

**MALAYSIAN SUSTAINABLE PALM OIL  
- ANNUAL SURVEILLANCE ASSESSMENT 2  
Public Summary Report**

<b>Kulim (Malaysia) Berhad</b>
Client company Address: K.B. 705 Ulu Tiram, 81900 Johor Bahru, Johor, Malaysia
Certification Unit: Palong Cocoa Palm Oil Mill and supply bases (Palong Estate, Mungka Estate, UMAC Estate, Kemedak Estate, Sepang Loi Estate & Labis Baru Estate)
Location of Certification Unit: PTD 15678, HSD 52398, Mukim Buloh Kasap, 85000 Daerah Segamat, Johor, Malaysia

**Report prepared by:**  
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**Report Number: 3091784**

**Assessment Conducted by:**  
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## Section 1: Executive Summary

<b>1.1 Organizational Information and Contact Person</b>			
Company Name	Kulim (Malaysia) Berhad		
Mill/Estate	MPOB License No.	Expiry Date	
	Palong Cocoa Palm Oil Mill - 578392004000	13/11/2021	
	Palong Estate - 570585002000	31/03/2021	
	Mungka Estate - 570584002000	31/03/2021	
	Kemedak Estate - 570583002000	31/03/2021	
	Sepang Loi Estate - 501828802000	31/12/2021	
	UMAC Estate - 501362602000	31/03/2021	
	Labis Bahru Estate - 501775302000	30/04/2021	
Address	HQ: K.B. 705 Ulu Tiram, 81900 Johor Bahru, Johor, Malaysia Site: PTD 15678, HSD 52398, Mukim Buloh Kasap, 85000 Daerah Segamat, Johor, Malaysia		
Certification Unit	Palong Cocoa POM and Supply Base		
Contact Person Name	Salasah Elias		
Website	www.kulim.com.my	E-mail	salasah@kulim.com.my
Telephone	07-8611611	Facsimile	07-8631084

<b>1.2 Certification Information</b>			
Certificate Number	Mill: MSPO 698010 Estates: MSPO 698011		
Issue Date	01/04/2019	Expiry date	31/03/2024
Scope of Certification	Mill: Production of Sustainable Palm Oil and Palm Oil Products Estate: Production of Sustainable Oil Palm Fruits		
Standard	MS 2530: 2013 Part 3: General principles for oil palm plantations and organized smallholders MS 2530:2013 Part 4: General principles for palm oil mills		
Stage 1 Date	N/A. This is RSPO certified company		
Stage 2 / Initial Assessment Visit Date (IAV)	22-25/10/2018		
Continuous Assessment Visit Date (CAV) 1	23-26/09/2019		
Continuous Assessment Visit Date (CAV) 2	30/11-03/12/2020		
Continuous Assessment Visit Date (CAV) 3	-		
Continuous Assessment Visit Date (CAV) 4	-		

<b>Other Certifications</b>			
Certificate Number	Standard(s)	Certificate Issued by	Expiry Date
QMS 00714	ISO 9001:2015	SIRIM QAS International Sdn Bhd	10/11/2021
A116161	MS 1500:2009	JAKIM	30/06/2021
EU-ISCC-Cert-DE119-60206780	ISCC	ASG Cert	08/05/2021
RSPO 613087	RSPO Principles & Criteria for Sustainable Palm Oil Production: 2018	BSI Services Malaysia Sdn. Bhd.	22/01/2024
BYC-MSP0/SC-0031	MSPO SCC	Bureau Veritas	10/03/2025

<b>1.3 Location of Certification Unit</b>			
Name of the Certification Unit (Palm Oil Mill/ Estate/ Smallholder/ Independent Smallholder)	Site Address	GPS Reference of the site office	
		Longitude	Latitude
Palong Palm Oil Mill	PTD 15677, HSD 52397, Mukim Buloh Kasap, Daerah Segamat, Johor, Malaysia	102.786599	2.706335
Palong Estate	PTD 15677, HSD 52397, Mukim Buloh Kasap, Daerah Segamat, Johor, Malaysia	102.751902	2.748065
Mungka Estate	PTD 15678, HSD 52398, Mukim Buloh Kasap, Daerah Segamat, Johor, Malaysia	102.787488	2.686354
Kemedak Estate	PTD 15678, HSD 52398, Mukim Buloh Kasap, Daerah Segamat, Johor, Malaysia	102.768611	2.713056
Sepang Loi Estate	Lot 1468, Geran 45514, Mukim Sermin, Daerah Segamat, Johor, Malaysia	102.818543	2.692688
UMAC Estate	PTD 298, HSD 3746, Mukim Keratong, Daerah Rompin, Pahang, Malaysia	102.906667	2.884167
Labis Bahru Estate	Lot 1265, Geran 38197, Mukim Pogoh, Daerah Segamat, Johor, Malaysia	102.874167	2.430000

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<b>1.4 Certified Area</b>					
<b>Estate</b>	<b>Total Planted (Mature + Immature) (ha)</b>	<b>HCV (ha)</b>	<b>Infrastructure &amp; Other (ha)</b>	<b>Total Area (ha)</b>	<b>% of Planted</b>
Palong Estate	1829.89	5.68	80.08	1915.65	95.523
Mungka Estate	1746.50	68.10	113.46	1928.06	90.583
Kemedak Estate	1691.69	15.06	79.52	1786.27	94.705
Sepang Loi Estate	899.92	12.69	57.60	970.21	92.755
UMAC Estate	1549.81	2.24	58.01	1610.06	96.258
Labis Bahru Estate	1945.51	14.53	148.12	2108.16	92.285
<b>Total</b>	<b>9663.32</b>	<b>118.30</b>	<b>536.79</b>	<b>10318.41</b>	<b>93.651</b>

<b>1.5 Plantings &amp; Cycle</b>							
<b>Estate</b>	<b>Age (Years)</b>					<b>Mature**</b>	<b>Immature</b>
	<b>0 - 3</b>	<b>4 - 10</b>	<b>11 - 20</b>	<b>21 - 25</b>	<b>26 - 30</b>		
Palong Estate	0	1447.74	382.15	0	0	1829.89	0
Mungka Estate	0	1063.13	683.37	0	0	1746.5	0
Kemedak Estate	0	526.66	1165.03	0	0	1691.69	0
Sepang Loi Estate	0	0	899.92	0	0	899.92	0
UMAC Estate	0	173.89	1353.24	22.68	0	1549.81	0
Labis Bahru Estate	0	247.69	1428.16	269.66	0	1945.51	0
<b>Total (ha)</b>	<b>0</b>	<b>3459.11</b>	<b>5911.87</b>	<b>292.34</b>	<b>0</b>	<b>9663.32</b>	<b>0</b>

<b>1.6 Certified Tonnage of FFB</b>			
<b>Estate</b>	<b>Tonnage / year</b>		
	<b>Estimated (Sep 2019 - Aug 2020)</b>	<b>Actual (Sep 2019 - Oct 2020)</b>	<b>Forecast (Nov 2020 - Oct 2021)</b>
Palong Estate	34,255	41,014.54	36,823
Mungka Estate	33,654	41,237.92	40,898
Kemedak Estate	37,373	35,049.70	35,166
Sepang Loi Estate	21,189	23,220.77	21,516
UMAC Estate	37,117	30,104.85	35,006
Labis Bahru Estate	41,265	45,922.13	37,188
<b>Total</b>	<b>204,853</b>	<b>216,549.91</b>	<b>206,597</b>

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<b>1.7 Uncertified Tonnage of FFB</b>			
Estate	Tonnage / year		
	Estimated (Sep 2019 - Aug 2020)	Actual (Sep 2019 - Oct 2020)	Forecast (Nov 2020 - Oct 2021)
Nil			
<b>Total</b>			

<b>1.8 Certified Tonnage</b>			
	Estimated (Sep 2019 - Aug 2020)	Actual (Sep 2019 - Oct 2020)	Forecast (Nov 2020 - Oct 2021)
	<b>Mill Capacity: 40 MT/hr</b>	<b>FFB</b>	<b>FFB</b>
204,853		216,549.91	206,597
<b>SCC Model: SG/MB</b>	<b>CPO (OER: 21.43%)</b>	<b>CPO (OER: 21.24%)</b>	<b>CPO (OER: 21.86%)</b>
	43,903	45,986.34	45,162
	<b>PK (KER: 5.22%)</b>	<b>PK (KER: 5.54%)</b>	<b>PK (KER: 5.34%)</b>
	10,698	12,000.25	11,029

<b>1.9 Actual Sold Volume (CPO)</b>					
CPO (MT)	MSPO Certified	Other Schemes Certified		Conventional	Total
		ISCC	RSPO		
45,986.34	0	0	22,472.07	23,428.08	45,900.15

<b>1.10 Actual Sold Volume (PK)</b>					
PK (MT)	MSPO Certified	Other Schemes Certified		Conventional	Total
		ISCC	RSPO		
12,000.25	0	0	8,700.51	2,350.64	11,051.15

## 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

This remote assessment was conducted from 30/11-3/12/2020. The audit programme is included as Appendix A. The approach to the audit was to treat the Palong Cocoa Palm Oil Mill and Supply Bases 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 interviews of staff, workers using Microsoft Meeting and phone called, review of documentation and monitoring data by document shared. MS 2530-3:2013 and MS 2530-4:2013 were used to guide the collection of information to assess compliance. There was no interview and site visit carried out due to 100% remote audit caused by Covid-19 pandemic.

The estates or smallholders sample were determined based on formula  $S = r\sqrt{n}$  where  $n$  is the number of estates while when applicable, the smallholders sample were determined following the MSPO Certification Requirement. The sampling of smallholders were based on the formula  $(r\sqrt{n})$ ; 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.

Structured worker interviews with male and female workers and staff were held in private at the workplace in the mill and the estates using phone called and meeting using Microsoft meeting. No visits were made due to remote audit 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

<b>Assessment Program</b>					
<b>Name (Mill / Plantation / Group smallholders)</b>	<b>Year 1 (Certification)</b>	<b>Year 2 (ASA 1)</b>	<b>Year 3 (ASA 2)</b>	<b>Year 4 (ASA 3)</b>	<b>Year 5 (ASA 4)</b>
Palong Cocoa Palm Oil Mill	√	√	√	√	√
Palong Estate	√	√	-	√	-
Mungka Estate	√	-	√	-	√
Kemedak Estate	-	√	-	√	-
Sepang Loi Estate	-	-	√	-	√
UMAC Estate	-	√	-	√	-
Labis Bahru Estate	√	-	√	-	√

**Tentative Date of Next Visit: October 3, 2021 - October 8, 2021**

**Total No. of Mandays: 8**

**2.1 BSI Assessment Team**

<b>Team Member Name</b>	<b>Role</b> <i>(Team Leader or Team member)</i>	<b>Qualifications</b> <i>(Short description of the team members)</i>
Muhamad Naquiuddin Mazeli	Team Leader	He graduated with Bachelor of Science Horticulture at University Putra Malaysia. He started his career in 2009 as Researcher at Sime Darby Research Seed Centre and manage for Quality control for seed production for paddy, chilli and corn with collaboration with Malaysian Agricultural Research and Development Institute (MARDI) for 4 years. During the period, he was also involved with Nestle project on Red Rice production. He later joins the Sime Darby Plantation Berhad Sustainability Team in 2013 as Sustainability Executive. Joining the sustainability team, he managed, implemented and monitored the RSPO, ISCC, MSPO and ISO 9001 and ISO 18001 certification requirements for the estates, mills, refineries and Smallholder scheme. He also support in providing training and internal audits related to RSPO, MSPO and other certifications where applicable to the operations within Sime Darby Plantation. He is a trained Safety Officer and he managed the Occupation Safety and Health of Northern Region Sime Darby Plantation Berhad operations. During this assessment, he assessed on the aspects of legal, mill best practices, safety and health and workers consultation.
Vijay Kanna Pakirisamy	Team Member	He holds a bachelor's degree in Agribusiness Science Management with Honours from University Utara Malaysia in 2010. He gained his working



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		<p>exposure in the plantation sector, serving as an Assistant Manager with KL Kepong and IOI Plantations and as a Sr. Assistant Manager with United Plantations Berhad. Throughout his 10 year tenure in the oil palm industry, he has been part of the operations team that implements standards within the estate such as RSPO, MSPO, ISCC and FINWATCH. He has completed ISO IMS 9001, 14001, 45001(OHS 18001) Lead Auditor Course in November 2019, endorsed RSPO P&amp;C Lead Auditor Course in October 2019 and endorsed MSPO Lead Auditor Course in November 2019. During this assessment, he assessed on the aspects of Occupational, Health &amp; Safety and estate best practises. He is fluent in Bahasa Malaysia and English languages.</p>
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**2.2 Assessment Plan**

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

Date	Time	Subjects	(MNM)	(VKP)	ICT Planned
Monday, 23/11/2020	10.30-12.00	Communication on document preparation - Audit plan - Any additional Information	√	√	Teleconference, Microsoft Team Meeting, Email
Monday, 30/11/2020 <b>Palong Cocoa Mill</b>	0900-0915	Opening meeting Opening presentation by audit team leader Confirmation of assessment scope and finalize audit plan	√	√	Teleconference, Microsoft Team Meeting, Email
	0915-1030	Assessment and documentation review on mill best practice, legal requirements, OHS, environment and continual improvement		√	Teleconference, Microsoft Team Meeting, Email
	1030-1040	10-minute break		√	
	1040-1230	Assessment and documentation review on mill best practice, legal requirements, OHS, environment and continual improvement		√	Teleconference, Microsoft Team Meeting, Email
	1230-1330	Lunch & Break	√	√	Teleconference, Microsoft Team Meeting, Email
	1330-1450	Assessment and documentation review on social aspects, legal requirements, employees' welfare and stakeholder management	√		Teleconference, Microsoft Team Meeting, Email
	1450-1500	10-minute break	√		
	1500-1700	Assessment and documentation review on social aspects, legal requirements, employees' welfare and stakeholder management	√		Teleconference, Microsoft Team Meeting, Email
	1700-1730	Interim closing briefing	√	√	Teleconference, Microsoft Team Meeting, Email

Date	Time	Subjects	(MNM)	(VKP)	ICT Planned
Tuesday, 1/12/2020 <b>Labis Bahru Estate</b>	0915-1030	Assessment and documentation review on good agricultural practices, legal requirements, OHS, environment, biodiversity and continual improvement		√	Teleconference, Microsoft Team Meeting, Email
	1030-1040	10-minute break		√	
	1040-1230	Assessment and documentation review on good agricultural practices, legal requirements, OHS, environment, biodiversity and continual improvement		√	Teleconference, Microsoft Team Meeting, Email
	1230-1330	Lunch & Break	√	√	Teleconference, Microsoft Team Meeting, Email
	1330-1450	Assessment and documentation review on social aspects, legal requirements, employees' welfare and stakeholder management	√		Teleconference, Microsoft Team Meeting, Email
	1450-1500	10-minute break	√		
	1500-1700	Assessment and documentation review on social aspects, legal requirements, employees' welfare and stakeholder management	√		Teleconference, Microsoft Team Meeting, Email
	1700-1730	Interim closing briefing	√	√	Teleconference, Microsoft Team Meeting, Email
Wednesday, 2/12/2020 <b>Sepang Loi Estate</b>	0915-1030	Assessment and documentation review on good agricultural practices, legal requirements, OHS, environment, biodiversity and continual improvement		√	Teleconference, Microsoft Team Meeting, Email
	1030-1040	10-minute break		√	
	1040-1230	Assessment and documentation review on good agricultural practices, legal requirements, OHS, environment, biodiversity and continual improvement		√	Teleconference, Microsoft Team Meeting, Email
	1230-1330	Lunch & Break	√	√	
	1330-1450	Assessment and documentation review on social aspects, legal requirements, employees' welfare and stakeholder management	√		Teleconference, Microsoft Team Meeting, Email
	1450-1500	10-minute break	√		Teleconference, Microsoft Team Meeting, Email
	1500-1700	Assessment and documentation review on social aspects, legal requirements, employees' welfare and stakeholder management	√		Teleconference, Microsoft Team Meeting, Email
	1700-1730	Interim closing briefing	√	√	Teleconference, Microsoft Team Meeting, Email

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Date	Time	Subjects	(MNM)	(VKP)	ICT Planned
Thursday, 3/12/2020 <b>Mungka Estate</b>	0915-1030	Assessment and documentation review on social aspects, legal requirements, employees' welfare and stakeholder management	√		Teleconference, Microsoft Team Meeting, Email
	1030-1040	10-minute break	√		
	1040-1230	Assessment and documentation review on social aspects, legal requirements, employees' welfare and stakeholder management	√		Teleconference, Microsoft Team Meeting, Email
	1230-1330	Lunch & Break	√	√	
	1330-1450	Assessment and documentation review on good agricultural practices, legal requirements, OHS, environment, biodiversity and continual improvement		√	Teleconference, Microsoft Team Meeting, Email
	1450-1500	10-minute break		√	
	1500-1600	Assessment and documentation review on good agricultural practices, legal requirements, OHS, environment, biodiversity and continual improvement		√	Teleconference, Microsoft Team Meeting, Email
	1600-1630	Assessment team discussion and preparation of closing meeting		√	Teleconference, Microsoft Team Meeting, Email
	1630-1700	Closing meeting	√	√	Teleconference, Microsoft Team Meeting, Email

## 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

During the Certification Assessment there were No Major & No Minor nonconformities raised. The implementation of the previously Corrective Actions for the Major Non-conformity(ies) has been verified for its effectiveness and closed accordingly.

Noteworthy Positive Comments	
1	Good commitment from estate management and Kulim SQD's team.
2	Good retrieval document and fast feedback during remote audit by Management and SQD team.

### 3.3 Status of Nonconformities Previously Identified and OFI

Not applicable.



### 3.4 Summary of the Nonconformities and Status

CAR Ref.	CLASS	ISSUED	STATUS
1696077-201806-M1	Major	25/10/18	Closed on 17/1/2019
1696077-201806-M2	Major	25/10/18	Closed on 17/1/2019

### 3.5 Issues Raised by Stakeholders

No interview with stakeholder due to Covid-19 issue.

