> <ul style="list-style-type: none"> a) Labour statement / Allocation of wages / Labour benefit b) Yield statement oil palm c) vehicle and running schedule / Job allocation for vehicles d) workshop running schedule e) Summary of general charges f) CAPEX. 	Complied
4.6.2.4	<p>The management plan shall be effectively implemented and the achievement of the goals and objectives shall be regularly monitored, periodically reviewed and documented.</p> <p>- Major compliance -</p>	<p>The estates performance is recorded in the monthly progress report. Details on the actual vs budget i.e. crop production, fixed and direct cost are shown therein. The management also provides variance report on the performance and reviewed monthly. The supervisory personnel maintained a daily cost for the field operations. The Regional meeting involving the Managers sits monthly with the Regional Controller /Head Office Management for the performance review. The following mechanism is available and adopted as</p>	Complied

MSPO Public Summary Report
Revision 0 (Aug 2017)

Criterion / Indicator		Assessment Findings	Compliance
		<p>standard practices and procedures in the estates operations.</p> <ul style="list-style-type: none"> a) Plantation Inspectorate Visit program 2x /year b) Internal audit by Sustainability Unit 2x /year c) Task Force visits d) Monthly and weekly ad hoc meeting e) Daily /monthly production & financial report f) Daily supervision by the field staff/Executives 	
Criterion 4.6.3: Transparent and fair price dealing			
4.6.3.1	<p>Pricing mechanisms for the products and other services shall be documented and effectively implemented.</p> <p>- Major compliance -</p>	<p>Pricing mechanism for all the estates and mills is guided by Kulim’s “Purchasing Guidelines & Procedures”, revised in 2019. The objectives of the guideline is:</p> <ul style="list-style-type: none"> 1) To improve efficiency in procurement of inputs from vendors 2) To act as guidelines for transparent dealings with all vendors 3) To include suppliers to competitively bid for the supply of company’s requirements through fair dealings and timely payments for goods and/or tasks performed 4) To promote long term relationship with supplier who share the Company’s vision of growing together 	Complied
4.6.3.2	<p>All contracts shall be fair, legal and transparent and agreed payments shall be made in timely manner.</p> <p>- Major compliance -</p>	<p>Based on interview, there was no issue raised by vendors. Generally they are happy with Kulim’s current practice of contract awards (e.g. opened tender) and purchasing (e.g. quotation). Payments were also made on timely manner.</p>	Complied

Criterion / Indicator		Assessment Findings	Compliance
Criterion 4.6.4: Contractor			
4.6.4.1	Where contractors are engaged, they shall understand the MSPO requirements and shall provide the required documentation and information. - Major compliance -	Addressed in the addendum of all contract agreements between Mahamurni Plantations Sdn Bhd and vendors where content is to require the vendors to comply with the RSPO, MSPO and ISCC requirements related to the execution of the contract.	Complied
4.6.4.2	The management shall provide evidence of agreed contracts with the contractor. - Major compliance -	Both the management and contractors have signed the contract agreement to show that the terms & conditions stipulated in the contracts are agreed upon by both parties. E.g. contract agreements verified: MPSB/Renggam 2/2015, MPSB/Renggam 4/2016, KMB/Mutiara 4/2017, KMB/Mutiara 4/2016	Complied
4.6.4.3	The management shall accept MSPO approved auditors to verify assessments through a physical inspection if required. - Minor compliance -	There is also being mentioned in the addendum that the vendors are subject to any certification audit assessment through physical inspection if required.	Complied
4.6.4.4	The management shall be responsible for the observance of the control points applicable to the tasks performed by the contractor, by checking and signing the assessment of the contractor for each task and season contracted. - Major compliance -	All works performed at the estates are checked and verified by the estates personnel. The evaluation is reported in "Contract Works Progress Payment Form" to proceed with the payment.	Complied
4.7 Principle 7: Development of new planting			
Criterion 4.7.1: High biodiversity value			

Criterion / Indicator		Assessment Findings	Compliance
4.7.1.1	Oil palm shall not be planted on land with high biodiversity value unless it is carried out in compliance with the National and/or State Biodiversity Legislation. - Major compliance -	There is no development of new planting at all the visited estates.	NA
4.7.1.2	No conversion of Environmentally Sensitive Areas (ESAs) to oil palm as required under Peninsular Malaysia's National Physical Plan (NPP) and the Sabah Forest Management Unit under the Sabah Forest Management License Agreement. For Sabah and Sarawak, new planting or replanting of an area 500ha or more requires an EIA. For areas below 500ha but above 100ha, a Proposal for Mitigation Measures (PMM) is required. - Major compliance -	There is no development of new planting at all the visited estates.	NA
Criterion 4.7.2: Peat Land			
4.7.2.1	New planting and replanting may be developed and implemented on peat land as per MPOB guidelines on peat land development or industry best practice. - Major compliance -	There is no development of new planting at all the visited estates.	NA
Criterion 4.7.3: Social and Environmental Impact Assessment (SEIA)			
4.7.3.1	A comprehensive and participatory social and environmental impact assessment shall be conducted prior to establishing new plantings or operations.	There is no development of new planting at all the visited estates.	NA

Criterion / Indicator		Assessment Findings	Compliance
	- Major compliance -		
4.7.3.2	SEIAs shall include previous land use or history and involve independent consultation as per national and state regulations, via participatory methodology which includes external stakeholders. - Major compliance -	There is no development of new planting at all the visited estates.	NA
4.7.3.3	The results of the SEIA shall be incorporated into an appropriate management plan and operational procedures developed, implemented, monitored and reviewed. - Major compliance -	There is no development of new planting at all the visited estates.	NA
4.7.3.4	Where the development includes smallholder schemes of above 500ha in total or small estates, the impacts and implications of how each scheme or small estate is to be managed should be documented and a plan to manage the impacts developed, implemented, monitored and reviewed. - Minor compliance -	There is no development of new planting at all the visited estates.	NA
Criterion 4.7.4: Soil and topographic information			
4.7.4.1	Information on soil types shall be adequate to establish the long-term suitability of the land for oil palm cultivation. - Major compliance -	There is no development of new planting at all the visited estates.	NA

Criterion / Indicator		Assessment Findings	Compliance
4.7.4.2	Topographic information shall be adequate to guide the planning of planting programmes, drainage and irrigation systems, roads and other infrastructure. - Major compliance -	There is no development of new planting at all the visited estates.	NA
Criterion 4.7.5: Planting on steep terrain, marginal and fragile soils			
4.7.5.1	Extensive planting on steep terrain, marginal and fragile soils shall be avoided unless permitted by local, state and national laws. - Major compliance -	There is no development of new planting at all the visited estates.	NA
4.7.5.2	Where planting on fragile and marginal soils is proposed, plans shall be developed and implemented to protect them and to minimize adverse impacts (e.g. hydrological) or significantly increased risks (e.g. fire risk) in areas outside the plantation. - Major compliance -	There is no development of new planting at all the visited estates.	NA
4.7.5.3	Marginal and fragile soils, including excessive gradients and peat soils, shall be identified prior to conversion. - Major compliance -	There is no development of new planting at all the visited estates.	NA
Criterion 4.7.6: Customary land			
4.7.6.1	No new plantings are established on recognised customary	There is no development of new planting at all the visited estates.	NA

Criterion / Indicator		Assessment Findings	Compliance
	land without the owners' free, prior and informed consent, dealt with through a documented system that enables indigenous peoples, local communities and other stakeholders to express their views through their own representative institutions. - Major compliance -		
4.7.6.2	Where new plantings on recognised customary lands are acceptable, management plans and operations should maintain sacred sites. - Minor compliance -	There is no development of new planting at all the visited estates.	NA
4.7.6.3	Where recognized customary or legally owned lands have been taken-over, the documentary proof of the transfer of rights and of payment or provision of agreed compensation shall be made available. - Major compliance -	There is no development of new planting at all the visited estates.	NA
4.7.6.4	The owner of recognised customary land shall be compensated for any agreed land acquisitions and relinquishment of rights, subject to their free prior informed consent and negotiated agreement. - Major compliance -	There is no development of new planting at all the visited estates.	NA
4.7.6.5	Identification and assessment of legal and recognised customary rights shall be documented.	There is no development of new planting at all the visited estates.	NA

Criterion / Indicator		Assessment Findings	Compliance
	- Major compliance -		
4.7.6.6	A system for identifying people entitled to compensation and for calculating and distributing fair compensation shall be established and implemented. - Major compliance -	There is no development of new planting at all the visited estates.	NA
4.7.6.7	The process and outcome of any compensation claims shall be documented and made publicly available. - Major compliance -	There is no development of new planting at all the visited estates.	NA
4.7.6.8	Communities that have lost access and rights to land for plantation expansion should be given opportunities to benefit from the plantation development. - Minor compliance -	There is no development of new planting at all the visited estates.	NA

B) MS 2530-4:2013 Malaysian Sustainable Palm Oil (MSPO) Part 4: General principles for Palm Oil Mill

Criterion / Indicator		Assessment Findings	Compliance
4.1 Principle 1: Management commitment & responsibility			
Criterion 4.1.1 – Malaysian Sustainable Palm Oil (MSPO) Policy			
4.1.1.1	Policy for the implementation of MSPO shall be established. - Major compliance -	Kulim Malaysia Berhad has established an MSPO Policy dated 01/5/2018 signed by the Executive Director. The Policy among others emphasised commitment to implement all Principles and Criteria set out by the MSPO.	Complied
4.1.1.2	The policy shall also emphasize on the commitment to continual improvement with the objective of improving the milling operation. - Major compliance -	Kulim Malaysia Berhad in the Policy will make every effort to achieve the balance between People, Planet, and Profit in all management decisions and operations through continual program	Complied
Criterion 4.1.2 – Internal Audit			
4.1.2.1	Internal audit shall be planned and conducted regularly to determine the strong and weak points and potential area for further improvement. - Major compliance -	The procedure documented the process to conduct internal audit. The internal audit checklist is available to cover all the required MSPO requirements. The internal audit schedule for 2019 has been planned and communicated by SQD to the respective Regional Offices Estate and Mills. Each estate will be audited twice in a year. The procedure is documented in <i>doc no SQD/SMS/5.0</i> dated 01/7/18.	Complied

MSPO Public Summary Report
Revision 0 (Aug 2017)

Criterion / Indicator	Assessment Findings	Compliance															
<p>4.1.2.2 The internal audit procedures and audit results shall be documented and evaluated, followed by the identification of strengths and root causes of nonconformities, in order to implement the necessary corrective action.</p> <p>- Major compliance -</p>	<p>The Internal Audit Procedure is stated in doc no <i>SQD/SMS/5.0</i> dated 01/7/18. Therein providing details relating to the following;</p> <ul style="list-style-type: none"> g) Aim/Responsibility h) Documentation i) Procedure Month / Areas j) Frequency at 1x/year k) Reporting format l) NCR reporting <p>The procedure documented the process to conduct internal audit. The internal audit checklist is available to cover all the required MSPO requirements. The internal audit schedule for 2019 has been planned and communicated by SQD to the respective Regional Offices Estate and Mills.</p> <p>Internal audits for the Tereh CU have been conducted as per the following. SQD performs twice /year for each estate/mill</p> <table border="1" data-bbox="1048 1023 1693 1163"> <thead> <tr> <th></th> <th>Mill</th> <th>Audit Date</th> <th>NCR</th> <th>OFI</th> </tr> </thead> <tbody> <tr> <td>1</td> <td>Tereh</td> <td>10/9/19</td> <td>1</td> <td>-</td> </tr> <tr> <td></td> <td></td> <td>13/6/19</td> <td>2</td> <td>-</td> </tr> </tbody> </table> <p>Notification was delivered to the estates/Mill via email dated 13/8/19 from SQD. The mill was issued with 1 NCR relating to working hours in July 19. The internal audit raised during 13/6/19 visit is in relation to JKPP submission and supply chain.</p>		Mill	Audit Date	NCR	OFI	1	Tereh	10/9/19	1	-			13/6/19	2	-	<p>Complied</p>
	Mill	Audit Date	NCR	OFI													
1	Tereh	10/9/19	1	-													
		13/6/19	2	-													

MSPO Public Summary Report
Revision 0 (Aug 2017)

Criterion / Indicator		Assessment Findings	Compliance								
4.1.2.3	<p>Reports shall be made available to the management for their review.</p> <p>- Major compliance -</p>	<p>Reports are made available and retained for min 10 years. All reports are circulated to the Estate management, Regional Office KMB <i>Exco</i> HQ relevant personnel. There is a monthly SQD meeting at HQ level to review the reports' findings and performance raised in both internal and external audit</p>	Complied								
Criterion 4.1.3 – Management Review											
4.1.3.1	<p>The management shall periodically review the continuous suitability, adequacy and effectiveness of the requirements for effective implementation of MSPO and decide on any changes, improvement and modification.</p> <p>- Major compliance -</p>	<p>The Estates held their management review respectively chaired by the Managers. Attendance from both estates executives and staff were noted and the members discussed issues relating to the MSPO progress and issues;</p> <table border="1" style="margin-left: auto; margin-right: auto;"> <thead> <tr> <th></th> <th>Mill</th> <th>Date</th> <th>Attendees</th> </tr> </thead> <tbody> <tr> <td> </td> <td> </td> <td> </td> <td> </td> </tr> </tbody> </table> <ul style="list-style-type: none"> a) Introduction b) Follow-up from previous meeting c) Presentation / discussion of internal and external audit d) Findings and corrective action plan. e) Performance and effectiveness of sustainable management system/training f) Customer complaint/feedback g) FFB /Product Quality Conformity h) Review Of Contractors /Performance i) Review Of Policies j) Continual improvement plan 		Mill	Date	Attendees					Complied
	Mill	Date	Attendees								

MSPO Public Summary Report
Revision 0 (Aug 2017)

Criterion / Indicator		Assessment Findings					Compliance
		The	1	Tereh	20/9/19	17	
		meeting made a conclusive statement on the suitability, effectiveness of the MSPO implementation.					
Criterion 4.1.4 – Continual Improvement							
4.1.4.1	The action plan for continual improvement shall be based on a consideration of the main social and environmental impact and opportunities for the company. - Major compliance -	This is being made upon confirmation of any new projects. Employees were briefed of any new development in basic understanding during the weekly briefings. The management team will be informed of such development during the monthly management meetings. Dissemination of information by the RC and the Estates Dept are transacted during the monthly Managers meetings and emails. The mill had the following projects in progress; <ul style="list-style-type: none"> a) Construction of a biogas plant 60 % progress expected to commission in Mac 2020. b) Additional of 8200 furrow with 1500 units in current 2019 end. c) Construction of 8 units effluent pond to comply with the revised BOD of 100mg/l d) Replacement of new water piping from mill to housing complex. 					Complied
4.1.4.2	The company should establish a system to improve practices in line with new information and techniques; and for disseminating this information throughout the workforce. - Major compliance -	Where introduction of new machines and new work method, all level of employees will be trained to handle /implement the new techniques and work changes. Monitoring is made by the Mill Managers and Engineers throughout the on-the-job training and familiarisation.					Complied

Criterion / Indicator	Assessment Findings	Compliance	
4.2 Principle 2: Transparency			
Criterion 4.2.1 – Transparency of information and documents relevant to MSPO requirements			
4.2.1.1	<p>The management shall communicate adequate information to other stakeholder on environmental, social and legal issues relevant to sustainable practices in the relevant languages and forms.</p> <p>- Major compliance -</p>	<p>Kulim has issued “Communication and Consultation Management Guidelines” that define the responsibilities and actions required for receiving, recording and responding to enquiries and requests from internal and external stakeholders. The visited estates are committed to implement the “Communication and Consultation Management guidelines”. Records of request (in “Enquiry Register Book”) were well maintained. There has been no request from any stakeholders since the last assessment.</p>	<p>Complied</p>
4.2.1.2	<p>The management documents shall be publicly available, except where this is prevented by commercial confidentiality or where disclosure of information would result in negative environmental or social outcomes.</p> <p>- Major compliance -</p>	<p>There is no restriction imposed by Kulim to present its management documents to the public. Guided by SPO Transparency Program (ver. 2.0), among the documents which are publicly available upon request are:</p> <ul style="list-style-type: none"> - Land titles/user right - Health & safety plan - Plans and impact assessments relating to environmental and social impacts - Pollution prevention plans - Details of complaints and grievances - Negotiation procedures 	<p>Complied</p>

