

**MALAYSIAN SUSTAINABLE PALM OIL
- ANNUAL SURVEILLANCE ASSESSMENT (ASA 1)
Public Summary Report**

BOUSTEAD PLANTATIONS BERHAD
Client company Address: 19th Floor Menara Boustead 69, Jalan Raja Chulan 50200 Kuala Lumpur, Malaysia
Certification Unit: Eldred Estate and Bekoh Estate Location of Certification Unit: Eldred Estate, Jalan Ladang Eldred, 86500 Bekok, Johor, Malaysia Bekoh Estate, Jalan Bekoh, 84900 Tangkak, Johor, Malaysia

Report prepared by: Hafriazhar Mohd. Mokhtar (Lead Auditor)

Report Number: 3224321

Assessment Conducted by:

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Section 1: Executive Summary

1.1 Organizational Information and Contact Person			
Company Name	Boustead Plantations Berhad		
Mill/Estate	MPOB License No.	Expiry Date	
Eldred Estate	Eldred Estate: 504635402000	Eldred Estate: 31/12/2020	
Bekoh Estate	Bekoh Estate: 616049002000	Bekoh Estate: 31/12/2020	
Address	19th Floor Menara Boustead, 69, Jalan Raja Chulan, 50200 Kuala Lumpur, Malaysia		
Certification Unit	Eldred Estate, Jalan Ladang Eldred, 86500 Bekok, Johor, Malaysia Bekoh Estate, Jalan Bekoh, 84900 Tangkak, Johor, Malaysia		
Contact Person Name	Mr. Hafizi Boniran		
Website	www.bousteadplantations.com.my/	E-mail	hafizi@bplant.com.my
Telephone	+603-2145 2121	Facsimile	+603-2144 7917

1.2 Certification Information			
Certificate Number	MSPO 697579		
Issue Date	18/04/2019	Expiry date	17/04/2024
Scope of Certification	Production of Sustainable Oil Palm Fruits		
Standard	MS 2530-3:2013 Part 3: General principles for oil palm plantations and organized smallholders		
Stage 1 Date	28-29/08/2018		
Stage 2/Initial Assessment Visit Date (IAV)	23-24/11/2018		
Continuous Assessment Visit Date (CAV) 1	14-15/05/2020 (Remote) & 17-18/06/2020 (On-site)		
Continuous Assessment Visit Date (CAV) 2	-		
Continuous Assessment Visit Date (CAV) 3	-		
Continuous Assessment Visit Date (CAV) 4	-		
Other Certifications			
Certificate Number	Standard(s)	Certificate Issued by	Expiry Date
N/A	N/A	N/A	N/A

1.3 Location of Certification Unit			
Name of the Certification Unit (Palm Oil Mill/ Estate/ Smallholder/ Independent Smallholder)	Site Address	GPS Reference of the site office	
		Longitude	Latitude

Eldred Estate	Jalan Ladang Eldred, 86500 Bekok, Johor, Malaysia	103.11519	2.27800
Bekoh Estate	Jalan Bekoh, 84900 Tangkak, Johor, Malaysia	102.53811	2.35761

1.4 Certified Area

Estate	Total Planted (Mature + Immature) (ha)	HCV (ha)	Infrastructure & Other (ha)	Total Area (ha)	% of Planted
Eldred Estate	1,793.50	-	33.80	1,827.30	98.15
Bekoh Estate	1,188.40	-	37.70	1,226.10	96.93
Total	2,981.90	-	71.50	3,053.40	97.66

1.5 Plantings & Cycle

Estate	Age (Years)					Immature	Mature**
	0 - 3	4 - 10	11 - 20	21 - 25	26 - 30		
Eldred Estate	437.10	498.10	85.80	772.50	-	437.10	1,356.40
Bekoh Estate	194.80	357.50	396.30	239.80	-	194.80	993.60
Total (ha)	631.90	855.60	482.10	1,012.30	-	631.90	2,350.00

1.6 Certified Tonnage of FFB

Estate	Tonnage / year		
	Estimated (Jan 19 - Dec 19)	Actual (Jan 19 - May 20)	Forecast (Jan 20 - Dec 20)
Eldred Estate	25,000.00	35,416.67	26,250.00
Bekoh Estate	21,357.00	30,255.75	22,424.85
Total	46,357.00	65,672.42	48,674.85

1.7 Uncertified Tonnage of FFB

Estate	Tonnage / year		
	Estimated (Jan 19 - Dec 19)	Actual (Jan 19 - May 20)	Forecast (Jan 20 - Dec 20)
N/A	N/A	N/A	N/A
Total	N/A	N/A	N/A

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1.8 Certified Tonnage			
	Estimated (Jan 19 - Dec 19)	Actual (Jan 19 - May 20)	Forecast (Jan 20 - Dec 20)
Mill Capacity: N/A	FFB	FFB	FFB
	N/A	N/A	N/A
SCC Model: N/A	CPO (OER: %)	CPO (OER: %)	CPO (OER: %)
	N/A	N/A	N/A
	PK (KER: %)	PK (KER: %)	PK (KER: %)
	N/A	N/A	N/A

1.9 Actual Sold Volume (CPO)					
CPO (MT)	MSP0 Certified	Other Schemes Certified		Conventional	Total
		ISCC	RSPO		
N/A	N/A	N/A	N/A	N/A	N/A

1.10 Actual Sold Volume (PK)					
PK (MT)	MSP0 Certified	Other Schemes Certified		Conventional	Total
		ISCC	RSPO		
N/A	N/A	N/A	N/A	N/A	N/A

Section 2: Assessment Process

BSI is a leading global provider of management systems assessment and certification, with more than 80,000 certified locations and clients in over 190 countries. BSI Standards is the UK's National Standards Body. BSI provides independent, third-party certification of management systems.

Assessment Methodology, Programme, Site Visits

Due to the COVID-19 Conditional Movement Control Order (CMCO) and Recovery Movement Control Order (RMCO) period enforced by the government, the assessment was divided into two sessions through remote audit and on-site audit. The remote assessment was conducted on 14-15 May 2020 while the on-site assessment was conducted on 17-18 June 2020. The audit programme is included as Section 2.3. The approach to the audit was to treat the Eldred Estate and Bekoh Estate 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 HBVs, 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 were used to guide the collection of information to assess compliance. The comments made by external stakeholders were also considered in the assessment.

The estates sample were determined based on formula $S = r\sqrt{n}$ where n is the number of estates while when applicable, the smallholder's sample were determined following the MSPO Certification Requirement. The sampling of smallholders was based on the formula $(r\sqrt{n})$; where r is the risk factor (may defers 1, 1.5 and 2 depending on risk), where n is total number of group members. The sampled smallholder listed in Appendix C. However, since this certification involved individual estate, both estates were audited.

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 wives of workers and staff were interviewed in informal group meetings at their housing. Separate visits were made to each of the local communities to meet with the village head and residents. Company officials were not present at any of the internal or external stakeholder interviews. A list of Stakeholders contacted is included as Appendix B.

All the previous nonconformities are remains closed. The assessment findings for the initial assessment are detailed in Section 4.2.

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.

This report was externally reviewed by MSPO approved Peer Reviewer prior to certification decision by BSI.

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

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 4)
Eldred Estate	✓	✓	✓	✓	✓
Bekoh Estate	✓	✓	✓	✓	✓

Tentative Date of Next Visit: June 1, 2021 - June 4, 2021

Total No. of Mandays: 4

2.1 BSI Assessment Team

Team Member Name	Role (Team Leader or Team member)	Qualifications (Short description of the team members)
Hafriazhar Mohd Mokhtar	Team Leader	Hafriazhar Mohd. Mokhtar is a Chemical Engineer by qualification. He has more than five years of direct work experience in the upstream processes of palm oil within the plantation industry. He is a qualified Lead Auditor for CDM, ISO 9001, ISO 14001, ISO 45001 and ISO 50001 and has accumulated more than 1000 audit days throughout his current career as the auditor for multiple disciplines covering Malaysia, Indonesia and Thailand. He has been trained in the MSPO & RSPO P&C and SCCS standards since 2011 and completed his MSPO & RSPO P&C and SCCS Lead Assessor courses successfully. He has been involved in RSPO audits within Malaysia, Papua New Guinea, Solomon Islands, Gabon, Nigeria and Pakistan. During this assessment, he assessed the aspects Legal, SIA, workers employment terms, pay & conditions, welfare, stakeholders' consultation, social, long-term economic viability etc. (Principle 2, Principle 3, Principle 4, Principle 6, and Principle 7). Able to speak and understand Bahasa Malaysia and English.

2.2 Accompanying Persons

No.	Name	Role
Nil		

2.3 Assessment Plan

The Assessment plan was sent to the client prior to the assessment (attached assessment plan).

Remote assessment:

Date	Time	Subjects	HMM
Thursday 14/5/2020	08:30 - 09:00	Opening Meeting <ul style="list-style-type: none"> • Presentation by Boustead • Presentation by BSI Lead Auditor - introduction of team member and assessment agenda • Confirmation of assessment scope and finalizing audit scope 	✓
	09:00 - 12:30	Eldred Estate Document Review (MS2530:2011 Part 3): P1: Management commitment and responsibility, P2: Transparency, P3: Compliance to legal requirement, P4: Social responsibility, health safety and employment condition, P5: Environment, natural resources, biodiversity and ecosystem services, P6: Best practices and P7: Development of New Planting	✓
	12:30 - 13:30	Lunch break	
	13:30 - 16:30	Bekoh Estate Document Review (MS2530:2011 Part 3): P1: Management commitment and responsibility, P2: Transparency, P3: Compliance to legal requirement, P4: Social responsibility, health safety and employment condition, P5: Environment, natural resources, biodiversity and ecosystem services, P6: Best practices and P7: Development of New Planting	✓
	16:30 - 17:00	Interim closing meeting	✓
Friday 15/5/2020	08:30 - 11:30	Continue with any unfinished elements	✓
	11:30 - 12:00	Closing meeting	✓

On-site assessment:

Date	Time	Subjects	HMM
Tuesday 16/6/2020	PM	Auditor travel to Segamat	✓
Wednesday 17/6/2020	08:30 - 09:00	Opening Meeting <ul style="list-style-type: none"> • Presentation by Boustead • Presentation by BSI Lead Auditor - introduction of team member and assessment agenda • Confirmation of assessment scope and finalizing audit scope 	✓
	09:00 - 12:30	Bekoh Estate - Estate assessment: Field visit, boundary inspection, field operations, staff & workers interview, buffer zone, HCV area, IPM implementation, OSH&ERP, workshop, storage area (agrochemical, fertilizer, lubricant etc.), agrochemical mixing area, Schedule waste management, worker housing, clinic, Landfill etc.	✓

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Date	Time	Subjects	HMM
		- Stakeholder visit/consultation	
	12:30 - 13:30	Lunch break	
	13:30 - 16:30	Bekoh Estate Document Review (MS2530:2011 Part 3): P1: Management commitment and responsibility, P2: Transparency, P3: Compliance to legal requirement, P4: Social responsibility, health safety and employment condition, P5: Environment, natural resources, biodiversity and ecosystem services, P6: Best practices and P7: Development of New Planting	✓
	16:30 - 17:00	Interim closing meeting	✓
Thursday 18/6/2020	09:00 - 12:30	Eldred Estate - Estate assessment: Field visit, boundary inspection, field operations, staff & workers interview, buffer zone, HCV area, IPM implementation, OSH&ERP, workshop, storage area (agrochemical, fertilizer, lubricant etc.), agrochemical mixing area, Schedule waste management, worker housing, clinic, Landfill etc. - Stakeholder visit/consultation	✓
	12:30 - 13:30	Lunch break	
	13:30 - 16:30	Eldred Estate Document Review (MS2530:2011 Part 3): P1: Management commitment and responsibility, P2: Transparency, P3: Compliance to legal requirement, P4: Social responsibility, health safety and employment condition, P5: Environment, natural resources, biodiversity and ecosystem services, P6: Best practices and P7: Development of New Planting	✓
	16:30 - 17:00	Closing meeting • Presentation of findings by BSI Lead Auditor	✓
Friday 19/6/2020	AM	Auditor travel back to KL	✓

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 Certification Assessment there was one (1) Major nonconformity raised. The Eldred Estate and Bekoh Estate Certification unit submitted Corrective Action Plans for the nonconformity. Corrective action plans with respect to the nonconformity was reviewed by the BSI audit team and accepted.