**Section 4: Assessment Conclusion and Recommendation**

<b>Acknowledgement of Internal Responsibility and Formal Sign-off of Assessment Findings</b>	
Based on the findings during the assessment Palong Cocoa Palm Oil Mill and Supply Bases Certification Unit complies with the <i>MS 2530-3:2013</i> and <i>MS 2530-4:2013</i> . It is recommended that the certification of Palong Cocoa Palm Oil Mill and Supply Bases Certification Unit is approved and/or continued.	
<b>Acknowledgement of Assessment Findings</b>	<b>Report Prepared by</b>
<b>Name:</b> SALASAH ELIAS	<b>Name:</b> Muhamad Naquiuddin Mazeli
<b>Company name:</b> KULIM (MALAYSIA) BERHAD	<b>Company name:</b> BSI Services (M) Sdn Bhd
<b>Title:</b> DEPUTY GENERAL MANAGER	<b>Title:</b> Client Manager
<b>Signature:</b> 	<b>Signature:</b> 
<b>Date:</b> 24 DECEMBER 2020	<b>Date:</b> 10/12/2020

**Appendix A: Summary of the findings by Principles and Criteria**

**Malaysian Sustainable Palm Oil Part 3: General principles for Plantations and Organized Smallholders**

Criterion / Indicator		Assessment Findings	Compliance
<b>4.1 Principle 1: Management commitment &amp; responsibility</b>			
<b>Criterion 4.1.1 – Malaysian Sustainable Palm Oil (MSPO) Policy</b>			
<b>4.1.1.1</b>	A policy for the implementation of MSPO shall be established. <b>- Major compliance -</b>	Kulim (M) Berhad has established a policy on sustainable palm oil production signed by Executive Director, Mr Zulkifli Zakariah dated 30/11/2019. The policy was written in bi-lingual (english and national language) available at pertinent location in the estate compound.	Yes
<b>4.1.1.2</b>	The policy shall also emphasize commitment to continual improvement. <b>- Major compliance -</b>	The established policy has emphasized on the commitment to comply with all applicable legal requirements, contribute to local community development, and environmental consideration with the objective of improving the milling and estate operation	Yes
<b>Criterion 4.1.2 – Internal Audit</b>			
<b>4.1.2.1</b>	Internal audit shall be planned and conducted regularly to determine the strong and weak points and potential area for further improvement. <b>- Major compliance -</b>	The internal audit for MSPO was conducted on 23 <sup>th</sup> Sept 2020 at Labis Bahru estate. The internal audit had covered all the MSPO MS2530 elements specifically on part 3. 1 NC raised related to Procedure on local workers hiring. The NC was close out on 28/9/19 and verified by SQM team.	Yes
<b>4.1.2.2</b>	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	Kulim (M) Berhad has established procedure, Sustainable Management System, Internal Audit: SQD/SMS/3.2, issue: 1 dated 1/8/2020 . The procedure is designed for all applicable sustainability standards	Yes

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	corrective action. - <b>Major compliance</b> -	requirements such as ISCC, RSPO, MSPO and management guideline to be used as audit criteria. The procedure has incorporated the internal auditor competency requirement. Based on the procedure, internal audit is to be carried out at least once a year.	
<b>4.1.2.3</b>	Report shall be made available to the management for their review. - <b>Major compliance</b> -	The internal audit report has distributed to the Labis Bahru estate management and reported to Kulim (M) Berhad management. Refer to internal audit report dated 23/9/20. Another sampling in Sepang Loi estate, internal audit conducted on 21/9/2020. The audit report was available for review	Yes
<b>Criterion 4.1.3 – Management Review</b>			
<b>4.1.3.1</b>	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. - <b>Major compliance</b> -	The last management review was conducted on 8/10/2020. The management review had included internal and external sustainable palm oil audit results review and all pertinent agenda as per standard requirements. The status of the correction and preventive actions are being discuss and reviewed. The meeting was chaired by estate Manager and attended by management representative. The minutes of the meeting and review presentation was sighted.	Yes
<b>Criterion 4.1.4 – Continual Improvement</b>			
<b>4.1.4.1</b>	The action plan for continual improvement shall be based on consideration of the main social and environmental impact and opportunities of the company. - <b>Major compliance</b> -	The Continual Improvement Plan Palong Complex was available and the plan contain based on consideration of the main social and environmental impact and opportunities of the company as the following:	Yes

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		To conduct gotong royong in workers housing complex by quarterly basis. 20 unit linesite painting programme and 10 unit staff bungalow. To carry out repair for worker housing monthly basis.	
<b>4.1.4.2</b>	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.  <b>- Major compliance -</b>	The means to improve practices consistent with new information, new techniques or new industry standards were obtained from Agronomy Advisory Services Dept. Other manners to keep abreast of these development include being members of various oil palm related association e.g. ISP, MPOA, Johor Planters Association (JPA), and relationship with suppliers.	Yes
<b>4.1.4.3</b>	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.  <b>- Major compliance -</b>	The action plan are available as per progress report for the projects. Sighted the scenario, issue, recommendation and benefits of the projects.	Yes
<b>4.2 Principle 2: Transparency</b>			
Criterion 4.2.1 – Transparency of information and documents relevant to MSPO requirements			
<b>4.2.1.1</b>	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.  <b>- Major compliance -</b>	Kulim (Malaysia) Sdn Bhd has developed a Transparency Procedure Issue no:01 Rev: 00 Doc No: SQD/SMS/1.0 dated 1/8/2020 where the objective of the procedure is to ensure that operating units provide adequate information when requested by stakeholders on sustainability, social and legal issues when appropriate. Stakeholders will have the information available in appropriate forms and to allow stakeholders participation in decision making in these areas. The	Yes



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		modes for internal and external communication are such as tool box, meeting with representatives, inspections, suggestion boxes, memo, stakeholder meeting and etc.	
<b>4.2.1.2</b>	<p>Management documents shall be publicly available, except where this is prevented by commercial confidentiality or where disclosure of information would result in negative environmental or social outcomes.</p> <p><b>- Major compliance -</b></p>	<p>There is a SPO Transparency Program under Kulim Malaysia Berhad. The procedure is to ensure that documents if to be release and made publicly available are readily available. The Corporate Dept will ensure that the following documents are available if requested and they do not impinge on confidentiality and will not cause detrimental sustainability or social outcomes.</p> <p>Among the documents that were made available for viewing are:</p> <ul style="list-style-type: none"> <li>• Land title (held as hard copy by the property department)</li> <li>• Health and safety plan</li> <li>• Plans and impact assessment- environmental &amp; social</li> <li>• Pollution prevention plans</li> <li>• Details of complaints and grievances</li> <li>• Negotiation procedures</li> <li>• Continuous improvement plan</li> <li>• Biodiversity plans</li> <li>• Policy documents (sustainability handbook)</li> </ul> <p>In addition to the website, the policies were also displayed at various locations at the operating units including the main notice boards of the estates, mill offices and muster ground notice boards for employees and visitors to view</p>	Yes
<b>Criterion 4.2.2 – Transparent method of communication and consultation</b>			
<b>4.2.2.1</b>	Procedures shall be established for consultation and communication	Kulim (Malaysia) Sdn Bhd has developed a Consultancy and Communication Procedure Issue no:01 Rev: 00 Doc No: SQD/SMS/1.1	Yes

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	<p>with the relevant stakeholders.</p> <p><b>- Major compliance -</b></p>	<p>dated 1/8/2020 where the objective of the procedure is ensure that KULIM has open and transparent communication methods with local communities and other stakeholders such as;-</p> <ul style="list-style-type: none"> <li>• Adequate information to relevant stakeholders on environmental, social and legal issues relevant to RSPO Criteria, in appropriate languages and forms</li> <li>• Communication between your organisation and local communities</li> <li>• Taking action as a result of communication if warranted</li> <li>• Recording communication</li> <li>• Ensuring communication is open and transparent</li> <li>• Consultation and communication documentation</li> </ul>	
<b>4.2.2.2</b>	<p>A management official should be nominated to be responsible for issues related to Indicator 1 at each operating unit.</p> <p><b>- Minor compliance -</b></p>	<p>The Labis bahru Manager has appointed the Assistant Manager to be the Social Person In Charge for the social issue in the estate and seen the appointment letter dated 10/1/2020</p> <p>The Sepang Loi Manager has appointed the Pn Mariyah Bt Md Nor to be the Social Person In Charge for the social issue in the estate and seen the appointment letter dated 6/1/2020</p>	Yes
<b>4.2.2.3</b>	<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><b>- Major compliance -</b></p>	<p>The estates has developed a stakeholder list that consisted of internal and external stakeholders such as contractors and suppliers, local communities, government authorities, buyers and etc. Combine stakeholder meeting was conducted on 11/11/2020 with all stakeholder. No issue was raised during the meeting. Meeting minutes was sighted.</p>	Yes

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		The estate has sent the invitation letter to stakeholders such as local communities' representatives, schools' representatives and contractor to attend stakeholder meeting on November 2020.	
<b>Criterion 4.2.3 – Traceability</b>			
<b>4.2.3.1</b>	The management shall establish, implement and maintain a standard operating procedure to comply with the requirements for traceability of the relevant product(s).  <b>- Major compliance -</b>	Sustainability Management System; Traceability; Doc: No: SQD/SMS/1.2; Date: 01.08.2020; Issue No: 01; Revision No: 05 was available and verified.  The SOP outlines the aim to establish traceability of the FFB from field (block) to load and transport all harvested FFB from roadside platforms to the Mill within the shortest possible time, usually within 24 hours.	Yes
<b>4.2.3.2</b>	The management shall conduct regular inspections on compliance with the established traceability system.  <b>- Major compliance -</b>	Traceability records is maintained by all estates by using delivery note which include information such as lorry number, field/block number, numbers of bunches. This will be monitored and verified by field supervisor or estate assistant prior to delivery.  Daily inspection and checking are done to cross check the bunch count records and mill's weighbridge ticket information to ensure daily production data is consistent and tally.	Yes
<b>4.2.3.3</b>	The management should identify and assign suitable employees to implement and maintain the traceability system.  <b>- Minor compliance -</b>	The person appointed for Traceability is GM/Senior Manager/Manager/Deputy Manager/Assistant in-charge/Acting Manager or Respective Operating Units as per appointment letter:  Labis Bahru Estate: Appointment letter dated 30.06.2018  Mungka Estate: Appointment letter dated 21.09.2020  Sepang Loi Estate: Appointment letter dated 21.09.2020	Yes

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<p><b>4.2.3.4</b> Records of sales, delivery or transportation of FFB shall be maintained.</p> <p><b>- Major compliance -</b></p>	<p>Record of FFB Dispatch was maintained by the estate and available for verification. The sampled records are as below:</p> <p><u>Labis Bahru Estate</u></p> <ol style="list-style-type: none"> <li>1. Product: FFB            Delivery Chit Number: 55947            Lorry Number: WBR 9219            Date: 25.03.2020</li> <li>2. Product: FFB            Delivery Chit Number: 56312            Lorry Number: WBS 6974            Date: 02.07.2020</li> </ol> <p><u>Sepang Loi Estate</u></p> <ol style="list-style-type: none"> <li>3. Product: FFB            Delivery Chit Number: 22486            Lorry Number: LSL 3            Date: 05.03.2020</li> <li>4. Product: FFB            Delivery Chit Number: 13.07.2020            Lorry Number: LSL 1            Date: 13.07.2020</li> </ol> <p><u>Mungka Estate</u></p> <ol style="list-style-type: none"> <li>5. Product: FFB            Delivery Chit Number: 65338</li> </ol>	<p>Yes</p>

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		<p>Lorry Number: LM 7 Date: 09.03.2020 Tonnage: 5.99 mt</p> <p>6. Product: FFB Delivery Chit Number: 67366 Lorry Number: LM 8 Date: 30.07.2020 Tonnage: 8.01 mt</p>	
<b>4.3 Principle 3: Compliance to legal requirements</b>			
<b>Criterion 4.3.1 – Regulatory requirements</b>			
<b>4.3.1.1</b>	<p>All operations are in compliance with the applicable local, state, national and ratified international laws and regulations.</p> <p><b>- Major compliance -</b></p>	<p>The estates under the certification unit continued its commitment to comply with applicable legal requirements. Among the licenses and permits verified were:</p> <p><u>Labis Bahru Estate</u></p> <ol style="list-style-type: none"> <li>1. MPOB License; License Number: 501775302000; License Valid from 01.05.2020 till 30.04.2021</li> <li>2. Diesel License; Reference Number: JH(SGT)0103/03 PSK; Serial Number: J 001480; Diesel Capacity: 18, 000 litres.</li> <li>3. License to Possess Arms and Ammunition; License Number: A/2448; License Valid till 30.06.2021</li> <li>4. Air Compressor License; License Number: JH 130353; License Valid till 16.06.2021</li> </ol>	Yes

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	<p><u>Sepang Loi Estate</u></p> <ol style="list-style-type: none"> <li>1. MPOB License; License Number: 501828802000; License Valid from 11.12.2019 till 31.12.2020. (970.21 Ha)</li> <li>2. Diesel License; License Reference Number: JH(SGT)0101/03 PK; Capacity: Diesel (10,000 L) and Petrol (500 L).</li> <li>3. SPAN License; License Number: SPAN/EKS(PT)/800-4(2)/29/09; License valid from 16.08.2017 till 31.12.2020</li> <li>4. BAKAJ License; License Number: 07/A/SGT/024; License Valid from 12.12.2019 till 31.12.2020</li> </ol> <p><u>Mungka Estate</u></p> <ol style="list-style-type: none"> <li>1. MPOB License; License Number: 570584002000; License Valid from 01.04.2020 till 31.03.2021</li> <li>2. Diesel License; License Number: (12) JH(SGT)0099/88 PSK; License Valid from 24.09.2019 till 23.09.2020. The license was in the process of renewal. Capacity: Diesel (7000 Litre) and Petrol (3000 Litre)</li> <li>3. SPAN License; License Number: SPAN/EKS(PT)/800-4(1)/2/14; License Valid from 13.04.2020 till 12.04.2023</li> <li>4. BAKAJ License; License Number: BAKAJ/334/430/2/6/3/1; License Valid from 12.12.2019 till 31.12.2020</li> </ol>	

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<p><b>4.3.1.2</b></p> <p>The management shall list all laws applicable to their operations in a legal requirements register.</p> <p><b>- Major compliance -</b></p>	<p>Documented procedures have been established and implemented; refer to:</p> <ol style="list-style-type: none"> <li>1. Prosedur Pematuhan Keperluan Undang-Undang; YPJ Plantations Sdn Bhd; Doc Number: YPJP-SOP-77; Version 1.0; Effective Date: 25.10.2020</li> <li>2. Compliance to Legal Requirement; Kulim (Malaysia) Berhad; Doc No: SQD/SMS/2.0; Doc Date: 01.08.2020; Issue No: 01.</li> </ol> <p>A list of all relevant laws related to the legal requirements were available and maintained at the mill.</p>	<p style="text-align: center;">Yes</p>
<p><b>4.3.1.3</b></p> <p>The legal requirements register shall be updated as and when there are any new amendments or any new regulations coming into force.</p> <p><b>- Major compliance -</b></p>	<p>All legal requirement was documented in Legal and Other Requirement Register. Compliance to each applicable law and regulation is monitored by the operating units. The legal register at all sites were reviewed/updated on a yearly basis / as and when needed for new updates/licenses. Sighted the document 'Summary of Compliance' available at the estates undersigned by the Top Management. The document lists the latest applicable laws and amendments, revision dates and acknowledgement by the management.</p> <p>All the legal and other requirements were registered accordingly and documented in the legal requirement register including new updates for:</p> <ol style="list-style-type: none"> <li>1. Fees (Employment Pass, Visit Pass (Temporary Employment) and Work Pass (Remission of Fees) Order 2020.</li> <li>2. Prevention and Control of Infectious Diseases (Compounding of Offences) (Amendment) (No.6) Regulations 2020.</li> <li>3. Minimum Wages Order 2020</li> </ol>	<p style="text-align: center;">Yes</p>

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		4. Employment Provident Fund (Amendment) Rules 2020.	
<b>4.3.1.4</b>	<p>The management should assign a person responsible to monitor compliance and to track and update the changes in regulatory requirements.</p> <p><b>- Minor compliance -</b></p>	<p>Tracking system available to identify changes in the relevant regulations through head office, website information and the information are communicated from the Group Head Office.</p> <p>The certification unit has appointed Cik Siti Hajarah Baharom (Executive regional Controller) as the person in charge to monitor the changes and updates on legal requirements for the whole complex. Verified the appointment letter dated 27.06.2018 undersigned by the Regional Controller, Palong Complex at Sepang Loi Estate and Mungka Estate.</p> <p><u>Labis Bahru Estate</u> The estate has appointed Mohd. Hafiz Bin Abdul Hashim as the person in charge to responsible for compliance as stated in the appointment letter undersigned by the Labis Bahru Estate manager dated 10.01.2020</p>	Yes
<b>Criterion 4.3.2 – Lands use rights</b>			
<b>4.3.2.1</b>	<p>The management shall ensure that their oil palm cultivation activities do not diminish the land use rights of other users.</p> <p><b>- Major compliance -</b></p>	In Labis Bahru estate, there are 20 land title and land usage of all land titles are for agriculture purposes and no land encroachment occur.	Yes
<b>4.3.2.2</b>	The management shall provide documents showing legal ownership or lease, history of land tenure and the actual use of the land.	Documents showing legal ownership or lease, history of land tenure and the actual use of the land was verified. Labis Bahru estate:-	Yes



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	- Major compliance -	Land Title	Legal ownership	Land type	Used		
		The total land title 20 with total hectarage 2108.16	Freehold	Agriculture			
		Mungka Estate					
		Land Title	Legal ownership	Land type	Used		
		The total land title 4 with total hectarage 5,637.05 (combined hectarage between mungka, kemedak and palong estate)	Lease hold until 11/9/2112	Agriculture			
		Land Title	Legal ownership	Land type	Used		