Criterion / Indicator		Assessment Findings	Compliance
		<ul style="list-style-type: none"> - Continuous improvement plan - Biodiversity plans - Policy documents 	
Criterion 4.2.2 – Transparent method of communication and consultation			
4.2.2.1	<p>Procedures shall be established for consultation and communication with the relevant stakeholders.</p> <p>- Major compliance -</p>	<p>Kulim has a handbook called "Sustainability Handbook" dated June 2007 that details the company's environmental and social policies and grievance procedure. "Communication and Consultation Management Guidelines" (Ver. 2.0) describes the responsibilities and actions required for receiving, recording and responding to enquiries and requests from internal and external stakeholders.</p>	Complied
4.2.2.2	<p>The management shall nominate management officials at the operating unit responsible for issues related to <i>indicator 1</i>.</p> <p>- Minor compliance -</p>	<p>Guided by its "Communication and Consultation Management Guidelines, first issue", each manager of Kulim mills and estates is responsible to handle issues related to social, OHS and environmental issues from internal and external stakeholders.</p>	Complied
4.2.2.3	<p>A list of stakeholders, records of all consultation and communication and records of action taken in response to input from stakeholders shall be properly maintained.</p> <p>- Major compliance -</p>	<p>Lists of stakeholders were made available at the visited estates and last updated in September 2019. Among the stakeholders included in the lists were government agencies, contractors, suppliers, surrounding communities and NGOs. Stakeholder consultation is conducted once a year. Minutes of meeting were available for verification.</p>	Complied
Criterion 4.2.3 – Traceability			

MSPO Public Summary Report
Revision 0 (Aug 2017)

Criterion / Indicator		Assessment Findings	Compliance
4.2.3.1	The management shall commit itself to implement and maintain the requirements for the traceability and shall establish a standard operation procedure for traceability. - Major compliance -	SOP for Traceability was available [doc. No.: SQD/SMS/1.2, dated 20/9/2019, issue 1, rev.4]. It outlined the traceability implementation from reception of FFB until the dispatch of CPO and PK.	Complied
4.2.3.2	The management shall conduct regular inspections on compliance with the established traceability system. - Major compliance -	Inspection on compliance with the traceability procedure is regularly checked through supply chain internal audit. The internal audit report, which was carried out together with other schemes such as RSPO and ISCC, was available for verification.	Complied
4.2.3.3	The management shall identified and assign suitable employees to implement and maintain traceability system. - Minor compliance -	The head of each operating unit would automatically be the appointed person responsible for traceability system. Ref.: letter from Head of Plantation Division [SQD/ADMIN/021/2018], dated 30/6/2018.	Complied
4.2.3.4	Records of storage, sales, delivery or transportation of crude palm oil and palm kernel shall be maintained. - Major compliance -	Recorded in CPO & PK production which is updated daily and information about FFB received & processed, CPO & PK produced, storage tank & kernel bunker stock balance.	Complied
4.3 Principle 3: Compliance to legal requirements			
Criterion 4.3.1 – Regulatory requirements			
4.3.1.1	All operations shall be in compliance with applicable local, state, national and ratified international laws and regulations. - Major compliance -	Permit for Overtime more than 104 hour/month from Labour Department, Kulang [ref. BHG.PU/9/134 Jld 22(14), Limit: 130 hours/month, dated 9/7/2019, valid for 2 years]	Complied

Criterion / Indicator	Assessment Findings	Compliance				
<p>4.3.1.2 The management shall list all relevant laws related to their operations in a legal requirements register.</p> <p>- Major compliance -</p>	<p>Tereh CU continued to comply with legal requirements. Compliance to each applicable law and regulation is monitored by the operating units and SQD sustainability team. SQD Department, based at Head Office is responsible to track changes in the law and the information was disseminated to all of its plantations and mills. The identified legal among others includes;</p> <ul style="list-style-type: none"> a) Pesticides Act 1974 and Regulations, b) Environmental Quality Act and Regulations 1974, c) Factories and Machinery Act and Regulations, 1967 d) Weights and Measures Regulations 1981 e) Electricity Regulations 1994 f) Immigration Act 1959 g) Employee Provident Fund 1991 h) Occupational Safety and Health Act 1994 i) Employment Act 1955 j) Aboriginal Peoples Act 1954 k) Industrial Relations Act 1967 l) Children and Young Persons (Employment) Act 1966 m) MPOB Regulations (Licensing) 2005, EQ (Prescribed Premise) (Crude Palm Oil) Regulations 1977 n) Electrical Supply Act 1990 o) Fire Services Act 1984 p) Personal Data Protection Act 2010 q) Code of practice - safe working in a confined space 2001 <p>The mill obtained and renewed license and permits as required by the law. The licenses/permit viewed among others were;</p> <table border="1" data-bbox="1048 1347 1756 1375"> <thead> <tr> <th data-bbox="1048 1347 1576 1375">Licence/Permit/Regulatory Requirement</th> <th data-bbox="1576 1347 1756 1375">Validity Period</th> </tr> </thead> <tbody> <tr> <td> </td> <td> </td> </tr> </tbody> </table>	Licence/Permit/Regulatory Requirement	Validity Period			<p>Complied</p>
Licence/Permit/Regulatory Requirement	Validity Period					

MSPO Public Summary Report
Revision 0 (Aug 2017)

Criterion / Indicator		Assessment Findings			Compliance
		1	MPOB License 50000-48604000	31/5/20`	
		2	Dept Of Environmental DOE – JP 4685	30/6/20	
		3	KPDNKK Diesoline Storage BPGK0730	24/7/20	
		4	Weighbridge - Metrology Corporation SB	20/3/10	
		5	JTK – Wages deduction 10101- 56569	08/8/12	
		6	SPAN – Ref no 800-4	12/3/20	
		7	BAKAJ – 7AKLG115	31/12/19	
		8	Boilermech Boiler JH PMD 80258	04/8/20	
		9	Air Receiver JH PMT 34678	04/8/19	
		10	Steriliser no 1 JH PMT23917	04/8/20	
		11	Steriliser no 2 JH PMT 24353	04/8/20	
		12	Steriliser no 3 JH PMT24354	04/8/19	
		13	Air Receiver JH PMT 20424	04/8/19	
		14	Back pressure receiver JH PMT 26859	04/8/20	
		15	CePSWaM – Senior Assistant	Eff 31/5/18	
		16	CePSWaM – Assistant Engineer	17/7/18	
		17	CePPOME – Assistant Engineer	1/11/18	
		18	CePPOME – Assistant Engineer	23/1/19	
		19	AESP – Confined space – Assist Engineer	09/4/20	
		20	Steam Engineer – 146/2005	18/10/05	
		21	Steam Engineer – 007/2009	12/3/09	
		22	Engine Driver – J42/2000	21/8/00	
		23	Engine Driver - 034014	21/8/00	
		24	Boiler man - 034013	13/11/17	

MSPO Public Summary Report
Revision 0 (Aug 2017)

Criterion / Indicator		Assessment Findings		Compliance	
		25	MPOB – FFB Grading 14-10	20/10/10	
		<p>The recent DOSH machinery inspection was made on 01/10/19 for the renewal of CF of expired machinery. The BOD was revised to 100 mg/l. as the mill is in progressing in meeting the new standard DOE has approved for the deferment till 31/3/20 through letter dated 24/9/19. This will be met upon completion of Biogas Plant scheduled in Mac 2020.</p>			
4.3.1.3	<p>The legal requirements register shall be updated as and when there are any new amendments or any new regulations coming into force.</p> <p>- Major compliance -</p>	<p>The mechanism used for tracking changes in laws/regulations is made through the following methods;</p> <ul style="list-style-type: none"> a) News release through daily newspaper. b) Law change tracked by book publisher (MDC Book Publications). c) Circulars from relevant association (eg. MPOA, MPOB, MAPA) d) Internet (e-federal gazette, www.lawnet.com.my, www.e-warta.com.my) <p>The Kulim M Berhad Legal Department from headquarters alerts all operating units on legal updates via email and also through management meetings.</p>			Complied
4.3.1.4	<p>The management should assign a person responsible to monitor compliance and to track update the changes in regulatory requirements.</p> <p>- Minor compliance -</p>	<p>The Mill Manager is responsible for the monitoring of compliance of the entire regulatory requirement needed for the mill operations. Changes if any will be channelled to the Manager for further implementation in the Mill. In addition Executive - Regional Controller Sindora/Sedenak Complex also play role in the monitoring of the legal compliance. Job responsibilities among others include the following;</p> <ul style="list-style-type: none"> a) Identify and assess compliance 			Complied

MSPO Public Summary Report
Revision 0 (Aug 2017)

Criterion / Indicator		Assessment Findings	Compliance
		<ul style="list-style-type: none"> b) Monitoring of compliance action plan c) Prepare & report compliance status to RMC dept. d) Maintain highest alert on both internal and external activities of consequences to KMB 	
Criterion 4.3.2 – Lands use rights			
4.3.2.1	<p>The management shall ensure that their oil palm milling activities do not diminish the land use rights of other users.</p> <p>- Major compliance -</p>	Tereh POM is located inside Tereh Utara land title. Title # HS (D) 6766; District: Kluang; Mukim: Niyor; Lot # PTD 3326; Area: 1608.0588 ha. Owned by Kulim Plantations (Malaysia) Sdn. Bhd. The land was granted to Kulim Plantations (Malaysia) S/B with the use condition of oil palm planting.	NA
4.3.2.2	<p>The management shall provide documents showing legal ownership or lease, history of land tenure and the actual legal use of the land.</p> <p>- Major compliance -</p>	Details of Land Titles and summary of lease history are held in file "Grant Title" on the Sustainability Department Server. The land title # HS (D) 6766; District: Kluang; Mukim: Niyor; Lot # PTD 3326; Area: 1608.0588 ha. Owned by Kulim Plantations (Malaysia) Sdn. Bhd.	NA
4.3.2.3	<p>Legal parameter boundary markers should be clearly demarcated and visibly maintained on the ground where practicable.</p> <p>- Major compliance -</p>	Not applicable as land issues is handled by the estate.	NA
4.3.2.4	<p>Where there are, or haven been disputes, documented proof of legal acquisition of land and fair compensation that have been or are being made to previous owners and occupants; shall made available and that these should have been accepted with free prior informed consent (FPIC).</p>	Not applicable as land issues is handled by the estate.	NA

Criterion / Indicator		Assessment Findings	Compliance
- Minor compliance -			
Criterion 4.3.3 – Customary rights			
4.3.3.1	Where lands are encumbered by customary rights, the company shall demonstrate that these rights are understood and are not being threatened or reduced. - Major compliance -	Not applicable as land issues is handled by the estate.	NA
4.3.3.2	Maps of an appropriate scale showing extent of recognized customary rights shall be made available. - Minor compliance -	Not applicable as land issues is handled by the estate.	NA
4.3.3.3	Negotiation and FPIC shall be recorded and copies of the relevant agreements should be made available. - Major compliance -	Not applicable as land issues is handled by the estate.	NA
4.4 Principle 4: Social responsibility, health, safety and employment condition			
Criterion 4.4.1: Social Impact Assessment (SIA)			
4.4.1.1	Social impacts should be identified and plans should be implemented to mitigate the negative impacts and promote the positive ones. - Minor compliance -	The Social Impact Assessment for Tereh certification unit for all operating units was conducted internally by Kulim’s internal auditors and register the impacts in “Daftar Impak Social Kulim (Malaysia) Berhad 2019”. In the register there is information about type of issue, level of severity, recommendation for improvement and person responsible. At the operating unit level, “Cadangan Penambahbaikan Sosial bagi Ladang/Kilang XX 2019” where information about issue, recommendation for improvement, actions to be taken, person in-	Complied

Criterion / Indicator		Assessment Findings	Compliance
		charge and comments from internal auditors. Apart from that the positive impacts were also registered in the "Cadangan Penambahbaikan Sosial bagi Ladang/Kilang XX 2019" where action to promote them are spelt out.	
Criterion 4.4.2: Complaints and grievances			
4.4.2.1	A system for dealing with complaints and grievances shall be established and documented. - Major compliance -	Kulim has established the procedure (SPO Grievances Procedure 2007) to deal with complaints and grievances by using the complaint form. Verified some of the complaint forms where most complaints were about housing defects (e.g. structure, wiring and piping) which was recorded in the "Borang Aduan/Cadangan" file. Verification of the forms showed that the issues have been timely and appropriately handled.	Complied
4.4.2.2	The system shall be able to resolve dispute in an effective, timely and appropriate manner, which is accepted by all parties. - Major compliance -	The complaint and grievances are open to affected parties which includes internal and external stakeholders. The time to process the complaints or grievances is depending on the severity of the complaint.. Mostly the complaints received were about housing maintenance & repair by the employees. They were recorded in a log book which has the information about date, complainant, details of complain and status. There was no complaint from external stakeholders ever since the last assessment.	Complied
4.4.2.3	A complaint form should be made available at the premises, where employees and affected stakeholders can make complaints.	The operating unit managements have maintained its "Borang Aduan/Cadangan" file to record any complaints or grievances from stakeholders. The complaints lodged related to housing repair were resolved accordingly and it was acknowledged by the complaints	Complied

MSPO Public Summary Report
Revision 0 (Aug 2017)

Criterion / Indicator		Assessment Findings	Compliance
	- Minor compliance -	after the action has been taken.	
4.4.2.4	<p>Employees and surrounding communities should be made aware of its existence and that complaints or suggestions may be made at any time.</p> <p>- Minor compliance -</p>	Employees and surrounding communities were made aware on the complaints and grievances through various ways such as meeting, training and briefing. Meetings between the operating units and their relevant stakeholders were conducted from time to time. Minutes of meeting were available for verification.	Complied
4.4.2.5	<p>Complaints and solutions within the past 24 months shall be documented and be made available to affected stakeholders upon request.</p> <p>- Major compliance -</p>	All the visited estates maintained their records of complaint in a complain file. Records for more than 24 months ago were still kept in the file.	Complied
Criterion 4.4.3: Commitment to contribute to local sustainable development			
4.4.3.1	<p>Palm oil miller should contribute to local development in consultation with the local communities. Where the mill is an integral part of plantation, such contribution to local community development may be regarded as a joint effort by the mill and the plantation.</p> <p>- Minor compliance -</p>	Tereh complex has continued to make appropriate contributions to local communities in the form of donations and assistance to schools and places of worship and donations for religious festivals and provide work opportunity for the locals which has been verified through documentation evidence and interviewed with respective stakeholders.	Complied
Criterion 4.4.4: Employees safety and health			
4.4.4.1	An occupational safety and health policy and plan which is in line with Occupational Safety and Health Act 1994 and Factories and Machinery Act 1967 (Act 139) shall be documented, effectively	The Group Occupational Safety & Health Management Policy had been established and implemented. The policy was signed by the Executive Director of Kulim (Malaysia) Berhad on 01 May 2015 and displayed prominently on notice boards in English and local language	Complied