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

Major/Minor Nonconformities:		
Ref: 1923596-202006-M1	Area/Process: MS2530-3:2013 (MSPO Part 3) Eldred Estate and Bekoh Estate	Clause: 4.5.5.1
	Issue Date: 18/6/2020	Due Date: 17/9/2020
Requirements:	The occupational safety and health plan shall cover the following: 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.	
Statement of Nonconformity:	First Aid Kits equipped with approved contents were not available at visited worksite	
Objective Evidence:	First Aid Kit equipped with approved contents was not available at audit sample visited worksites as following: - Bekoh Estate: Manuring & Harvesting operations - Eldred Estate: Manual weeding operations	
Corrections:	To purchase sufficient first aid kit and issue to all mandores to bring to all operational sites	
Root cause analysis:	Limited availability of first aid kit and trained first aider	
Corrective Actions:	To conduct first aid training to all mandores and conduct regular checking on the availability of first aid kit and its contents in all worksites and include in OSHA plan.	
Assessment Conclusion:	CAP verification: CAP has been accepted and evidence verified as following:	

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	<ul style="list-style-type: none"> - First aid kit purchase and issuance records dated 22/8/2020 - First aid training records for mandores in Eldred Estate on 23/8/2020 and Bekoh Estate on 25/8/2020
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Opportunity For Improvement		
Ref: Nil	Area/Process: N/A	Clause: N/A
Objective Evidence:	N/A	

Noteworthy Positive Comments	
1	Good commitment given by all personnel involved
2	Positive comments by most external stakeholders
3	Good planning on management unit operations

3.3 Status of Nonconformities Previously Identified and OFI

Major/Minor Nonconformities:					
Ref: 1711673-201811-M1	<table border="1"> <tr> <td>Area/Process: MS2530-3:2013 (MSPO Part 3) Eldred Estate and Bekoh Estate</td> <td>Clause: 4.4.4.2</td> </tr> <tr> <td>Issue Date: 24/11/2018</td> <td>Due Date: 23/2/2019</td> </tr> </table>	Area/Process: MS2530-3:2013 (MSPO Part 3) Eldred Estate and Bekoh Estate	Clause: 4.4.4.2	Issue Date: 24/11/2018	Due Date: 23/2/2019
Area/Process: MS2530-3:2013 (MSPO Part 3) Eldred Estate and Bekoh Estate	Clause: 4.4.4.2				
Issue Date: 24/11/2018	Due Date: 23/2/2019				
Requirements:	<p>The occupational safety and health plan shall cover the following:</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 and Occupational Safety Health (Use and Standard of Exposure of Chemical Hazardous to Health) Regulation 2000.</p> <p>h) Accident and emergency procedures shall exist and instructions shall be clearly understood by all employees.</p>				
Statement of Nonconformity:	The occupational safety and health plan was not effectively implemented.				
Objective Evidence:	<p>Bekoh Estate:</p> <ol style="list-style-type: none"> 1. Found a pesticide container at workshop area left without proper storage. 2. No test of emergency response (fire drill) was conducted. 				
Corrections:	<ol style="list-style-type: none"> 1. Collected all container that has been sighted at workshop and relocated properly at schedule waste store. 2. Letter dated 28 Nov 2018 has been send to BOMBA for cooperation in conducting fire drill at estate on 13 Dec 2018. 				
Root cause analysis:	No monitoring the movement of the empty container and firefighting training				
Corrective Actions:	<ol style="list-style-type: none"> 1. Appoint person in-charge to monitor the movement of the empty containers 2. Include firefighting in the training programme. 				
Assessment Conclusion:	<ol style="list-style-type: none"> 1. Sighted the picture of scheduled waste store with proper labelling. 2. The letter dated 26/11/2018 for BOMBA to conduct the fire drill was sighted. 3. The training programme for 2019 to include fire fighting training was sighted. 				

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	<p>4. Appointment letter dated 1/12/2018 from Estate Manager to monitor the scheduled waste was sighted.</p> <p>All the evidence sighted found adequate and effectively implemented. Hence, the Major NC was closed.</p>
Verification Statement	<p>ASA 1 verification:</p> <p>Hence, the Major NC remained closed.</p>

Major/Minor Nonconformities:

Ref:	Area/Process:	Clause:
1711673-201811-M2	MS2530-3:2013 (MSPO Part 3) Eldred Estate and Bekoh Estate	4.5.3.3
	Issue Date: 24/11/2018	Due Date: 23/2/2019
Requirements:	The management shall establish Standard Operating Procedure for handling of used chemicals that are classified under Environment Quality Regulations (Scheduled Waste) 2005, Environmental Quality Act, 1974 to ensure proper and safe handling, storage and disposal.	
Statement of Nonconformity:	The handling of scheduled waste was not effectively implemented	
Objective Evidence:	<p>Bekoh Estate:</p> <ol style="list-style-type: none"> The records of scheduled waste were not properly documented. Scheduled waste store not accordance with Environment Quality Regulations (Scheduled Waste) 2005. The labelling of scheduled waste was not accordance with Environment Quality Regulations (Scheduled Waste) 2005 	
Corrections:	<ol style="list-style-type: none"> Record the schedule waste properly base on requirement in compliance with environment Quality Regulation (schedule waste) 2005 and Environment Quality Act 1974. Schedule waste store that have been provided now is temporary but will be prepared properly accordance with Environmental Quality Regulation (Schedule Waste) 2005 and new and proper Schedule waste store will be built in 2019 its already budgeted 2019 financial budget. Relabelling work will be done at schedule waste store to match the requirement at the Environment Quality Regulation (Schedule Waste) 2005 	
Root cause analysis:	No monitoring by the estate	
Corrective Actions:	To appoint person in-charge to monitor scheduled waste.	
Assessment Conclusion:	<ol style="list-style-type: none"> Sighted the picture of scheduled waste store with proper labelling. Appointment letter dated 1/12/2018 from Estate Manager to monitor the scheduled waste was sighted. Budget was allocated to construct new scheduled waste store. The inventory was sighted as per EQA (SW) Regulation 2005. <p>All the evidence sighted found adequate and effectively implemented. Hence, the Major NC was closed.</p>	
Verification Statement	ASA 1 verification:	

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	Hence, the Major NC remained closed.
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Major/Minor Nonconformities:		
Ref: 1711673-201811-M3	Area/Process: MS2530-3:2013 (MSPO Part 3) Eldred Estate and Bekoh Estate	Clause: 4.5.6.1
	Issue Date: 24/11/2018	Due Date: 23/2/2019
Requirements:	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: 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 (e.g. 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.	
Statement of Nonconformity:	The information for high biodiversity value habitats and conservation status was not available.	
Objective Evidence:	Bekoh Estate and Eldred Estate: The HCV assessment was done by the Malaysia Environmental Consultant on 2-6/4/2018, however the report yet to be received by the management.	
Corrections:	The Management continue to liase with BEA Sustainability Team Regarding this matter	
Root cause analysis:	The report is still yet to be received by BEA Sustainability Team	
Corrective Actions:	Any issue in the report will be attended once the report is release	
Assessment Conclusion:	The communication between the estate and sustainability section was sighted. All the evidence sighted found adequate and effectively implemented. Hence, the Major NC was closed.	
Verification Statement	ASA 1 verification: Hence, the Major NC remained closed.	

Major/Minor Nonconformities:		
Ref: 1711673-201811-M4	Area/Process: MS2530-3:2013 (MSPO Part 3) Eldred Estate and Bekoh Estate	Clause: 4.4.2.5
	Issue Date: 24/11/2018	Due Date: 23/2/2019
Requirements:	Complaints and resolutions for the last 24 months shall be documented and made available to affected stakeholders upon request.	
Statement of Nonconformity:	Implementation of complaint system was ineffective.	
Objective Evidence:	Bekoh Estate and Eldred Estate: Defects Complaint Form and Complaint Form was implemented in the Bekoh Estate and Eldred Estate. However, the complaints that have been resolved could not be verified as there was no date and evidence of resolved and no acknowledgement by the complainant after action has been taken.	

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Corrections:	Eldred Estate: There must be a space and column for the complainant for acknowledgement. Bekoh Estate: Update complain form by adding the side for evidence of resolve and acknowledgement by the complainant for the action that have been taken
Root cause analysis:	There is no evidence of the complaint have been resolved
Corrective Actions:	Eldred Estate: In future all the complaints will be attended properly and acknowledge by the complainant using latest complaint form. Bekoh Estate: Update and used the latest complain form
Assessment Conclusion:	The latest complaint form that have been resolved was sighted for both estates. All the evidence sighted found adequate and effectively implemented. Hence, the Major NC was closed.
Verification Statement	ASA 1 verification: Hence, the Major NC remained closed.

Major/Minor Nonconformities:		
Ref: 1711673-201811-M5	Area/Process: MS2530-3:2013 (MSPO Part 3) Eldred Estate and Bekoh Estate	Clause: 4.4.5.5
	Issue Date: 24/11/2018	Due Date: 23/2/2019
Requirements:	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.	
Statement of Nonconformity:	Records provided an accurate account for the contractor workers in Bekoh Estate were not available.	
Objective Evidence:	Bekoh Estate: Records provided an accurate account for the contractor workers in Bekoh Estate were not available.	
Corrections:	The management will instruct the contractors to provide muster file for every individual workers belongs to them. The muster file will be more or less identical with direct employee that been kept by estate.	
Root cause analysis:	No monitoring for contractor workers	
Corrective Actions:	1. Monitoring on contractors for fully cooperation in issue solvent. 2. Appoint person incharge to monitor the contactor workers	
Assessment Conclusion:	Sighted the memo (meeting) with the contractors and the appointment letter by estate manager. All the evidence sighted found adequate and effectively implemented. Hence, the Major NC was closed.	

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Verification Statement	ASA 1 verification: Hence, the Major NC remained closed.
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Major/Minor Nonconformities:		
Ref: 1711673-201811-M6	Area/Process: MS2530-3:2013 (MSPO Part 3) Eldred Estate and Bekoh Estate	Clause: 4.4.5.9
	Issue Date: 24/11/2018	Due Date: 23/2/2019
Requirements:	Wages and overtime payment documented on the pay slips shall be in line with legal regulations and collective agreements.	
Statement of Nonconformity:	The management did not comply with the MAPA/NUPW Circular No. 22/2015 for the deduction of subscription fee and insurance premium.	
Objective Evidence:	<p>Eldred Estate: The workers in Eldred Estate who are member of NUPW have been deducted RM 11 for the subscription fees all the while. In fact, according to MAPA/NUPW Circular No. 22/2015 dated 4/8/2015, the employer required to fully subsidize RM 3.00 per month for each of the members of NUPW as premium towards NUPW/AIA Personal Accident Group Scheme. Sampled of the workers' payslip as below:</p> <ul style="list-style-type: none"> a. Employee No.: 0002 b. Employee No.: 0032 c. Employee No.: 0043 d. Employee No.: 0092 e. Employee No.: 0073 	
Corrections:	The balances RM3.00 need to be return back to the union members. The management have decided to reimburse RM3.00 to all NUPW checkroll members. The reimbursement have been pay on 6/12/2018	
Root cause analysis:	No person in-charge monitor the circular from MAPA/NUPW.	
Corrective Actions:	Appoint person in-charge to monitor the payslip	
Assessment Conclusion:	<ol style="list-style-type: none"> 1. The evidence of reimbursement for sampled workers were sighted 2. The appointment letter dated 1/1/2019 for person incharge that monitor on MAPA/NUPW was sighted. <p>All the evidence sighted found adequate and effectively implemented. Hence, the Major NC was closed.</p>	
Verification Statement	ASA 1 verification: Hence, the Major NC remained closed.	