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		The total land title 42 with total hectarage 970.21	Lease hold until 11/9/2112	Agriculture	
<b>4.3.2.3</b>	Legal perimeter boundary markers should be clearly demarcated and visibly maintained on the ground where practicable.  - <b>Major compliance</b> -	Due to the ongoing Covid 19 Pandemic, onsite assessment was unable to be conducted and a remote assessment audit was conducted instead. Therefore, the boundaries were unable to be physically visited. Nevertheless, the management has provided photo evidence of boundary markers (red and white wooden poles) and security trenches as indication of legal perimeter boundary. There were no reports of land encroachment based on the complaints and grievance records in the estates.			Yes
<b>4.3.2.4</b>	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).  - <b>Minor compliance</b> -	The management has the SOP – SPO negotiations concerning compensation program dated 04 Sept 2007 to ensure that any negotiations with regards to compensation for loss of local rights are dealt with fairly. From the record there has no issue on land dispute at the visit estates and verified through stakeholder’s consultation and documentation of land ownership.			Yes
<b>Criterion 4.3.3 – Customary rights</b>					
<b>4.3.3.1</b>	Where lands are encumbered by customary rights, the company shall demonstrate that these rights are understood and are not being threatened or reduced.  - <b>Major compliance</b> -	The estate lands are legally owned by the company. As per record stakeholder meeting dated 11/11/2020 with the surrounding communities and stakeholders confirm no disputes record.			Yes

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4.3.3.2	Maps of an appropriate scale showing extent of recognized customary rights land, if any, should be made available. - <b>Minor compliance</b> -	The estate lands are legally owned by the company. As per record stakeholder meeting dated 11/11/2020 with the surrounding communities and stakeholders confirm no disputes record.	Yes
4.3.3.3	Negotiation and FPIC shall be recorded and copies of negotiated agreements should be made available. - <b>Major compliance</b> -	The estate lands are legally owned by the company. As per record stakeholder meeting dated 11/11/2020 with the surrounding communities and stakeholders confirm no disputes record.	Yes
<b>4.4 Principle 4: Social responsibility, health, safety and employment condition</b>			
<b>Criterion 4.4.1: Social Impact Assessment (SIA)</b>			
4.4.1.1	Social impact should be identified and plans are implemented to mitigate the negative impacts and promote the positive ones. - <b>Minor compliance</b> -	Social impact has been identified based on consultative process to mitigate the negative impacts and promote the positive one. Based on the social impact improvement plan, total of 6 positive impacts identified with proposed mitigation plan for improvement. As part of continuous monitoring, latest social audit carried out on 23/9/2020 for Labis Bahru estate. From audit finding, no negative feedback recorded and a few positive impact identified based the report. For Palong Estate, Social Improvement Action Plan dated 15/9/19 was verified. Nine (9) positive impacts were identified in the list.	Yes
<b>Criterion 4.4.2: Complaints and grievances</b>			
4.4.2.1	A system for dealing with complaints and grievances shall be established and documented. - <b>Major compliance</b> -	Kulim (Malaysia) Berhad has implemented Grievance Procedure (SQD/SMS/4.1) dated 1/8/2020. The objective of the procedure is to ensure that Kulim has a documented system for dealing with complaints and grievances that is agreeable to all sides and accepted	Yes

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		by all stakeholders. The management shall process and resolve the complaints within 25 work days.	
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. <b>- Major compliance -</b>	Any grievance (social and environmental issues) shall also be recorded in the Enquiry Register (acted upon within 7 working days) and responded by following the Kulim's grievance. The complaint and grievances is open to effected parties including internal and external stakeholders. The time to process the complaints or grievances is within 25 work days	Yes
4.4.2.3	A complaint form should be made available at the premises, where employees and affected stakeholders can make a complaint. <b>- Minor compliance -</b>	The complaint form is made available together with the Enquiry Register Record in the suggestion box in front of office and compiled in Enquiry Register Book. The form is made for complaint, requisition or visit/inspection.	Yes
4.4.2.4	Employees and the surrounding communities should be made aware that complaints or suggestions can be made any time. <b>- Minor compliance -</b>	The complaints and feedback has been communicated to all stakeholders through the stakeholder's meeting conducted by SQD.	Yes
4.4.2.5	Complaints and resolutions for the last 24 months shall be documented and made available to affected stakeholders upon request. <b>- Major compliance -</b>	Sighted the record for complaints and feedbacks available since 2019 in Enquiry Register Book/Records. Latest record enquiry was on 19/11/2020 on build up the sport house in SK Kemedak. The evidence of management response was 22/11/2020 refered petty cash voucher 20000043.	Yes
<b>Criterion 4.4.3: Commitment to contribute to local sustainable development</b>			
4.4.3.1	Growers should contribute to local development in consultation with the local communities. <b>- Minor compliance -</b>	The Estate management have made contribution to both internal and external stakeholders. Records of contribution to the communities such as donation to SK Buloh Kasap school's PIBG for upgrading the school were sighted. Seen the petty cash vouchers for all the donation made.	Yes

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<b>Criterion 4.4.4: Employees safety and health</b>			
<p><b>4.4.4.1</b></p>	<p>An occupational safety and health policy and plan shall be documented, effectively communicated and implemented.</p> <p><b>- Major compliance -</b></p>	<p>Kulim Plantation has established the Occupational Health and Safety Policy signed by the Executive Director on 01.05.2018. The policy has been communicated to the workers through induction training for new workers and morning briefing.</p> <p>The Sustainability Team is also committed in establishing various working standards through procedures or pictorial method to improve safe working condition.</p> <p>The estates have established Safety and Health Management Plan and documented in Environment, Safety and Health Plan FY 2020. The management plan includes the ESH risk management, Emergency Response Procedure, Chemical Safety Management, Noise Boundary Monitoring, Health monitoring.</p> <p>The OSH Policy have been effectively communicated to all the respective estate workers and staffs as below:</p> <p>Labis Bahru Estate – 02.10.2020 Sepang Loi Estate – 25.10.2020 Mungka Estate – 13.02.2020</p>	<p>Yes</p>
<p><b>4.4.4.2</b></p>	<p>The occupational safety and health plan shall cover the following:</p> <p>a) A safety and health policy, which is communicated and implemented.</p>	<p>a) Kulim Plantation has established the Occupational Health and Safety Policy signed by the Executive Director on 01.05.2018. The policy has been communicated to the workers through induction training for new workers and morning briefing. The OHS Policy</p>	<p>Yes</p>

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<p>b) The risks of all operations shall be assessed and documented.</p> <p>c) An awareness and training programme which includes the following requirements for employees exposed to pesticides:</p> <ul style="list-style-type: none"> <li>i. all employees involved shall be adequately trained on safe working practices</li> <li>ii. all precautions attached to products shall be properly observed and applied</li> </ul> <p>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).</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>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.</p>	<p>have been effectively communicated to all respective estate workers and staffs on as stated in 4.4.4.1.</p> <p>b) Labis Bahru Estate</p> <p>HIRARC was used to assess the risks associated to all work units in the estate. HIRARC is reviewed yearly or as and when there are accidents that occur in the estate. The latest review sighted was on 18.09.2020. Among the HIRARC available were Harvesting, Trunk Injection, FFB Transport and Fogging.</p> <p>CHRA assessment was conducted by QMSPRO Sdn Bhd on 08.05.2018 till 13.08.2018 at the estate. The CHRA Report (JKKP HQ/03/ASS/00/154-2018-054) was available for verification. The CHRA action plan was developed based on the assessor's recommendation where the management have listed out the existing measures, action to be taken and improvement plans.</p> <p>Medical Surveillance was done for workers exposed to hazardous chemicals in the estate. A total of 20 workers were selected and sent for medical surveillance on 29.07.2020 by registered DOSH Doctor (Reg Number: HQ/08/DOC/00/468). The medical surveillance report indicated that all 20 workers had no traces of chemical contamination and were fit to work.</p> <p><u>Sepang Loi Estate</u></p> <p>HIRARC was used to assess the risks associated to all work units in the estate. HIRARC is reviewed yearly or as and when there are accidents that occur in the estate. The latest review sighted was</p>	

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<p>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><b>- Major compliance -</b></p>	<p>on April 2020. Among the HIRARC available were Landfill, Office &amp; Security, Pulling Creepers, Road Maintenance and Rotor Slashing.</p> <p>CHRA assessment was conducted by QMSPRO Sdn Bhd on 06.05.2018 till 13.08.2018 at the estate. The CHRA Report (JKKP HQ/03/ASS/00/154-2018-051) was available for verification. The CHRA action plan was developed based on the assessor's recommendation where the management have listed out the existing measures, action to be taken and improvement plans.</p> <p>Medical Surveillance was done for workers exposed to hazardous chemicals in the estate. A total of 29 workers were selected and sent for medical surveillance on 29.07.2020 by registered DOSH Doctor (Reg Number: HQ/08/DOC/00/468). The medical surveillance report indicated that all 29 workers had no traces of chemical contamination and were fit to work.</p> <p><u>Mungka Estate</u></p> <p>HIRARC was used to assess the risks associated to all work units in the estate. HIRARC is reviewed yearly or as and when there are accidents that occur in the estate. The latest review sighted was on 01.03.2020. Among the HIRARC available were Covid 19, Trunk Injection, Harvesting and FFB Transport.</p> <p>CHRA assessment was conducted by QMSPRO Sdn Bhd on 07.05.2018 till 13.08.2018 at the estate. The CHRA Report (JKKP HQ/03/ASS/00/154-2018-053) was available for verification. The CHRA action plan was developed based on the assessor's recommendation where the management have listed out the existing measures, action to be taken and improvement plans.</p>	

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		<p>Medical Surveillance were conducted for 45 workers deemed to have worked with hazardous chemicals. Out of the 45 workers, 22 of the workers were tested with serum cholinesterase where all 22 were declared by the doctor to not have any chemical contamination in the samples and were deemed fit to resume work.</p> <p>c) The estates have established training program for employees exposed to chemicals used at the palm oil estates to ensure the continuous awareness to the employee. The training was conducted by the Manager, Asst. Manager and representative from the chemical suppliers to the supervisors and operators. Sighted the training records as follows:</p> <p>Labis Bahru Estate</p> <ul style="list-style-type: none"> <li>• Spraying &amp; Spraying Calibration Training – 17.01.2020</li> <li>• Chemical handling Training – 05.02.2020</li> <li>• Safety Work at Chemical Store Training – 05.02.2020</li> <li>• Bagworm Treatment Training – 28.01.2020</li> <li>• Fogging Training – 22.10.2020</li> <li>• Triple Rinsing Training – 20.02.2020</li> </ul> <p>Sepang Loi Estate</p> <ul style="list-style-type: none"> <li>• Circle Spraying Training (CKS) – 09.09.2020</li> <li>• Chemical Handling Training – 04.02.2020</li> <li>• Safety Work at Chemical Store Training – 04.02.2020</li> </ul> <p>Mungka Estate</p>	



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	<ul style="list-style-type: none"> <li>• Spraying &amp; Spraying Calibration Training – 20.02.2020</li> <li>• Bagworm Treatment Training – 30.01.2020</li> <li>• Fogging Training – 08.07.2020</li> <li>• Triple Rinsing Training – 04.08.2020</li> </ul> <p>d) The estates have provided appropriate PPEs based on the SOP and HIRARC that has been developed by the operating units. All PPE are provided by the estate free of charge to the workers. The PPE issuance form were available for the estates for verification which indicated that PPE’s were provided to the workers on regular basis with the workers acknowledgement available.</p> <p>e) The organization has established Work Instructions for handling of chemicals to ensure proper and safe handling and storage in accordance to Occupational Safety Health (Classification, Labelling and Safety Data Sheet Of Hazardous Chemicals) Regulation 2013 and Occupational Safety Health (Use and Standard of Exposure of Chemical Hazardous to Health) Regulation 2000. Sighted also the “<i>Peraturan Menjalankan Kerja-Kerja Penyemburan Racun (Manual) Dan Prosedur Kerja Selamat</i>” document which staes the safe operating procedures in conducting spraying works.</p> <p>f) All the sampled estates have appointed an OSH Committee Members to address all Osh related issues in the estates. The OSH Organisational Chart was available for verification together with the appointment letters of all members. OSH Chairman were appointed as follows:</p>	

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	<p><u>Labis Bahru Estate</u>: 21.09.2020; Doc Number: SQD/ADMIN/023/20; Undersigned by Chairman, Safety and Health Main Committee Kulim (M) Berhad.</p> <p><u>Mungka Estate</u>: 21.09.2020; Doc Number: SQD/ADMIN/023/20; Undersigned by Chairman, Safety and Health Main Committee Kulim (M) Berhad.</p> <p><u>Sepang Loi Estate</u>: 21.09.2020; Doc Number: SQD/ADMIN/023/20; Undersigned by Chairman, Safety and Health Main Committee Kulim (M) Berhad.</p> <p>g) OSH Meeting Minutes were sighted for all the estates as follows:            Labis Bahru Estate – 10.09.2020 (03/2020)            Sepang Loi Estate – 03.11.2020 (04/2020)            Mungka Estate – 18.11.2020 (03/2020)</p> <p>h) <u>Labis Bahru Estate</u>            Accident and emergency procedures were available at the estate. There is a formation of ERP Team &amp; ERP for all the identified incidences (Fire, Flood, Wild Animal Attack, Chemical Spillage &amp; Strike). The ERP Team was appointed, and the organizational chart was available together with the emergency contact list. Fire extinguishers were available with regular monitoring. Emergency Response Plan (Evacuation) Training was conducted on</p>	

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	<p>06.11.2020. Fire Drill and Use Of Fire Extinguisher Training was conducted on 12.10.2020.</p> <p><u>Mungka Estate</u></p> <p>Accident and emergency procedures were available at the estate. There is a formation of ERP Team &amp; ERP for all the identified incidences (Fire, Flood, Wild Animal Attack, Chemical Spillage &amp; Strike). The ERP Team was appointed, and the organizational chart was available together with the emergency contact list. Fire extinguishers were available with regular monitoring. Fire Drill and Fire Fighting Training was conducted on 20.09.2020</p> <p><u>Sepang Loi Estate</u></p> <p>Accident and emergency procedures were available at the estate. There is a formation of ERP Team &amp; ERP for all the identified incidences (Fire, Flood, Wild Animal Attack, Chemical Spillage &amp; Strike). The ERP Team was appointed, and the organizational chart was available together with the emergency contact list. Fire extinguishers were available with regular monitoring. The ERP training was conducted on 08.07.2020.</p> <p>i) <u>Labis Bahru Estate</u></p> <p>A list of first aiders were available at the estate comprising of all main work operations and stores. First Aid boxes were assigned to the respective first aiders. Monthly First Aid Box inspection was conducted by the Medical Assistant at the estate. The first aid kit holders are trained on a regular basis and with refresher trainings. The First Aid Training was conducted on 22.11.2020</p>	

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	<p><u>Mungka Estate</u> A list of first aiders were available at the estate comprising of all main work operations and stores. First Aid boxes were assigned to the respective first aiders. Monthly First Aid Box inspection was conducted by the Medical Assistant at the estate. The first aid kit holders are trained on a regular basis and with refresher trainings. The First Aid Training was conducted on 14.09.2020</p> <p><u>Sepang Loi Estate</u> A list of first aiders were available at the estate comprising of all main work operations and stores. First Aid boxes were assigned to the respective first aiders. Monthly First Aid Box inspection was conducted by the Medical Assistant at the estate. The first aid kit holders are trained on a regular basis and with refresher trainings. The first aid training was conducted on 10.09.2020.</p> <p>j) Labis Bahru Estate There were 13 accident cases recorded for the year 2019. The relevant JKPP 6 forms were submitted to JKPP. There were also 2 poisoning cases based on the annual medical surveillance showing traces of chemical contamination during the biological monitoring. The JKPP 7 form has been submitted to JKPP and available for verification. The JKPP 8 form for the year ending 2019 was submitted and available for verification. There were 1 accident case for the year 2020 as of to date. The JKPP 6 form has been submitted accordingly.</p> <p>Mungka Estate</p>	

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		<p>There were no accident cases reported for the year 2019. The JKPP 8 form has been submitted to JKPP with the form available for verification. For the year 2020, there were 1 accident case and 1 poisoning case reported. The JKPP 6 and JKPP 7 form were submitted accordingly and available for verification.</p> <p><u>Sepang Loi Estate</u></p> <p>There were 1 accident case reported for the year 2019. The JKPP 6 form was submitted to JKPP accordingly. The JKPP 8 form for the year 2019 was submitted on 27.01.2020 with the form available for verification. There were 2 accident reported for the year 2020. The JKPP 6 form was submitted and available for verification.</p>	
<b>Criterion 4.4.5:</b> Employment conditions			
<b>4.4.5.1</b>	<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><b>- Major compliance -</b></p>	<p>Kulim (M) Berhad had established and implemented good social practice regarding human rights in respect of industrial harmony. The practice was mentioned in the Mission Policy, Core Labour Standard Policy, People Policy and Ethics Policy. All the policies were dated 01 May 2018 and signed by the Executive Director. These policies were communicated to all employees through trainings and briefings due muster/roll calls.</p>	Yes
<b>4.4.5.2</b>	<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><b>- Major compliance -</b></p>	<p>All sampled estates had employed Migrant Indonesian and Local workers. Migrant Indonesian workers were recruited on a 2 years contract basis while Local workers were employed on a long-term basis. Both Migrant and Local workers were provided with the wage structure, amenities, etc.</p>	Yes

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		<p>The management establish sustainable policy to commit to their transparent respect and recognition of the right of all teir employee including contract, temporary and migrant workers as well as people living nearby and adjacent communities. Other support such as job opportunities and amenities such as free housing, water and medical care are given to all employees without discrimination.</p>																							
<b>4.4.5.3</b>	<p>Management shall ensure that employees’ pay and conditions meet legal or industry minimum standards and as per agreed Collective Agreements. The living wage should be sufficient to meet basic needs and provide some discretionary income based on minimum wage.</p> <p><b>- Major compliance -</b></p>	<p>All the workers are under direct employment. The payslip has included basic income, allowance pay, working days, medical leave, and deduction of salary and others as per employment contract. The payroll for the following sampled workers for Jan 2020 and Sept 2020 were verified to be consistent with the Minimum Wages Order 2020. For the new Minimum Wages Order 2020 implementation; -</p> <p>Labis Bahru Estate</p> <table border="1" style="width: 100%; border-collapse: collapse;"> <thead> <tr> <th style="width: 50%;">Passport/IC</th> <th style="width: 50%;">Employee no.</th> </tr> </thead> <tbody> <tr><td>BQ0154504</td><td>605789</td></tr> <tr><td>741209017179</td><td>605852</td></tr> <tr><td>AT746043</td><td>605662</td></tr> <tr><td>930221015259</td><td>605872</td></tr> <tr><td>970401016335</td><td>605873</td></tr> <tr><td>AS846214</td><td>605666</td></tr> <tr><td>970401016335</td><td>605779</td></tr> <tr><td>C4265043</td><td>605859</td></tr> <tr><td>B745555</td><td>605860</td></tr> <tr><td>AU001/87/M</td><td>605862</td></tr> </tbody> </table> <p>Mungka Estate</p>	Passport/IC	Employee no.	BQ0154504	605789	741209017179	605852	AT746043	605662	930221015259	605872	970401016335	605873	AS846214	605666	970401016335	605779	C4265043	605859	B745555	605860	AU001/87/M	605862	Yes
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<b>4.4.5.4</b>	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.	There are 2 contractors for harvesting and transporting of FFB. Verification of payslip and employment contract has confirmed that employees of contractors are paid based on legal or industry minimum		Yes																						