Criterion / Indicator		Assessment Findings		Compliance								
	<p>communicated and implemented.</p> <p>- Major compliance -</p>	<p>Bahasa Malaysia. The Policy is implemented through the OSH activities by the SQD Executives and monitored by SQ Department at Head Office. Included in the policy is the commitment of the Company to;</p> <ul style="list-style-type: none"> a) Comply or where practicable exceed applicable OSH legislation, regulations and codes of practices. b) Regularly review and audit the OSH management systems to ensure that they remain relevant and appropriate. c) Effective communication of this policy to all employees and other affected parties d) Regularly and continuously conduct education, training and awareness program on OSH to all parties concerned. <p>The implementation of OSH plan was monitored by internal audits conducted by OSH Executives from SQ Department.</p>										
4.4.4.2	<p>The occupational safety and health plan should cover the following:</p> <ul style="list-style-type: none"> a) A safety and health policy, which is communicated and implemented. b) The risk of all operations shall be assessed and documented. c) An awareness and training programme which includes the following requirements for employees exposed to chemicals used at the palm oil mill: <ul style="list-style-type: none"> i. All employees involved are adequately trained on safe working practices; ii. All precautions attached to products should be properly observed and applied; d) The management shall provide the appropriate PPE at the 	<p>The OSH policy is communicated through training session and during muster. Ad hoc training is also being carried in a smaller group of employees. <i>Reference training 4.4.6.1</i></p> <p>The mill had identified and reviewed significant hazards and risks and determined appropriate risk control measures. The hazard identification, risk assessment and risk control (HIRARC) records latest reviewed on 02/8/19 (to include Biogas Plant Construction) as well as CHRA reports were verified during the assessment. At the estates, among the HIRARC covered activities are;</p> <table border="1" style="width: 100%; border-collapse: collapse;"> <thead> <tr> <th style="width: 5%;"></th> <th style="width: 45%;">Activity</th> <th style="width: 5%;"></th> <th style="width: 45%;">Activity</th> </tr> </thead> <tbody> <tr> <td style="text-align: center;">1</td> <td>Chemical mixing</td> <td style="text-align: center;">11</td> <td>Scheduled waste storage</td> </tr> </tbody> </table>			Activity		Activity	1	Chemical mixing	11	Scheduled waste storage	Complied
	Activity		Activity									
1	Chemical mixing	11	Scheduled waste storage									

MSPO Public Summary Report
Revision 0 (Aug 2017)

Criterion / Indicator		Assessment Findings				Compliance					
<p>place of work to cover all potentially hazardous operations as identified in the risk assessment and control such as Hazard Identification, Risk Assessment and Risk Control (HIRARC).</p> <p>e) The management shall establish Standard Operating Procedure for handling of chemicals to ensure proper and safe handling and storage in accordance to Occupational Safety Health (Classification Packaging and Labeling) Regulation 1997 Occupational Safety Health (Use and Standard of Exposure of Chemical Hazardous to Health) Regulation 2000.</p> <p>f) The management shall appoint responsible person(s) for workers' safety and health. The appointed person(s) of trust shall have knowledge and access to latest national regulations and collective agreements.</p> <p>g) The management shall conduct regular two-way communication with their employees where issues that affect their business such as those related to employees' safety, health and welfare are discussed openly. Records from such meeting shall be kept and the concerns of employees and any remedial actions taken shall be recorded.</p> <p>h) Accident and emergency procedures shall exist and instructions shall be clearly understood by all employees.</p> <p>i) Employees trained in First Aid shall be present at all mill operations. First Aid equipment should be available at each worksite.</p> <p>j) Records shall be kept of all accidents and be reviewed periodically at quarterly intervals.</p>	2	CPO storage	12	Use of vehicle	<p>Full review for the HIRARC was conducted by the ESH committee and no major changes were observed in term of hierarchy to determine appropriate control measures. They are made on annual basis or whenever a situation deemed necessary in event of accident or new machinery / work process. All HIRARC prepared were adequate to address any situation of the risk management. All HIRARC were verified and approved accordingly.</p> <p>The mill provides training to the workers and staff exposed to pesticides and chemicals. The following training sessions were recorded.</p> <table border="1" style="width: 100%; border-collapse: collapse;"> <thead> <tr> <th style="width: 70%;">Subjects</th> <th style="width: 15%;">Date</th> <th style="width: 15%;">Attendn</th> </tr> </thead> <tbody> <tr> <td> </td> <td> </td> <td> </td> </tr> </tbody> </table>	Subjects	Date	Attendn			
	Subjects	Date	Attendn								
	3	FFB Reception	13	Water treatment							
	4	Generating power	14	Waste handling							
	5	Lab operations	15	Diesel engine							
	6	Machine/vehicle maint	16	Storage tank							
	7	Office work	17	Effluent treatment plant							
	8	Oil clarification	18	Bio-compost							
	9	Oil pressing	19	Biogas plant construction							
	10	EFB shredding	20	-							

Criterion / Indicator	Assessment Findings				Compliance								
<p>- Major compliance -</p>	1	PPE adherence	03/6/19	Entire									
	2	Spill containment ERP	11/9/19	Entire									
	3	Water treatment / water sampling	24/9/19	14									
	4	Laboratory operations	24/9/19	14									
	5	Chemical handling	09/10/19	5									
	<p>Details of other training are available 4.4.6.1 (training and competency). OSH programs are also included. Common programs are initiated from HQ level e.g. OSH meeting, workplace inspection, inspection on PPE, training on MSPO/RSPO etc.</p>												
	<p>The mill provides PPE to the employees relevant to the work handled by the workers. The list of PPE that were provided by the estates are as below:</p>												
<table border="1"> <thead> <tr> <th></th> <th>Workers category</th> <th>Type of PPE</th> </tr> </thead> <tbody> <tr> <td>1</td> <td>General workers</td> <td>Safety Helmet, cotton/leather gloves. Safety shoes</td> </tr> <tr> <td>2</td> <td>Workshop personnel</td> <td>Safety Helmet, cotton/leather gloves. Safety shoes, harness, face mask.</td> </tr> </tbody> </table>						Workers category	Type of PPE	1	General workers	Safety Helmet, cotton/leather gloves. Safety shoes	2	Workshop personnel	Safety Helmet, cotton/leather gloves. Safety shoes, harness, face mask.
	Workers category	Type of PPE											
1	General workers	Safety Helmet, cotton/leather gloves. Safety shoes											
2	Workshop personnel	Safety Helmet, cotton/leather gloves. Safety shoes, harness, face mask.											
<p>Records of PPE issuance were sighted. During the site visit workers</p>													

**MSPO Public Summary Report
Revision 0 (Aug 2017)**

Criterion / Indicator	Assessment Findings	Compliance
	<p>were observed to be in their respective PPE.</p> <p>The mill has established SOP for chemical handling. This is available in Integrated Management Manual and SOP provided in the Company's documents - Operational Control Procedure under subject Chemical Safety Management. This includes compliance related to;</p> <ul style="list-style-type: none"> - Conduct/reassess CHRA - Review of chemical register - Chemical management assessment review - Conduct health surveillance. <p>The document was sighted and verified.</p> <p>The Mill Manager is appointed as the Chairman of the ESH committee via letter dated 22/9/19. The letter of appointment for the Managers is signed by the Chairman ESH based at Head Office.</p> <p>The Mill Manager is the Chairman of the mill ESH committee. The Manager subsequently assigned duties of ESH coordinator to the Assistants for the down line implementation of ESH practices in the mill. All identified Executives were officially given a letter for such an appointment. The mill management conducts regular two-way communication with their employees through the quarterly ESH meeting. The dates of meeting held by both estates/mill are recorded below.</p>	

Criterion / Indicator		Assessment Findings					Compliance
			1st	2nd	3rd	4 th	
		Date	24/9/19	20/6/19	21/3/19	25/12/18	
		participant	23	19	14	18	
		<p>The minutes of meeting dated 24/9/19 and 21/3/19 were sighted and verified. Workers during the meeting participated in the discussion mainly on housing and safety. This agenda list to be refined for a retrieved discussion relating safety, environmental and health. The agenda as discussed during the meeting among others includes the following;</p> <ul style="list-style-type: none"> a) Introduction b) Matters arising c) Presentation from Head Section d) Feedback from Chairman e) Accident Statistics f) Other matters <p>Accident and emergency procedures are available in the SOP. The Mill had procedures emergencies situation as listed below in the table. There was formation of ERP Team & ERP for all the identified incidences. The organisation chart for the ERP team was established and displayed for information of the employees. The important telephone contact numbers were also provided therein. Procedures guidelines were issued by SQD and amended to tailor to the situation differences in the estates and mills.</p>					
		Emergencies Situation		Mill	Estate		

MSPO Public Summary Report
Revision 0 (Aug 2017)

Criterion / Indicator		Assessment Findings				Compliance																								
		1	Fire Hazard	/	/																									
		2	Injury At Site	/	/																									
		3	Dieseline /chemical spillage	/	/																									
		<p>ERT members received training and practice in emergency procedures appropriate to their respective workplace and degree of risk. The trainings are conducted by an accredited or qualified organisation who can demonstrate their suitability to provide training. Among others the training held are as follows;</p> <table border="1"> <thead> <tr> <th></th> <th>Subjects</th> <th>Date</th> <th>Attend</th> </tr> </thead> <tbody> <tr> <td>1</td> <td>Spill containment ERP</td> <td>11/9/19</td> <td>Entire</td> </tr> <tr> <td>2</td> <td>Fire drill training</td> <td>22/9/19</td> <td>Entire</td> </tr> <tr> <td>3</td> <td>First aid</td> <td>11/9/19</td> <td>22</td> </tr> <tr> <td>4</td> <td>PPE /ERP /ERT</td> <td>03/6/19</td> <td>Entire</td> </tr> <tr> <td>5</td> <td>HCV/Buffer Zone Waste Management</td> <td>27/8/19</td> <td>Entire</td> </tr> </tbody> </table> <p>The mill trained their nominated employees for First Aid mainly those involved in the field operations. A training program Basic Occupational First Aider & CPR was organised by KSTS at Head Office level attended by employees nominated by the Estates/Mill. This was sighted in a certified training session on 27/11/17 & 6/8/18. A First Aid Kit equipped with approved 16 items were available and replenished on a weekly basis. Distribution of the 1st Aid Kit for both the estates are made at the following places/personnel among</p>					Subjects	Date	Attend	1	Spill containment ERP	11/9/19	Entire	2	Fire drill training	22/9/19	Entire	3	First aid	11/9/19	22	4	PPE /ERP /ERT	03/6/19	Entire	5	HCV/Buffer Zone Waste Management	27/8/19	Entire	
	Subjects	Date	Attend																											
1	Spill containment ERP	11/9/19	Entire																											
2	Fire drill training	22/9/19	Entire																											
3	First aid	11/9/19	22																											
4	PPE /ERP /ERT	03/6/19	Entire																											
5	HCV/Buffer Zone Waste Management	27/8/19	Entire																											

MSPO Public Summary Report
Revision 0 (Aug 2017)

Criterion / Indicator		Assessment Findings	Compliance															
		<p>others;</p> <p>Office / AP Post / Chemical Store / Fertiliser Store / Workshop / Supervisor. The boxes kept by the supervisors were sighted during the field visit. The mill had regular briefing to the 1st Aid Kit holders on the management of the content and usage. The sessions were briefed by the HA/MA and also during the weekly briefings.</p> <p>Records of all accidents are kept in both estates for a min of 10 years. Accident incidences are reviewed during safety meetings. Records in 2017 as extracted from the JKPP 8 (<i>submitted to DOSH on 11/1/19</i>) as shown below;</p> <table border="1"> <thead> <tr> <th>No of cases</th> <th>1</th> <th>LTI</th> <th>Non LTI</th> <th>Total</th> </tr> </thead> <tbody> <tr> <td></td> <td>0</td> <td>0</td> <td>0</td> <td>0</td> </tr> <tr> <td>Oc Disease</td> <td>8</td> <td>-</td> <td>-</td> <td>8</td> </tr> </tbody> </table> <p>Submission of JKPP6 & 8 to DOSH was submitted under the legislative requirement.</p>	No of cases	1	LTI	Non LTI	Total		0	0	0	0	Oc Disease	8	-	-	8	
No of cases	1	LTI	Non LTI	Total														
	0	0	0	0														
Oc Disease	8	-	-	8														
Criterion 4.4.5: Employment conditions																		
4.4.5.1	The management shall establish a policy on good social practice regarding human rights in respect of industrial harmony. The policy shall be signed by the top management and communicated to the employees.	Kulim has established a policy on good social ethics with regards to human rights such as Human Policy, Ethic Policy, Prevention of Sexual Harassment in the Workplace Policy, Right of Employees Policy, and etc. dated 1/5/2018. All the policies were signed off by Executive Director.	Complied															

MSPO Public Summary Report
Revision 0 (Aug 2017)

Criterion / Indicator		Assessment Findings	Compliance
	- Major compliance -	The policies were communicated through display at the strategic location, induction & training, memo and meeting.	
4.4.5.2	The management shall not engage in or support discriminatory practices and shall provide equal opportunity and treatment regardless of race, colour, sex, religion, political opinion, nationality, social origin or any other distinguishing characteristics. - Major compliance -	Kulim has established Core Labour Standard policy, where it commits not to engage any form of discrimination based on race, colour, sex, religion, political opinion, nationality, social origin or any other distinguishing characteristics. Interviews with the workers showed that no evidence of discrimination occurred in the workplace.	Complied
4.4.5.3	Management shall ensure that employees' pay and conditions meet legal or industry minimum standards as per Collective Agreements. The living wage should be sufficient to meet basic needs and provide some discretionary income based on minimum wage. - Major compliance -	Employment contracts for workers were available for verification. Pay and conditions are documented and in line with the Minimum Wage Order 2018. Sampled of employment contracts confirmed that terms and conditions are clearly outlined and have been signed by the worker. Below were the sampled workers ID number whom payslips for June and February, 2019 were verified: <u>Tereh POM:</u> 612246, 612271, 612302, 612063, 612263, 612289 (150), 612041, 612236, 612323, 612193.	Complied
4.4.5.4	Management should ensure employees of contractors are paid based on legal or industry minimum standards according to the employment contract agreed between the contractor and his employee. - Minor compliance -	The contractors have signed on the contract agreement prior commencement of work in the estate. In the agreement, it was clearly stated that the contractors shall ensure their workers are paid according to legal requirements. Interview with the contractors confirmed that they understood the terms and conditions stated in the contract. Their workers were paid according to Minimum Wage Order 2018 based on the pay slips	Complied

MSPO Public Summary Report
Revision 0 (Aug 2017)

Criterion / Indicator		Assessment Findings	Compliance
		prepared by the contractors.	
4.4.5.5	<p>The management shall establish records that provide an accurate overview of all employees (including seasonal workers and subcontracted workers on the premises). The records should contain full names, gender, date of birth, date of entry, a job description, wage and the period of employment.</p> <p>- Major compliance -</p>	<p>The employees that recruited by the estates are of local, Indonesia, Bangladesh and India. Most of them are under direct employment to the estates and have signed the employment contract prior to commencement of work. Information about duration of contract, type of work offered, wages, annual leave, allowances and etc. was stated in the employment contract. Sampled of employment contracts as below:</p> <p><u>Tereh POM:</u></p> <p>612246, 612271, 612302, 612063, 612263, 612289 (150), 612041, 612236, 612323, 612193</p>	Complied
4.4.5.6	<p>All employees shall be provided with fair contracts that have been signed by both employee and employer. A copy of employment contract shall be made available for each and every employee indicated in the employment records.</p> <p>- Major compliance -</p>	<p>The employment contract is available and signed by both employee and employer. Verification of the terms and conditions showed that they are in line with the MAPA/NUPW latest agreement [MAPA Circular No. 12/2019 dated 2/4/2019].</p> <p>Those workers whom are employed by contractors appointed by the company have their own contract agreements with their employers.</p>	Complied
4.4.5.7	<p>The management shall establish a time recording system that makes working hours and overtime transparent for both the employees and employers.</p> <p>- Major compliance -</p>	<p>The mill is using "punch card" method which is able to record time-in/time-out and overtime done. Thereafter the information is registered in the computer recording system.</p>	Complied
4.4.5.8	<p>The working hours and breaks of the individual worker indicated in the time records shall comply with legal regulations and collective agreements. Overtime shall be mutually agreed upon</p>	<p>Interviewed with the workers confirmed that they have rest time in between of the working hours. Overtimes were paid according to the rate stated in the agreement and regulatory requirements.</p>	Complied