Major/Minor Nonconformities:		
Ref: 1711673-201811-M7	Area/Process: MS2530-3:2013 (MSPO Part 3) Eldred Estate and Bekoh Estate	Clause: 4.5.3.4
	Issue Date: 24/11/2018	Due Date: 23/2/2019

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Requirements:	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.
Statement of Nonconformity:	The disposal of empty pesticide container was not fully implemented.
Objective Evidence:	Bekoh Estate: There were 2 empty pesticides containers found in the landfill area (PM99A)
Corrections:	Collect the empty containers in the land fill and close existing landfill. Made a new land fill where garbage will be separate between organic and inorganic. The estate will provide two type of garbage bin for every workers quarters to ensure that all garbage littered correctly.
Root cause analysis:	No monitoring by the management
Corrective Actions:	Appoint person incharge to monitor the empty container
Assessment Conclusion:	1. The empty containers were collected and stored in the scheduled waste store. 2. Sighted the appointment letter from the Estate Manager. 3. Sighted the picture of landfill that was closed. All the evidence sighted found adequate and effectively implemented. Hence, the Major NC was closed.
Verification Statement	ASA 1 verification: Hence, the Major NC remained closed.

Major/Minor Nonconformities:		
Ref: 1711673-201811-N1	Area/Process: MS2530-3:2013 (MSPO Part 3) Eldred Estate and Bekoh Estate	Clause: 4.4.1.1
	Issue Date: 24/11/2018	Due Date: 23/11/2019
Requirements:	Social impact should be identified and plans are implemented to mitigate the negative impacts and promote the positive ones.	
Statement of Nonconformity:	Social Impact Assessment report was not available during the audit in Bekoh Estate and Eldred Estate.	
Objective Evidence:	Bekoh Estate and Eldred Estate: Social Impact Assessment was carried out on 2-10/4/2018 by MEC Consultant that involved the participation of relevant stakeholders. Preliminary of SIA findings was sighted. However, the official assessment report has yet to be obtained in Eldred Estate and Bekoh Estate. Therefore, the action plan to mitigate the negative impacts and promote the positive impacts was not sighted.	
Corrections:	The Management continue to liase with BEA Sustainability Team regarding this matter	
Root cause analysis:	The report is yet to be received from sustainability team.	
Corrective Actions:	Any issue in the report will be attended once the report is release.	
Assessment Conclusion:	CAP was accepted. The effectiveness of the corrective action will be verified during next assessment.	

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Verification Statement	ASA 1 verification: Hence, the Minor NC has been closed on 14/5/2020.
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Major/Minor Nonconformities:		
Ref: 1711673-201811-N2	Area/Process: MS2530-3:2013 (MSPO Part 3) Eldred Estate and Bekoh Estate	Clause: 4.4.5.4
	Issue Date: 24/11/2018	Due Date: 23/11/2019
Requirements:	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	
Statement of Nonconformity:	Terms and conditions of employment contract between the contractors and workers were not clearly indicated.	
Objective Evidence:	<p>Eldred Estate: Reviewed on the agreement between the contractors and workers found that clauses below were not included in the contract in Eldred Estate:</p> <ul style="list-style-type: none"> a. Annual leave entitlement b. Public holiday entitlement c. Number of medical leave entitlement d. Rate of work on rest day and public holiday e. Total working hours per day or per week f. Termination of contract <p>Besides, the contract agreement has restricted the workers from forming of joining association as there was a clause stated "Anda tidak boleh menubuhkan sebarang pakatan atau persatuan dan tidak akan melibatkan diri dalam apa juga aktiviti persatuan-persatuan yang ada dinegeri ini".</p> <p>Bekoh Estate The payslips' format could be further improved by indicates the number of working days in the payslip for contractors in Bekoh Estate.</p>	
Corrections:	<p>Eldred Estate: All the item mention must be included in contractors-workers agreement for all contractors.</p> <p>Bekoh Estate: Instruct contractors to improve their payslip by improve the current content as similar as pay slip that been provided by Estate.</p>	
Root cause analysis:	One of the contractors-workers agreement was not included all the item.	
Corrective Actions:	<p>Eldred Estate: The agreement will be renewed in January 2019 and all the item mention will be included in the agreement</p> <p>Bekoh Estate: Provide enough information to contractors for better issue solved.</p>	

Assessment Conclusion:	CAP was accepted. The effectiveness of the corrective action will be verified during next assessment.
Verification Statement	ASA 1 verification: Hence, the Minor NC has been closed on 14/5/2020.

Opportunity for Improvement		
Ref: 1711673-201811-I1	Area/Process: MS2530-3:2013 (MSPO Part 3) & MS2530-4:2013 (MSPO Part 4) Eldred Estate and Bekoh Estate	Clause: 4.2.2.2
Objective Evidence:	Bekoh Estate The appointment letters dated 1/6/2018 to the Complaint Panel committee were sighted. However, all the appointment letters were appointed the committee as Secretary.	
Verification Statement	ASA 1 verification: As per indicator 4.2.2.2	

Opportunity for Improvement		
Ref: 1711673-201811-I2	Area/Process: MS2530-3:2013 (MSPO Part 3) & MS2530-4:2013 (MSPO Part 4) Eldred Estate and Bekoh Estate	Clause: 4.3.1.1
Objective Evidence:	The contractor has deducted the water and electricity usage bill from the contract workers. Communication/ approval from JTK to contractors was require to allow them to make deduction.	
Verification Statement	ASA 1 verification: As per indicator 4.3.1.1	

Opportunity for Improvement		
Ref: 1711673-201811-I3	Area/Process: MS2530-3:2013 (MSPO Part 3) & MS2530-4:2013 (MSPO Part 4) Eldred Estate and Bekoh Estate	Clause: 4.4.5.11
Objective Evidence:	Linesite inspection was carried out on weekly basis by Hospital Assistant and Staff in Bekoh Estate and Eldred Estate. The last inspection was carried out on 15/11/2018 in Bekoh Estate. The inspection was conducted in the manner of one week inspected one block of housing. This could be further enhanced by carry out the inspection for all housing in a week.	
Verification Statement	ASA 1 verification: As per indicator 4.4.5.11	

Opportunity for Improvement		
Ref: 1711673-201811-I4	Area/Process: MS2530-3:2013 (MSPO Part 3) & MS2530-4:2013 (MSPO Part 4) Eldred Estate and Bekoh Estate	Clause: 4.6.3.1
Objective Evidence:	The credit terms of payment for contractors should be stated in the agreement in Bekoh Estate and Eldred Estate as below: a. Contract No.: Bkh-Bpe 02/18 b. Contract No.: Bkh-Bpe 03/18	

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	c. Contract No.: Bkh-Syke 04/18 d. Contract No.: E-BPE001/2018 e. Contract No.: E-WCK001/2018
Verification Statement	ASA 1 verification: As per indicator 4.6.3.1

3.4 Summary of the Nonconformities and Status

CAR Ref.	CLASS	ISSUED	STATUS
1711673-201811-M1	Major (Clause 4.4.4.2)	24/11/2018	Closed on 18/2/2019
1711673-201811-M2	Major (Clause 4.5.3.3)	24/11/2018	Closed on 18/2/2019
1711673-201811-M3	Major (Clause 4.5.6.1)	24/11/2018	Closed on 18/2/2019
1711673-201811-M4	Major (Clause 4.4.2.5)	24/11/2018	Closed on 18/2/2019
1711673-201811-M5	Major (Clause 4.4.5.5)	24/11/2018	Closed on 18/2/2019
1711673-201811-M6	Major (Clause 4.4.5.9)	24/11/2018	Closed on 18/2/2019
1711673-201811-M7	Major (Clause 4.5.3.4)	24/11/2018	Closed on 18/2/2019
1711673-201811-N1	Minor (Clause 4.4.1.1)	24/11/2018	Closed on 14/5/2020
1711673-201811-N2	Minor (Clause 4.4.5.4)	24/11/2018	Closed on 14/5/2020
1923596-202006-M1	Major (Clause 4.4.4.2)	18/6/2020	Closed on 16/9/2020

3.5 Issues Raised by Stakeholders

IS #	Description
1	Issues: Kampung Tanah Gembur (Kampung Orang Asli) representatives - Estate management is supportive and responded to request made promptly. Previous issue related to tolling for use of estate road has been resolved and villagers allowed to use without any toll with consent from estate management.
	Management Responses: The earlier implementation of estate access toll for villagers was part of security measure to avoid unnecessary circumstances such as theft of estate crops or other properties. The current implementation of use upon approval could help villagers to transport their crops with no issue of security.
	Audit Team Findings: No further issue.
2	Issues: Estate contractors/suppliers (vendors) – No issue with estate management in terms of contractual matters including payments. Having long relationship with company for over 10 years of services.
	Management Responses: Services by contractors and suppliers are monitored to ensure they comply with all requirements including MSPO.
	Audit Team Findings: No further issue.



3	<p>Issues: Local workers representatives – no issue among workers with estate management. All local workers provided with sufficient housing accommodation and utilities subsidiary by company. Salary always paid on time.</p>
	<p>Management Responses: Noted on the positive feedbacks by local workers.</p>
	<p>Audit Team Findings: No further issue.</p>
4	<p>Issues: Foreign workers representatives - no issue among workers with estate management. All foreign workers provided with free housing accommodation and utilities by company. Foreign workers have freedom to either kept their own passports or surrendered to the office for safekeeping and renewal process.</p>
	<p>Management Responses: Noted on the positive feedbacks by foreign workers.</p>
	<p>Audit Team Findings: No further issue.</p>

Section 4: Assessment Conclusion and Recommendation

Acknowledgement of Internal Responsibility and Formal Sign-off of Assessment Findings

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Based on the findings during the assessment Eldred Estate and Bekoh Estate Certification Unit complies with the MS 2530-3:2013. It is recommended that the certification of Eldred Estate and Bekoh Estate Certification Unit is approved and/or continued.

Acknowledgement of Assessment Findings	Report Prepared by
Name: Hafizi Boniran	Name: Hafriazhar Mohd. Mokhtar
Company name: Boustead Plantations Berhad	Company name: BSI Services Malaysia Sdn. Bhd.
Title: Sustainability Manager	Title: Lead Auditor
Signature:  Date: 7/11/2020	Signature:  Date: 6/11/2020

Appendix A: Summary of the findings by Principles and Criteria

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 -	The MSPO Policy was established where the policy was signed by Chief Executive Officer of Boustead Plantations Berhad dated 9/12/2019.	Complied
4.1.1.2	The policy shall also emphasize commitment to continual improvement. - Major compliance -	The policy was emphasized on the engagement and commitment to produce sustainable palm oil with the objective of improving the milling and estate operation.	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 -	Internal audit was planned and conducted on annual basis by internal auditors from Boustead Plantations HQ sustainability unit. Latest internal audit was conducted on 24-25/11/2019 at Eldred Estate & Bekoh by a team led by Muhd. Hafiz Mamat assisted by Ahmad Amirul Ariff and Amrul Nizam Abdul Ghani. 3 Major NC raised in Bekoh Estate were verified closed by internal auditors on 10/3/2020. Sighted the Lead Auditor training certificate for completion of MSPO Lead Auditor Course held on 18-22/12/2017; Cert. # MSPO 46130.	Complied

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Criterion / Indicator		Assessment Findings	Compliance
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. - Major compliance -	Internal audit procedure; SOP Issue 1; Date of issue: July 2016 was established by the management to include audit frequency, audit schedule, audit team, performing audit, audit responsibility etc. Internal audit shall be carried out once a year.	Complied
4.1.2.3	Report shall be made available to the management for their review. - Major compliance -	Report of internal audit were reviewed in the Management Review Meeting as per minutes of meeting records dated 28/11/2019.	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 -	Latest management review meeting was conducted on 28/11/2019 chaired by Planting Director as a Sustainability Chairman and attended by Visiting Engineer, Sustainability personnel and all operating units' managers and assistant managers.	Complied
Criterion 4.1.4 – Continual Improvement			
4.1.4.1	The action plan for continual improvement shall be based on consideration of the main social and environmental impact and opportunities of the company. - Major compliance -	Action plan for continual improvements in estates were based on consideration of operational productivity, safety, environmental and social opportunities as following: - Old electrical wiring at workers housing to be progressively replace with new wiring - Old workshop building to be demolished and construct new	Complied