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<b>4.4.5.5</b>	<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>- <b>Major compliance</b> -</p>	<p>The workers master list was reviewed. The list includes names, NRIC &amp; Passports numbers, Expiry dates of Passports &amp; Work Permits, date of birth, date joined, gender etc.</p>	Yes													
<b>4.4.5.6</b>	<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>Employees had been provided with fair contracts that have been signed by both employee and employer. Foreign migrant Indonesian workers are recruited with 2 years contract. Local workers are on a long-term employment basis.</p>	Yes													



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<p><b>- Major compliance -</b></p>	<p>The following contracts has been verified to confirm that workers have binding working agreement with the company:</p> <p>Labis Bahru Estate:-</p> <table border="1" data-bbox="1099 592 1664 963"> <thead> <tr> <th>Passport/IC</th> <th>Employee no.</th> </tr> </thead> <tbody> <tr><td>BQ0154504</td><td>605789</td></tr> <tr><td>741209017179</td><td>605852</td></tr> <tr><td>AT746043</td><td>605662</td></tr> <tr><td>930221015259</td><td>605872</td></tr> <tr><td>970401016335</td><td>605873</td></tr> <tr><td>AS846214</td><td>605666</td></tr> <tr><td>970401016335</td><td>605779</td></tr> <tr><td>C4265043</td><td>605859</td></tr> <tr><td>B745555</td><td>605860</td></tr> <tr><td>AU001/87/M</td><td>605862</td></tr> </tbody> </table> <p>Mungka Estate</p> <table border="1" data-bbox="1099 1031 1664 1393"> <thead> <tr> <th>Passport/IC</th> <th>Employee no.</th> </tr> </thead> <tbody> <tr><td>B5357842</td><td>635665</td></tr> <tr><td>900717015810</td><td>635222</td></tr> <tr><td>AT993562</td><td>635721</td></tr> <tr><td>AU222528</td><td>635656</td></tr> <tr><td>C4660779</td><td>635489</td></tr> <tr><td>B7196868</td><td>635665</td></tr> <tr><td>C2755571</td><td>635664</td></tr> <tr><td>B5357858</td><td>635533</td></tr> <tr><td>901121015750</td><td>635733</td></tr> <tr><td>880719016336</td><td>635137</td></tr> </tbody> </table>	Passport/IC	Employee no.	BQ0154504	605789	741209017179	605852	AT746043	605662	930221015259	605872	970401016335	605873	AS846214	605666	970401016335	605779	C4265043	605859	B745555	605860	AU001/87/M	605862	Passport/IC	Employee no.	B5357842	635665	900717015810	635222	AT993562	635721	AU222528	635656	C4660779	635489	B7196868	635665	C2755571	635664	B5357858	635533	901121015750	635733	880719016336	635137	
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4.4.5.7	The management shall establish a time recording system that makes working hours and overtime transparent for both employees and employer. <b>- Major compliance -</b>	Kulim (M) Berhad has established a time recording system that makes working hours and overtime transparent. Pocket check roll was used for daily attendance recording. Instead the Estates used the I-Plant System, from which it is down loaded in the computers.	Yes																						
4.4.5.8	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. <b>- Major compliance -</b>	The management of both estates had informed all workers the working hours and breaks times. The working hours and break times complied with legal regulations and collective agreements. The working hours and break time was exhibited on notice boards. Working time was from 6.30am to 2.30pm while the break time was from 11.00am to 11.30am.	Yes																						
4.4.5.9	Wages and overtime payment documented on the pay slips shall be in line with legal regulations and collective agreements. <b>- Major compliance -</b>	<p>The payslip and the inputs were reviewed to confirm the wages and overtime is in line with legal requirements of Employment Act 1955 and worker's employment contract.</p> <p>Labis Bahru Estate</p> <table border="1"> <thead> <tr> <th>Passport/IC</th> <th>Employee no.</th> </tr> </thead> <tbody> <tr> <td>BQ0154504</td> <td>605789</td> </tr> <tr> <td>741209017179</td> <td>605852</td> </tr> <tr> <td>AT746043</td> <td>605662</td> </tr> <tr> <td>930221015259</td> <td>605872</td> </tr> <tr> <td>970401016335</td> <td>605873</td> </tr> <tr> <td>AS846214</td> <td>605666</td> </tr> <tr> <td>970401016335</td> <td>605779</td> </tr> <tr> <td>C4265043</td> <td>605859</td> </tr> <tr> <td>B745555</td> <td>605860</td> </tr> <tr> <td>AU001/87/M</td> <td>605862</td> </tr> </tbody> </table>	Passport/IC	Employee no.	BQ0154504	605789	741209017179	605852	AT746043	605662	930221015259	605872	970401016335	605873	AS846214	605666	970401016335	605779	C4265043	605859	B745555	605860	AU001/87/M	605862	Yes
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<b>4.4.5.10</b>	<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><b>- Minor compliance -</b></p>	<p>The company provides free medical benefit and free housing to foreign workers.</p> <p>In addition, there is free school bus provided for local's children to go and back from school, football field, mosque, community hall were provided.</p>	Yes																						
<b>4.4.5.11</b>	<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><b>- Major compliance -</b></p>	<p>Estate worker lived in 1 house with 3 rooms, which shared 2 person in a room (maximum 6 person per dwelling). Water for domestic usage is provided from SAJ and Tenaga Nasional Berhad with subsidize rate as per agreement which is 50 kWh per month for electric and 35 gallon/people. Linesite inspection was carried out on weekly basis by Estate Hospital Assistant.</p> <p>Mungka Estate – Weekly inspection dated</p>	Yes																						

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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><b>- Major compliance -</b></p>	<p>The Sexual Harassment Policy dated 01 May 2018 and signed by the Executive Director defined sexual harassment and mentioned that the company endeavours to prevent sexual harassment and all other forms of violence against women and workers in the workplace or in the course of an employee's work.</p> <p>On all Estates, a Gender committee named "Women On Wards" (WOW) had been established.</p> <p>Latest WOW meeting was carried out on 12/2/2020. Sighted minute of meeting which chaired by the chairlady, Puan Yulie binti Shuridin. For workers in Sepang Loi Estate the Sexual harassment and violence briefing conducted during morning rollcall dated 6/9/2020 attended by all workers.</p>	Yes
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><b>- Major compliance -</b></p>	<p>The management respected the right of all employees to form and join trade union and allow workers' own representative(s) to facilitate collective bargaining in accordance with applicable laws and regulations. The workers have their freedom to join the NUPW. This was evident from NUPW membership subscription deductions made in the pay slips. Latest NUPW meeting was on 26/11/2020. No unresolved issues reported in the meeting.</p>	Yes
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</p>	<p>The Core Labour Standard Policy dated 01 May 2018 and signed by the Executive director covered the commitment not to engage in or use of Child Labour. The master list of employees was verified.</p>	Yes

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	programmes. Children shall not expose to hazardous working conditions. <b>- Major compliance -</b>																
<b>Criterion 4.4.6: Training and competency</b>																	
<b>4.4.6.1</b>	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. <b>- Major compliance -</b>	<p>The mill established a training program for all workers based on the training need analysis conducted on a yearly basis. Covid-19 training and briefings were sighted at the mill and estates.</p> <p>Records of trainings were maintained by the estates as below: -</p> <p>Labis Bahru Estate</p> <table border="1"> <thead> <tr> <th>Training</th> <th>Date</th> </tr> </thead> <tbody> <tr> <td>Spill Containment Training</td> <td>05.02.2020</td> </tr> <tr> <td>Harvesting Training</td> <td>14.07.2020</td> </tr> <tr> <td>Fertilizer Handling &amp; Sampling Training</td> <td>23.01.2020</td> </tr> <tr> <td>Tractor Lorry &amp; MB Safe Driving Training</td> <td>25.09.2020</td> </tr> <tr> <td>Workshop – Safety Work Training</td> <td>06.02.2020</td> </tr> <tr> <td>PPE Usage Training</td> <td>13.02.2020</td> </tr> </tbody> </table> <p>Sepang Loi Estate</p>	Training	Date	Spill Containment Training	05.02.2020	Harvesting Training	14.07.2020	Fertilizer Handling & Sampling Training	23.01.2020	Tractor Lorry & MB Safe Driving Training	25.09.2020	Workshop – Safety Work Training	06.02.2020	PPE Usage Training	13.02.2020	Yes
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Criterion / Indicator		Assessment Findings		Compliance		
		Training	Date			
		Manuring – Manual Application Training	05.02.2020			
		Harvesting Training	12.03.2020			
		Water Sampling Training	07.10.2020			
		Chemical Handling Training	04.02.2020			
		Triple Rinsing Training	27.01.2020			
		Mungka Estate				
		Training	Date			
		Tractor, Lorry and MB Driver Training	29.11.2020			
		Safe Work and Management Training - Workshop	16.01.2020			
		Safety Work at Diesel Tank	12.10.2020			
		Water Sampling Training	03.10.2020			
		Harvesting Training	01.03.2020			

Criterion / Indicator		Assessment Findings		Compliance
		Manuring Training	06.01.2020	
<b>4.4.6.2</b>	<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><b>- Major compliance -</b></p>	<p>The training needs at all visited estates for Training Program 2020 have been established. It is aimed to provide specific skills and competency required for employees to discharge their duties diligently. Included in this program are subjects related to environment, safety &amp; health and best practices.</p>		Yes
<b>4.4.6.3</b>	<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><b>- Minor compliance -</b></p>	<p>Training Program are established on annual basis based on training needs. In addition, it is subject for review during the financial year, if necessary. The details of the training needs include categories of job descriptions, sections, and employees' group.</p>		Yes
<b>4.5 Principle 5: Environment, natural resources, biodiversity and ecosystem services</b>				
<b>Criterion 4.5.1: Environmental Management Plan</b>				
<b>4.5.1.1</b>	<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><b>- Major compliance -</b></p>	<p>Kulim (M) Plantation has established an Environmental Policy signed by Executive Director, Mr. Zulkifly Zakariah dated 01.05.2018. The policy has been established, communicated to all employees, displayed at notice board and continuously implemented by the management. The policy has been recently communicated to the workers and staffs of the estates as below:                      Labis Bahru Estate: 24.09.2020                      Sepang Loi Estate: 21.09.2020                      Mungka Estate: 20.05.2020</p>		Yes

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Criterion / Indicator		Assessment Findings	Compliance				
<p><b>4.5.1.2</b></p>	<p>The environmental management plan shall cover the following:</p> <ul style="list-style-type: none"> <li>a) An environmental policy and objectives;</li> <li>b) The aspects and impacts analysis of all operations.</li> </ul> <p><b>- Major compliance -</b></p>	<p>Kulim (M) Plantation has established an Environmental Policy signed by Executive Director, Mr. Zulkifly Zakariah dated 01.05.2018. The policy indicated the commitment of the organization to protect the environment during the course of their business.</p> <p>An aspect and impact analysis were conducted by the estate to assess all possible environmental risks associated to the operations in the estate. The Environmental Risk Assessment Form was available for all operations together with the possible environmental risks it can cause. The risk control is stated to ensure the operation limits the environmental impact it causes. Sighted the ERA form for Clinic, Compound, Harvesting, Workshop and Replanting. The Environment Assessment is done on a yearly basis or as and when there are changes in the operations that could impact the environment. The latest review was as below:</p> <p>Labis Bahru Estate: 25.08.2020 Sepang Loi Estate: January 2020 Mungka Estate: 06.02.2020</p>	<p>Yes</p>				
<p><b>4.5.1.3</b></p>	<p>An environmental improvement plan to mitigate the negative impacts and to promote the positive ones, shall be developed, effectively implemented and monitored.</p> <p><b>- Major compliance -</b></p>	<p>The estate management have developed a yearly Environmental Improvement Plan to address the possible environmental impacts due to the operations.</p> <p>Labis Bahru Estate</p> <table border="1" style="width: 100%; border-collapse: collapse;"> <thead> <tr> <th style="width: 50%;">Description</th> <th style="width: 50%;">Element</th> </tr> </thead> <tbody> <tr> <td style="height: 20px;"> </td> <td> </td> </tr> </tbody> </table>	Description	Element			<p>Yes</p>
Description	Element						



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Criterion / Indicator		Assessment Findings		Compliance	
		Disposal of Expired Medicine, Disposal of dressing contaminated with human tissue.	Disposal of expired medicine, Disposal by DOE approved contractor through Kualiti Alam.		
		Open Burning	<ol style="list-style-type: none"> <li>1. Signage,</li> <li>2. Awareness Programme</li> <li>3. Weekly Monitoring by EHA</li> </ol>		
		Leaking of Diesel from MB, Tractor & lorry onto land.	<ol style="list-style-type: none"> <li>1. Record of machine or contractor service</li> <li>2. Record tractor or MB condition.</li> <li>3. Training for MB and Tractor Driver</li> </ol>		
		Disposal of Fuel Filter	SW Management procedure – SW Store (record of storage and disposal)		
		<p>Mungka Estate</p> <ol style="list-style-type: none"> <li>1. Monitoring buffer zone near the water source as per DID guidelines.</li> <li>2. Inlet and Outlet water test monitoring for nitrate and phosphate.</li> <li>3. Training and awareness: Schedule waste management, Triple Rinse Empty Chemical Container, Chemical Handling and Storage Procedure, ERP Procedure Training (Spillage and Fire), PCD Monitoring, Domestic Waste Management</li> <li>4. Maintenance and Inspection of Vehicles.</li> </ol>			

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Criterion / Indicator		Assessment Findings	Compliance													
		<p>5. Conduct Monitoring and records of: Scheduled waste disposal &amp; Reused chemical containers.</p> <p>Sepang Loi Estate</p> <table border="1"> <thead> <tr> <th>Description</th> <th>Implementation</th> </tr> </thead> <tbody> <tr> <td>Environmental Impact Assessment</td> <td>To review the related activities at LSL.</td> </tr> <tr> <td>Biodiversity</td> <td>Awareness on biodiversity and monitoring of HCV areas.</td> </tr> <tr> <td rowspan="2">Waste Colection</td> <td>Scheduled Waste to be stored and disposed as per DOE guidelines.</td> </tr> <tr> <td>Waste from households need to be disposed at the landfill.</td> </tr> <tr> <td rowspan="3">Pollution Emissions</td> <td>Monitoring of Scheduled Waste</td> </tr> <tr> <td>Monitoring of Chemical usage in GHG Calculation</td> </tr> <tr> <td>Reduce chemical usage by implementing good agriculture practice.</td> </tr> </tbody> </table>	Description	Implementation	Environmental Impact Assessment	To review the related activities at LSL.	Biodiversity	Awareness on biodiversity and monitoring of HCV areas.	Waste Colection	Scheduled Waste to be stored and disposed as per DOE guidelines.	Waste from households need to be disposed at the landfill.	Pollution Emissions	Monitoring of Scheduled Waste	Monitoring of Chemical usage in GHG Calculation	Reduce chemical usage by implementing good agriculture practice.	
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	Monitoring of Chemical usage in GHG Calculation															
	Reduce chemical usage by implementing good agriculture practice.															
<b>4.5.1.4</b>	<p>A programme to promote the positive impacts should be included in the continual improvement plan.</p> <p><b>- Minor compliance -</b></p>	<p>The program to promote the positive impacts were documented in several management plans such as environmental management plan, energy management plan, pollution and emission management plan, water management plan and waste management plan.</p>	Yes													

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Criterion / Indicator		Assessment Findings	Compliance
<b>4.5.1.5</b>	<p>An awareness and training programme shall be established and implemented to ensure that all employees understand the policy and objectives of the environmental management and improvement plans and are working towards achieving the objectives.</p> <p><b>- Major compliance -</b></p>	<p>Estates visited has established training program for all workers based on training need analysis conducted on annually basis including the environmental policy and awareness. Sighted the trainings conducted as below:</p> <p>Labis Bahru Estate:</p> <ul style="list-style-type: none"> <li>• Spraying (HCV &amp; Buffer Zone Areas Training) – 17.01.2020</li> <li>• Waste Cleaning and Landfill Training – 09.01.2020</li> <li>• Scheduled Waste Training – 24.11.2020</li> <li>• PCD Cleaning Training – 10.11.2020</li> <li>• IPM Training – 10.09.2020</li> </ul> <p>Mungka Estate</p> <ul style="list-style-type: none"> <li>• Spraying (HCV &amp; Buffer Zone Areas Training) –23.09.2020</li> <li>• Waste Cleaning and Landfill Training – 08.09.2020</li> <li>• HCV &amp; Biodiversity Training – 24.06.2020</li> <li>• Zero Burning Training – 26.11.2020</li> </ul> <p>Sepang Loi Estate</p> <ul style="list-style-type: none"> <li>• Waste Segregation Training – 26.10.2020</li> <li>• Scheduled Waste Handling Training – 23.11.2020</li> <li>• Zero Burning Training – 20.02.2020</li> <li>• HCV &amp; Biodiversity Training – 18.03.2020</li> </ul>	Yes
<b>4.5.1.6</b>	<p>Management shall organize regular meetings with employees where their concerns about environmental quality are discussed.</p> <p><b>- Major compliance -</b></p>	<p>The estates conduct regular Environmental Meeting to address the environmental issues and possible improvements that can be done in the work process to reduce the operational impacts to the environment. The Environmental Management Meeting Minutes were available and verified as below:</p> <p>Labis Bahru Estate: 20.08.2020</p> <p>Mungka Estate: 08.10.2020</p>	Yes