MSPO Public Summary Report
Revision 0 (Aug 2017)

Criterion / Indicator		Assessment Findings	Compliance
	and shall meet the legal requirements applicable. - Major compliance -		
4.4.5.9	Wages and overtime payment documented on the pay slips shall be in line with legal regulations and collective agreements. - Major compliance -	Sample payslips checked found the wages and overtime/ Rest day payments are documented in line with the employee contract & agreement and complies with Minimum Wage Order 2018 requirement of RM 1,100 monthly/ Daily RM42.31 and rate stated in the / collective agreement NUPW/ MAPA. Sampled Workers checked for wages: <u>Tereh POM:</u> 612246, 612271, 612302, 612063, 612263, 612289 (150), 612041, 612236, 612323, 612193	Complied
4.4.5.10	Other forms of social benefits should be offered by the employer to employees, their families or community such as incentives for good work performance, bonus payment, support of professional development, medical care provisions and improvement of social surroundings. - Minor compliance -	Among the benefits offered by the company: <ul style="list-style-type: none"> • Subsidies for electricity and water • Medical treatment at estates' clinics • Free transportation to hospital • Shift allowance 	Complied
4.4.5.11	In cases where on-site living quarters are provided, these quarters shall be habitable and have basic amenities and facilities. - Major compliance -	Generally, the workers quarters were in very good condition. In addition, line-site inspection was done by the medical or hospital assistants and reports were documented in accordance to the Workers' Minimum Standards Housing and Amenities Act 1990. The inspection reports were verified by the managers. Drinking water test is done twice a year by accredited laboratory (e.g. SAMM No. 146). Verified two latest report at Tereh POM i.e. LW/423/19 dated 10/6/2019 and LW/857/18 dated 12/12/2018. Among the parameters	Complied

MSPO Public Summary Report
Revision 0 (Aug 2017)

Criterion / Indicator		Assessment Findings	Compliance
		tested were pH, Turbidity, Al, Cl ₂ , total Coliform and E. Coli. Based on the test report, the analysis results were within the limit set in Drinking Water Quality Standard, Ministry of Health Malaysia; Engineering Services Division, Year 2010.	
4.4.5.12	The management shall establish a policy to prevent all forms of sexual harassment and violence at the workplace. - Major compliance -	Kulim has implemented sexual harassment & domestic violence in the workplace policy where the management is committed to develop and apply a policy to prevent sexual harassment and other forms of violence against women and to protect their reproductive rights. Gender Committee was established to monitor and take care of the welfare of female workers to ensure no case of sexual harassment or violence happened. Awareness campaign is conducted time to time through various methods such as briefing and meetings.	Complied
4.4.5.13	The management shall respect the right of all employees to form and join trade union and allow workers' own representative(s) to facilitate collective bargain in accordance with applicable laws and regulations. Employees shall be given freedom to join trade unions relevant to the industry or organize themselves for collective bargaining. Employees shall have the right to organize and negotiate their work conditions. Employees exercising this right should not be discriminated against or suffer repercussions. - Major compliance -	All visited operating units continued to implement Kulim's Core Labour Standard dated 1/5/2018 where the management is committed and respect the rights of all personnel to form and join trade unions of their choice. Union Meetings at all the visited estates were regularly held and minutes of meeting were maintained. Interview with the workers from different nationalities confirmed that they are allowed to join Union freely without any restriction.	Complied
4.4.5.14	Children and young persons shall not be employed or exploited. The minimum age shall comply with local, state and national legislation.	All visited operating units continued to implement Kulim's Core Labour Standard dated 1/5/2018 where the management is committed not to engage or support the use of Child Labour as defined by Malaysian law. Through document reviewed on the Employee Master Listing confirmed that no employee under 18 years	Complied

MSPO Public Summary Report
Revision 0 (Aug 2017)

Criterion / Indicator		Assessment Findings	Compliance																								
	- Major compliance -	was recruited by the company. Interview with the workers and contractors also found that no child labour was practice in the estates.																									
Criterion 4.4.6: Training and competency																											
4.4.6.1	<p>All employees and contractors shall be appropriately trained. A training programme shall include regular assessment of training needs and documentation, including records of training.</p> <p>- Major compliance -</p>	<p>Formal training programmes for 2019 that covered aspects of the MSPO indicators as well as other salient requirement of the estates operations. Regular assessments of training needs were available for all the audited sites. Training Plan was for each operating unit were established. A training need identification matrix has been established with target dates for the training identified. The training program among others includes the following subjects. Trainings were provided during musters and also in session held in the estate community hall/mill compound. The following trainings made for the employees were recorded as follows. Subjects extracted were mainly related to ESH, SOPs, and pesticide handlings.</p> <table border="1"> <thead> <tr> <th></th> <th>Subjects</th> <th>Date</th> <th>Attend</th> </tr> </thead> <tbody> <tr> <td>1</td> <td>PPE adherence</td> <td>03/6/19</td> <td>Entire</td> </tr> <tr> <td>2</td> <td>ISCC Tool</td> <td>21/3/19</td> <td>1</td> </tr> <tr> <td>3</td> <td>Station Ramp/weighbridge/thresher/kernel</td> <td>1/8/19</td> <td>8</td> </tr> <tr> <td>4</td> <td>Spill containment ERP</td> <td>11/9/19</td> <td>Entire</td> </tr> <tr> <td>5</td> <td>Station boiler/laboratory/workshop/effluent</td> <td>3/2/19</td> <td>11</td> </tr> </tbody> </table>		Subjects	Date	Attend	1	PPE adherence	03/6/19	Entire	2	ISCC Tool	21/3/19	1	3	Station Ramp/weighbridge/thresher/kernel	1/8/19	8	4	Spill containment ERP	11/9/19	Entire	5	Station boiler/laboratory/workshop/effluent	3/2/19	11	Complied
	Subjects	Date	Attend																								
1	PPE adherence	03/6/19	Entire																								
2	ISCC Tool	21/3/19	1																								
3	Station Ramp/weighbridge/thresher/kernel	1/8/19	8																								
4	Spill containment ERP	11/9/19	Entire																								
5	Station boiler/laboratory/workshop/effluent	3/2/19	11																								

MSPO Public Summary Report
Revision 0 (Aug 2017)

Criterion / Indicator		Assessment Findings				Compliance
		6	Station kernel/Nut station	01/8/19	11	
		7	Scheduled waste management	11/10/19	12	
		8	Water treatment / water sampling	24/9/19	14	
		9	Ramp & grading	01/8/19	8	
		10	Laboratory operations	24/9/19	14	
		11	Chemical handling	09/10/19	5	
		12	fogging	01/10/10	6	
		13	Fire drill training	22/9/19	Entire	
		14	First aid	11/9/19	22	
		15	Tractor /lorry / vehicle driving	15/4/19	6	
		16	LOTO Workshop operations	27/9/19	Entire	
		17	OSHA & PPE	05/9/19	5	
		18	FW – Induction program	26/5/19	Entire	
		19	PPE /ERP /ERT	03/6/19	Entire	
		20	HCV/Buffer Zone Waste Management	27/8/19	Entire	
		21	MSPO/RSPO /ISCC Awareness	08/1/19	Entire	
		22	GHG calculations	08/1/19	5	
		2	Policies briefing	26/5/19	Entire	

MSPO Public Summary Report
Revision 0 (Aug 2017)

Criterion / Indicator		Assessment Findings				Compliance
		24	Halal briefing	22/9/19	Entire	
		25	Confined space & work at height	24/9/19	1	
		26	Hearing impairment	10/10/19	9	
		27	Domestic waste management	17/9/19	Entire	
		28	Supply chain	18/9/19	11	
		29	MPOB FFB grading	28/3/19	1	
		30	MSPO documentation	28/3/19	20	
		31	Supply chain and traceability	18/9/19	11	
4.4.6.2	<p>Training needs of individual employees shall be identified prior to the planning and implementation of the training programmes in order to provide the specific skill and competency required to all employees based on their job description.</p> <p>- Major compliance -</p>	<p>The training needs for the mill 2019 training program has been established. The details of the training needs include categories of stations, subjects, and employees' group. Included in this program are subjects related to;</p> <ul style="list-style-type: none"> a) environmental, b) safety & health policy, c) scheduled waste management, d) environmental responsibility, e) HCV & Biodiversity training, f) machine handling, mill stations operations, control of process parameters, g) Workshop management. etc 				Complied
4.4.6.3	A continuous training programme shall be planned and implemented to ensure that all employees are well trained in	This is in compliance and detailed in 4.4.6.1 above. Training program are made on annual basis. In addition, it is subject for a review				Complied

Criterion / Indicator		Assessment Findings	Compliance
	<p>their job function and responsibility in accordance to the documented training procedure.</p> <p>- Minor compliance -</p>	<p>during the financial year should need arises. The training program at current is adequate to support the management needs in enhancing the knowledge and skill of its employees to operate the mill along with the MSPO/RSPO certification.</p>	
4.5 Principle 5: Environment, natural resources, biodiversity and ecosystem services			
Criterion 4.5.1: Environmental Management Plan			
4.5.1.1	<p>An environmental policy and management plan shall be in line with the relevant country and state environmental laws shall be established, effectively communicated and implemented.</p> <p>- Major compliance -</p>	<p>There is an Environmental Management Policy for the mill issued and endorsed in Jan 2015 by the Managing Director. Inside the policy among others has stated that the Company is committed to protecting the environment and conserving biodiversity through sustainable development. This is policy is prominently displayed in the office along with other Company's Policies.</p>	Complied
4.5.1.2	<p>The environmental management plan shall cover the following:</p> <p>a) An environmental policy and objectives;</p> <p>b) The aspects and impacts analysis of all operations</p> <p>- Major compliance -</p>	<p>The Policy is available with the objectives stated therein. Kulim (Malaysia) Berhad have conducted the annual Environmental Risk Assessment.</p> <p>a) The last review was dated July 2018. The Environmental Risk Assessment was conducted by Kulim SPO team and operating units (e.g. mill & estate).</p> <p>b) The Environmental Risk Assessment is annually reviewed and accepted to conclude that proper environmental management has been considered prior any activities.</p> <p>c) As per the EQA 1974, there is no EIA required as there is no expansion of mill activities or expansion of new land planting.</p> <p>The environmental aspects for the mill are tabulated in the EAI master list Risk Assessment (RA) Register updated on July 2018. Among others the EIAs are divided into the all stations in the mill</p>	Complied

MSPO Public Summary Report
Revision 0 (Aug 2017)

Criterion / Indicator		Assessment Findings	Compliance
		<p>processing as listed below. The newest added activities being the MDS and ETP (additional dust cyclone being installed).</p> <ul style="list-style-type: none"> a) the boiler stack emission, black smoke b) palm oil mill effluent (POME) discharge and water contamination, c) Activities related to managing of scheduled wastes and general waste. d) Activities of all operations beginning from the mill entrance ending to the effluent, EFB operations. e) Activities relating to construction i.e. building repair and new construction <p>Documents are maintained, sighted and verified.</p>	
4.5.1.3	<p>An environmental improvement plan to mitigate the negative impacts and to promote the positive ones, shall be developed, implemented and monitored.</p> <p>- Major compliance -</p>	<p>The Mill maintained its documented environmental impact assessment.</p> <ul style="list-style-type: none"> a) The information of environmental impact assessment contained in the Environmental Aspect Identification (EAI) and Environmental Impact Evaluation Risk Assessment Register (RA) register. b) The documents included the identification and evaluation of environmental aspects covering mill and plantation operation, including replanting. c) Tereh Mill developed documents relating to <ul style="list-style-type: none"> - Pollution & Emission Management Plan dated 01/4/2018. was sighted i.e. permissible black smoke emission and to ensure final effluent discharge within the stipulated limit has been developed. d) All the Mill Executives has been assigned to ensure the action 	Complied

MSPO Public Summary Report
Revision 0 (Aug 2017)

Criterion / Indicator		Assessment Findings	Compliance																																																																								
		plan are effectively implemented within the stipulate time frame. They were assisted by the respective supervisors/staff.																																																																									
4.5.1.4	A programme to promote the positive impacts should be included in the continual improvement plan. - Minor compliance -	<p>The mitigation measures to manage the significant environmental impact were defined in the following documents</p> <p>a) Mill – Pollution & Emission Plan dated 01/4/18 Details as provided therein among others as given below;</p> <table border="1"> <thead> <tr> <th></th> <th>Emission</th> <th>Source</th> <th>Frequency</th> </tr> </thead> <tbody> <tr> <td>1</td> <td>Dark smoke</td> <td>Mill stack – boiler</td> <td>As required</td> </tr> <tr> <td></td> <td></td> <td>Running vehicles</td> <td>Daily</td> </tr> <tr> <td>2</td> <td>Noise</td> <td>Diesel engines</td> <td>Operational hours</td> </tr> <tr> <td>3</td> <td>Dust particles</td> <td>Shredded EFB</td> <td>Operational hours</td> </tr> <tr> <td></td> <td></td> <td>Boiler ashes</td> <td>Operational hours</td> </tr> <tr> <td>4</td> <td>Air pollutant</td> <td>Boiler combustion</td> <td>As required</td> </tr> <tr> <td></td> <td></td> <td>Diesel engine</td> <td>As required</td> </tr> <tr> <td></td> <td></td> <td>Running vehicles</td> <td>Daily</td> </tr> <tr> <td>5</td> <td>POME</td> <td>Mill process</td> <td>Daily</td> </tr> <tr> <td>6</td> <td>Waste Water</td> <td>PCD</td> <td>As required</td> </tr> <tr> <td></td> <td></td> <td>Septic tank spillage</td> <td>Weekly inspection</td> </tr> </tbody> </table> <table border="1"> <thead> <tr> <th></th> <th>Emission</th> <th>Action Plan</th> <th>PIC</th> </tr> </thead> <tbody> <tr> <td>1</td> <td>Dark smoke</td> <td>Follow manual procedure to ensure compliance meets permissible limits</td> <td>Execs/Boilerman</td> </tr> <tr> <td></td> <td></td> <td>Vehicle inspection</td> <td>Exec/supervisors</td> </tr> <tr> <td>2</td> <td>Noise</td> <td>Noise mapping data</td> <td>Exec/supervisors</td> </tr> <tr> <td>3</td> <td>Dust particles</td> <td>Routine maintenance</td> <td>Exec/supervisors</td> </tr> <tr> <td></td> <td></td> <td>Storage far from</td> <td>Exec/supervisors</td> </tr> </tbody> </table>		Emission	Source	Frequency	1	Dark smoke	Mill stack – boiler	As required			Running vehicles	Daily	2	Noise	Diesel engines	Operational hours	3	Dust particles	Shredded EFB	Operational hours			Boiler ashes	Operational hours	4	Air pollutant	Boiler combustion	As required			Diesel engine	As required			Running vehicles	Daily	5	POME	Mill process	Daily	6	Waste Water	PCD	As required			Septic tank spillage	Weekly inspection		Emission	Action Plan	PIC	1	Dark smoke	Follow manual procedure to ensure compliance meets permissible limits	Execs/Boilerman			Vehicle inspection	Exec/supervisors	2	Noise	Noise mapping data	Exec/supervisors	3	Dust particles	Routine maintenance	Exec/supervisors			Storage far from	Exec/supervisors	Complied
	Emission	Source	Frequency																																																																								
1	Dark smoke	Mill stack – boiler	As required																																																																								
		Running vehicles	Daily																																																																								
2	Noise	Diesel engines	Operational hours																																																																								
3	Dust particles	Shredded EFB	Operational hours																																																																								
		Boiler ashes	Operational hours																																																																								
4	Air pollutant	Boiler combustion	As required																																																																								
		Diesel engine	As required																																																																								
		Running vehicles	Daily																																																																								
5	POME	Mill process	Daily																																																																								
6	Waste Water	PCD	As required																																																																								
		Septic tank spillage	Weekly inspection																																																																								
	Emission	Action Plan	PIC																																																																								
1	Dark smoke	Follow manual procedure to ensure compliance meets permissible limits	Execs/Boilerman																																																																								
		Vehicle inspection	Exec/supervisors																																																																								
2	Noise	Noise mapping data	Exec/supervisors																																																																								
3	Dust particles	Routine maintenance	Exec/supervisors																																																																								
		Storage far from	Exec/supervisors																																																																								