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Criterion / Indicator		Assessment Findings	Compliance
		- To increase number of 3R bin availability within estate area mainly workers housing	
4.1.4.2	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. - Major compliance -	Both Eldred Estate and Bekoh Estate has planned to implement a new mechanization involved the use of Backpack Blower (Zenoah) in estate field operation. Trial use has been kick started since February 2020.	Complied
4.1.4.3	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. - Major compliance -	Both Eldred Estate and Bekoh Estate has planned to implement a new mechanization involved the use of Backpack Blower (Zenoah) in estate field operation. Trial use has been kick started since February 2020.	Complied
4.2 Principle 2: Transparency			
Criterion 4.2.1 – Transparency of information and documents relevant to MSPO requirements			
4.2.1.1	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. - Major compliance -	The company has maintained records of request and response, land titles and OSH plans, complaints and grievances records that make available upon request.	Complied
4.2.1.2	Management documents shall be publicly available, except	The company holds copies of each of the management documents that are required to be publicly available. Copies of the document such as	Complied

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Criterion / Indicator		Assessment Findings	Compliance
	<p>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>documents related to environmental and social issues, waste management plan, records of complaints and grievances were available upon request. All the policies such as Pesticide Use Policy, Human Rights Policy and Foreign Workers Policy were publicly available in the company's website as per link as following: www.bousteadplantations.com.my. Other sustainability practices were also available in the website.</p>	
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>Both Eldred Estate and Bekoh Estate has implemented the company's Boustead Plantations Berhad established Communication Procedure. The scope of the procedure is to handle communication for internal and external stakeholders. The methods of communication such as formally write in, through phone call, discussion or meeting etc. The communication is achieved through notice board, meeting minutes, trainings and newspapers. Complaint/ Suggestion Form and the Suggestion Box was implemented in the company.</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>Management official nominated responsible for stakeholders' communication and consultation are the estate managers.</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>List of stakeholders available for both internal and external stakeholders identified by estates. Records of consultation and communication maintained properly as per sample records for minutes of meeting of stakeholder consultation for both internal and external. External stakeholder meeting latest conducted at Bekoh Estate on 4/12/2019 while internal stakeholder meeting was conducted on</p>	Complied

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Criterion / Indicator		Assessment Findings	Compliance
		11/12/2019. Feedbacks and inputs from stakeholders were recorded and actions were taken for necessary issues.	
Criterion 4.2.3 – Traceability			
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 -	Both Eldred Estate and Bekoh Estate implemented the supply chain program based on Bousted Plantations MSPO Traceability Procedures; Issue 1; Issue date: July 2016; Rev. # 2; Rev. date: March 2918. The procedure was approved by MSPO Chairman which covering the implementation of all supply chain requirements for both POM and estate.	Complied
4.2.3.2	The management shall conduct regular inspections on compliance with the established traceability system. - Major compliance -	Regular inspections on compliance with the established traceability system were conducted through periodical internal audit. Furthermore, the estate management and staff responsible to conduct related inspections on compliance of all operations including traceability system. Verification on site confirmed the inspections were regularly implemented accordingly.	Complied
4.2.3.3	The management should identify and assign suitable employees to implement and maintain the traceability system. - Minor compliance -	The procedure also specified that the Sustainability Chairman shall have the overall responsibility for the implementation of the procedure with assignment of relevant personnel from various departments to assist in the implementation. At both Eldred Estate and Bekoh Estate, Estate Managers are responsible for the MSPO implementation including traceability.	Complied
4.2.3.4	Records of sales, delivery or transportation of FFB shall be maintained. - Major compliance -	Records of FFB sales & delivery including FFB Weighbridge Tickets together with FFB Delivery Note (Chit) and Daily Record (FFB Receiving Details Daily Report) were maintained. Sighted samples record available as following:	Complied

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Criterion / Indicator		Assessment Findings	Compliance
		<ul style="list-style-type: none"> - Eldred Estate FFB Delivery Note Chit # S0001631/1632; Date: 7/5/2020; FFB origin field/area: PJ11B & PJ14A; Delivered Mill: Telok Sengat Palm Oil Mill (own company); Lorry/tractor # MBD 8041; Mill weighbridge ticket # 106598; Net weight: 38,600 kg - Bekoh Estate FFB Delivery Note Chit # LB 3989; Date: 14/5/2020; FFB origin field/area: 96A, 01B, 13A, 03B, 17A & 97A; Delivered Mill: Lenga Palm Oil Industries Sdn. Bhd. (external); Lorry/tractor # BHQ 5325; Mill weighbridge ticket # 10485021; Net weight: 38,490 kg 	
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>A mechanism to ensure compliance to legal and other requirement has been documented in documented Legal Procedure. Applicable requirements listed in the Legal and Other Requirement Register (LORR) together with licenses and permits as per sample sighted as following:</p> <ul style="list-style-type: none"> - Bekoh Estate MPOB License # 616049002000; License activity: Sell and transport FFB#; Validity period: 1/1/2020 – 31/12/2020 - Bekoh Estate Schedule Controlled Items Permit Serial # J/MUR/00101; Ref. # MR/PD/SK-0380@SKS89; Items: Diesel (EURO 2M); Storage capacity: 16,380 liters; Validity period: 12/6/2019 – 11/6/2020 (renewed on 10/3/2020) 	Complied

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Criterion / Indicator		Assessment Findings	Compliance
		<ul style="list-style-type: none"> - Bekoh Estate Workers Salary Deduction Permit Serial # PP3/29/020/2010; Date: 15/8/2010 <p>Sustainability Department will assist the respective operating units to undertake the responsibility of identifying, managing, updating and tracking the legal requirement as well as monitoring the status of legal compliance.</p>	
4.3.1.2	<p>The management shall list all laws applicable to their operations in a legal requirements register.</p> <p>- Major compliance -</p>	<p>LORR was established to cover all legal acts, regulations and other requirement related to POM and supply base. Sighted the sample applicable Legal and Other Requirements to both estates as following:</p> <ul style="list-style-type: none"> - Minimum Wages Order 2020 - OSHA 1994 - FMA 1967 - Pesticide Act 1974 - Electrical Supply (Amendment) Act 2015 - Fire Services Act - Environmental Quality Act - Local Government Act etc. 	Complied
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>All the legal and other requirements were register accordingly in the legal requirement register including Minimum Wages Order 2020.</p> <p>The evaluation was last carried out by Assistant Manager and approved by the Estate Manager during management review meeting on 28/11/2019.</p>	Complied
4.3.1.4	<p>The management should assign a person responsible to monitor compliance and to track and update the changes in regulatory requirements.</p>	<p>Tracking system available to identify changes in the relevant regulations through head office, sustainability team, website information and the information are communicated from the Head</p>	Complied

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Criterion / Indicator		Assessment Findings	Compliance
	- Minor compliance -	Office (Sustainability Section). Boustead Plantations Berhad have centralised system for tracking any changes in the law and subscribe into Lawnet. The latest updated was done on 15/7/2019.	
Criterion 4.3.2 – Lands use rights			
4.3.2.1	<p>The management shall ensure that their oil palm cultivation activities do not diminish the land use rights of other users.</p> <p>- Major compliance -</p>	<p>Company’s management ensured that their oil palm cultivation activities do not diminish the land use rights of other users. The land within Eldred Estate and Bekoh Estate belongs to the company with valid land titles. Bekoh Estate hold 1 land titles (under CIMB Islamic Trustee Berhad) as following:</p> <ul style="list-style-type: none"> - Grant # 214542; Lot # 208 <p>Eldred Estate hold 7 land titles (under Boustead Eldred Sdn Bhd) as per sample as following:</p> <ul style="list-style-type: none"> - Grant # 112011; Lot # 537 - Grant # 112019; Lot # 538 - Grant # 112190; Lot # 534 - Grant # 112191; Lot # 536 - Grant # 98808; Lot # 542 <p>The annual return of a company for Boustead Sungai Manar Sdn Bhd (Chamek Estate, Kulai Young Estate & Bekoh Estate) was sighted, where 100% of share under Boustead Plantations Berhad.</p> <p>The supplemental agreement between CIMB Trustee Berhad and Boustead Telok Sengat Sdn Bhd dated 5/3/2010 and between CIMB</p>	Complied

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Criterion / Indicator		Assessment Findings	Compliance
		Trustee Berhad and Boustead Sungai Manar Sdn Bhd dated 5/3/2010 were sighted.	
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 -	Both estates' management provided document showing legal ownership as per land titles sighted in indicator 4.3.2.1 above.	Complied
4.3.2.3	Legal perimeter boundary markers should be clearly demarcated and visibly maintained on the ground where practicable. - Major compliance -	A legal boundary was clearly demarcated. Site visit to boundary at field PR17A (Bekoh Estate) and PJ13C (Eldred Estate) with smallholder, found that the boundary stone at Bekoh Estate (GPS Coordinate: 20° 02' 17.3" N; 102°31' 58.4" E) and at Eldred Estate (GPS Coordinate: 17° 02' 18.4" N; 05°103' 03.3" E) was maintained.	Complied
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 is no land dispute within Eldred Estate and Bekoh Estate as of the time of audit. The lands are leased from CIMB Trustee Berhad via verified with the land titles. There was no encroachment of land by the both estates. Maps available as per sample UAV Mapping; Field Hectarage Statement by Eldred Estate and Bekoh Estate.	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 -	The estate lands are legally owned by the company. The existing estates are not encumbered by any customary land rights. The company has constructed trenches, wooden pegs and gates to differentiate the land boundaries. No issues related to loss of legal	Complied

Criterion / Indicator		Assessment Findings	Compliance		
		customary rights with indigenous peoples, local communities and other stakeholders reported during as of the time of audit.			
4.3.3.2	Maps of an appropriate scale showing extent of recognized customary rights land, if any, should made available. - Minor compliance -	The estate lands are legally owned by the company. The existing estates are not encumbered by any customary land rights. The company has constructed trenches, wooden pegs and gates to differentiate the land boundaries. No issues related to loss of legal customary rights with indigenous peoples, local communities and other stakeholders reported during as of the time of audit.	Complied		
4.3.3.3	Negotiation and FPIC shall be recorded and copies of negotiated agreements should be made available. - Major compliance -	The estate lands are legally owned by the company. The existing estates are not encumbered by any customary land rights. The company has constructed trenches, wooden pegs and gates to differentiate the land boundaries. No issues related to loss of legal customary rights with indigenous peoples, local communities and other stakeholders reported during as of the time of audit.	Complied		
4.4 Principle 4: Social responsibility, health, safety and employment condition					
Criterion 4.4.1: Social Impact Assessment (SIA)					
4.4.1.1	Social impact should be identified and plans are implemented to mitigate the negative impacts and promote the positive ones. - Minor compliance -	Social impact identified through Social Impact Assessment conducted by Malaysian Environmental Consultants Sdn. Bhd. as per report dated 29/6/2018. Assessment was conducted on 2-10/4/2018 with stakeholder consultations conducted on 21-22/5/2018. The SIA study summarizes few key areas findings as following samples: <table border="1" data-bbox="1048 1316 1870 1380"> <tr> <td>SIA Key Areas</td> <td>Findings</td> </tr> </table>	SIA Key Areas	Findings	Complied
SIA Key Areas	Findings				