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Criterion / Indicator		Assessment Findings	Compliance																																												
		Sepang Loi Estate: 25.08.2020																																													
<b>Criterion 4.5.2:</b> Efficiency of energy use and use of renewable energy																																															
<b>4.5.2.1</b>	<p>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.</p> <p><b>- Major compliance -</b></p>	<p>At all estates audited, the consumption of non-renewable energy (diesel) was recorded and monitored. The records of diesel usage (litres) of the estates are as below:</p> <table border="1"> <thead> <tr> <th>Month</th> <th>Labis Bahru Estate</th> <th>Sepang Loi Estate</th> <th>Mungka Estate</th> </tr> </thead> <tbody> <tr> <td>Jan 2020</td> <td>2863</td> <td>2469</td> <td>1360</td> </tr> <tr> <td>Feb 2020</td> <td>2863</td> <td>3069</td> <td>1600</td> </tr> <tr> <td>Mar 2020</td> <td>2654</td> <td>1276</td> <td>1300</td> </tr> <tr> <td>Apr 2020</td> <td>2121</td> <td>1217</td> <td>900</td> </tr> <tr> <td>May 2020</td> <td>3227</td> <td>2422</td> <td>1400</td> </tr> <tr> <td>Jun 2020</td> <td>3290</td> <td>3999</td> <td>2060</td> </tr> <tr> <td>Jul 2020</td> <td>2455</td> <td>2052</td> <td>1150</td> </tr> <tr> <td>Aug 2020</td> <td>3470</td> <td>4788</td> <td>1150</td> </tr> <tr> <td>Sept 2020</td> <td>3015</td> <td>2373</td> <td>1700</td> </tr> <tr> <td>Oct 2020</td> <td>2275</td> <td>2883</td> <td>1060</td> </tr> </tbody> </table>	Month	Labis Bahru Estate	Sepang Loi Estate	Mungka Estate	Jan 2020	2863	2469	1360	Feb 2020	2863	3069	1600	Mar 2020	2654	1276	1300	Apr 2020	2121	1217	900	May 2020	3227	2422	1400	Jun 2020	3290	3999	2060	Jul 2020	2455	2052	1150	Aug 2020	3470	4788	1150	Sept 2020	3015	2373	1700	Oct 2020	2275	2883	1060	Yes
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<b>4.5.2.2</b>	The oil palm premises shall estimate the direct usage of non-renewable energy for their operations, including fossil fuel, and	The estimation for the direct usage of non-renewable energy for their operations, including fossil fuel, and electricity to determine energy	Yes																																												

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	electricity to determine energy efficiency of their operations. This shall include fuel use by contractors, including all transport and machinery operations. <b>- Major compliance -</b>	efficiency of their operations inclusive of fuel use by contractors, including all transport and machinery operations was available in the respective estate annual budgets.	
<b>4.5.2.3</b>	The use of renewable energy should be applied where possible. <b>- Minor compliance -</b>	No renewable energy been applied in estate.	Yes
<b>Criterion 4.5.3: Waste management and disposal</b>			
<b>4.5.3.1</b>	All waste products and sources of pollution shall be identified and documented. <b>- Major compliance -</b>	The identification of wastes products and sources of pollution were documented in EAI, Waste and Pollution Management Plan and also DOE's Scheduled Wastes Second Schedule. In general, among the wastes identified were domestic wastes, recyclable wastes, scheduled wastes and sewerage waste water.	Yes
<b>4.5.3.2</b>	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 <b>- Major compliance -</b>	Waste and Pollution Management Plan was established based on environmental aspect identification. The plan includes identifying and monitoring sources of waste and pollution, action required such as recycling of palm by-product into the field as nutrient, Reuse, Reduce and Recycle, and the method of disposal of each identified waste.  Domestic wastes, especially food waste after segregation at source are tied in used fertilizer bag for disposal at estate operated landfill.	Yes
<b>4.5.3.3</b>	The management shall establish Standard Operating Procedure for handling of used chemicals that are classified under Environment	Kulim Plantation had established Work Instruction, Doc Number: SW/WI/22; Waste Management and Work Instruction, Doc Number: SPO/WI/06; Scheduled Waste to ensure proper and safe handling,	Yes

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<p>Quality Regulations (Scheduled Waste) 2005, Environmental Quality Act, 1974 to ensure proper and safe handling, storage and disposal.</p> <p><b>- Major compliance -</b></p>	<p>storage and disposal in accordance to EQ (Scheduled Wastes) Regulations 2005.</p> <p>The procedures for safe handling, storage and disposal of used chemicals classified under Environment Quality Regulation (Scheduled Waste) 2005, Environmental Quality Act, 1974 are available prepared at Group level by Sustainability Department and implemented in all estates for all the applicable practices. Verification of consignment notes showed that the estates disposed their used chemical such as spent oil through DOE License Contractor.</p> <p><u>Labis Bahru Estate</u></p> <p>The most recent scheduled waste disposal are as follows:</p> <ol style="list-style-type: none"> <li>1. SW 4040 Clinical Waste; Waste Manager: Kualiti Alam Sdn Bhd; Date: 07.10.2020; Quantity: 2.20kg; Serial Number: 0383395.</li> <li>2. SW 307 Oil Water Emulsion; Waste Manager: Kualiti Alam Sdn Bhd; Date: 16.06.2020; Quantity: 1 Pallet; Consignment Note Number: 090832-006.</li> <li>3. SW 305 Spent Lubricant Oil; Waste Manager: Kualiti Alam Sdn Bhd; Date: 16.06.2020; Quantity: 1 Pallet &amp; 1 Pail; Consignment Note Number: 090832-004.</li> <li>4. SW 408 Contaminated Soil; Waste Manager: Kualiti Alam Sdn Bhd; Date: 16.06.2020; Quantity: 1 Pallet &amp; 2 Pail; Consignment Note Number: 090832-005.</li> </ol> <p><u>Mungka Estate</u></p>	

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Criterion / Indicator	Assessment Findings	Compliance
	<p>5. SW 102 Used Battery; Waste Manager: Kualiti Alam Sdn Bhd; Date: 22.07.2020; Quantity: 0.0150mt; Consignment Note Number: 2020072215K6AXJC.</p> <p>6. SW 110 Electric and Electronic; Waste Manager: Kualiti Alam Sdn Bhd; Date: 22.07.2020; Quantity: 0.0090mt; Consignment Note Number: 2020072215ULXVHB</p> <p>7. SW 305 Spent Lubricant Oil; Waste Manager: Kualiti Alam Sdn Bhd; Date: 22.07.2020; Quantity: 0.0550mt; Consignment Note Number: 2020072214VN3DK6</p> <p>8. SW 306 Spent Hydraulic Oil; Waste Manager: Kualiti Alam Sdn Bhd; Date: 22.07.2020; Quantity: 0.0410mt; Consignment Note Number: 2020072215O942ES</p> <p><u>Sepang Loi Estate</u></p> <p>1. SW 305 Spent Lubricant; Waste Manager: Kualiti Alam Sdn Bhd; Date: 17.06.2020; Quantity: 0.120mt; Consignment Note Number: 2020072011H13VP7.</p> <p>2. SW 408 Contaminated Soil &amp; Debris; Waste Manager: Kualiti Alam Sdn Bhd; Date: 17.06.2020; Quantity: 0.0590mt; Consignment Note Number: 2020072011PFG7ZS.</p> <p>3. SW 409 Empty Herbicide Container; Waste Manager: Kualiti Alam Sdn Bhd; Date: 17.06.2020; Quantity: 0.1100mt; Consignment Note Number: 2020072011A7EY9B.</p> <p>4. SW 410 Contaminated rags &amp; Filter; Waste Manager: Kualiti Alam Sdn Bhd; Date: 17.06.2020; Quantity: 0.210mt; Consignment Note Number: 2020072011Q0K8Y.</p>	

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<p><b>4.5.3.4</b> 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><b>- Major compliance -</b></p>	<p>The empty pesticide containers were triple rinsed, punctured and stored in a designated storage at each estate. When the cumulative amount of the containers reached an economically logistically feasible volume to be disposed, then the authorized recycler will be called to collect them. This was evident through verification of transaction receipts at the visited estates as below;</p> <p><u>Labis Bahru Estate</u>  Waste Manager: G-Planter Sdn Bhd; Date: 22.09.2020; Quantity: 4 Litre Containers – 414 pcs, 20 Litres Containers – 86 pcs, 50g Containers – 53 pcs, 500ml Containers – 28pcs and Storm (Rat Bait) boxes – 400 pcs.</p> <p>Mungka Estate: G-Planter Sdn Bhd; Date: 28.07.2020; Quantity: 4 Litre Containers – 114 pcs, 20 Litres Containers – 24 pcs, 50g Containers – 785 pcs, Garlon Mix 4L Containers – 732pcs and Miracle Containers – 215 pcs.</p> <p><u>Sepang Loi Estate</u>: G-Planter Sdn Bhd; Date: 21.06.2019; Quantity: 4 Litre Containers – 84 pcs, 20 Litres Containers – 36 pcs, 500g Containers – 58 pcs, Storm Bait Containers – 42 pcs.</p>	<p>Yes</p>
<p><b>4.5.3.5</b> Domestic waste should be disposed as such to minimize the risk of contamination of the environment and watercourses.</p> <p><b>- Minor compliance -</b></p>	<p>Domestic wastes from the linesites were buried in a designated landfill in the oil palm estates. Based on SOP, no toxic wastes such as spent lubricants, empty chemical containers, used lab chemical, etc. were permitted to be disposed in the rubbish pit. The location of the landfill was also far from residential area and water ways based on the estate</p>	<p>Yes</p>



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		map provided. The weekly domestic waste disposal records were available and verified for all estates.	
<b>Criterion 4.5.4: Reduction of pollution and emission</b>			
<b>4.5.4.1</b>	An assessment of all polluting activities shall be conducted, including greenhouse gas emissions, scheduled wastes, solid wastes and effluent. <b>- Major compliance -</b>	Assessment of polluting activities were available in the Pollution and Emission Management Plan in all estates. The Management Plan identified the source of pollution, activity, possible threat, action plan, time frame, records and responsibility.	Yes
<b>4.5.4.2</b>	An action plan to reduce identified significant pollutants and emissions shall be established and implemented. <b>- Major compliance -</b>	The action plans to reduce identified significant pollutants and emissions has been documented in Waste, Pollution and Emission Management Plan and implemented. Example, <ul style="list-style-type: none"> <li>• Weekly linesite inspection and check to ensure no septic tank overflow &amp; spillage. Else, immediate action must be taken to contain overflow &amp; spills.</li> <li>• Daily inspection / routine maintenance on vehicles to reduce emission of dark smoke or emission of air pollutant</li> <li>• Routine maintenance to be carried out as per schedule and inspection of vehicle condition to reduce emission of noise.</li> <li>• Apply bio compost to recycle nutrient from the EFB instead of fertilizer usage to reduce emission of GHG</li> </ul>	Yes
<b>Criterion 4.5.5: Natural water resources</b>			
<b>4.5.5.1</b>	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:	Water Management Plan was available for the estates audited. The management plan includes the water source, action plan to reduce water contamination, associated records and PIC. The management plan is reviewed on a yearly basis.	Yes

Criterion / Indicator	Assessment Findings	Compliance
<p>a. Assessment of water usage and sources of supply.</p> <p>b. Monitoring of outgoing water which may have negative impacts into the natural waterways at a frequency that reflects the estate's current activities.</p> <p>c. Ways to optimize water and nutrient usage to reduce wastage (e.g. having in place systems for re-use, night application, maintenance of equipment to reduce leakage, collection of rainwater, etc.).</p> <p>d. Protection of water courses and wetlands, including maintaining and restoring appropriate riparian buffer zones at or before planting or replanting, along all natural waterways within the estate.</p> <p>e. Where natural vegetation in riparian areas has been removed, a plan with a timetable for restoration shall be established and implemented.</p> <p>f. Where bore well is being use for water supply, the level of the ground water table should be measured at least annually.</p> <p><b>- Major compliance -</b></p>	<p><u>Labis Bahru Estate</u></p> <ol style="list-style-type: none"> <li>Water Management Plan (01.08.2020) <ul style="list-style-type: none"> <li>Pollution Control Device (PCD); PCD must be inspected to ensure the effectiveness. During scheduled cleaning of PCD, collect the pollutants and place at the scheduled waste store.</li> <li>Septic Tank Overflow &amp; Spillage; Conduct weekly linesite inspection and check to ensure no septic tank overflow &amp; spillage. Immediate action must be taken in case of any overflow or spillage.</li> </ul> </li> <li>Labis Bahru Estate have conducted a Rapid Biodiversity Assessment with the report available for verification dated 26.09.2007. The report states that the estate is surrounded by smallholders and river bank of Sungai Labis. There were a clear and visible buffer zone demarcated as Riparian Reserve. Based on the photo evidence the buffer zone is well maintained with natural vegetation and there are appropriate signboards prohibiting use of chemicals or fertilizers at the area.</li> <li>Water Sampling was conducted at the inlet and outlet of the Sg Labis that is boundary with the estate to monitor the possible impact that the estate operations could cause the water course. The water sampling report was available for verification as below: <ul style="list-style-type: none"> <li>Date: 15.11.2020</li> </ul> </li> </ol>	

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Criterion / Indicator	Assessment Findings	Compliance
	<ul style="list-style-type: none"> <li>• Report Number: WI/2020/11/32</li> <li>• Sample Tested by: UTCL Laboratory</li> <li>• Results: All 4 samples were within the limit specifications.</li> </ul> <p><u>Mungka Estate</u></p> <ol style="list-style-type: none"> <li>1. Water Management Plan was available for the estate dated 01.08.2020               <ul style="list-style-type: none"> <li>• Water Pollution from Spraying Activities.                   <ul style="list-style-type: none"> <li>- Buffer Zone areas where all the activity (spraying and manuring) not allowed in this area.</li> <li>- Inlet and outlet water analysis done after manuring activity for the month to monitor water quality.</li> <li>- Drinking water analysis to monitor drinking water quality and is required by SPAN.</li> </ul> </li> <li>• Replanting &amp; Nursery Activities                   <ul style="list-style-type: none"> <li>- Follow work instruction and SOP for any activities done at the estate to avoid water pollution.</li> <li>- Follow scheduled waste management procedure to avoid water pollution caused by scheduled waste.</li> </ul> </li> </ul> </li> <li>2. Mungka Estate have conducted a Rapid Biodiversity Assessment with the report available for verification dated 01.07.2008. The report states that there is a small jungle strip of severely degraded secondary swampy forest along the banks of Sungai Sepang Loi and small patch of wooden scrap land.</li> </ol>	

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	<p>3. Water Sampling was conducted at the inlet and outlet of the Sg Sepang Loi that is boundary with the estate to monitor the possible impact that the estate operations could cause the water course. The water sampling report was available for verification as below:</p> <ul style="list-style-type: none"> <li>• Date: 15.11.2020</li> <li>• Report Number: WI/2020/09/20</li> <li>• Sample Tested by: UTCL Laboratory</li> <li>• Results: All 4 samples were within the limit specifications.</li> </ul> <p>4. Drinking water sampling was conducted on 02.06.2020 by Decagon Lab and Analytical Testing Sdn Bhd (Report No: LW/331/20). The results were as below:</p> <ul style="list-style-type: none"> <li>• <u>Drinking Water Collected at Inlet (Raw Water)</u> All parameters are within the limit as specified under the Regulations Limit follows the Raw Water Quality Standard, Ministry of Health Malaysia; Engineering Services Division; Year 2010</li> <li>• <u>Drinking Water Collected at Outlet (Treated Water)</u> All parameters are within the limit as specified under the Regulations Limit follows the Drinking Water Quality Standard, Ministry of Health Malaysia; Engineering Services Division; Year 2010. The water can be used as a drinking water.</li> </ul> <p><u>Sepang Loi Estate</u></p> <p>1. Water Management Plan was available reviewed in January 2020.</p> <ul style="list-style-type: none"> <li>• Water Pollution from Spraying Activities.</li> </ul>	

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		<ul style="list-style-type: none"> <li>- Buffer Zone areas where all the activity (spraying and manuring) not allowed in this area.</li> <li>- Inlet and outlet water analysis done after manuring activity for the month to monitor water quality.</li> <li>- Drinking water analysis to monitor drinking water quality and is required by SPAN.</li> <li>• Replanting &amp; Nursery Activities               <ul style="list-style-type: none"> <li>- Follow work instruction and SOP for any activities done at the estate to avoid water pollution.</li> <li>- Follow scheduled waste management procedure to avoid water pollution caused by scheduled waste.</li> </ul> </li> <li>2. Drinking water sampling was conducted on 02.06.2020 by Decagon Lab and Analytical Testing Sdn Bhd (Report No: LW/351/20). The results were as below:               <ul style="list-style-type: none"> <li>• <u>Drinking Water Collected at Inlet (Raw Water)</u> All parameters are within the limit as specified under the Regulations Limit follows the Raw Water Quality Standard, Ministry of Health Malaysia; Engineering Services Division; Year 2010</li> <li>• <u>Drinking Water Collected at Outlet (Treated Water)</u> All parameters are within the limit as specified under the Regulations Limit follows the Drinking Water Quality Standard, Ministry of Health Malaysia; Engineering Services Division; Year 2010. The water can be used as a drinking water.</li> </ul> </li> </ul>	