MSPO Public Summary Report
Revision 0 (Aug 2017)

Criterion / Indicator		Assessment Findings				Compliance
				water source		
		4	Air pollutant	Conduct stack monitoring	Exec/supervisors	
				Routine maintenance	Exec/supervisors	
				Inspection & maintenance of vehicle.	Exec/supervisors	
		5	POME	Supervise management of effluent application.	Exec/supervisors	
		6	Waste Water	Regular PCD inspection. Follow SW guidelines.	Execs/Staff/foreman	
				Conduct weekly line site inspection. Appropriate action in event of spillages.	Execs/Staff/EHA	
4.5.1.5	An awareness and training programme shall be established and implemented to ensure that employees understand the policy, objectives and management plans and are working towards achieving objectives. - Major compliance -	A training program is available and updated on a yearly basis or revised as per the management requirement. Included in this program are subjects related to environment e.g. environmental, safety & health policy, scheduled waste management, environmental responsibility, HCV & Biodiversity training.				Complied
4.5.1.6	The management shall organize regular meetings with workers where concerns of workers about the environmental quality are discussed. - Major compliance -	Similar forum is used by the mill and the estates in discussing concerns on environmental performance and issues. The forum used in the mill is the annual environmental meeting and dialogues during the weekly muster. The former emphasized more on issues on water management plan, electricity use, diesel consumption, waste management, EMP, renewable energy, aspect/impact. The mill had a meeting on 11/9/19				Complied

MSPO Public Summary Report
Revision 0 (Aug 2017)

Criterion / Indicator		Assessment Findings	Compliance																
		<p>The meetings chaired by the Manager discussed the environmental issues follows;</p> <ul style="list-style-type: none"> a) Chairman’s Introduction. b) Issues from audit report c) Compliance to legal requirement d) EIA – discussion e) Compliance to environmental issue (Water/Air/Land/ f) Biogas Operations g) Training / Other matters <p>The Head Office organize am similar meeting at a higher level namely “Environmental Regulatory Compliance Monitoring Committee (ERCMC) Meeting discussing an overall performance by Group Palm Oil Mill and supply base. The minutes of meeting in 27/8/19 was sighted and verified.</p>																	
Criterion 4.5.2: Efficiency of energy use and use of renewable energy																			
4.5.2.1	<p>Consumption of non-renewable energy shall be optimized and closely monitored by establishing baseline values and trends shall be observed within appropriate timeframe. There should be a plan to assess the usage of non-renewable energy including fossil fuel, electricity in the operations over the base period</p> <p>- Major compliance -</p>	<p>The monitoring is recorded in environment performance indicator- electricity generated by steam turbine tabulated for the financial year 2019. It is calculated as electricity generated from turbine that produces power for the mill entire complex operation unit in kwh/mt FFB. A monthly record on energy consumption for both renewable and non-renewable sources were also maintained and documented. It is monitored to optimize use of renewable energy.</p> <table border="1"> <thead> <tr> <th></th> <th>Diesel L</th> <th>FFB/mt</th> <th>Diesel/FFB</th> <th></th> <th>Diesel L</th> <th>FFB/mt</th> <th>Diesel/FFB</th> </tr> </thead> <tbody> <tr> <td>Jan</td> <td>17421</td> <td>35652</td> <td>0.49</td> <td>June</td> <td>18100</td> <td>28085</td> <td>0.64</td> </tr> </tbody> </table>		Diesel L	FFB/mt	Diesel/FFB		Diesel L	FFB/mt	Diesel/FFB	Jan	17421	35652	0.49	June	18100	28085	0.64	Complied
	Diesel L	FFB/mt	Diesel/FFB		Diesel L	FFB/mt	Diesel/FFB												
Jan	17421	35652	0.49	June	18100	28085	0.64												

MSPO Public Summary Report
Revision 0 (Aug 2017)

Criterion / Indicator		Assessment Findings								Compliance
		Feb	15963	30373	0.53	July	22308	28675	0.78	
		Mac	22500	29407	0.77	Aug	24016	30113	0.80	
		Apr	26905	32873	0.82	Sept	17782	27923	0.64	
		May	18345	32475	0.56	Tot	183240	275577	0.66	
		<p>The data is compiled for comparison and control for future improvement with aim of gradual reduction particularly diesel. Details of the data/records maintained by the mill were sighted; Electricity produced kWh and ratio over mt FFB (Baseline of 10.44 for a period of 2018 to July 2019 Variation of ratio in the analysis were explained and justified Under the energy management plan 2019 the mill aimed for reduction plan among others;</p> <ul style="list-style-type: none"> - educate workers on fuel saving practice - avoid leakages during vehicles maintenance. 								
4.5.2.2	<p>The oil palm premises shall estimate the direct usage of non-renewable energy for their operations, including fossil fuel, and electricity to determine energy efficiency of their operations. This shall include fuel use by contractors, including all transport and machinery operations.</p> <p>- Major compliance -</p>	<p>This is provided in the annual budget under the EVIT running accounts. The quantum used by the Contractors is obtainable through the Contractors data declaration. Variation is possible as the vehicles are used for other jobs works outside the scope of Tereh Mill.</p>								Complied
4.5.2.3	<p>The use of renewable energy should be applied where possible.</p> <p>- Minor compliance -</p>	<p>The fibre and shell are used in the boiler for fuel recycled in the process system. Surplus quantity of shell/fibre are delivered to estates for multi purposes or sold to outside buyers. EFB is used in the estates for mulching. Details of renewable energy fibre/shell used in the mill is shown in 4.5.2.2 above. The long term planning for</p>								Complied

MSPO Public Summary Report
Revision 0 (Aug 2017)

Criterion / Indicator		Assessment Findings	Compliance																																								
		<p>biogas implementation was reviewed to stand similar with other sister mills in the Group. The recovered biogas is used for energy generation (e.g. steam & electricity).</p> <p>In addition, the mill also performed the monitoring of renewable energy usage in its operations. The data compiled for 2019 as shown below. When the renewable energy consumption is maximized the utilisation of non-renewable is reduced.</p> <table border="1"> <thead> <tr> <th>Month</th> <th>FFB prod</th> <th>Fibre/mt</th> <th>Shell/mt</th> <th>EFB mt</th> </tr> </thead> <tbody> <tr> <td>Jan</td> <td>35652</td> <td>4966</td> <td>2417</td> <td>7708</td> </tr> <tr> <td>Feb</td> <td>30373</td> <td>4246</td> <td>2062</td> <td>6102</td> </tr> <tr> <td>Mac</td> <td>29407</td> <td>4102</td> <td>1991</td> <td>6008</td> </tr> <tr> <td>Apr</td> <td>32873</td> <td>4536</td> <td>2202</td> <td>7137</td> </tr> <tr> <td>May</td> <td>32475</td> <td>4449</td> <td>2160</td> <td>6677</td> </tr> <tr> <td>June</td> <td>28085</td> <td>3909</td> <td>1899</td> <td>5884</td> </tr> <tr> <td>July</td> <td>28675</td> <td>4003</td> <td>1947</td> <td>5950</td> </tr> </tbody> </table>	Month	FFB prod	Fibre/mt	Shell/mt	EFB mt	Jan	35652	4966	2417	7708	Feb	30373	4246	2062	6102	Mac	29407	4102	1991	6008	Apr	32873	4536	2202	7137	May	32475	4449	2160	6677	June	28085	3909	1899	5884	July	28675	4003	1947	5950	
Month	FFB prod	Fibre/mt	Shell/mt	EFB mt																																							
Jan	35652	4966	2417	7708																																							
Feb	30373	4246	2062	6102																																							
Mac	29407	4102	1991	6008																																							
Apr	32873	4536	2202	7137																																							
May	32475	4449	2160	6677																																							
June	28085	3909	1899	5884																																							
July	28675	4003	1947	5950																																							
Criterion 4.5.3: Waste management and disposal																																											
4.5.3.1	<p>All waste products and sources of pollution shall be identified and documented.</p> <p>- Major compliance –</p>	<p>All waste and pollution are identified and documented in the Waste & Pollution Management Plan 2019 made on the Regional level. Details of waste generated from the estates/mill activities among others as shown below;</p> <table border="1"> <thead> <tr> <th></th> <th>Type of waste</th> <th>Location</th> </tr> </thead> <tbody> <tr> <td>1</td> <td>Domestic waste rubbish</td> <td>Line sites, office complex</td> </tr> <tr> <td>2</td> <td>Industrial waste-empty bags</td> <td>Empty bags store</td> </tr> <tr> <td>3</td> <td>Scrap metal</td> <td>workshop</td> </tr> </tbody> </table>		Type of waste	Location	1	Domestic waste rubbish	Line sites, office complex	2	Industrial waste-empty bags	Empty bags store	3	Scrap metal	workshop	Complied																												
	Type of waste	Location																																									
1	Domestic waste rubbish	Line sites, office complex																																									
2	Industrial waste-empty bags	Empty bags store																																									
3	Scrap metal	workshop																																									

Criterion / Indicator		Assessment Findings		Compliance																																																		
		<table border="1"> <tr> <td>4</td> <td>SW 404 Clinical waste</td> <td>clinic</td> </tr> <tr> <td>5</td> <td>SW rags, plastics, filters</td> <td>workshop</td> </tr> <tr> <td>6</td> <td>Spent lubricant & hydraulic oil</td> <td>workshop</td> </tr> <tr> <td>7</td> <td>Disposed containers, bags, equipment contaminated with chemicals, pesticides, SW,</td> <td>Scheduled waste store</td> </tr> <tr> <td>8</td> <td>Sewage waste</td> <td>Workers/staff toilets/office</td> </tr> </table> <p>The pollution identified from Tereh Mill activities</p> <table border="1"> <thead> <tr> <th></th> <th>Emission</th> <th>Source</th> </tr> </thead> <tbody> <tr> <td>1</td> <td>Dark smoke</td> <td>Mill stack – boiler</td> </tr> <tr> <td></td> <td></td> <td>Running vehicles</td> </tr> <tr> <td>2</td> <td>Noise</td> <td>Diesel engines</td> </tr> <tr> <td>3</td> <td>Dust particles</td> <td>Shredded EFB</td> </tr> <tr> <td></td> <td></td> <td>Boiler ashes</td> </tr> <tr> <td>4</td> <td>Air pollutant</td> <td>Boiler combustion</td> </tr> <tr> <td></td> <td></td> <td>Diesel engine</td> </tr> <tr> <td></td> <td></td> <td>Running vehicles</td> </tr> <tr> <td>5</td> <td>POME</td> <td>Mill process</td> </tr> <tr> <td>6</td> <td>Waste Water</td> <td>PCD</td> </tr> <tr> <td></td> <td></td> <td>Septic tank spillage</td> </tr> </tbody> </table> <p>The source of mill pollution generated from the mill is the smoke from the boiler. It is monitored from the stack emission during the entire operations. These reports are reviewed by the mill and submitted to DOE. There was no major issue.</p>	4	SW 404 Clinical waste	clinic	5	SW rags, plastics, filters	workshop	6	Spent lubricant & hydraulic oil	workshop	7	Disposed containers, bags, equipment contaminated with chemicals, pesticides, SW,	Scheduled waste store	8	Sewage waste	Workers/staff toilets/office		Emission	Source	1	Dark smoke	Mill stack – boiler			Running vehicles	2	Noise	Diesel engines	3	Dust particles	Shredded EFB			Boiler ashes	4	Air pollutant	Boiler combustion			Diesel engine			Running vehicles	5	POME	Mill process	6	Waste Water	PCD			Septic tank spillage	
4	SW 404 Clinical waste	clinic																																																				
5	SW rags, plastics, filters	workshop																																																				
6	Spent lubricant & hydraulic oil	workshop																																																				
7	Disposed containers, bags, equipment contaminated with chemicals, pesticides, SW,	Scheduled waste store																																																				
8	Sewage waste	Workers/staff toilets/office																																																				
	Emission	Source																																																				
1	Dark smoke	Mill stack – boiler																																																				
		Running vehicles																																																				
2	Noise	Diesel engines																																																				
3	Dust particles	Shredded EFB																																																				
		Boiler ashes																																																				
4	Air pollutant	Boiler combustion																																																				
		Diesel engine																																																				
		Running vehicles																																																				
5	POME	Mill process																																																				
6	Waste Water	PCD																																																				
		Septic tank spillage																																																				
4.5.3.2	A waste management plan shall be developed and implemented, to avoid or reduce pollution. The waste management plan should include measure for:	There are procedures and guidelines in the disposal of wastes and pollutants guided by SQD Head Office level to minimise pollution on the routine operation.		Complied																																																		

MSPO Public Summary Report
Revision 0 (Aug 2017)

Criterion / Indicator	Assessment Findings			Compliance																																															
a) Identifying and monitoring sources of waste and pollution. b) Improving the efficiency and recycling potential of mill by-products by converting them into value-added products. - Major compliance -	<table border="1"> <thead> <tr> <th></th> <th>Type of waste</th> <th>Description</th> <th>Location</th> </tr> </thead> <tbody> <tr> <td>1</td> <td>Domestic waste</td> <td>Rubbish</td> <td>Line sites, office, workshop, store,</td> </tr> <tr> <td></td> <td rowspan="2">Industrial Waste</td> <td>Scrap metal</td> <td>workshop</td> </tr> <tr> <td></td> <td>POME</td> <td>ETP</td> </tr> <tr> <td>3</td> <td>Sewage waste</td> <td>sewage</td> <td>Workers/housing toilets/office</td> </tr> <tr> <td rowspan="4">4</td> <td rowspan="4">Scheduled Waste</td> <td>SW 404 Clinical waste</td> <td>clinic</td> </tr> <tr> <td>SW rags, plastics, filters</td> <td>workshop</td> </tr> <tr> <td>Spent lubricant & hydraulic oil</td> <td>workshop</td> </tr> <tr> <td>Disposed containers, bags, equipment contaminated with chemicals</td> <td>SW store</td> </tr> </tbody> </table> <table border="1"> <thead> <tr> <th></th> <th>Type of waste</th> <th>Description</th> <th>Action</th> </tr> </thead> <tbody> <tr> <td>1</td> <td>Domestic waste</td> <td>Rubbish</td> <td>Collection/disposal min 2x-3x /week internally. Establish landfill/collection SOP Establish collection schedule & PIC Create awareness on hygiene Monitoring of line site</td> </tr> <tr> <td rowspan="2">2</td> <td rowspan="2">Industrial Waste</td> <td>Scrap metal</td> <td>Inventory maintained, tender at zone level for sale to licensed contractor.</td> </tr> <tr> <td>POME</td> <td>Daily monitoring of application at designated field P00.</td> </tr> <tr> <td>3</td> <td>Sewage</td> <td>sewage</td> <td>To monitor during housing</td> </tr> </tbody> </table>				Type of waste	Description	Location	1	Domestic waste	Rubbish	Line sites, office, workshop, store,		Industrial Waste	Scrap metal	workshop		POME	ETP	3	Sewage waste	sewage	Workers/housing toilets/office	4	Scheduled Waste	SW 404 Clinical waste	clinic	SW rags, plastics, filters	workshop	Spent lubricant & hydraulic oil	workshop	Disposed containers, bags, equipment contaminated with chemicals	SW store		Type of waste	Description	Action	1	Domestic waste	Rubbish	Collection/disposal min 2x-3x /week internally. Establish landfill/collection SOP Establish collection schedule & PIC Create awareness on hygiene Monitoring of line site	2	Industrial Waste	Scrap metal	Inventory maintained, tender at zone level for sale to licensed contractor.	POME	Daily monitoring of application at designated field P00.	3	Sewage	sewage	To monitor during housing	
	Type of waste	Description	Location																																																
1	Domestic waste	Rubbish	Line sites, office, workshop, store,																																																
	Industrial Waste	Scrap metal	workshop																																																
		POME	ETP																																																
3	Sewage waste	sewage	Workers/housing toilets/office																																																
4	Scheduled Waste	SW 404 Clinical waste	clinic																																																
		SW rags, plastics, filters	workshop																																																
		Spent lubricant & hydraulic oil	workshop																																																
		Disposed containers, bags, equipment contaminated with chemicals	SW store																																																
	Type of waste	Description	Action																																																
1	Domestic waste	Rubbish	Collection/disposal min 2x-3x /week internally. Establish landfill/collection SOP Establish collection schedule & PIC Create awareness on hygiene Monitoring of line site																																																
2	Industrial Waste	Scrap metal	Inventory maintained, tender at zone level for sale to licensed contractor.																																																
		POME	Daily monitoring of application at designated field P00.																																																
3	Sewage	sewage	To monitor during housing																																																