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Criterion / Indicator		Assessment Findings		Compliance
		Economic livelihood/quality of life	<ul style="list-style-type: none"> - Minimum wage met - No land disputes since 2015 - Local young generation not interested to work in plantation 	
		Environment	No complaints & noncompliance of environmental issue	
		Health & wellbeing	- Health screening prior to employment/FOMEMA compliance	
		Community, families and individuals	- No issue	
		<p>Plans (as per section 4: Summary of Issues Raised by External stakeholders and Actions Required & Section 5: Summary of Issues Raised by Internal Stakeholders and Action Required). Based on the consultation, few action plans were established as per following samples:</p> <ul style="list-style-type: none"> - Maintain existing good communication with all internal and external stakeholders by estate management - Maintenance of boundary drains at all estate boundary with neighboring smallholder - Continuous training of workers on MSPO & RSPO 		

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Criterion / Indicator	Assessment Findings	Compliance	
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 -	Eldred Estate and Bekoh Estate has developed Flowchart of Complaint/ Suggestion (Grievance Procedure) to receive the complaints from internal and external stakeholders. The flowchart has clearly stated the Social Officer will be receiving the complaints. Besides, the company has developed Whistleblowing Policy dated 11/1/2011 signed by Senior General Manager.	Complied
4.4.2.2	The system shall be able to resolve disputes in an effective, timely and appropriate manner that is accepted by all parties. - Major compliance -	Complaint/ Suggestion Form was established and implemented in the estates to record any complaints from the stakeholders. The estate management has taken action to rectify the complaints and updated the actions taken in the form and Complaint Report Book. The complainant has acknowledged on the complaint form after the issue has been resolved by the estate management.	Complied
4.4.2.3	A complaint form should be made available at the premises, where employees and affected stakeholders can make a complaint. - Minor compliance -	Complaint/ Suggestion Form was implemented, and the empty form was available in the suggestion box area in front of the office in Eldred Estate and Bekoh Estate. Interview conducted with the stakeholders confirmed that they are understood about the complaint procedure.	Complied
4.4.2.4	Employees and the surrounding communities should be made aware that complaints or suggestions can be made any time. - Minor compliance -	Consultation with the stakeholders confirmed that they are understood about the complaint procedure.	Complied

Criterion / Indicator		Assessment Findings	Compliance
4.4.2.5	Complaints and resolutions for the last 24 months shall be documented and made available to affected stakeholders upon request. - Major compliance -	Complaints and resolutions records were documented and made available to affected stakeholders upon request since August 2018.	Complied
Criterion 4.4.3: Commitment to contribute to local sustainable development			
4.4.3.1	Growers should contribute to local development in consultation with the local communities. - Minor compliance -	The management has made contribution to the local communities and workers such as donation to the school and surau activities upon request by the stakeholders. The company also provided job opportunity to the local communities. Sample contributions records sighted as following: <ul style="list-style-type: none"> - SK Seri Bekok Softball Team contribution by Eldred Estate; Date: 26/2/2020 - SK Seri Bekok PIBG contribution by Eldred Estate; Date: 6/3/2020 - Grass spraying of Madarasah Syeikhul Ariffien, Simpang Bekoh, Asahan, Melaka by Bekoh Estate; Date: 29/2/2020 	Complied
Criterion 4.4.4: Employees safety and health			
4.4.4.1	An occupational safety and health policy and plan shall be documented, effectively communicated and implemented. - Major compliance -	Boustead Plantations Berhad established Safety and Health Policy, dated 2/12/2019 signed by Chief Executive Officer (CEO). Safety programs schedule for 2019/2020 has been established comprises of emergency response plan (ERP), OSH management system, risk management, safety committee activities, medical surveillance. At Bekoh Estate, the latest CHRA was done on 2/11/2018 while for Eldred Estate, CHRA was done on 2/11/2018 by Env Consultancy & Monitoring Services Sdn. Bhd. (JKKP IH 127/171-2(193)). A total of 31 nos. of chemicals were assessed in Bekoh Estate while in Eldred 26 nos. The	Complied

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	<p>medical surveillance was last conducted on 15/11/2019 by OHD (HQ/08/DOC/00/526). All estate workers found to be fit for work.</p> <p>For Eldred Estate, the medical surveillance was done on 26/10/2019 by Klinik Segamat (HQ/08/DOC/00/545). All workers found fit to work.</p>	
<p>4.4.4.2</p> <p>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 Labelling) Regulation 1997 and Occupational Safety Health (Use and Standard of Exposure of Chemical Hazardous to Health) Regulation 2000. 	<ul style="list-style-type: none"> a) The communication of sustainability policies including safety and health policy was done through briefing during daily muster roll call from time to time. Latest sample briefing of safety policy was done on 4/12/2019 (Bekoh Estate) and 16/12/2019 (Eldred Estate). Furthermore, the policy also being displayed on notice boards at estates offices. b) SOP for HIRARC was established with latest review of HIRARC was done on 4/12/2019 (Bekoh Estate) and on 16/12/2019 (Eldred Estate). HIRARC covered all estate operational activities include Harvesting, Manuring, Spraying, transportation etc. c) A formal training programs on all aspects of OSH and MSPO was established and implemented. Training for various categories of operators, including all field and office staff, with regards to individual duties and training needs had been reviewed and found to be complied. The records of training were available as per sighted latest training conducted for chemical mixing, spraying, harvesting, manuring etc. on March 2020. A specific COVID-19 Emergency Preparedness and Response training also has been established and conducted by Eldred Estate and Bekoh Estate. d) Based on the observation at visited harvesting, spraying and manuring operations at both Eldred Estate and Bekoh Estate, appropriate protective equipment were worn by workers. Records 	<p>Complied</p>

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<p>f) The management shall appoint responsible person(s) for workers' safety and health. The appointed person(s) of trust 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>of PPE issuance also shown adequate PPE were issued by management to workers. The latest HIRARC review done on 4/12/2019 (Bekoh Estate) and on 16/12/2019 (Eldred Estate) also includes COVID-19 assessment in Boustead estate's operation.</p> <p>e) The operating unit comply with Regulation 9 of the Pesticides Act 1974 requiring balance of remaining solution to be kept under lock and key. During visit it was noted that all the remaining pesticides were kept in the store and securely locked and comply with regulation.</p> <p>f) The responsible persons were the Estate Manager and Assistant Manager of the respective operating units together with appointed members of Safety & Health Committee among representatives from management and workers.</p> <p>g) Regular two-way communication of safety and health issues was done through briefing during daily muster roll call from time to time. Specific communication also conducted during Safety Committee Meeting as per sample of latest safety committee meeting conducted on 4/12/2019 (Bekoh Estate) and 16/12/2019 (Eldred Estate). Minutes of meeting were kept in documented information by the management and distributed among safety committee members.</p> <p>h) Accident and emergency procedures were established to include emergency evacuation, fire situation, chemical spillage, accident at work place. The accident report was maintained accordingly including latest JKKP 8 2019 for both Eldred Estate and Bekoh Estate. No accident recorded in both estate in 2020 as of the on-site audit date.</p>	

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		<p>i) First aid equipment was available at site. First aider’s competency certificate available. The training was conducted by PBSM Kota Tinggi, Johor. Sighted the report of first aid training dated 7-9/5/2018.</p> <p>j) Records of incident and accident were available, using internal reporting system. Records on Lost Time Incident (LTI) metrics found to be satisfactory</p>	
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>Boustead Plantations Berhad established Human Rights Policy, dated 2/12/2019 signed by Chief Executive Officer (CEO). The communication of sustainability policies including human rights policy was done through briefing during daily muster roll call from time to time. Latest sample briefing of policy was done on 4/12/2019 (Bekoh Estate) and 16/12/2019 (Eldred Estate). Furthermore, the policy also being displayed on notice boards at estates offices.</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>Boustead Plantations Berhad established Equal Rights Policy, dated 2/12/2019 signed by Chief Executive Officer (CEO). The communication of sustainability policies including equal rights policy was done through briefing during daily muster roll call from time to time. Latest sample briefing of policy was done on 4/12/2019 (Bekoh Estate) and 16/12/2019 (Eldred Estate). Furthermore, the policy also being displayed on notice boards at estates offices.</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</p>	<p>The company has employed checkroll workers in Bekoh Estate and Eldred Estate. Sampled of the payslips for checkroll workers sighted and checked as following:</p>	Complied

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Criterion / Indicator		Assessment Findings	Compliance
	<p>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>	<ul style="list-style-type: none"> - Employee # 0007; Joined date: 22/10/2016; Post: Harvester (EE) - Employee # 0119; Joined date: 27/7/2017; Post: Weeder (EE) - Employee # 076; Joined date: 1/11/2016; Post: Weeder (EE) - Employee # 0353I; Joined date: 11/4/2016; Post: Harvester (BE) - Employee # 0505B; Joined date: 10/8/2015; Post: Weeder (BE) - Employee # 0601F; Joined date: 17/10/2016; Post: Harvester (BE) <p>The recent MAPA/NUPW Agreement on the Wages of Harvesters, Harvesting Kanganyies, Loaders and "Other Loaders" on Oil Palm Estates, 2019; MAPA/NUPW Field and Other General Employees and Fringe Benefits Agreement, 2019; MAPA Circular No. 12/2019; Dated 2/4/2019 referred to in the agreement was kept available by both estates.</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>Contractors and their employees were employed in harvesting operation including for FFB transporters and palm tree felling & chipping of replanting machinery operator.</p> <p>Sighted the sample payslips of contractor workers as following:</p> <ul style="list-style-type: none"> i) Harvesting Contractor: Sri Yogaletchumi Kali Enterprise; Harvester ID # T3513654; Month: October 2019 ii) Harvesting Contractor: Sri Yogaletchumi Kali Enterprise; Harvester ID # AU442815; Month: January 2020 iii) Harvesting Contractor: Sri Yogaletchumi Kali Enterprise; Harvester ID # T3519656; Month: March 2020 <p>All sample records of payslips shown workers were paid above the Minimum Wage Order 2020 rate.</p>	Complied

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Criterion / Indicator		Assessment Findings	Compliance
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>There is a list of employees consist of employee number, name, division, pay, NRIC/Passport no, employment category, nationality, DOB, age, race and status in the employee database system – Name List of Workers (as at April 2020).</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 is available for each and every employee indicated in the employment records.</p> <p>- Major compliance -</p>	<p>The worker’s contract valid for a 3 years basis, termination of service is after receiving 1-month prior notice or deduction of 1 month salary in lieu or where either party mutually agree to terminate the service.</p> <p>The company can terminate the service under varies conditions as per the Employment Agreement (eq. if they fail the medical test or any criminal misconduct during the employment period).</p> <p>The cost involved for their return will be borne by the company.</p> <p>All workers are provided an explanation of the understanding of the agreement, given a copy of the agreement and the original is kept in respective personal file.</p> <p>- As per stated in item 2.3 of the contract, all workers are given the probation period for 6 months and as per bullet 6 stated that all works, salary, rewards, rules, and conditions based on the current Minimum Wage Order.</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>Based on the sampled pay slips of workers, there is no trace of breach of payment as stipulated in their contract.</p> <p>Interview with workers shows no issue on wages received.</p>	Complied

Criterion / Indicator		Assessment Findings	Compliance
		<p>During site visit, interview with both local and foreign workers revealed no discrimination on overtime hours as well on wages received for overtime work done.</p> <p>This was also cross checked in their respective payslips and no discrepancies found.</p>	
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>- Major compliance -</p>	<p>Working hours is 8 hours. From Monday to Saturday. Total monthly working hours is 208 hours. The overtime maximum is 104 hours according to the Malaysia Employment Act 1955.</p> <p>As at current, there was none has crossed 80 hours of overtime. Verified the payslips, the payment and calculation of overt time well distributed.</p> <p>The overtime rate after 8 hours daily rated is: upkeeping</p> <ul style="list-style-type: none"> • Mon - Sat – daily rated / 8 hours x 1.5 • Sunday - daily rated / 8 hours x 2.0 • Public holiday – daily rated / 8 hours x 3.0 <p>The overtime rate after 8 hours piece rated is: harvesters</p> <ul style="list-style-type: none"> • Mon - Sat – flat rate • Sunday – flat rate x 2.0 • Public holiday – flat rate x 3.0 	Complied
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>Salary slips clearly shows the calculations of gross salary, all deductions and net salary of a worker.</p>	Complied