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Criterion / Indicator		Assessment Findings	Compliance
4.5.5.2	No construction of bunds, weirs and dams across main rivers or waterways passing through an estate. <b>- Minor compliance -</b>	Due to the Covid 19 ongoing pandemic, onsite verification was unable to be conducted. Based on site visit conducted during the previous assessment, there was no construction of bunds, weirs or dams observed.	Yes
4.5.5.3	Water harvesting practices should be implemented (e.g. water from road-side drains can be directed and stored in conservation terraces and various natural receptacles). <b>- Minor compliance -</b>	Due to the Covid 19 ongoing pandemic, onsite verification was unable to be conducted. Based on site visit conducted during the previous assessment, it was noted during that all the visited estates that many silt pits were prepared by the road sides to capture rain water in order to maintain the moisture content in the field. At estate offices and workshop sighted the practice of rainwater harvesting.	Yes
<b>Criterion 4.5.6: Status of rare, threatened, or endangered species and high biodiversity value</b>			
4.5.6.1	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. <b>- Major compliance -</b>	<u>Labis Bahru Estate</u> Labis Bahru Estate have conducted a Rapid Biodiversity Assessment with the report available for verification dated 26.09.2007. The report states that there were two narrow strips of forest found in the estate, having long tailed macaques and giant squirrels. There were no wildlife areas categorised as HCV within or outside the estate. The estate have implemented a Biodiversity Improvement Plan 2020 which was available for verification which includes the action plan to manage the biodiversity within the estate such as to continuously brief workers on the importance of preserving HCV areas.  <u>Mungka Estate</u> Mungka Estate have conducted a Rapid Biodiversity Assessment with the report available for verification dated 01.07.2008. The report states	Yes

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		<p>that there is a small jungle strip of severely degraded secondary swampy forest along the banks of Sungai Sepang Loi and small patch of wooden scrap land where a single Spectacled Langur was seen. "Otter" reported by workers; any of 3 likely species; Otter Civet Otter: Endangered; Smooth-coated Otter, Small - clawed Otter: Vulnerable; Spectacled Langur.</p> <p><u>Sepang Loi Estate</u></p> <p>Mungka Estate have conducted a Rapid Biodiversity Assessment with the report available for verification dated 01.07.2008. The report states that there are forests found on the boundary (northwest, centre east) are very secondary, from re-growth (mostly saplings) to shrubby with few larger trees. Overall rather degraded, but with surprising wildlife: Rhinoceros Hornbills, Giant Squirrels and Langurs (likely the Silvered Leaf, but could also, be Spectacled). In the middle of the estate lies a small forested outcrop, possibly serving as a stepping stone between the northeast and south-central forested regions. A larger forested area is situated about 1 km to the east of the estate, though that too is looking fairly open and degraded.</p>	
<b>4.5.6.2</b>	<p>If rare, threatened or endangered species or high biodiversity value, are present, appropriate measures for management planning and operations should include:</p> <p>a) Ensuring that any legal requirements relating to the protection of the species are met.</p>	<p><u>Labis Bahru Estate</u></p> <p>Labis Bahru Estate have conducted a Rapid Biodiversity Assessment with the report available for verification dated 26.09.2007. The report states that there were two narrow strips of forest found in the estate, having long tailed macaques and giant squirrels. There was no wildlife</p>	

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<p>b) Discouraging any illegal or inappropriate hunting, fishing or collecting activities; and developing responsible measures to resolve human-wildlife conflicts.</p> <p><b>- Major compliance -</b></p>	<p>categorised as rare, threatened or endangered within or outside the estate.</p> <p><u>Mungka Estate</u></p> <p>Mungka Estate have conducted a Rapid Biodiversity Assessment with the report available for verification dated 01.07.2008. The report states that there is a small jungle strip of severely degraded secondary swampy forest along the banks of Sungai Sepang Loi and small patch of wooden scrap land where a single Spectacled Langur was seen.</p> <p><u>Sepang Loi Estate</u></p> <p>Mungka Estate have conducted a Rapid Biodiversity Assessment with the report available for verification dated 01.07.2008. The report states that there are forests found on the boundary (northwest, centre east) are very secondary, from re-growth (mostly saplings) to shrubby with few larger trees. Overall rather degraded, but with surprising wildlife: Rhinoceros Hornbills, Giant Squirrels and Langurs (likely the Silvered Leaf, but could also, be Spectacled). In the middle of the estate lies a small forested outcrop, possibly serving as a stepping stone between the northeast and south-central forested regions. A larger forested area is situated about 1 km to the east of the estate, though that too is looking fairly open and degraded.</p>	



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Criterion / Indicator		Assessment Findings	Compliance
4.5.6.3	A management plan to comply with Indicator 1 shall be established and effectively implemented, if required. <b>- Major compliance -</b>	Among the management plan implemented were establishment of buffer zones, regular education to workers on importance of conservation areas, patrol reports, animal sighting records and signage of restriction of hunting, fishing and collecting.	Yes
<b>Criterion 4.5.7: Zero burning practices</b>			
4.5.7.1	Use of fire for waste disposal and for preparing land for oil palm cultivation or replanting shall be avoided except in specific situations, as identified in regional best practice. <b>- Major compliance -</b>	The operating units adhered to the policy of "Zero open burning" for any replanting. From field visits and interviews with the workers there is no open burning being practiced in the estates. For replanting land preparation, palms are felled, chipped and windrowed as required in the company's procedure.	Yes
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. <b>- Major compliance -</b>	No open burning noted based on the records on the land clearing and felling for the replanting at sampled estates. Method of land clearing and preparation was used such as felling & chipping, cambering/land forming and path construction.	Yes
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. <b>- Major compliance -</b>	No controlled burning noted based on the records on the land clearing and felling for the replanting at sampled estates. Method of land clearing and preparation was used such as felling & chipping, cambering/land forming and path construction.	Yes
4.5.7.4	Previous crops should be felled or mowed down, chipped and shredded, windrowed or pulverized or ploughed and mulched. <b>- Minor compliance -</b>	Noted based on the records on the land clearing and felling for the replanting at sampled estates, method of land clearing and preparation was used such as felling & chipping, cambering/land forming and path construction.	Yes

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Criterion / Indicator	Assessment Findings	Compliance	
<b>4.6 Principle 6: Best Practices</b>			
<b>Criterion 4.6.1: Site Management</b>			
<b>4.6.1.1</b>	<p>Standard operating procedures shall be appropriately documented and consistently implemented and monitored.</p> <p><b>- Major compliance -</b></p>	<p>Standard Operating Procedures were available for Palong Cocoa POM &amp; its Supply Bases. Among the SOP's that were sampled were:</p> <p><u>Kulim Plantations (M) Berhad</u></p> <ol style="list-style-type: none"> <li>1. Transparency; Doc No: SQD/SMS/1.0; Doc Date 01/08/2020</li> <li>2. Core labour Standard; Doc No: SQD/SMS/4.0; Doc Date: 01.08.2020</li> <li>3. Waste Management; Doc No: SQD/SMS/6.2; Doc Date: 01.08.2020.</li> <li>4. Agrochemicals Management; Doc No: SQD/SMS/6.1; Doc Date: 01.08.2020</li> <li>5. Immature/ Mature Area – Rat Baiting; Doc No: LR-SOP-W07</li> <li>6. Grievance; Doc No: SQD/SMS/4.1; Doc Date: 01.08.2020</li> <li>7. Traceability; Doc No: SQD/SMS/1.2; Doc Date: 01.08.2020</li> <li>8. Consultation and Communication; Doc No: SQD/SMS/1.1; Doc Date: 01.08.2020</li> </ol> <p>Regular Internal Audits are conducted to ensure all SOP's are implemented. Internal Audits were conducted as below for the estates:</p> <p>Labis Bahru Estate: 23.09.2020</p> <p>Sepang Loi Estate: 21.09.2020</p>	<p>Yes</p>

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Criterion / Indicator		Assessment Findings	Compliance										
		<p>Mungka Estate: 21.09.2020</p> <p>Plantation Inspectorate Visit is done twice in a year to inspect the estates performance in line with the SOPs that are in place. Verified the PI Visit as below:</p> <p>Labis Bahru Estate: 13.10.2020</p> <p>Mungka Estate: 18.10.2020</p> <p>Sepang Loi Estate: 07 – 08.09.2020</p>											
<b>4.6.1.2</b>	<p>Where oil palm is grown within permitted levels on sloping land, appropriate soil conservation measures shall be implemented to prevent both soil erosion as well as siltation of drains and waterways. Measures shall be put in place to prevent contamination of surface and groundwater through runoff of either soil, nutrients or chemicals.</p> <p><b>- Major compliance -</b></p>	<p>Where planting is on slope, construction of terraces was in accordance to guidance in the Agricultural Manual. The guidance for planting on slope is as follows:</p> <table border="1"> <thead> <tr> <th>Slope (°)</th> <th>Terrace width (m)</th> </tr> </thead> <tbody> <tr> <td>&lt;2°</td> <td>Straight Planting</td> </tr> <tr> <td>2 – 5°</td> <td>Straight planting. Water Conservation terraces at 32m interval</td> </tr> <tr> <td>6 – 15°</td> <td>5.00</td> </tr> <tr> <td>16 – 25°</td> <td>3.60</td> </tr> </tbody> </table> <p>Areas with greater than 25-degree slope are not to be planted but be left for biodiversity purposes. Among the soil conservation measures implemented to prevent soil erosion and siltation were construction of terrace, planting of cover crop and construction of road side drains. Planting terraces had been constructed where slope &gt;10°. Field</p>	Slope (°)	Terrace width (m)	<2°	Straight Planting	2 – 5°	Straight planting. Water Conservation terraces at 32m interval	6 – 15°	5.00	16 – 25°	3.60	Yes
Slope (°)	Terrace width (m)												
<2°	Straight Planting												
2 – 5°	Straight planting. Water Conservation terraces at 32m interval												
6 – 15°	5.00												
16 – 25°	3.60												

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		inspection showed groundcover with soft grass and soft weeds at all estates.				
<b>4.6.1.3</b>	A visual identification or reference system shall be established for each field.  - <b>Major compliance</b> -	Due to the ongoing Covid 19 Pandemic, onsite assessment was unable to be conducted and a remote assessment audit was conducted instead. Therefore, the fields were unable to be physically visited. Nevertheless, the management has provided photo evidence of Fields Identification which clearly states the Field Number and Hectarage.				Yes
<b>Criterion 4.6.2: Economic and financial viability plan</b>						
<b>4.6.2.1</b>	A documented business or management plan shall be established to demonstrate attention to economic and financial viability through long-term management planning.  - <b>Major compliance</b> -	Annual business plan in the form of annual budget and the projection for 3 years prepared as guidance for future planning. The business plan contains FFB yield, CPO, OER and KER, costs of production, etc.				Yes
<b>4.6.2.2</b>	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.  - <b>Major compliance</b> -	Year	Labis Bahru Estate	Sepang Lui Estate	Mungka Estate	Yes
		2020	270.08	Nil	Nil	
		2021	Nil	Nil	113.90	
		2022	Nil	Nil	Nil	
		2023	235.53	Nil	Nil	
		2024	208.50	Nil	Nil	
<b>4.6.2.3</b>	The business or management plan may contain:	Annual business plan in the form of annual budget and the projection for 3 years prepared as guidance for future planning. The business plan contains FFB yield, CPO, OER and KER, costs of production, etc.				Yes

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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) Financial indicators: cost benefit, discounted cash flow, return on investment <b>- Major compliance -</b>		
<b>4.6.2.4</b>	The management plan shall be effectively implemented and the achievement of the goals and objectives shall be regularly monitored, periodically reviewed and documented. <b>- Major compliance -</b>	The management plan was effectively implemented, and achievements of the goals and objectives regularly monitored, periodically reviewed and documented by performance monitoring. The estates' performance was recorded in the monthly progress reports. Details on the actual vs budget i.e crop production, fixed and direct cost are shown therein. The management also provides variance report on the performance and reviewed monthly.	Yes
<b>Criterion 4.6.3: Transparent and fair price dealing</b>			
<b>4.6.3.1</b>	Pricing mechanisms for the products and other services shall be documented and effectively implemented. <b>- Major compliance -</b>	The pricing mechanism for the contractor are mentioned in the contract signed between Kulim and contractor.	Yes
<b>4.6.3.2</b>	All contracts shall be fair, legal and transparent and agreed payments shall be made in timely manner. <b>- Major compliance -</b>	On both Estates all contracts verified were fair, legal and transparent and agreed payments were made in timely manner. All contracts and purchases are documented i.e in the form of purchase orders, invoices, and contracts for the larger transaction. All documents are signed by both vendor and management.	Yes

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Criterion / Indicator		Assessment Findings	Compliance
		<p>Mungka Estate</p> <p>Contract No. EPA/Mungka6/2013 (commencement date 1/1/18, completion date 31/12/20) for Harvesting of FFB from field P10 and P12 at Mungka Estate            Contractor: Malar Enterprise            Records verified: tax invoice 20000607) dated 3/11/2020, contract claim for October 2020</p> <p>Sepang Loi Estate</p> <p>Contract No. MPSB/LSL5/2017 (commencement date 1/2/18, completion date 31/12/20) for loading and transporting of FFB from field P00,P03,P04,P05 and P08 at Sepang Loi estate to Palong Cocoa POM, Segamat.            Contractor: Liew Kim Fah Plantations Sdn Bhd            Record verified: tax invoice 20000456 dated 5/11/2020, contract claim for October 2020</p>	
<b>Criterion 4.6.4:</b> Contractor			
<b>4.6.4.1</b>	<p>Where contractors are engaged, they shall understand the MSPO requirements and shall provide the required documentation and information.</p> <p><b>- Major compliance -</b></p>	<p>The Estates had informed its contractors regarding the need to follow the MSPO requirements through MSPO training/briefing. The latest session was carried out on 10/3/2020 in estate.</p>	Yes

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<b>4.6.4.2</b>	<p>The management shall provide evidence of agreed contracts with the contractor.</p> <p><b>- Major compliance -</b></p>	<p>Evidence of agreed contracts with the contractors were verified as per sampling estate below:-</p> <p>Mungka Estate</p> <p>Contract No. EPA/Mungka6/2013 (commencement date 1/1/18, completion date 31/12/20) for Harvesting of FFB from field P10 and P12 at Mungka Estate. Contractor: Malar Enterprise</p> <p>Sepang Loi Estate</p> <p>Contract No. MPSB/LSL5/2017 (commencement date 1/2/18, completion date 31/12/20) for loading and transporting of FFB from field P00,P03,P04,P05 and P08 at Sepang Loi estate to Palong Cocoa POM, Segamat. Contractor: Liew Kim Fah Plantations Sdn Bhd</p>	Yes
<b>4.6.4.3</b>	<p>The management shall accept MSPO approved auditors to verify assessments through a physical inspection if required.</p> <p><b>- Minor compliance -</b></p>	<p>There were no objections from management to accept MSPO approved auditors to verify assessments through a physical inspection where required and written in the addendum contract. Refer to contract, EPA/Mungka6/2013 under Malar Enterprise</p>	Yes
<b>4.6.4.4</b>	<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><b>- Major compliance -</b></p>	<p>All works performed at the estates are checked and verified by the estates personnel before payment been made to the contractors. Verified records were for:-</p> <p>Mungka Estate</p>	Yes

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	<p>Contract No. EPA/Mungka6/2013 (commencement date 1/1/18, completion date 31/12/20) for Harvesting of FFB from field P10 and P12 at Mungka Estate.            Contractor: Malar Enterprise</p> <p>Sepang Loi Estate</p> <p>Contract No. MPSB/LSL5/2017 (commencement date 1/2/18, completion date 31/12/20) for loading and transporting of FFB from field P00,P03,P04,P05 and P08 at Sepang Loi estate to Palong Cocoa POM, Segamat.            Contractor: Liew Kim Fah Plantations Sdn Bhd</p>	
<p><b>4.7 Principle 7: Development of new planting (Not Applicable because no new planting in Sampling estate)</b></p>		



**Malaysian Sustainable Palm Oil Part 4: General principles for palm oil mills.**

Criterion / Indicator		Assessment Findings	Compliance
<b>4.1 Principle 1: Management commitment &amp; responsibility</b>			
<b>Criterion 4.1.1 – Malaysian Sustainable Palm Oil (MSPO) Policy</b>			
<b>4.1.1.1</b>	Policy for the implementation of MSPO shall be established. <b>- Major compliance -</b>	Kulim (M) Berhad has established a policy on sustainable palm oil production signed by Executive Director, Mr Zulkifli Zakariah dated 30/11/2019. The policy was written in bi-lingual (english and national language) available at pertinent location in the estate compound.	Yes
<b>4.1.1.2</b>	The policy shall also emphasize on the commitment to continual improvement with the objective of improving the milling operation. <b>- Major compliance -</b>	The established policy has emphasized on the commitment to comply with all applicable legal requirements, contribute to local community development, and environmental consideration with the objective of improving the milling and estate operation	Yes
<b>Criterion 4.1.2 – Internal Audit</b>			
<b>4.1.2.1</b>	Internal audit shall be planned and conducted regularly to determine the strong and weak points and potential area for further improvement. <b>- Major compliance -</b>	The internal audit for MSPO was conducted on 20 <sup>th</sup> Sept 2020 at Palong Cocoa Palm Oil Mill. The internal audit had covered all the MSPO MS2530 elements specifically on part 4. 1 NC raised related to Procedure on local workers hiring. The NC was close out on 29/9/19 and verified by SQM team.	Yes
<b>4.1.2.2</b>	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.	Kulim (M) Berhad has established procedure, Sustainable Management System, Internal Audit : SQD/SMS/3.2, issue: 1 dated 1/8/2020 . The procedure is designed for all applicable sustainability standards requirements such as ISCC, RSPO, MSPO and management guideline to be used as audit criteria.	Yes

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Criterion / Indicator		Assessment Findings	Compliance
	- <b>Major compliance</b> -	The procedure has incorporated the internal auditor competency requirement. Based on the procedure, internal audit is to be carried out at least once a year.	
4.1.2.3	Reports shall be made available to the management for their review. - <b>Major compliance</b> -	The internal audit report has distributed to the POM management and reported to Kulim (M) Berhad management. Refer to internal audit report dated 20/9/20.	Yes
<b>Criterion 4.1.3 – Management Review</b>			
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. - <b>Major compliance</b> -	The last management review was conducted on 12/11/2020. The management review had included internal and external sustainable palm oil audit results review and all pertinent agenda as per standard requirements. The status of the correction and preventive actions are being discuss and reviewed. The meeting was chaired by Mill Manager and attended by HODs. The minutes of the meeting and review presentation was sighted.	Yes
<b>Criterion 4.1.4 – Continual Improvement</b>			
4.1.4.1	The action plan for continual improvement shall be based on a consideration of the main social and environmental impact and opportunities for the company. - <b>Major compliance</b> -	Continual improvement plan for the mill has been documented in the management review meeting minutes dated 10/9/2019. The plan was developed based on consideration of the social and environmental impact, for example: Install Thermal Deaerator and to sell more fibre and shell. Reducing the BOD for Final Discharge from 5000mgll to below 70mgll by using Polishing PIant.	Yes
4.1.4.2	The company should establish a system to improve practices in line with new information and techniques; and for disseminating this information throughout the workforce.	The means to improve practices consistent with new information, new techniques or new industry standards were obtained from Agronomy Advisory Services Dept. Other manners to keep abreast of these development include being members of various oil palm	Yes