Criterion / Indicator		Assessment Findings			Compliance								
			waste	inspection and residents' complaints. Engagement with licensed contractor for sewage management.									
		4	Scheduled Waste	<table border="1"> <tr> <td>SW 404 Clinical waste</td> <td>Inventory maintained. Storage in sharp bin in clinic. Disposal to <i>M/s Kualiti Alam Sdn Bhd.</i></td> </tr> <tr> <td>SW rags, plastics, filters</td> <td>Inventory maintained. Storage in scheduled waste store. Disposal to licensed contractor.</td> </tr> <tr> <td>Spent lubricant & hydraulic oil</td> <td>Collection by licensed vendor. Inventory maintained.</td> </tr> <tr> <td>Disposed containers, bags, equipment contaminated with chemicals, SW,</td> <td>Inventory maintained. Storage in SW store. All containers are labelled. Empty containers collected by authorized vendor.</td> </tr> </table>	SW 404 Clinical waste	Inventory maintained. Storage in sharp bin in clinic. Disposal to <i>M/s Kualiti Alam Sdn Bhd.</i>	SW rags, plastics, filters	Inventory maintained. Storage in scheduled waste store. Disposal to licensed contractor.	Spent lubricant & hydraulic oil	Collection by licensed vendor. Inventory maintained.	Disposed containers, bags, equipment contaminated with chemicals, SW,	Inventory maintained. Storage in SW store. All containers are labelled. Empty containers collected by authorized vendor.	
SW 404 Clinical waste	Inventory maintained. Storage in sharp bin in clinic. Disposal to <i>M/s Kualiti Alam Sdn Bhd.</i>												
SW rags, plastics, filters	Inventory maintained. Storage in scheduled waste store. Disposal to licensed contractor.												
Spent lubricant & hydraulic oil	Collection by licensed vendor. Inventory maintained.												
Disposed containers, bags, equipment contaminated with chemicals, SW,	Inventory maintained. Storage in SW store. All containers are labelled. Empty containers collected by authorized vendor.												
		Tereh Mill (addn type of waste peculiar to the mill processing)											
			Waste type	Action									
		1	POME	Application at designated field specified by Agronomist.									
		2	EFB	Application at designated field specified by Agronomist.									
		3	Fibre/shell	Utilization as fuel in the boiler. Surplus fibre used in compost production & shell sold externally									
		4	Boiler Ash	Placed in area far from water source to prevent									

MSPO Public Summary Report
Revision 0 (Aug 2017)

Criterion / Indicator		Assessment Findings				Compliance																														
				water pollution.																																
4.5.3.3	<p>The palm oil mill management shall establish Standard Operating Procedure for handling of used chemicals that are classified under Environmental Quality Regulations (Scheduled Waste) 2005, Environmental Quality Act, 1974 to ensure proper and safe handling, storage and disposal. Scheduled waste shall be disposed as per Environmental Quality Act 1974 (Scheduled Waste) Regulations, 2005</p> <p>- Major compliance -</p>	<p>The SOP on Scheduled Waste disposal is established and implemented. The standard operation procedure for the estates / mill operations are available which is prepared on Group basis. There are levels of the documentation identified as follows;</p> <ul style="list-style-type: none"> a) Level 1 Integrated Management Manual b) Level 2 standard operating procedure/SPO OHS c) Level 3 work instruction d) Level 4 records. <p>Amendments are made should there be requirement to suit the local issues/situation.</p> <p>Kulim (Malaysia) Berhad adopted the guidelines provided by the Agriculture Department on the empty chemicals containers management. All empty chemical containers in both estates and mill were triple rinsed, and disposed through approved licensed contractor <i>G-Planter Sdn Bhd</i>. The DOE licensed contractor <i>Kualiti Alam Sdn Bhd</i> caters the collection of scheduled wastes for both mill and estates within Tereh and Supply Base Complex. Sighted record of disposal made as follows by the mill;</p> <table border="1" style="margin-left: auto; margin-right: auto;"> <thead> <tr> <th></th> <th>Code</th> <th>12/9/19</th> <th></th> <th>Code</th> <th>12/9/2019</th> </tr> </thead> <tbody> <tr> <td>1</td> <td>SW102</td> <td>0.200</td> <td>5</td> <td>SW408</td> <td>0.036</td> </tr> <tr> <td>2</td> <td>SW110</td> <td>0.031</td> <td>6</td> <td>SW409</td> <td>0.113</td> </tr> <tr> <td>3</td> <td>SW305</td> <td>1.400</td> <td>7</td> <td>SW410</td> <td>0.278</td> </tr> <tr> <td>4</td> <td>SW307</td> <td>-</td> <td>8</td> <td>SW404</td> <td>0.001</td> </tr> </tbody> </table>					Code	12/9/19		Code	12/9/2019	1	SW102	0.200	5	SW408	0.036	2	SW110	0.031	6	SW409	0.113	3	SW305	1.400	7	SW410	0.278	4	SW307	-	8	SW404	0.001	Complied
	Code	12/9/19		Code	12/9/2019																															
1	SW102	0.200	5	SW408	0.036																															
2	SW110	0.031	6	SW409	0.113																															
3	SW305	1.400	7	SW410	0.278																															
4	SW307	-	8	SW404	0.001																															
4.5.3.4	<p>Domestic waste should be disposed as such to minimize the risk of contamination of the environment and watercourse.</p>	<p>Domestic waste disposal for the Tereh Mill and Tereh Utara Estate has been made simpler through the collection and disposal to the estate landfill situated in field no P04/Block 3. The estate manages</p>				Complied																														

Criterion / Indicator		Assessment Findings	Compliance												
	- Minor compliance -	the same landfill for Tereh Mill. Collection 2 to 3 times a week.													
Criterion 4.5.4: Reduction of pollution and emission															
4.5.4.1	An assessment of all polluting activities shall be conducted, including greenhouse gas emissions, particulate and soot emissions, scheduled wastes, solid wastes and effluent. - Major compliance -	The polluting activities are identified and documented in the Environmental Aspect & Impact Identification. From the EIA, it will be evaluated for the impact. The identified impact if any will be included in the management plan. The evaluation is documented in the Environmental Impact Evaluation. It was last reviewed on July 2019. Areas of focus include activities at the chemical store / workshop / store / scheduled waste / diesel tank / boiler house / effluent pond / WTP.	Complied												
4.5.4.2	An action plan to reduce identified significant pollutants and emissions shall be established and implemented. - Major compliance -	<p>The GHG emissions due to the operations is identified and recorded in the palm GHG version 3.01.</p> <p>The emission reduction plan for mill and estate for all complexes is published in the Carbon Footprint report. The plan includes reduction of fertilizer usage by embarking organic fertilizer and installation of biogas plan. During the field assessment at mill, it was confirmed that composting plant is implementing production of bio-compost fertilizer.</p> <table border="1"> <thead> <tr> <th></th> <th>Issues & Strategies</th> <th>Action Plan</th> </tr> </thead> <tbody> <tr> <td>1</td> <td>Reduce diesel consumption at mill operation</td> <td>to monitor diesel usage to ensure vehicle scheduled maintenance optimum gen set usage</td> </tr> <tr> <td>2</td> <td>Reduce smoke emission to the air</td> <td>to effectively implement the CEMS eliminate use of wet shell as fuel</td> </tr> <tr> <td>3</td> <td>Reduce electricity usage</td> <td>monitor usage vs baseline install capacitor at identified large</td> </tr> </tbody> </table>		Issues & Strategies	Action Plan	1	Reduce diesel consumption at mill operation	to monitor diesel usage to ensure vehicle scheduled maintenance optimum gen set usage	2	Reduce smoke emission to the air	to effectively implement the CEMS eliminate use of wet shell as fuel	3	Reduce electricity usage	monitor usage vs baseline install capacitor at identified large	Complied
	Issues & Strategies	Action Plan													
1	Reduce diesel consumption at mill operation	to monitor diesel usage to ensure vehicle scheduled maintenance optimum gen set usage													
2	Reduce smoke emission to the air	to effectively implement the CEMS eliminate use of wet shell as fuel													
3	Reduce electricity usage	monitor usage vs baseline install capacitor at identified large													

MSPO Public Summary Report
Revision 0 (Aug 2017)

Criterion / Indicator		Assessment Findings		Compliance																																				
			power consumption motor install LED bulb for the lighting system																																					
4.5.4.3	<p>Palm oil mill effluent (POME) shall be treated to ensure compliance with standards as stipulated in the relevant Environmental Quality (Prescribed Premises) (Crude Palm Oil) Regulations 1977. POME discharge limits and method should be in accordance with the respective state and national policies and regulations.</p> <p>- Major compliance -</p>	<p>The effluent treatment plant was made in accordance and interview with operator in charge revealed that the operation was in accordance with standard operation procedure and legal requirements. No over flow was observed, and flow meter reading was recorded daily. The mill monitoring the effluent and submits to DOE through '<i>Borang Penyata Suku Tahunan</i>'. The treated POME is discharged to Tereh Utara Estate for land application. Sighted application activities at field no P00 of 63.3 ha. The DOE license stated that the BOD level discharged from Anaerobic Pond C shall be below 5,000ppm revised to 100 ppm for 2019. The analysis of the effluent parameters 2019 as shown below;</p> <table border="1"> <thead> <tr> <th>Sample date</th> <th>14/7/19</th> <th>18/8/19</th> <th>22/9/19</th> </tr> </thead> <tbody> <tr> <td>PH</td> <td>8.10</td> <td>8.40</td> <td>8.20</td> </tr> <tr> <td>BOD</td> <td>286</td> <td>465</td> <td>396</td> </tr> <tr> <td>COD</td> <td>2909</td> <td>3557</td> <td>3165</td> </tr> <tr> <td>Total solids</td> <td>10512</td> <td>11404</td> <td>12244</td> </tr> <tr> <td>Suspended solids</td> <td>1016</td> <td>2004</td> <td>1328</td> </tr> <tr> <td>Oil & grease</td> <td>7</td> <td>9</td> <td>8</td> </tr> <tr> <td>A Nitrogen</td> <td>290</td> <td>2.00</td> <td>365</td> </tr> <tr> <td>Total N</td> <td>341</td> <td>416</td> <td>421</td> </tr> </tbody> </table> <p>The results from final discharge were compliance within parameter limit. The Mill had made correspondence dated 29/8/19 with the DOE on the BOD level of 100 mg/l compliance. The mill expected to comply by 31/6/20 upon completion of Biogas Plant.</p>		Sample date	14/7/19	18/8/19	22/9/19	PH	8.10	8.40	8.20	BOD	286	465	396	COD	2909	3557	3165	Total solids	10512	11404	12244	Suspended solids	1016	2004	1328	Oil & grease	7	9	8	A Nitrogen	290	2.00	365	Total N	341	416	421	Complied
Sample date	14/7/19	18/8/19	22/9/19																																					
PH	8.10	8.40	8.20																																					
BOD	286	465	396																																					
COD	2909	3557	3165																																					
Total solids	10512	11404	12244																																					
Suspended solids	1016	2004	1328																																					
Oil & grease	7	9	8																																					
A Nitrogen	290	2.00	365																																					
Total N	341	416	421																																					

Criterion / Indicator	Assessment Findings	Compliance																				
Criterion 4.5.5: Natural water resources																						
<p>4.5.5.1 The management shall establish water management plans to maintain the quality and availability of natural water resources (surface and ground water). The water management plan may include:</p> <ul style="list-style-type: none"> a) Assessment of water usage and sources. b) Monitoring of outgoing water which may have negative impacts into the natural waterways at a frequency that reflects the mill's current activities. c) Ways to optimize water and nutrient usage and reduce wastage (<i>e.g.</i> having in place systems for re-use, night application, maintenance of equipment to reduce leakage, collection of rainwater, etc.). <p>- Major compliance -</p>	<p>The Mill Water Management Plan 2019 has been established with the recent review made on 01/8/2019. Among others the plan therein has emphasized;</p> <ul style="list-style-type: none"> a) rain water harvesting for cleaning purposes, b) water from the reservoir for the mill operations c) water from pond and treated for human consumption d) continual training for workers on water efficiency consumption, e) desilting of water reservoir to retain the reservoir optimal capacity. f) The action plan in event of draught/water pollution and <p>The mill adopted the following water management plan. Among others containing the following initiatives.</p> <table border="1" data-bbox="1048 959 1803 1399"> <thead> <tr> <th></th> <th>Source</th> <th>Activity</th> <th>Threat</th> <th>Action Plan</th> </tr> </thead> <tbody> <tr> <td>1</td> <td>Reservoir/pond/SAJ/Rain</td> <td>Chemical mixing</td> <td>Pollution Draught Wastage</td> <td>Enforcement of buffer zone as non-spraying activities.</td> </tr> <tr> <td></td> <td></td> <td>General Upkeep</td> <td>Pollution Draught Wastage</td> <td>Follow WI & SOP to avoid water pollution. Follow SW SOP to avoid pollution caused from SW.</td> </tr> <tr> <td></td> <td></td> <td>Line site</td> <td>Pollution Draught Wastage</td> <td>Every house is supplied with containers. To schedule water supply to avoid wastage. Awareness on water usage efficiency. Outsource from</td> </tr> </tbody> </table>		Source	Activity	Threat	Action Plan	1	Reservoir/pond/SAJ/Rain	Chemical mixing	Pollution Draught Wastage	Enforcement of buffer zone as non-spraying activities.			General Upkeep	Pollution Draught Wastage	Follow WI & SOP to avoid water pollution. Follow SW SOP to avoid pollution caused from SW.			Line site	Pollution Draught Wastage	Every house is supplied with containers. To schedule water supply to avoid wastage. Awareness on water usage efficiency. Outsource from	<p>Complied</p>
	Source	Activity	Threat	Action Plan																		
1	Reservoir/pond/SAJ/Rain	Chemical mixing	Pollution Draught Wastage	Enforcement of buffer zone as non-spraying activities.																		
		General Upkeep	Pollution Draught Wastage	Follow WI & SOP to avoid water pollution. Follow SW SOP to avoid pollution caused from SW.																		
		Line site	Pollution Draught Wastage	Every house is supplied with containers. To schedule water supply to avoid wastage. Awareness on water usage efficiency. Outsource from																		