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Criterion / Indicator		Assessment Findings	Compliance
	- Major compliance -	<p>Workers interviewed confirmed that they are being paid more than the stipulated minimum wage and that they understand all the deductions being made.</p> <p>Sampled 3 months' payslip for:</p> <ul style="list-style-type: none"> - Employee # 0353I; Joined date: 11/4/2016; Post: Harvester (BE) - Employee # 0505B; Joined date: 10/8/2015; Post: Weeder (BE) - Employee # 0601F; Joined date: 17/10/2016; Post: Harvester (BE) - Employee # 0007; Joined date: 22/10/2016; Post: Harvester (EE) - Employee # 0119; Joined date: 27/7/2017; Post: Weeder (EE) - Employee # 076; Joined date: 1/11/2016; Post: Weeder (EE) 	
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>The social benefits for:</p> <p>Local - incentives for good work performance by giving hampers for general workers during annual dinner and for staff is based on KPI eligible for incentive, bonus payment, professional development for only executive and above, medical care and health provisions are for entire work force.</p> <p>Foreigner – new employees arriving from overseas are given the necessities and food.</p>	Complied
4.4.5.11	<p>In cases where on-site living quarters are provided, these 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>Based on field visit and interview with workers known that the adequate housing, clean water supplies, medical, mosque, electricity and access to adequate, sufficient and affordable food has been provided.</p> <p>Foreign workers housed accordingly and have adequate beds, clean running water from taps, kitchen and toilet facility. There is no complain, and grievance related to housing standard.</p>	Complied

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Criterion / Indicator		Assessment Findings	Compliance
		<p>During site visit to line-site, interview both local and foreign workers claimed that the management provides decent living quarters with proper drainage system, twice a week domestic waste collection, attend to household repairs and free water and electricity supply for domestic consumption. The audit team witnessed the tap water condition in foreign worker’s quarter that has no sign of pollution.</p> <p>The clinic seen with sufficient facilities to treat patient with minor illness and for major case it will be refer to local government hospital in nearby town, Bekok for Eldred Estate and Labis for Bekoh Estate. Interview with workers, resulted positive feedbacks of the service from clinic.</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>Policy available established as Sexual Harassment & Violence Prevention Policy signed by the CEO dated on 2/12/2019. Policy been communicated to all employees including female employees through daily muster assembly and workers meeting such as gender committee meeting for female employee.</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 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>Boustead Plantations Berhad has developed Freedom of Association Policy dated 2/12/2019 signed by the CEO. The company is committed and allowed their stakeholders such as employees, clients, business partner and etc to form or join any association.</p>	Complied

Criterion / Indicator		Assessment Findings	Compliance									
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 be exposed to hazardous working conditions.</p> <p>- Major compliance -</p>	<p>Boustead Plantations Berhad has developed Employment of Child and Age Limit Policy dated 2/12/2019. The company will comply with the Children and Young Persons (Employment) Act 1966 and ILO Convention 138 (1973) Article 1-3. No workers less than 16 years old will be recruited and less than 18 years old for hazardous work. Document verified on the Employee Master List confirmed that all the workers employed were above 18 years old.</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>A formal training programme on all aspects of MSPO was established and implemented. Training for various categories of operators, including all field and office staff, with regards to individual duties and training needs were reviewed and found to be complied.</p> <p>Training programme planned for year 2018 was consistently implemented. The programme includes training for all categories of workers. Evidence of adequate and appropriate training on safe working practices provided to:</p> <ul style="list-style-type: none"> - harvesters - pesticides operators - manurers <p>The records of training were available at mill and estate office. Sample training checked:</p> <table border="1" style="margin-left: 20px;"> <thead> <tr> <th>Estate</th> <th>Training</th> <th>Date</th> </tr> </thead> <tbody> <tr> <td>Eldred</td> <td>Spraying</td> <td>16/1/2020</td> </tr> <tr> <td></td> <td>Chemical handling</td> <td>4/2/2020</td> </tr> </tbody> </table>	Estate	Training	Date	Eldred	Spraying	16/1/2020		Chemical handling	4/2/2020	Complied
Estate	Training	Date										
Eldred	Spraying	16/1/2020										
	Chemical handling	4/2/2020										

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Criterion / Indicator		Assessment Findings			Compliance
			Weeding	2/3/2020	
		Bekoh	Harvesting	12/12/2019	
			Spraying	17/1/2020	
			Manuring	4/4/2020	
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>Seen a matrix table that identified programs and whom are required to be trained. There is no special or specific training identified by the management, however the existing plans can promote individual workers improve their working skill.</p> <p>Training calendar with programs seen in align with management’s direction to ensure all workers are trained in their respective job. Cross verified, harvesters, sprayers and chemical/store handler found satisfactory discussion.</p> <p>Sighted the (Executive/Staffs/Workers) Training needs, analysis and plan for year 2019/2020 dated 16/12/2019.</p>			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>The estate has training program which updated annually. The annual internal audit by the HQ Sustainability personnel and the management review does review the effectiveness of the training plan and its execution.</p> <p>Interview with workers and staff, found they are aware on their job scope and responsibilities, e.g. Hospital Assistance, Asst. manager and field workers during site visit.</p>			Complied
4.5 Principle 5: Environment, natural resources, biodiversity and ecosystem services					
Criterion 4.5.1: Environmental Management Plan					

Criterion / Indicator		Assessment Findings	Compliance
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>Based on the <i>Polisi Alam Sekitar & Biodeversiti</i> (Environmental & Biodiversity Policy); dated 2 Dec 2019; signed by Senior GM of Bousted Estates Agency Sdn Bhd, the HCV Management Plan has been established as 4 objectives as following:</p> <p>i) Wild Life Conservation</p> <p>Target: to ensure no illegal hunting activities inside or outside the estate perimeter in line with the Protection of Wild Life Act 1972</p> <p>Action plan: monitoring records of hunting incidences; collaboration with estate workers; local people and stakeholders such as neighboring estate to investigate the extent and reasons for hunting and their awareness; training of estate personnel especially Aps in anti-poaching measures; working closely with local authorities such as Perhilitan to highlight and curtail any illegal activities.</p> <p>ii) Waterways Quality and Health Monitoring</p> <p>Target: to ensure recommended WQI index met a range of 81 to 100%</p> <p>Action plan: prohibit manuring and herbicide spraying at any point in buffer zone; prohibit application of herbicide/insecticide which classified as highly toxicity chemical; continue application of EFB as substitute fertilizers; monitoring the use of oil and chemical trap constructed to avoid chemical flowing into water source</p> <p>iii) Agricultural Land Contamination</p> <p>Target: to continuously establish and enhance in-estate buffers</p>	Complied

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Criterion / Indicator		Assessment Findings	Compliance
		<p>Action plan: establish 3m buffer zone adjacent to forest reserve; continue the in-estate program of establishment and enhancement of riverine buffer zones; continue planting of wild/natural species of hard wood along identified water courses, wetland and biodiversity area</p> <p>iv) Degradation of Agricultural Land</p> <p>Target: to minimize or free from soil erosion at slope/terrace area</p> <p>Action plan: planting LCC such as Pueraria Javanica at along slopes and Mucuna Bracteata; construct terrace at slope area >25o; continue constructing silt pits; conservation of Nephrolepis Biserrata; prohibit spray at any points of sloping banks; continue setting up buffer zone; planting certivar/Guatemala grasses; construct and maintain well drainage system; continue plant timer trees especially in buffer zone area</p> <p>The above programs were regularly communicated by estate management to all employees from time to time during routine workers assembly. The recent specific environmental and biodiversity policy briefing was conducted on 6-7 Nov 2019 and continuously until for year 2019 attended by all estate staff and employees.</p>	
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>On top of the above biodiversity management plan and objectives, the environmental management plan covered in the established action plan of significant environmental aspects identified and impacts evaluated as per documents sighted as following:</p> <ul style="list-style-type: none"> - Environmental Aspect and Impact Identification 2020/2021; Serial # EAI/2020/03-03 to EAI/2020/013-4 dated 14 Jan 2020 	Complied

Criterion / Indicator		Assessment Findings	Compliance
		- Environmental Impact Evaluation Form Serial # EIE/2020/001-1 to EIE/2020/014-4 dated 14 Jan 2020	
4.5.1.3	An environmental improvement plan to mitigate the negative impacts and to promote the positive ones, shall be developed, effectively implemented and monitored. - Major compliance -	The developed environmental improvement plan to mitigate the negative impacts and to promote the positive ones were effectively implemented and monitored.	Complied
4.5.1.4	A programme to promote the positive impacts should be included in the continual improvement plan. - Minor compliance -	Few environmental plans were established (environmental management plan and waste management plan). The plan was as follow: - To ensure water quality meets the environmental quality act 1974 - To ensure the slope/ terracing area minimum or free facing soil erosion and to keep buffer zone without chemical activity. - To ensure zero application of highly toxicity pesticides or herbicides - To minimize soil destruction and reduce frequency of chemical and fertilizer application - To substitute chemical to cultural and biological practices - To reduce conserve soil fertility - To recycle waste such as to recycle empty container as recycle waste after triple rinsing or reuse back as chemical container for spraying activity.	Complied
4.5.1.5	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	The above programs were regularly communicated by estate management to all employees from time to time during routine workers assembly. The recent specific biodiversity and environmental	Complied

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	improvement plans and are working towards achieving the objectives. - Major compliance -	policy briefing was conducted 18 Feb 2020. For other training such as chemical handling can refer in training indicator.					
4.5.1.6	Management shall organize regular meetings with employees where their concerns about environmental quality are discussed. - Major compliance -	Specific Environmental Aspects & Impacts reviews were conducted annually at each operating unit. Briefings were done as part of the environmental management plan on regular basis including during workers daily muster briefing and weekly assembly. The latest meeting was conducted on 24 Jan 2020.	Complied				
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 -	There was a plan established for improving efficiency of the use of fossil fuel. Sighted the estate diesel consumption 2019. Diesel consumption/FFB produced can refer to indicator 4.5.2.2	Complied				
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 -	The estate was established estimation on total energy required. This estimation was compared to the actual usage by monthly and reported to the head office for monitoring. The record of Diesel consumption/FFB produced as per below: <table border="1" data-bbox="1048 1267 1868 1398"> <thead> <tr> <th>Estate</th> <th>Liter/FFB (Diesel)</th> </tr> </thead> <tbody> <tr> <td>Eldred Estate</td> <td>1.96</td> </tr> </tbody> </table>	Estate	Liter/FFB (Diesel)	Eldred Estate	1.96	Complied
Estate	Liter/FFB (Diesel)						
Eldred Estate	1.96						

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Criterion / Indicator		Assessment Findings		Compliance
		Bekoh Estate	1.94	
4.5.2.3	The use of renewable energy should be applied where possible. - Minor compliance -	The estate are using grid supply as their source of electricity with diesel genset as a back-up power supply. There's no renewable energy generation or application of the time being except that the estate adopted utilization of renewable biomass source of their own EFB to be applied within the estate fields.		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 -	All waste products and sources of pollution had been identified in Waste Management Action Plan Year 2020 for the estate. Based on the Waste Management Action Plan Year 2020 the following wastes and its sources were identified: - Domestic waste: Rubbish from linesite, office etc. at Field PM01B - Scheduled waste: SW305, SW409 & SW 410 - Recyclable waste: Empty chemical container, empty fertilizer bag, palm fronds, etc.		Complied
4.5.3.2	A waste management plan to avoid or reduce pollution shall be developed and implemented. The waste management plan should include measures for: a) Identifying and monitoring sources of waste and pollution b) Improving the efficiency of resource utilization and recycling of potential wastes as nutrients or converting them into value-added by-products - Major compliance -	As above, all waste products and sources of pollution had been identified in Waste Management Action Plan Year 2020 for the estate. Site visit confirmed that the practice of reduce, reuse and recycle of materials has been implemented. Segregation of wastes i.e. general wastes and scheduled wastes were verified to be satisfactory. Proper storage areas were identified for the storage of the recyclable wastes at the estate.		Complied