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Criterion / Indicator		Assessment Findings	Compliance
	- <b>Major compliance</b> -	related association e.g. ISP, MPOA, Johor Planters Association (JPA), and relationship with suppliers. Evident as noted during the audit include the use of bin system for FFB handling from collection in the field at UMAC estate to dispensation at mill. No changes from previous	
<b>4.2 Principle 2: Transparency</b>			
Criterion 4.2.1 – Transparency of information and documents relevant to MSPO requirements			
<b>4.2.1.1</b>	The management shall communicate adequate information to other stakeholder on environmental, social and legal issues relevant to sustainable practices in the relevant languages and forms.  - <b>Major compliance</b> -	Kulim (Malaysia) Sdn Bhd has developed a Transparency Procedure Issue no:01 Rev: 00 Doc No: SQD/SMS/1.0 dated 1/8/2020 where the objective of the procedure is to ensure that operating units provide adequate information when requested by stakeholders on sustainability, social and legal issues when appropriate. Stakeholders will have the information available in appropriate forms and to allow stakeholders participation in decision making in these areas. The modes for internal and external communication are such as tool box, meeting with representatives, inspections, suggestion boxes, memo, stakeholder meeting and etc.	Yes
<b>4.2.1.2</b>	The management documents shall be publicly available, except where this is prevented by commercial confidentiality or where disclosure of information would result in negative environmental or social outcomes.  - <b>Major compliance</b> -	There is a SPO Transparency Program under Kulim Malaysia Berhad. The procedure is to ensure that documents if to be release and made publicly available are readily available. The Corporate Dept will ensure that the following documents are available if requested and they do not impinge on confidentiality and will not cause detrimental sustainability or social outcomes. Among the documents that were made available for viewing are: • Land title (held as hard copy by the property	Yes

Criterion / Indicator		Assessment Findings	Compliance
		department) • Health and safety plan • Plans and impact assessment- environmental & social • Pollution prevention plans • Details of complaints and grievances • Negotiation procedures • Continuous improvement plan • Biodiversity plans • Policy documents (sustainability handbook) In addition to the website, the policies were also displayed at various locations at the operating units including the main notice boards of the estates, mill offices and muster ground notice boards for employees and visitors to view	
<b>Criterion 4.2.2 – Transparent method of communication and consultation</b>			
<b>4.2.2.1</b>	Procedures shall be established for consultation and communication with the relevant stakeholders.  <b>- Major compliance -</b>	Kulim (Malaysia) Sdn Bhd has developed a Consultancy and Communication Procedure Issue no:01 Rev: 00 Doc No: SQD/SMS/1.1 dated 1/8/2020 where the objective of the procedure is ensure that KULIM has open and transparent communication methods with local communities and other stakeholders such as;- <ul style="list-style-type: none"> <li>• Adequate information to relevant stakeholders on environmental, social and legal issues relevant to RSPO Criteria, in appropriate languages and forms</li> <li>• Communication between your organisation and local communities</li> <li>• Taking action as a result of communication if warranted</li> </ul>	Yes

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Criterion / Indicator		Assessment Findings	Compliance
		<ul style="list-style-type: none"> <li>Recording communication</li> <li>Ensuring communication is open and transparent</li> <li>Consultation and communication documentation</li> </ul>	
<b>4.2.2.2</b>	The management shall nominate management officials at the operating unit responsible for issues related to <i>indicator 1</i> . <b>- Minor compliance -</b>	The Mill Manager has appointed the Assistant Manager to be the Social Person In Charge for the social issue in the mill and seen the appointment letter dated 19/7/2020	Yes
<b>4.2.2.3</b>	A list of stakeholders, records of all consultation and communication and records of action taken in response to input from stakeholders shall be properly maintained. <b>- Major compliance -</b>	<p>The mill and estates has developed a stakeholder list that consisted of internal and external stakeholders such as contractors and suppliers, local communities, government authorities, buyers and etc.</p> <p>Combine stakeholder meeting was conducted on 26/8/2020 with all stakeholder. No issue was raised during the meeting. Meeting minutes was sighted.</p> <p>The mill has sent the invitation letter to stakeholders such as local communities' representatives, schools' representatives and contractor to attend stakeholder meeting on August 2020.</p>	Yes
<b>Criterion 4.2.3 – Traceability</b>			
<b>4.2.3.1</b>	The management shall commit itself to implement and maintain the requirements for the traceability and shall establish a standard operation procedure for traceability. <b>- Major compliance -</b>	Traceability SOP; Sustainable Management System; Traceability; Doc: No: SQD/SMS/1.2; Date: 01.08.2020; Issue No: 01; Revision No: 05 was available and verified. The SOP outlines the preparations, receive and dispatch of FFB, CPO, Kernel and other by products at Kulim's mill, job assignments and recordings of transport productivity for payment purpose and statistics.	Yes

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4.2.3.2	The management shall conduct regular inspections on compliance with the established traceability system. - <b>Major compliance</b> -	Inspection on compliance with the traceability procedure is regularly checked through supply chain internal audit. The internal audit report, which was carried out together with other schemes such as RSPO and ISCC, was available for verification.  The Plant and Machinery Inspection is done by the Mill Inspector (MJAB) to inspect on compliance with the traceability standards. The most recent inspection was conducted on 08.09.2020. The inspection report was available for verification.	Yes
4.2.3.3	The management shall identified and assign suitable employees to implement and maintain traceability system. - <b>Minor compliance</b> -	The person appointed for Traceability is GM/Senior Manager/Manager/Deputy Manager/Assistant in-charge/Acting Manager or Respective Operating Units as per appointment letter dated 21.09.2020, ref: SQD/ADMIN/026/20.	Yes
4.2.3.4	Records of storage, sales, delivery or transportation of crude palm oil and palm kernel shall be maintained. - <b>Major compliance</b> -	Records of CPO and PK storage, sales, deliver were maintained at Palong Cocoa POM.  Example of records evidence are as below: 1. Despatch summary report by buyer (daily/monthly) 2. Despatch records (Weighbridge Tickets)	Yes
<b>4.3 Principle 3: Compliance to legal requirements</b>			
<b>Criterion 4.3.1 – Regulatory requirements</b>			
4.3.1.1	All operations shall be in compliance with applicable local, state, national and ratified international laws and regulations. - <b>Major compliance</b> -	The Palong Cocoa Palm Oil Mill continued its commitment to comply with applicable legal requirements. Among the licenses and permits verified were:	Yes

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Criterion / Indicator		Assessment Findings	Compliance
		<ol style="list-style-type: none"> <li>1. MPOB License; License Number: 578392004000; License Valid from: 01.12.2020 till 13.11.2021</li> <li>2. DOE Compliance Schedule; License Number: 004720; License Valid from 01.07.2020 till 30.06.2021</li> <li>3. Fire Certificate (Form II); License Number: JBPM: JH/7786/2019; Valid from 17.11.2019 till 16.11.2020. Request for Renewal has been sent on 30.10.2020. Verified the document for renewal. Doc Number: BL2020041923.</li> <li>4. Diesel Permit; Reference Number: JH(SGT)0143/08 PSK; Maximum Capacity: 14, 000 litres.</li> <li>5. Energy Commission License; License Number: 2020/02495; Serial Number: 46081; Valid from 01.11.2020 till 31.10.2021; Installation Capacity: 2170 kilowatt</li> </ol>	
<b>4.3.1.2</b>	<p>The management shall list all relevant laws related to their operations in a legal requirements register.</p> <p><b>- Major compliance -</b></p>	<p>Documented procedures have been established and implemented; refer to:</p> <ol style="list-style-type: none"> <li>3. Prosedur Pematuhan Keperluan Undang-Undang; YPJ Plantations Sdn Bhd; Doc Number: YPJP-SOP-77; Version 1.0; Effective Date: 25.10.2020</li> <li>4. Compliance to Legal Requirement; Kulim (Malaysia) Berhad; Doc No: SQD/SMS/2.0; Doc Date: 01.08.2020; Issue No: 01.</li> </ol> <p>A list of all relevant laws related to the legal requirements were available and maintained at the mill. The list was last updated on 17.11.2020.</p>	Yes
<b>4.3.1.3</b>	<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>All legal requirement was documented in Legal and Other Requirement Register. Compliance to each applicable law and regulation is monitored by the mill. The legal register at the mill</p>	Yes

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	- <b>Major compliance</b> -	<p>were reviewed/updated on a yearly basis / as and when needed for new updates/licenses. The latest review was conducted on 17.11.2020. Sighted the document 'Summary of Compliance' available at the mill undersigned by the Top Management. The document lists the latest applicable laws and amendments, revision dates and acknowledgement by the management.</p> <p>All the legal and other requirements were registered accordingly and documented in the legal requirement register including new updates for:</p> <ol style="list-style-type: none"> <li>5. Fees (Employment Pass, Visit Pass (Temporary Employment) and Work Pass (Remission of Fees) Order 2020.</li> <li>6. Prevention and Control of Infectious Diseases (Compounding of Offences) (Amendment) (No.6) Regulations 2020.</li> <li>7. Minimum Wages Order 2020</li> <li>8. Employment Provident Fund (Amendment) Rules 2020.</li> </ol>	
<b>4.3.1.4</b>	<p>The management should assign a person responsible to monitor compliance and to track update the changes in regulatory requirements.</p> <p>- <b>Minor compliance</b> -</p>	<p>Tracking system available to identify changes in the relevant regulations through head office, website information and the information are communicated from the Group Head Office.</p> <p>Palong Cocoa Mill has appointed Cik Siti Hajarah Baharom (Executive regional Controller) as the person in charge to monitor the changes and updates on legal requirements that are relevant to the mill operations. Verified the appointment letter dated 27.06.2018 undersigned by the Regional Controller, Palong Complex.</p>	Yes
<b>Criterion 4.3.2 – Lands use rights</b>			



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Criterion / Indicator		Assessment Findings	Compliance
4.3.2.1	The management shall ensure that their oil palm milling activities do not diminish the land use rights of other users. <b>- Major compliance -</b>	Palong Cocoa POM is on "State Lease" land. The land use was for Oil Palm Plantation. Land title of the POM under PTD 1354 HS(D) 11071 with 3413.58 ha that under Kemedak estate.	Yes
4.3.2.2	The management shall provide documents showing legal ownership or lease, history of land tenure and the actual legal use of the land. <b>- Major compliance -</b>	Details of Land Titles and summary of lease history are held in file "Grant Title" on the Sustainability Department Server. Seen the land title for POM was under the Kemedak estate (PTD 1354 HS(D) 11071 with 3413.58 ha) The validity use of the land was still valid as per the land title.	Yes
4.3.2.3	Legal parameter boundary markers should be clearly demarcated and visibly maintained on the ground where practicable. <b>- Major compliance -</b>	Due to the ongoing Covid 19 Pandemic, onsite assessment was unable to be conducted and a remote assessment audit was conducted instead. Nevertheless, based on the photo evidence provided, it was noticeable that the mill boundary was clearly demarcated by fences along its boundary. The mill does not have its own land title and sits on the land title of Mungka Estate, which is under the same parent company, Kulim Plantation.	Yes
4.3.2.4	Where there are, or haven been disputes, documented proof of legal acquisition of land and fair compensation that have been or are being made to previous owners and occupants; shall made available and that these should have been accepted with free prior informed consent (FPIC). <b>- Minor compliance -</b>	There is not land dispute recorded. This verified as per stakeholder meeting record dated 26/8/2020 and complaint/ grievances record.	Yes
<b>Criterion 4.3.3 – Customary rights</b>			

Criterion / Indicator		Assessment Findings	Compliance
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. - <b>Major compliance</b> -	The estate lands are legally owned by the company. There is not land dispute recorded. This verified as per stakeholder meeting record dated 26/8/2020 and complaint/ grievances record.	Yes
4.3.3.2	Maps of an appropriate scale showing extent of recognized customary rights shall be made available. - <b>Minor compliance</b> -	The estate lands are legally owned by the company. There is not land dispute recorded. This verified as per stakeholder meeting record dated 26/8/2020 and complaint/ grievances record.	Yes
4.3.3.3	Negotiation and FPIC shall be recorded and copies of the relevant agreements should be made available. - <b>Major compliance</b> -	The estate lands are legally owned by the company. There is not land dispute recorded. This verified as per stakeholder meeting record dated 26/8/2020 and complaint/ grievances record.	Yes
<b>4.4 Principle 4: Social responsibility, health, safety and employment condition</b>			
<b>Criterion 4.4.1: Social Impact Assessment (SIA)</b>			
4.4.1.1	Social impacts should be identified and plans should be implemented to mitigate the negative impacts and promote the positive ones. - <b>Minor compliance</b> -	Social Impact Assessment was conducted on 20/9/2020 by Sustainability Team of Kulim (M) Berhad. Seen the interview checklists with the relevant stakeholders that been utilized during the assessment. The stakeholders that participated in the assessment were such as school's representative, internal workers, contractors and etc. The topics that discussed during the assessment are child labour issue, discrimination, complaints, policies and etc. Based on the assessment, no negative impact and 6 positive impacts were identified.	Yes
<b>Criterion 4.4.2: Complaints and grievances</b>			

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Criterion / Indicator		Assessment Findings	Compliance
4.4.2.1	A system for dealing with complaints and grievances shall be established and documented. <b>- Major compliance -</b>	Kulim (Malaysia) Berhad has implemented Grievance Procedure (SQD/SMS/4.1) dated 1/8/2020. The objective of the procedure is to ensure that Kulim has a documented system for dealing with complaints and grievances that is agreeable to all sides and accepted by all stakeholders. The management shall process and resolve the complaints within 25 work days. In addition, the company also developed Grievance Policy dated 1/1/2008 where the company will resolved all the grievances and unsatisfied to ensure good relationship	Yes
4.4.2.2	The system shall be able to resolve dispute in an effective, timely and appropriate manner, which is accepted by all parties. <b>- Major compliance -</b>	The complaint and grievances is open to effected parties including internal and external stakeholders. The time to process the complaints or grievances is within 25 work days.	Yes
4.4.2.3	A complaint form should be made available at the premises, where employees and affected stakeholders can make complaints. <b>- Minor compliance -</b>	The complaint form is made available in the mill office. In case the complainant would want to make an anonymity complaint it can be made through electronic complaint form or email to Senior Director or Whistleblowing committee or toll free number or fax or by mail. This information is available in notice boards in the mill.	Yes
4.4.2.4	Employees and surrounding communities should be made aware of its existence and that complaints or suggestions may be made at any time. <b>- Minor compliance -</b>	Training conducted with workers and evaluation available to confirm their understanding of the complaint and grievance process. There is no grievance recorded for the pass 2 year. Only request for maintenance housing are made by workers.	Yes
4.4.2.5	Complaints and solutions within the past 24 months shall be documented and be made available to affected stakeholders upon request.	The complaint record for request for maintenance are available and kept for 10 years according to the Standard Operation Manual Section 4; Sub-section 4.2.3 Control of Documents.	Yes

Criterion / Indicator		Assessment Findings	Compliance
- Major compliance -			
<b>Criterion 4.4.3:</b> Commitment to contribute to local sustainable development			
<b>4.4.3.1</b>	<p>Palm oil miller should contribute to local development in consultation with the local communities. Where the mill is an integral part of plantation, such contribution to local community development may be regarded as a joint effort by the mill and the plantation.</p> <p>- Minor compliance -</p>	<p>The mill management has made contribution to the stakeholders such as contributed of cooking oil to all the workers during festive season, subsidized of electricity and water, provide clinic facilities etc. Programmed with stakeholders (internal and external) was also plan and included in the social improvement plan such as family days, sport event etc. Sampling for contribution to Sekolah Kebangsaan Kemedak refer Payment No: 19000054 dated 18 Sept 2019.</p>	Yes
<b>Criterion 4.4.4:</b> Employees safety and health			
<b>4.4.4.1</b>	<p>An occupational safety and health policy and plan which is in line with Occupational Safety and Health Act 1994 and Factories and Machinery Act 1967 (Act 139) shall be documented, effectively communicated and implemented.</p> <p>- Major compliance -</p>	<p>Kulim Plantation has established the Occupational Health and Safety Policy signed by the Executive Director on 01.05.2018. The policy has been communicated to the workers through induction training for new workers and morning briefing.</p> <p>The Sustainability Team is also committed in establishing various working standards through procedures or pictorial method to improve safe working condition.</p> <p>The mill has established Safety and Health Management Plan and documented in Environment, Safety and Health Plan FY 2020. The management plan includes the ESH risk management, Emergency Response Procedure, Chemical Safety Management, Noise Boundary Monitoring, Health monitoring.</p>	Yes