**MSPO Public Summary Report
Revision 0 (Aug 2017)**

Criterion / Indicator		Assessment Findings				Compliance																																													
				neighboring estates.																																															
		Drain upkeep	Interrupti on water flow at drainage system.	Periodic desilting Building of sand bags at specific points to contain water (weirs)																																															
		<p>The water consumption for the Mill processing comprises of mill general consumption, domestic and boiler water treatment.</p> <p>Target of 1.50 has been set as a control. All units in mt otherwise stated.</p> <table border="1"> <thead> <tr> <th>Month</th> <th>FFB prod</th> <th>Water /mt</th> <th>Water/FFB</th> </tr> </thead> <tbody> <tr><td>Jan</td><td>35652</td><td>53039</td><td>1.49</td></tr> <tr><td>Feb</td><td>30373</td><td>40334</td><td>1.33</td></tr> <tr><td>Mac</td><td>29407</td><td>43619</td><td>1.48</td></tr> <tr><td>Apr</td><td>32873</td><td>47291</td><td>1.44</td></tr> <tr><td>May</td><td>32475</td><td>46025</td><td>1.42</td></tr> <tr><td>June</td><td>28085</td><td>41299</td><td>1.47</td></tr> <tr><td>July</td><td>28675</td><td>38861</td><td>1.36</td></tr> <tr><td>Aug</td><td>30113</td><td>40445</td><td>1.34</td></tr> <tr><td>Sept</td><td>27923</td><td>37720</td><td>1.35</td></tr> <tr><td>Total</td><td>275577</td><td>388633</td><td>1.41</td></tr> </tbody> </table> <p>The mill takes samples from 2 points of Upstream and Downstream (<i>Tereh Utara – catchment road & concrete bridge monthly basis</i>). Results taken as shown below;</p>				Month	FFB prod	Water /mt	Water/FFB	Jan	35652	53039	1.49	Feb	30373	40334	1.33	Mac	29407	43619	1.48	Apr	32873	47291	1.44	May	32475	46025	1.42	June	28085	41299	1.47	July	28675	38861	1.36	Aug	30113	40445	1.34	Sept	27923	37720	1.35	Total	275577	388633	1.41		
Month	FFB prod	Water /mt	Water/FFB																																																
Jan	35652	53039	1.49																																																
Feb	30373	40334	1.33																																																
Mac	29407	43619	1.48																																																
Apr	32873	47291	1.44																																																
May	32475	46025	1.42																																																
June	28085	41299	1.47																																																
July	28675	38861	1.36																																																
Aug	30113	40445	1.34																																																
Sept	27923	37720	1.35																																																
Total	275577	388633	1.41																																																

MSPO Public Summary Report
Revision 0 (Aug 2017)

Criterion / Indicator		Assessment Findings					Compliance																																																																																																																																								
		<table border="1"> <thead> <tr> <th colspan="7"><i>Tereh Mill upstream</i></th> </tr> <tr> <th rowspan="2"></th> <th rowspan="2">Month</th> <th colspan="5">Parameters</th> </tr> <tr> <th>BOD</th> <th>COD</th> <th>PH</th> <th>TDS</th> <th>TS</th> </tr> </thead> <tbody> <tr> <td>1</td> <td>Jan</td> <td>6</td> <td>3</td> <td>7.8</td> <td>80</td> <td>100</td> </tr> <tr> <td>2</td> <td>Feb</td> <td>25</td> <td>255</td> <td>6.8</td> <td>80</td> <td>164</td> </tr> <tr> <td>3</td> <td>Mac</td> <td>6</td> <td>18</td> <td>6.3</td> <td>132</td> <td>180</td> </tr> </tbody> </table> <table border="1"> <thead> <tr> <th colspan="7"><i>Tereh Mill downstream</i></th> </tr> <tr> <th rowspan="2"></th> <th rowspan="2">Month</th> <th colspan="5">Parameters</th> </tr> <tr> <th>BOD</th> <th>COD</th> <th>PH</th> <th>SS</th> <th>TS</th> </tr> </thead> <tbody> <tr> <td>1</td> <td>Jan</td> <td>6</td> <td>3</td> <td>7.2</td> <td>80</td> <td>132</td> </tr> <tr> <td>2</td> <td>Feb</td> <td>13</td> <td>75</td> <td>6.9</td> <td>200</td> <td>220</td> </tr> <tr> <td>3</td> <td>Mac</td> <td>6</td> <td>95</td> <td>6.7</td> <td>300</td> <td>336</td> </tr> </tbody> </table> <p>Water for domestic consumption samples are taken monthly recent being on 10/6/2019. Analysis includes the above for the upstream/downstream in addition the presence of metal content. All results conform to the specification.</p> <table border="1"> <thead> <tr> <th colspan="7"><i>Tereh Mill 20/5/19</i></th> </tr> <tr> <th></th> <th>P/meter</th> <th>unit</th> <th>result</th> <th>Regn raw water</th> <th>Std drinking water</th> <th>Result</th> </tr> </thead> <tbody> <tr> <td>1</td> <td>PH</td> <td>-</td> <td>5.9</td> <td>5.5-9.0</td> <td>7.3</td> <td>7.2</td> </tr> <tr> <td>2</td> <td>Turbidity</td> <td>-</td> <td>11.2</td> <td>1000</td> <td>0.5</td> <td>1.2</td> </tr> <tr> <td>3</td> <td>Al</td> <td>NTU</td> <td>0.20</td> <td>-</td> <td><0.2</td> <td>0.2</td> </tr> <tr> <td>4</td> <td>Chlorine</td> <td>mg/L</td> <td>-</td> <td>-</td> <td>0.9</td> <td>0.9</td> </tr> <tr> <td>5</td> <td>Coliform</td> <td>mg/L</td> <td>10</td> <td>5000</td> <td><10</td> <td>ND</td> </tr> <tr> <td>6</td> <td>E coli</td> <td>MPN</td> <td>ND</td> <td>5000</td> <td><10</td> <td>ND</td> </tr> </tbody> </table>					<i>Tereh Mill upstream</i>								Month	Parameters					BOD	COD	PH	TDS	TS	1	Jan	6	3	7.8	80	100	2	Feb	25	255	6.8	80	164	3	Mac	6	18	6.3	132	180	<i>Tereh Mill downstream</i>								Month	Parameters					BOD	COD	PH	SS	TS	1	Jan	6	3	7.2	80	132	2	Feb	13	75	6.9	200	220	3	Mac	6	95	6.7	300	336	<i>Tereh Mill 20/5/19</i>								P/meter	unit	result	Regn raw water	Std drinking water	Result	1	PH	-	5.9	5.5-9.0	7.3	7.2	2	Turbidity	-	11.2	1000	0.5	1.2	3	Al	NTU	0.20	-	<0.2	0.2	4	Chlorine	mg/L	-	-	0.9	0.9	5	Coliform	mg/L	10	5000	<10	ND	6	E coli	MPN	ND	5000	<10	ND	
<i>Tereh Mill upstream</i>																																																																																																																																															
	Month	Parameters																																																																																																																																													
		BOD	COD	PH	TDS	TS																																																																																																																																									
1	Jan	6	3	7.8	80	100																																																																																																																																									
2	Feb	25	255	6.8	80	164																																																																																																																																									
3	Mac	6	18	6.3	132	180																																																																																																																																									
<i>Tereh Mill downstream</i>																																																																																																																																															
	Month	Parameters																																																																																																																																													
		BOD	COD	PH	SS	TS																																																																																																																																									
1	Jan	6	3	7.2	80	132																																																																																																																																									
2	Feb	13	75	6.9	200	220																																																																																																																																									
3	Mac	6	95	6.7	300	336																																																																																																																																									
<i>Tereh Mill 20/5/19</i>																																																																																																																																															
	P/meter	unit	result	Regn raw water	Std drinking water	Result																																																																																																																																									
1	PH	-	5.9	5.5-9.0	7.3	7.2																																																																																																																																									
2	Turbidity	-	11.2	1000	0.5	1.2																																																																																																																																									
3	Al	NTU	0.20	-	<0.2	0.2																																																																																																																																									
4	Chlorine	mg/L	-	-	0.9	0.9																																																																																																																																									
5	Coliform	mg/L	10	5000	<10	ND																																																																																																																																									
6	E coli	MPN	ND	5000	<10	ND																																																																																																																																									

MSPO Public Summary Report
Revision 0 (Aug 2017)

Criterion / Indicator		Assessment Findings	Compliance
4.5.5.2	Where open discharge of POME into water course is practiced, mills should undertake to gradually phase it out in accordance to the applicable state or national regulations. - Major compliance -	Details of effluent treatment and report as per item 4.5.4.3 above. The effluent BOD limit is revised to 100mg/L. No other initiatives except for the lowering of the BOD level as instructed by DOE of which the mill is able to meet. The effluent is on land application system.	Complied
4.6 Principle 6: Best Practices			
Criterion 4.6.1: Mill Management			
4.6.1.1	Standard operating procedures shall be appropriately documented and consistently implemented and monitored. - Major compliance -	The Mill operations are guided with the following documents a) Quality Manual (SM/QM) dated 1/9/14 b) Standards Operating Procedure (SM/SOP) dated 10/12/12 covering the following stations/operations among others; - loading ramp /sterilization station - threshing / press station - clarification station - kernel station/ depericarper station - effluent and water treatment plant, - boiler house / power house c) Work Instructions derived from SOPs and displayed the work stations/notice boards. Among others as sighted; - WI: Boiler Station / WI: Power House, - WI: Laboratory Manual /Waste Management, - WI: Handling chemicals - WI: Usage of hearing protection device, - WI: Emergency Response Procedure, - WI: Maintenance and servicing of oil trap, WI: Confined Space Management, - WI: Workshop/Working at Height/Oxy-Acetylene	Complied

MSPO Public Summary Report
Revision 0 (Aug 2017)

Criterion / Indicator		Assessment Findings	Compliance
		Set/Welding, etc	
4.6.1.2	All palm oil mills shall implement best practices.. - Major compliance -	The following mechanism is available and adopted as standard practices and procedures in the mill operations among others. a) Mill inspectorate Visit program 2x /year b) Internal audit by Sustainability Unit 2x /year c) Task Force visits d) Monthly and weekly ad hoc meeting e) Daily /monthly production & financial report f) Daily and monthly lab analysis report g) Daily supervision by the mill Supervisors/Executives	Complied
Criterion 4.6.2: Economic and financial viability plan			
4.6.2.1	A documented business or management plan shall be established to demonstrate attention to economic and financial viability through long-term management planning. - Major compliance -	The annual business plan is available as per the Group Financial Procedure. & Guidelines. Both estates and the mill had a similar format i.e. in the form of annual budget with a 3-year projection. This business plan is prepared as guidance for future planning. The budget contains the following among others; a) FFB production own estates crop/outside FFB. b) Production of CPO/CPK c) Component of operating expenditure includes administration, process labour, maintenance external, maintenance parts, consumable, EVIT, admin cost, labour overhead. d) Inclusive in the business plan is also Capital Expenditure (CAPEX) among others replacement / upgrading of building, vehicles replacement, workers amenities etc. the budget for 2019 for the mill was sighted and verified.	Complied
Criterion 4.6.3: Transparent and fair price dealing			



MSPO Public Summary Report
Revision 0 (Aug 2017)

Criterion / Indicator		Assessment Findings	Compliance
4.6.3.1	<p>Pricing mechanisms for the products and other services shall be documented and effectively implemented.</p> <p>- Major compliance -</p>	<p>Pricing mechanism for all the estates and mills is guided by Kulim's "Purchasing Guidelines & Procedures", revised in 2019. The objectives of the guideline is:</p> <ol style="list-style-type: none"> 1) To improve efficiency in procurement of inputs from vendors 2) To act as guidelines for transparent dealings with all vendors 3) To include suppliers to competitively bid for the supply of company's requirements through fair dealings and timely payments for goods and/or tasks performed 4) To promote long term relationship with supplier who share the Company's vision of growing together 	Complied
4.6.3.2	<p>All contracts shall be fair, legal and transparent and agreed payments shall be made in timely manner.</p> <p>- Major compliance -</p>	<p>Based on interview, there was no issue raised by vendors. Generally they are happy with Kulim's current practice of contract awards (e.g. opened tender) and purchasing (e.g. quotation). Payments were also made on timely manner.</p>	Complied
Criterion 4.6.4: Contractor			
4.6.4.1	<p>In case of the engagement of contractors, they shall be made to understand the MSPO requirements and shall provide the required documentation and information.</p> <p>- Major compliance -</p>	<p>NA. At the point of this assessment, the mill has yet to engage any contractors to do any jobs in the mill since the last MSPO assessment.</p>	Complied
4.6.4.2	<p>The management shall provide evidence of agreed contracts with the contractor.</p> <p>- Major compliance -</p>	<p>NA. At the point of this assessment, the mill has yet to engage any contractors to do any jobs in the mill since the last MSPO assessment.</p>	Complied

MSPO Public Summary Report
Revision 0 (Aug 2017)

Criterion / Indicator		Assessment Findings	Compliance
4.6.4.3	The management shall accept MSPO approved auditors to verify the assessments through a physical inspection, if required. - Minor compliance -	NA. At the point of this assessment, the mill has yet to engage any contractors to do any jobs in the mill since the last MSPO assessment.	Complied

Section 4: Assessment Conclusion and Recommendation

Acknowledgement of Internal Responsibility and Formal Sign-off of Assessment Findings	
Based on the findings during the assessment Tereh Palm Oil Mill and Supply Base Certification Unit complies with the MS 2530-3:2013 and MS 2530-4:2013 . It is recommended that the certification of Tereh Palm Oil Mill and Supply Base Certification Unit is approved and/or continued.	
Acknowledgement of Assessment Findings	Report Prepared by
Name: Salasah Elias	Name: Valence Shem
Company name: Kulim Malaysia Berhad	Company name: BSI Services Malaysia Sdn Bhd
Title: Deputy General Manager	Title: Lead Auditor
Signature: 	Signature: 
Date: 2/2/2020	Date: 1/2/2020

Appendix A: Assessment Plan

Date	Time	Subjects	VSH	ABH
Monday 14/10/2019	0900-0930	Opening meeting: <ul style="list-style-type: none"> Opening presentation by audit team leader Confirmation of assessment scope and finalize audit plan (including stakeholders consultation) 	✓	✓
	0930-1200	Renggam 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, Scheduled wastes management, workers housing, clinic, Landfill, etc.	✓	✓
	1000-1200	Stakeholder consultation	✓	-
	1200-1300	Lunch break		
	1300-1630	Renggam Estate Document review P1 – P7 (MSPO Part 3): 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	✓	✓
Tuesday 15/10/2019	0900-1200	Mutiara 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, Scheduled wastes management, workers housing, clinic, Landfill, etc.	✓	✓
	1000-1200	Stakeholder consultation	✓	-
	1200-1300	Lunch break		
	1300-1630	Mutiara Estate Document review P1 – P7 (MSPO Part 3): 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	✓	✓
Wednesday 16/10/2019	0900-1200	Sungai Sembrong 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, Scheduled wastes management, workers housing, clinic, Landfill, etc.	✓	✓
	1000-1200	Stakeholder consultation	✓	-
	1200-1300	Lunch break		
	1300-1630	Sungai Sembrong Estate Document review P1 – P7 (MSPO Part 3): 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	✓	✓

MSPO Public Summary Report
Revision 0 (Aug 2017)

Date	Time	Subjects	VSH	ABH
Thursday 17/10/2019	0900-1200	Tereh POM 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, meeting stakeholders, etc.	✓	✓
	1000-1200	Stakeholder consultation	✓	-
	1200-1300	Lunch break		
	1300-1530	Tereh POM Document Review P1 – P6 (MSPO Part 4): SOPs, Review on SEIA documents and records, wage records, employee data, training records, legal permits, mill inspection and internal monitoring records, CIP & implementation, etc.	✓	✓
	1530-1630	Audit team discussion & preparation for closing meeting	✓	✓
	1630-1700	Closing meeting	✓	✓

Appendix B: List of Stakeholders Contacted

Internal Stakeholders

Workers' Representative Women's Representative Harvesters Mill Operators Herbicides sprayers General workers Hospital Assistant