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Criterion / Indicator		Assessment Findings	Compliance
4.5.3.3	<p>The management shall establish Standard Operating Procedure for handling of used chemicals that are classified under Environment Quality Regulations (Scheduled Waste) 2005, Environmental Quality Act, 1974 to ensure proper and safe handling, storage and disposal.</p> <p>- Major compliance -</p>	<p>Visit to estate field and premises shown the management and disposal plan has been implemented accordingly. Records has been maintained by relevant person in-charge. Sighted during site verification in both estates, the labelling of scheduled waste was available accordingly.</p>	Complied
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>Eldred Estate conducted the Triple Rinsing of Empty Chemical Container Training (Latihan 3 Kali Pembilasan Bekas Racun dan Bahan Kimia) on 29 Nov 2019 to all sprayers gang for both divisions based on the guideline for used plastic pesticide container recycling program (UPPCR). Visit to estates confirmed that all pesticides stored at chemical store where empty chemical containers have been tripling rinsed and punctured. The containers were collected by G-Planter for recycle purposes.</p>	Complied
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 management used to segregate the waste, i.e. general wastes and scheduled wastes was verified to be satisfactory.</p> <p>Proper storage areas were identified for the storage of the recyclable wastes.</p>	Complied
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>Based on the assessment done by the estate of all polluting activities as of the Environment Aspect and Impact assessment, identified sources were fertilizer, diesel and pesticide chemicals.</p>	Complied

Criterion / Indicator		Assessment Findings	Compliance
4.5.4.2	An action plan to reduce identified significant pollutants and emissions shall be established and implemented. - Major compliance -	Action plan to reduce identified significant pollutants including IPM implementation, empty chemical container & empty fertilizer bags recycle.	Complied
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 reflects the estate's current activities. 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.). 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. e. Where natural vegetation in riparian areas has been removed, a plan with a timetable for restoration shall be established and implemented. f. Where bore well is being use for water supply, the level of	Assessment was documented as Water Management Plan Year 2020 which inclusive of location; wastewaters produced; treatment/containment method; reuse/recycle/disposal method was sighted. The plan implemented as per following: - Identification of water sources - Efficient use of water - Renewability of water sources - Riparian buffer zone - Areas where buffer zone not established - Water quality monitoring - Effluent analysis - Demarcation of wetlands areas - Soil and water conservation measures - No construction of bunds/weirs/dam across main rivers There is no natural stream or river flowing across both Bekoh Estate and Eldred Estate except for seasonal drain only.	Complied

Criterion / Indicator		Assessment Findings	Compliance
	<p>the ground water table should be measured at least annually.</p> <p>- Major compliance -</p>		
4.5.5.2	<p>No construction of bunds, weirs and dams across main rivers or waterways passing through an estate.</p> <p>- Minor compliance -</p>	<p>There is no natural stream or river flowing across both Bekoh Estate and Eldred Estate except for seasonal drain only.</p>	<p>Complied</p>
4.5.5.3	<p>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).</p> <p>- Minor compliance -</p>	<p>The estate practice water harvesting at strategic locations. They also maintained monitoring records of water usage which recorded every day and summarized on monthly basis including the monitoring of rainfall water, which has been an alternative source of water as mitigation plan during draught season.</p>	<p>Complied</p>
<p>Criterion 4.5.6: Status of rare, threatened, or endangered species and high biodiversity value</p>			
4.5.6.1	<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 (e.g. 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>The HCV assessment was done by the Malaysia Environmental Consultant on 2-10/4/2018, however the report yet to be received by the management during previous initial certification audit the report of HCV was available dated July 2018 in all operating unit. This report includes Telok Sengat Estate, Kulai Young Estate, Chamek Estate, Eldred Estate, and Bekoh Estate with total hectarage 8,3337.94 Ha. As per report total HCV area was 279.18 ha.</p>	<p>Complied</p>

Criterion / Indicator		Assessment Findings	Compliance
4.5.6.2	<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>- Major compliance -</p>	<p>The management plan was available referred as per Table 6.2 Recommendation for managing and monitoring identified threats to HCV from HCV report by Malaysian Environmental Consultants (MEC) 20 July 2018. Their management plan such as:</p> <ul style="list-style-type: none"> i) To ensure no agrichemical activities carried out near the riparian area. ii) To cover any bare soil with planting of vetiver grasses, groundcovers and to reduce soil erosion. iii) Establishment of safety/awareness signages iv) To give briefing during muster to include HCV related. v) HCV awareness training for estate management. 	Complied
4.5.6.3	<p>A management plan to comply with Indicator 1 shall be established and effectively implemented, if required.</p> <p>- Major compliance -</p>	<p>Based on the Polisi Alam Sekitar & Biodeversiti; dated 2/12/2019; signed by Senior GM of Bousted Estates Agency Sdn Bhd, the HCV Management Plan has been established as 4 objectives as following:</p> <ul style="list-style-type: none"> i) Wild Life Conservation <p>Target: to ensure no illegal hunting activities inside or outside the estate perimeter.</p> <p>Action plan: monitoring records of hunting incidences; collaboration with estate workers; local people and stakeholders such as neighboring estate to investigate the extent and reasons for hunting and their awareness; training of estate personnel especially APs in anti-poaching measures; working closely with local authorities such as Perhilitan to highlight and curtail any illegal activities.</p>	Complied

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		<p>ii) Waterways Quality and Health Monitoring</p> <p>Target: to ensure recommended WQI index met a range of 81 to 100%</p> <p>Action plan: prohibit manuring and herbicide spraying at any point in buffer zone; prohibit application of herbicide/insecticide which classified as highly toxicity chemical; continue application of EFB as substitute fertilizers; monitoring the use of oil and chemical trap constructed to avoid chemical flowing into water source.</p> <p>iii) Agricultural Land Contamination</p> <p>Target: to continuously establish and enhance in-estate buffers</p> <p>Action plan: establish 3m buffer zone adjacent to forest reserve; continue the in-estate program of establishment and enhancement of riverine buffer zones; continue planting of wild/natural species of hard wood along identified water courses, wetland and biodiversity area.</p>	
Criterion 4.5.7: Zero burning practices			
4.5.7.1	<p>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.</p> <p>- Major compliance -</p>	<p>The company has implemented Clearing Methods (From Oil Palm), O.P.C. No. 51.c – July 1999 where the company implemented zero burning unless there were incidences of Basal Stem Rot [BSR] on the old stands or high risk of Oryctes infestation, then partial burning and pulverisation are to be carried out.</p>	Complied

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Criterion / Indicator		Assessment Findings	Compliance
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 -	The visit to estate field confirmed no use of fire for land preparation during replanting. Hence, no special application made, and no approval granted.	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 -	The visit to estate field confirmed no use of fire for land preparation during replanting. Hence, no special application made, and no approval granted.	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 -	The visit to estate field confirmed no use of fire for land preparation during replanting. Hence, no special application made, and no approval granted.	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. - Major compliance -	Boustead Plantations Bhd has established the agriculture manual (Oil Palm Circular) covers felling and clearing, planting material, weeding, lalang, manuring, pest & disease, census & thinning out, drains, road & bridges, soil/water conservation, boundaries, fences & survey, supplying, pruning, collection (harvesting), external transport etc. This been verified during site verification and all according to company Standard Procedure.	Complied

Criterion / Indicator		Assessment Findings	Compliance
4.6.1.2	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. - Major compliance -	The implementation in estate was consistent with the Quality Assurance Manual and Work Instruction. Sighted Internal Audit report which was conducted once a year by Sustainability section, the 1 st internal audit was conducted accordingly to cover the entire criterion stated in the standard and SOP.	Complied
4.6.1.3	A visual identification or reference system shall be established for each field. - Major compliance -	Field marking was sighted at state visited. They are using palm trunk or sign board to identify the field.	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 -	Boustead Plantations Berhad has implemented a management system for monitoring and reporting of performance against production targets for achieving long-term economic and financial viability.	Complied
4.6.2.2	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. - Major compliance -	The earlier planting was in year 1995 and the next replanting would be in year 2020. Replanting programme planning has established until year 2025 for both estates.	Complied
4.6.2.3	The business or management plan may contain:	From the estate visited, each estate has an annual operating budget for the calendar year 2019 and five-year projections (2019 - 2023) for	Complied

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Criterion / Indicator		Assessment Findings	Compliance
	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) e) Financial indicators : cost benefit, discounted cash flow, return on investment - Major compliance -	production. The plan includes age profile, yield projection and cost per tonne of FFB production etc. CAPEX for Year 2020 are such as perimeter fencing for staff quarters and purchase one unit of Kubota tractor.	
4.6.2.4	The management plan shall be effectively implemented and the achievement of the goals and objectives shall be regularly monitored, periodically reviewed and documented. - Major compliance -	Bosutead Plantations Berhad has monitored the estate performance against the estimates. They have monitored the performance through Estate Weekly Report and action plan was developed if necessary.	Complied
Criterion 4.6.3: Transparent and fair price dealing			
4.6.3.1	Pricing mechanisms for the products and other services shall be documented and effectively implemented. - Major compliance -	Pricing mechanism for both Eldred Estate and Bekoh Estate mainly involved contracts for harvesting work, transportation of workers and FFB. Sighted that contracts available in documented information being signed and agreed by both parties that covers the pricing/pay rate, payment terms, terms and condition, areas of services, etc. Contracts found renewed annually and are paid promptly according to the terms.	Complied
4.6.3.2	All contracts shall be fair, legal and transparent and agreed payments shall be made in timely manner. - Major compliance -	Contracts are fair, legal and transparent as per sample sighted as following:	Complied

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Criterion / Indicator		Assessment Findings	Compliance
		i) Boustead Plantations Berhad Memorandum of Agreement Eldred Estate; FFB Harvesting Contract; Contractor: Lokman Khalid Baba Resources; Contract Agreement Serial Number: Contract Agreement 2 2020; Duration: 1/1/2020 -31/12/2020 ii) Boustead Plantations Berhad Memorandum of Agreement Bekoh Estate; FFB Harvesting Contract; Contractor: Perusahaan Mewah Hijau; Contract Agreement Serial Number: Contract Agreement 3 2020; Duration: 1/1/2020 -31/12/2020 Consultation with stakeholders among estate vendors and contractors confirmed that agreed payments were made in timely manner by estates.	
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 -	Sampled contract agreements (as per indicator 4.6.3.2 above) were included with a special clause on MSPO compliance required for the contractor upon award.	Complied
4.6.4.2	The management shall provide evidence of agreed contracts with the contractor. - Major compliance -	The contractors have signed on the contract agreement prior to provide services. Seen the contract agreement and details as refer to Criterion 4.6.3.2.	Complied
4.6.4.3	The management shall accept MSPO approved auditors to verify assessments through a physical inspection if required. - Minor compliance -	Boustead Plantations Berhad has agreed for BSI auditors to verify the assessment through a physical inspection if required.	Complied

Criterion / Indicator		Assessment Findings	Compliance
4.6.4.4	<p>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.</p> <p>- Major compliance -</p>	<p>The contractor will issue the working chit for every work done on daily basis as stated in the contract agreement. During the month end, the contractor will issue the tax invoice to the company for all the work done to proceed for payment.</p>	Complied
4.7 Principle 7: Development of new planting			
Criterion 4.7.1: High biodiversity value			
4.7.1.1	<p>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.</p> <p>- Major compliance -</p>	No new planting involved in both Eldred Estate and Bekoh Estate.	N/A
4.7.1.2	<p>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.</p> <p>- Major compliance -</p>	No new planting involved in both Eldred Estate and Bekoh Estate.	N/A
Criterion 4.7.2: Peat Land			