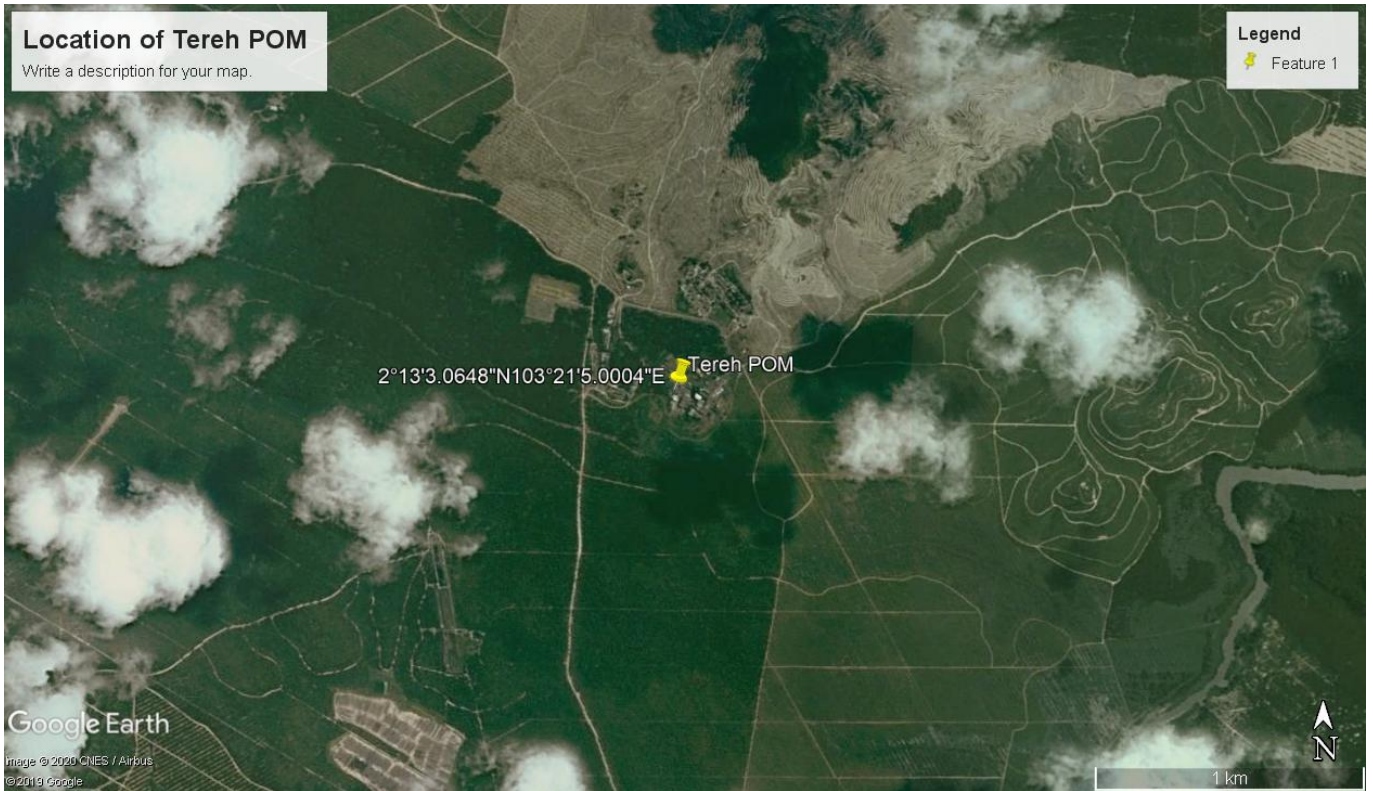
External Stakeholders

Government Departments	NGOs and others	Local Communities
Jabatan Perhilitan Pejabat Tenaga Kerja Schools representatives – SK Jubli Intan, SK Kemedak, SK Ladang Mutiara, SK Ladang Tereh	NUPW Johor	Contractors Surrounding plantations

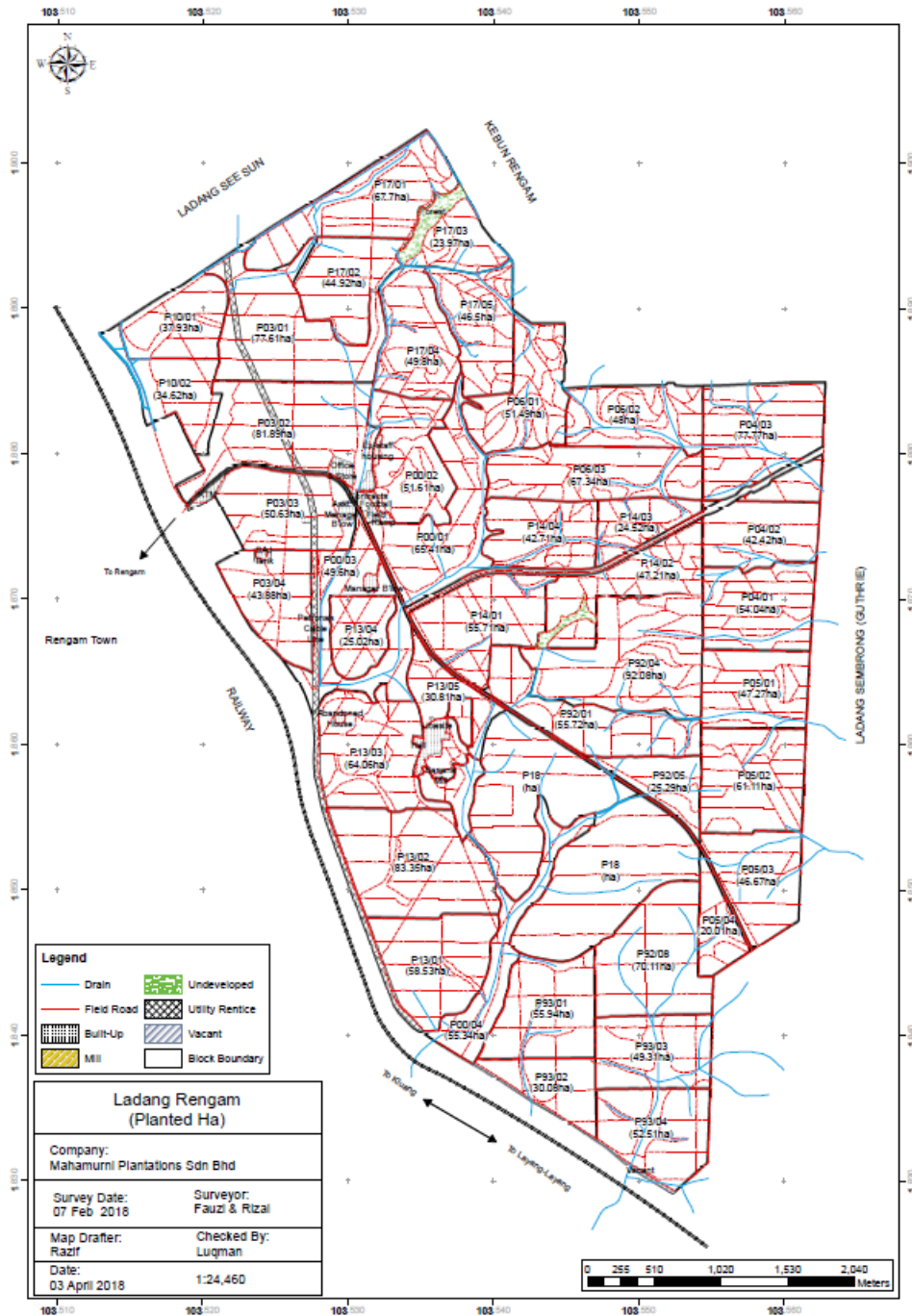
Appendix C: Smallholder Member Details

Not applicable.

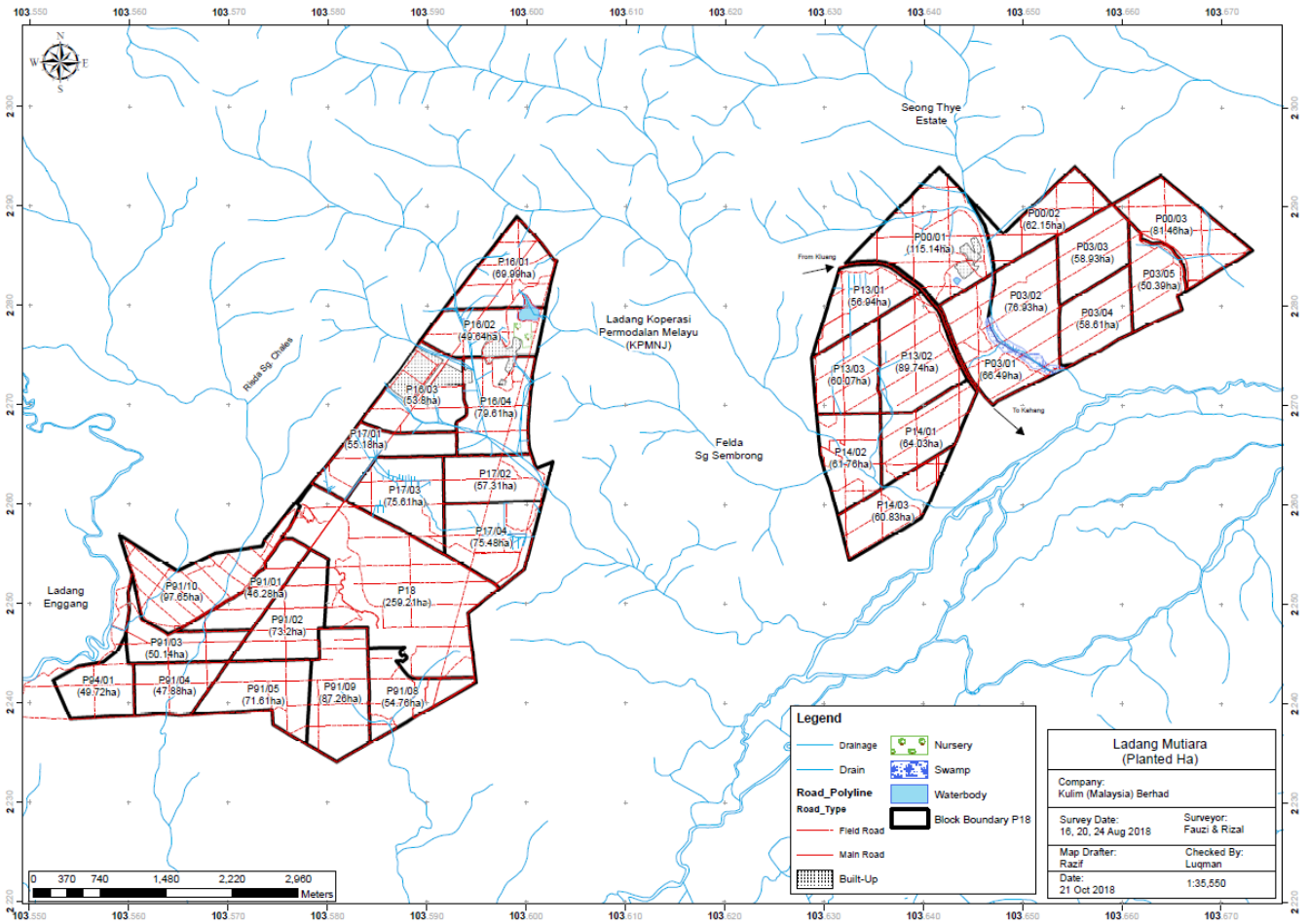
Appendix D : Location Map of Tereh Palm Oil Mill and Supply Base



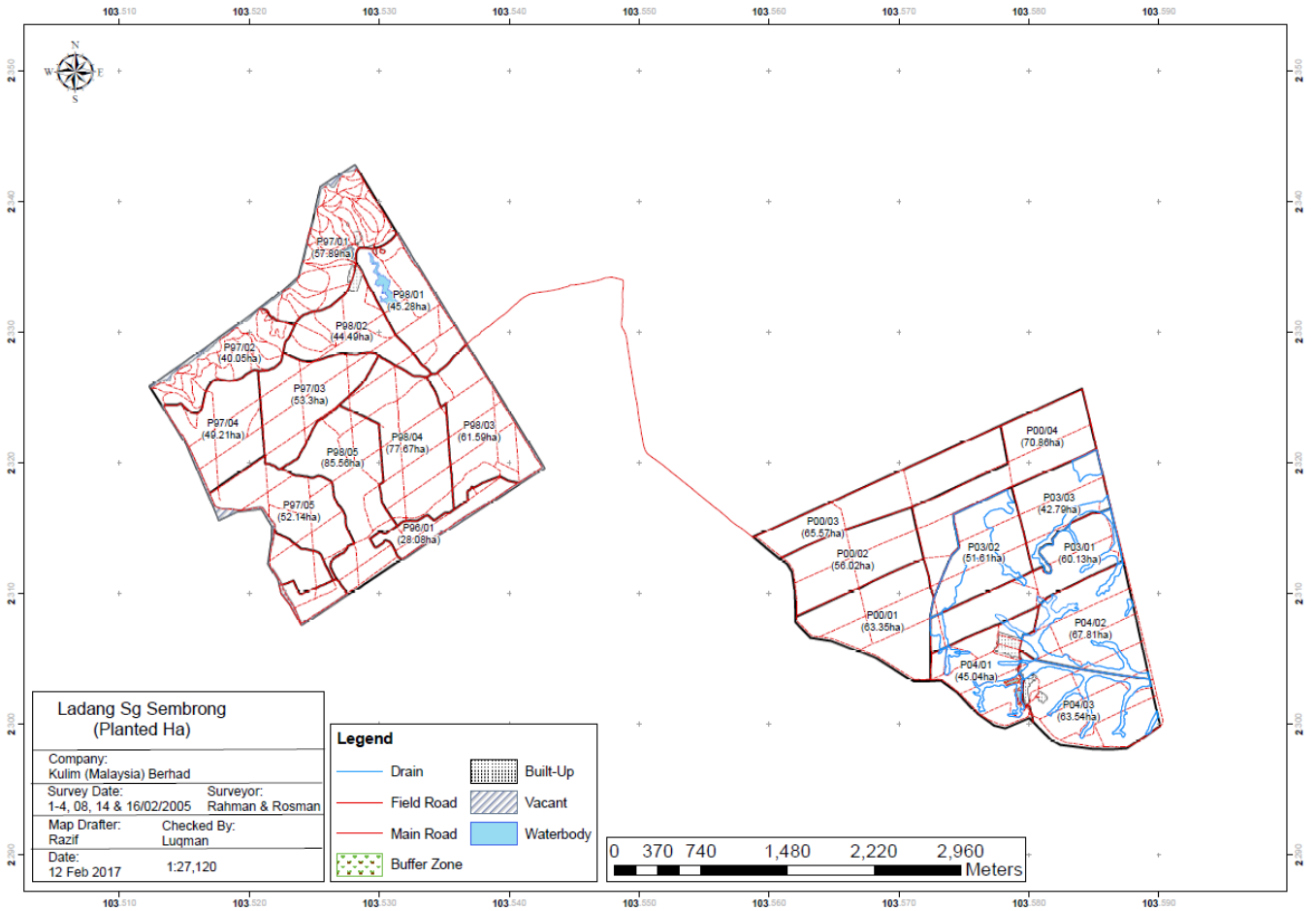
Map of Renggam Estate



Map of Mutiara Estate



Map of Sungai Sembrong Estate



Appendix E: List of Abbreviations Used

AN	Ammoniacal Nitrogen
BOD	Biological Oxygen Demand
CHRA	Chemical Health Risk Assessment
CPO	Crude Palm Oil
DOE	Department of Environment
DOSH	Department of Occupational Safety & Health
EFB	Empty Fruit Bunch
EMS	Environmental Management System
FFB	Fresh Fruit Bunch
GMP	Good Manufacturing Practice
HCV	High Conservation Value
IAV	Initial Assessment Visit
IPM	Integrated Pest Management
ISCC	International Sustainable Carbon Certification
MSDS	Material Safety Data Sheet
MSPO	Malaysian Sustainable Palm Oil
O&G	Oil and Grease
PK	Palm Kernel
PPE	Personal Protective Equipment
RC	Re-Certification
RED	Renewable Energy Directive
SEIA	Social & Environmental Impact Assessment
SIA	Social Impact Assessment
SOP	Standard Operating Procedure
SS	Suspended Solids
TN	Total Nitrogen
TS	Total Solids
VFA	Volatile Fatty Acids