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Criterion / Indicator		Assessment Findings	Compliance
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 -	No new planting involved in both Eldred Estate and Bekoh Estate.	N/A
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. - Major compliance -	No new planting involved in both Eldred Estate and Bekoh Estate.	N/A
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 -	No new planting involved in both Eldred Estate and Bekoh Estate.	N/A
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 -	No new planting involved in both Eldred Estate and Bekoh Estate.	N/A
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	No new planting involved in both Eldred Estate and Bekoh Estate.	N/A

Criterion / Indicator		Assessment Findings	Compliance
	documented and a plan to manage the impacts developed, implemented, monitored and reviewed. - Minor compliance -		
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 -	No new planting involved in both Eldred Estate and Bekoh Estate.	N/A
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 -	No new planting involved in both Eldred Estate and Bekoh Estate.	N/A
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 -	No new planting involved in both Eldred Estate and Bekoh Estate.	N/A
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.	No new planting involved in both Eldred Estate and Bekoh Estate.	N/A

Criterion / Indicator		Assessment Findings	Compliance
	- Major compliance -		
4.7.5.3	Marginal and fragile soils, including excessive gradients and peat soils, shall be identified prior to conversion. - Major compliance -	No new planting involved in both Eldred Estate and Bekoh Estate.	N/A
Criterion 4.7.6: Customary land			
4.7.6.1	No new plantings are established on recognised customary 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 -	No new planting involved in both Eldred Estate and Bekoh Estate.	N/A
4.7.6.2	Where new plantings on recognised customary lands are acceptable, management plans and operations should maintain sacred sites. - Minor compliance -	No new planting involved in both Eldred Estate and Bekoh Estate.	N/A
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 -	No new planting involved in both Eldred Estate and Bekoh Estate.	N/A

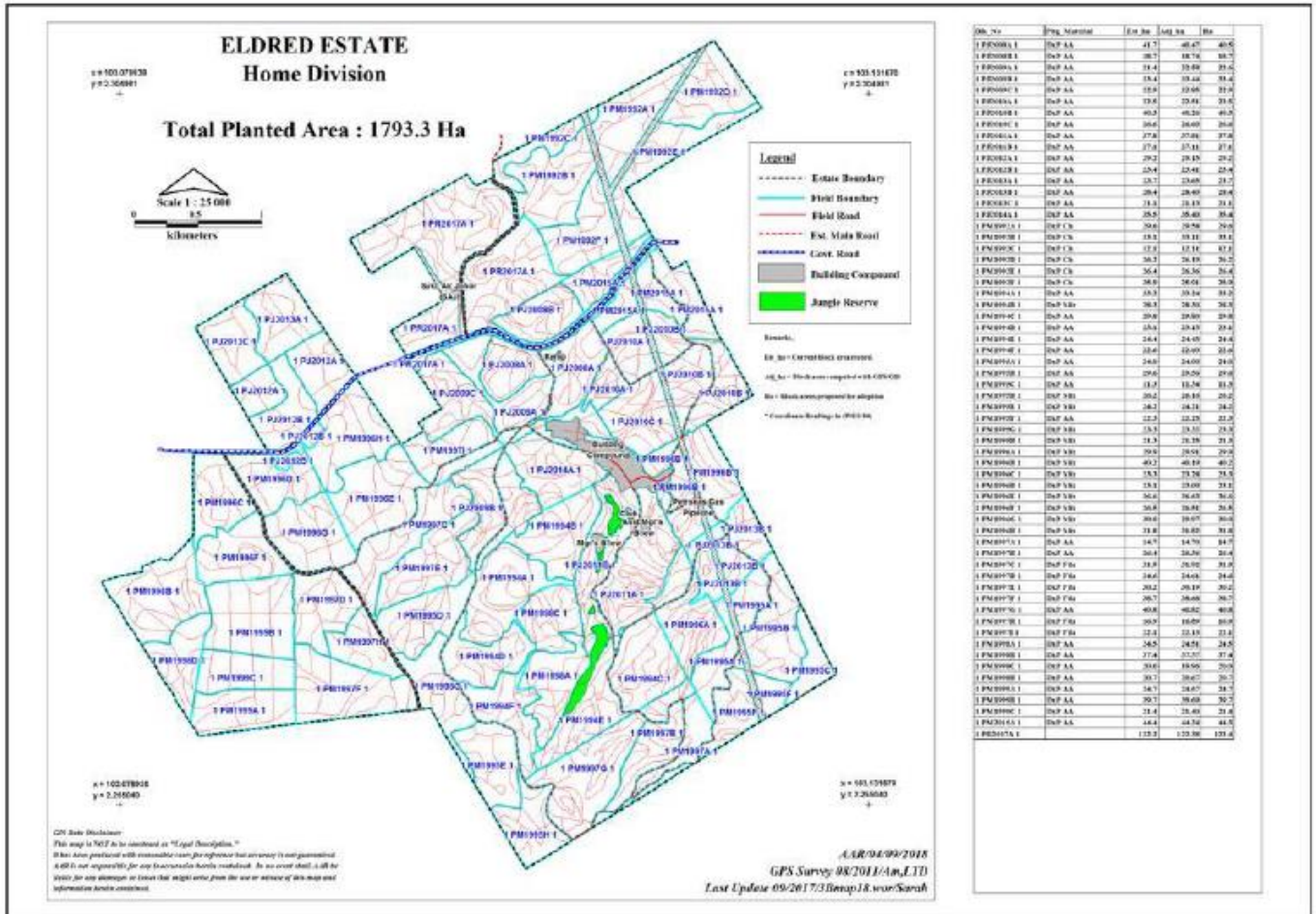
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Criterion / Indicator		Assessment Findings	Compliance
4.7.6.4	The owner of recognised customary land shall be compensated for any agreed land acquisitions and relinquishment of rights, subject to their free prior informed consent and negotiated agreement. - Major compliance -	No new planting involved in both Eldred Estate and Bekoh Estate.	N/A
4.7.6.5	Identification and assessment of legal and recognised customary rights shall be documented. - Major compliance -	No new planting involved in both Eldred Estate and Bekoh Estate.	N/A
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 -	No new planting involved in both Eldred Estate and Bekoh Estate.	N/A
4.7.6.7	The process and outcome of any compensation claims shall be documented and made publicly available. - Major compliance -	No new planting involved in both Eldred Estate and Bekoh Estate.	N/A
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 -	No new planting involved in both Eldred Estate and Bekoh Estate.	N/A

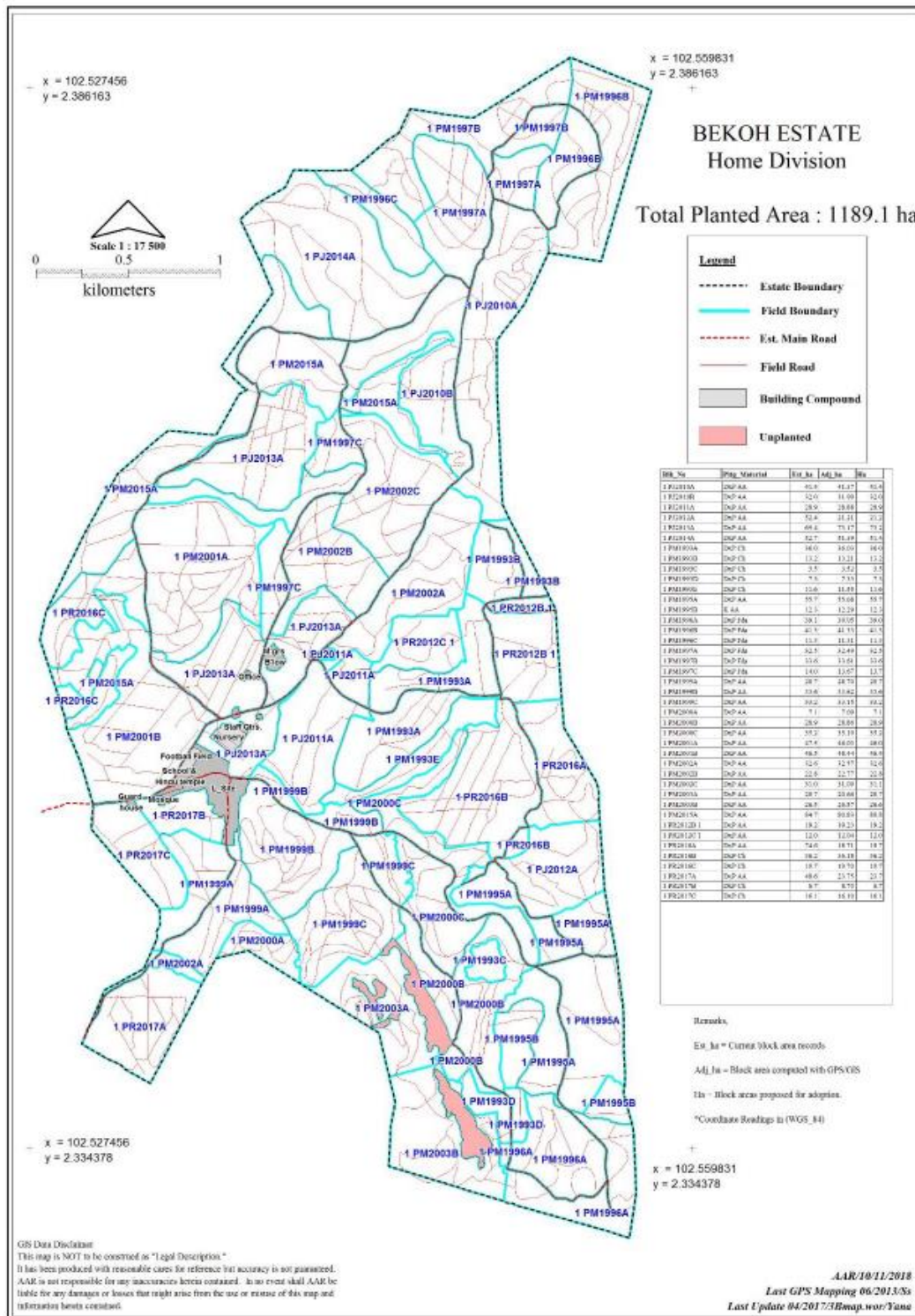
Appendix B: List of Stakeholders Contacted

<p>Government Officer: Nil</p>	<p>Community/ neighbouring village: Village Head, Kampung Orang Asli Tanah Gembur</p>
<p>Suppliers/Contractors/Vendors: Mill suppliers & contractors Estate suppliers & contractors</p>	<p>Worker’s Representative/Gender Committee: Workers Representative Gender Representative Harvesters Sprayers Mill Operators</p>

Appendix D: Eldred Estate Field Map



Appendix E: Bekoh Estate Field Map



Appendix F: List of Abbreviations

BE	Bekoh Estate
BOD	Biochemical Oxygen Demand
CB	Certification Bodies
CHRA	Chemical Health Risk Assessment
COD	Chemical Oxygen Demand
CPO	Crude Palm Oil
EE	Eldred Estate
EFB	Empty Fruit Bunch
EHS	Environmental, Health and Safety
EIA	Environmental Impact Assessment
EMS	Environmental Management System
FFB	Fresh Fruit Bunch
FPIC	Free, Prior, Informed and Consent
GAP	Good Agricultural Practice
GHG	Greenhouse Gas
GMP	Good Manufacturing Practice
GPS	Global Positioning System
HCV	High Conservation Value
IPM	Integrated Pest Management
ISCC	International Sustainable Carbon Certification
LD50	Lethal Dose for 50 sample
MSPO	Malaysian Sustainable Palm Oil
MSDS	Material Safety Data Sheet
MT	Metric Tonnes
OER	Oil Extraction Rate
OSH	Occupational Safety and Health
PK	Palm Kernel
PKO	Palm Kernel Oil
POM	Palm Oil Mill
POME	Palm Oil Mill Effluent
PPE	Personal Protective Equipment
RTE	Rare, Threatened or Endangered species
SEIA	Social & Environmental Impact Assessment
SIA	Social Impact Assessment
SOP	Standard Operating Procedure