Criterion / Indicator		Assessment Findings	Compliance
		The OSH Policy have been effectively communicated to all Mill workers and staffs on 19.01.2020.	
<b>4.4.4.2</b>	<p>The occupational safety and health plan should cover the following:</p> <ul style="list-style-type: none"> <li>a) A safety and health policy, which is communicated and implemented.</li> <li>b) The risk of all operations shall be assessed and documented.</li> <li>c) An awareness and training programme which includes the following requirements for employees exposed to chemicals used at the palm oil mill:               <ul style="list-style-type: none"> <li>i. All employees involved are adequately trained on safe working practices;</li> <li>ii. All precautions attached to products should be properly observed and applied;</li> </ul> </li> <li>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).</li> <li>e) The management shall establish Standard Operating Procedure for handling of chemicals to ensure proper and safe handling and storage in accordance to Occupational Safety Health (Classification Packaging and Labeling) Regulation 1997 Occupational Safety Health (Use and Standard of Exposure of Chemical Hazardous to Health) Regulation 2000.</li> <li>f) The management shall appoint responsible person(s) for workers' safety and health. The appointed person(s) of trust</li> </ul>	<ul style="list-style-type: none"> <li>a) Kulim Plantation has established the Occupational Health and Safety Policy signed by the Executive Director on 01.05.2018. The policy has been communicated to the workers through induction training for new workers and morning briefing. The OHS Policy have been effectively communicated to all Mill workers and staffs on 19.01.2020.</li> <li>b) HIRARC was used to assess risks associated to all work units in the mill. The HIRARC is reviewed on a yearly basis and as and when there occur any accidents in the mill. The latest review was done due to the recent accident that involved the Sterilizer work station. Also sighted HIRARC for Covid 19, Ramp Station, Boiler Station and Workshop.</li> </ul> <p>CHRA Report (Report No: JKPP HQ/03/ASS/00/154-2018/060) was available and verified. The CHRA was conducted by QMS Pro Sdn. Bhd on 21.05.2018 – 13.08.2018</p> <p>Noise Risk Assessment was conducted by Dr. Syed Abdul Hamid B. Syed Hassan (Dosh Reg: JKPP HIE 127/5/3-1 (No.169) on 05.02.2020. The NRA Report (Report No: JKPP HIE 127/5/3-1 (No.169) – 2020/003) was available for verification.</p> <p>Audiometric Test was conducted for all workers in the mill on 03.11.2019. A total of 12 workers were categorized as having "hearing impairment". The workers were sent for retest on</p>	Yes

Criterion / Indicator	Assessment Findings	Compliance
<p>shall have knowledge and access to latest national regulations and collective agreements.</p> <p>g) The management shall conduct regular two-way communication with their employees where issues that affect their business such as those related to employees' safety, health and welfare are discussed openly. Records from such meeting shall be kept ant the concerns of employees and any remedial actions taken shall be recorded.</p> <p>h) Accident and emergency procedures shall exist and instructions shall be clearly understood by all employees.</p> <p>i) Employees trained in First Aid shall be present at all mill operations. First Aid equipment should be available at each worksite.</p> <p>j) Records shall be kept of all accidents and be reviewed periodically at quarterly intervals.</p> <p><b>- Major compliance -</b></p>	<p>03.02.2020. The JKPP 7 form has been submitted to JKPP to report on the incidences.</p> <p>c) The mill has established training program for employees exposed to chemicals used at the palm oil mill to ensure the continuous awareness to the employee. The training was conducted by the Manager, Asst. Manager and representative form the chemical suppliers to the supervisors and operators. Sighted the training records as follows:</p> <ul style="list-style-type: none"> <li>• Chemical Handling Training – 18.08.2020</li> <li>• Water Treatment Plant Training – 18.08.2020</li> </ul> <p>d) The Mill has provided PPE based on the SOP and HIRARC that has been developed in the mill. All PPE are provided by the mill free of charge. The PPE issuance form was available for verification which indicated appropriate PPE's were provided to the workers on a regular basis.</p> <p>e) Palong Cocoa POM had established Work Instruction, SW/WI/23 for Handling of Chemicals and SW/WI/22 Waste Management to ensure proper and safe handling and storage, in accordance to OSH (Classification Packaging and Labelling) Regulation 1997, OSH (Use and Standard of Exposure of Chemical Hazardous to Health) Regulation 2000 and EQ (Scheduled Wastes) Regulations 2005.</p> <p>The organization has established Work Instructions for handling of chemicals to ensure proper and safe handling and storage in accordance to Occupational Safety Health</p>	

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Criterion / Indicator	Assessment Findings	Compliance
	<p>(Classification, Labelling and Safety Data Sheet Of Hazardous Chemicals) Regulation 2013 and Occupational Safety Health (Use and Standard of Exposure of Chemical Hazardous to Health) Regulation 2000.</p> <p>f) Mill Manager was appointed to be the Chairman of OHS Committee at the mill as per letter signed by the Chairman, Safety and Health Main Committee Kulim (M) Berhad, dated 21.09.2020. Mill management has appointed Safety Committee Member consist of OSH Coordinator, Secretary, representatives from Employer and representatives from Employee as per appointment letter by the Mill Manager</p> <p>g) The mill management conducted OSH committee meeting on a quarterly basis and when necessary due to accidents that occur. The meeting discussed issues on employees' safety, health and welfare such as mill safety and health achievement report, mill security, safety compliance by contractors, workplace audit report, legal compliance, safety and health training. Sighted the latest OSH Meeting Minutes dated 24.02.2020 (01/2020), 24.06.2020 (02/2020) and 24.06.2020 (03/2020).</p> <p>h) Accident and emergency procedures were available at the mill. Verified the Emergency Plans for Fire, Flood, Accidents and Spillage. The flowcharts for Emergency Plans were displayed at the noticeboards together with the emergency contacts. Fire extinguishers were available at the mill with monthly</p>	

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	<p>inspections done by the management to ensure the fire extinguishers are functional. An ERP training was conducted on 6<sup>th</sup> to 8<sup>th</sup> October 2020. Fire Drill Training was also conducted in the mill on 24.11.2020.</p> <p>i) A list of first aiders were available at the mill comprising of all main work stations. First Aid boxes were assigned to the respective first aiders. Monthly First Aid Box inspection was conducted by the Medical Assistant at the mill. The first aid kit holders are trained on a regular basis and with refresher trainings. The latest training was conducted on 15.09.2020. CPR and First Aid Training was conducted by Malaysian Red Crescent Society for 2 First Aiders of the mill on 28.12.2018.</p> <p>j) Records of accidents were maintained by the Mill management and was available for verification. There was 1 accident case reported for the year 2019. 12 workers were diagnosed with hearing impairment based on the audiometric test results. The JKKP 7 form was reported to JKKP and the report was available for verification. JKKP 8 form for the year ending 2019 was submitted to JKKP and the report available for verification also. There was 1 accident case reported for the year 2020 involving the sterilizer station dated 11.10.2020. The JKKP 6 form was submitted to JKKP accordingly with the report available for verification.</p>	



Criterion / Indicator		Assessment Findings	Compliance								
<b>Criterion 4.4.5:</b> Employment conditions											
<b>4.4.5.1</b>	<p>The management shall establish a policy on good social practice regarding human rights in respect of industrial harmony. The policy shall be signed by the top management and communicated to the employees.</p> <p><b>- Major compliance -</b></p>	<p>Kulim (M) Berhad had established and implemented good social practice regarding human rights in respect of industrial harmony. The practice was mentioned in the Sustainability Policy dated 1 Oct 2020, Sexual harassment Policy 1 May 2018 and MSPO Policy dated 30 Nov 2019. These policies were communicated to all employees through trainings and briefings due muster/roll calls.</p>	Yes								
<b>4.4.5.2</b>	<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><b>- Major compliance -</b></p>	<p>The Mill has employed Migrant Indonesian and Local workers. Migrant Indonesian workers were recruited on a 2 years contract basis while Local workers were employed on a long-term basis. Both Migrant and Local workers were provided with the wage structure, amenities, etc. No discrimination was noted. Job opportunities and amenities such as free housing, water and medical care are given to all employees without discrimination.</p>	Yes								
<b>4.4.5.3</b>	<p>Management shall ensure that employees' pay and conditions meet legal or industry minimum standards as per Collective Agreements. The living wage should be sufficient to meet basic needs and provide some discretionary income based on minimum wage.</p> <p><b>- Major compliance -</b></p>	<p>All the workers are under direct employment. The payslip has included basic income, allowance pay, working days, medical leave, and deduction of salary and others as per employment contract. The payroll for the following sampled workers for January 2020 and September 2020 were verified to be consistent with the Minimum Wages Order 2020.</p> <table border="1" data-bbox="1086 1197 1624 1388"> <thead> <tr> <th>Passport/IC no</th> <th>Employee no</th> </tr> </thead> <tbody> <tr> <td>690627-01-6227</td> <td>650264</td> </tr> <tr> <td>740116-01-6113</td> <td>637022</td> </tr> <tr> <td>640508-01-5437</td> <td>637033</td> </tr> </tbody> </table>	Passport/IC no	Employee no	690627-01-6227	650264	740116-01-6113	637022	640508-01-5437	637033	Yes
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Criterion / Indicator		Assessment Findings		Compliance
		870420-23-5033	637108	
		810428-01-6084	637170	
		020628-01-0035	637218	
		920426-01-5149	637224	
		940610-01-6799	637212	
		740629-01-5984	637167	
		C4659200	637139	
		C2753802	637166	
		C5719306	637159	
		There was no records or complaint observed during the interview with workers. All the sampled workers had achieved the minimum wage in accordance to Minimum Wage Order 2020 which was RM1,200.00 per month or RM 46.15 per day.		
<b>4.4.5.4</b>	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.  <b>- Minor compliance -</b>	There were no employees of contractors in the mill.		Yes
<b>4.4.5.5</b>	The management shall establish records that provide an accurate overview of all employees (including seasonal workers and subcontracted workers on the premises). The records should contain	The workers master list was reviewed. The list includes date of birth, date joined, gender etc.		Yes

Criterion / Indicator		Assessment Findings	Compliance																						
	<p>full names, gender, date of birth, date of entry, a job description, wage and the period of employment.</p> <p><b>- Major compliance -</b></p>																								
4.4.5.6	<p>All employees shall be provided with fair contracts that have been signed by both employee and employer. A copy of employment contract shall be made available for each and every employee indicated in the employment records.</p> <p><b>- Major compliance -</b></p>	<p>Employees hadl been provided with fair contracts that have been signed by both employee and employer.  Migrant Indonesian workers are recruited with 2 years contract. Local workers are on a long-term employment basis.  The following contracts has been verified to confirm that workers have binding working agreement with the company:</p> <table border="1"> <thead> <tr> <th>Passport/IC no</th> <th>Employee no</th> </tr> </thead> <tbody> <tr> <td>690627-01-6227</td> <td>650264</td> </tr> <tr> <td>740116-01-6113</td> <td>637022</td> </tr> <tr> <td>640508-01-5437</td> <td>637033</td> </tr> <tr> <td>870420-23-5033</td> <td>637108</td> </tr> <tr> <td>810428-01-6084</td> <td>637170</td> </tr> <tr> <td>020628-01-0035</td> <td>637218</td> </tr> <tr> <td>920426-01-5149</td> <td>637224</td> </tr> <tr> <td>940610-01-6799</td> <td>637212</td> </tr> <tr> <td>740629-01-5984</td> <td>637167</td> </tr> <tr> <td>C4659200</td> <td>637139</td> </tr> </tbody> </table>	Passport/IC no	Employee no	690627-01-6227	650264	740116-01-6113	637022	640508-01-5437	637033	870420-23-5033	637108	810428-01-6084	637170	020628-01-0035	637218	920426-01-5149	637224	940610-01-6799	637212	740629-01-5984	637167	C4659200	637139	Yes
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Criterion / Indicator		Assessment Findings		Compliance																										
		C2753802	637166																											
		C5719306	637159																											
<b>4.4.5.7</b>	<p>The management shall establish a time recording system that makes working hours and overtime transparent for both the employees and employers.</p> <p><b>- Major compliance -</b></p>	<p>The management had established a time recording system that makes working hours and overtime transparent using the Punch Card and Pocket Check roll system. Sighted the Punch Cards record and pocket check roll record of the following workers:</p> <table border="1"> <thead> <tr> <th>Passport/IC no</th> <th>Employee no</th> </tr> </thead> <tbody> <tr><td>690627-01-6227</td><td>650264</td></tr> <tr><td>740116-01-6113</td><td>637022</td></tr> <tr><td>640508-01-5437</td><td>637033</td></tr> <tr><td>870420-23-5033</td><td>637108</td></tr> <tr><td>810428-01-6084</td><td>637170</td></tr> <tr><td>020628-01-0035</td><td>637218</td></tr> <tr><td>920426-01-5149</td><td>637224</td></tr> <tr><td>940610-01-6799</td><td>637212</td></tr> <tr><td>740629-01-5984</td><td>637167</td></tr> <tr><td>C4659200</td><td>637139</td></tr> <tr><td>C2753802</td><td>637166</td></tr> <tr><td>C5719306</td><td>637159</td></tr> </tbody> </table>		Passport/IC no	Employee no	690627-01-6227	650264	740116-01-6113	637022	640508-01-5437	637033	870420-23-5033	637108	810428-01-6084	637170	020628-01-0035	637218	920426-01-5149	637224	940610-01-6799	637212	740629-01-5984	637167	C4659200	637139	C2753802	637166	C5719306	637159	Yes
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Criterion / Indicator		Assessment Findings	Compliance																						
4.4.5.8	<p>The working hours and breaks of the individual worker indicated in the time records shall comply with legal regulations and collective agreements. Overtime shall be mutually agreed upon and shall meet the legal requirements applicable.</p> <p><b>- Major compliance -</b></p>	<p>The working hours and breaks of the individual worker indicated in the time records complied with legal regulations and collective agreements. The working hours and break times was exhibited on notice boards. Working time from 7.30am to 4.00pm were given a 1 hour and 15 minutes break. The workers could take their breaks at their own convenient times. No changes from previous audit.</p>	Yes																						
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><b>- Major compliance -</b></p>	<p>The payslip and the inputs were reviewed to confirm the wages and overtime is in line with legal requirements of Employment Act 1955 and worker’s employment contract. The payroll for the following sampled workers for January 2020 and September 2020 were verified to be consistent with the Minimum Wages Order 2020.</p> <table border="1"> <thead> <tr> <th>Passport/IC no</th> <th>Employee no</th> </tr> </thead> <tbody> <tr> <td>690627-01-6227</td> <td>650264</td> </tr> <tr> <td>740116-01-6113</td> <td>637022</td> </tr> <tr> <td>640508-01-5437</td> <td>637033</td> </tr> <tr> <td>870420-23-5033</td> <td>637108</td> </tr> <tr> <td>810428-01-6084</td> <td>637170</td> </tr> <tr> <td>020628-01-0035</td> <td>637218</td> </tr> <tr> <td>920426-01-5149</td> <td>637224</td> </tr> <tr> <td>940610-01-6799</td> <td>637212</td> </tr> <tr> <td>740629-01-5984</td> <td>637167</td> </tr> <tr> <td>C4659200</td> <td>637139</td> </tr> </tbody> </table>	Passport/IC no	Employee no	690627-01-6227	650264	740116-01-6113	637022	640508-01-5437	637033	870420-23-5033	637108	810428-01-6084	637170	020628-01-0035	637218	920426-01-5149	637224	940610-01-6799	637212	740629-01-5984	637167	C4659200	637139	Yes
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		C2753802	637166	
		C5719306	637159	
<b>4.4.5.10</b>	Other forms of social benefits should be offered by the employer to employees, their families or community such as incentives for good work performance, bonus payment, support of professional development, medical care provisions and improvement of social surroundings.  <b>- Minor compliance -</b>	Palong Cocoa Palm Oil Mill provided free bus service and school uniforms for employees' school going children. The company also provides free medical benefit to workers dependent at the Sedenak Estate clinic. Family Day and Sports Days will be conducted on December 2020.		Yes
<b>4.4.5.11</b>	In cases where on-site living quarters are provided, these quarters shall be habitable and have basic amenities and facilities.  <b>- Major compliance -</b>	Kulim (M) Berhad has provided free housing and medical assistance to all the workers. Water and electricity was provided without any charges from workers. Government school was found in the compound of Palong complex. Linesite inspection was conducted on weekly basis by Hospital Assistant and twice a month together with VMO. Latest inspection was carried out on 23/11/2020. Domestic water supplies was either from the government or own treatment with samples taken and sent for analysis to ensure compliance with drinking water standard for own treated water.		Yes
<b>4.4.5.12</b>	The management shall establish a policy to prevent all forms of sexual harassment and violence at the workplace.  <b>- Major compliance -</b>	The Sexual Harassment Policy dated 01 may 2018 and signed by the Executive Director defined sexual harassment and mentioned that the company endeavour to prevent sexual harassment and all other forms of violence against women and workers in the workplace or in the course of an employee's work.		Yes
<b>4.4.5.13</b>	The management shall respect the right of all employees to form and join trade union and allow workers' own representative(s) to facilitate collective bargain in accordance with applicable laws and	The management respected the right of all employees to form and join trade union and allow workers' own representative(s) to facilitate collective bargain in accordance with applicable laws and regulations.		Yes

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Criterion / Indicator		Assessment Findings	Compliance												
	<p>regulations. Employees shall be given freedom to join trade unions relevant to the industry or organize themselves for collective bargaining. Employees shall have the right to organize and negotiate their work conditions. Employees exercising this right should not be discriminated against or suffer repercussions.</p> <p><b>- Major compliance -</b></p>	<p>This was mentioned in the Core Labour Standard Policy dated 01 May 2018 and signed by the Executive director.</p>													
<b>4.4.5.14</b>	<p>Children and young persons shall not be employed or exploited. The minimum age shall comply with local, state and national legislation.</p> <p><b>- Major compliance -</b></p>	<p>The Core Labour Standard Policy dated 01 May 2018 and signed by the Executive director covered the commitment not to engage in or use of Child Labour. The master list of employees was verified.</p>	Yes												
<b>Criterion 4.4.6: Training and competency</b>															
<b>4.4.6.1</b>	<p>All employees and contractors shall be appropriately trained. A training programme shall include regular assessment of training needs and documentation, including records of training.</p> <p><b>- Major compliance -</b></p>	<p>The mill established a training program for all workers based on the training need analysis conducted on a yearly basis. Covid-19 training and briefings were sighted at the mill and estates.</p> <p>Records of trainings were maintained by the estates as below: -</p> <table border="1"> <thead> <tr> <th>Training</th> <th>Date</th> </tr> </thead> <tbody> <tr> <td>Workers Salary &amp; Wages Training</td> <td>22.11.2020</td> </tr> <tr> <td>MSPO Briefing</td> <td>25.10.2020</td> </tr> <tr> <td>LOTO Training</td> <td>24.08.2020</td> </tr> <tr> <td>Tanker Inspection Training</td> <td>26.02.2020</td> </tr> <tr> <td>Working at Height &amp; Confined Space Training</td> <td>24.08.2020</td> </tr> </tbody> </table>	Training	Date	Workers Salary & Wages Training	22.11.2020	MSPO Briefing	25.10.2020	LOTO Training	24.08.2020	Tanker Inspection Training	26.02.2020	Working at Height & Confined Space Training	24.08.2020	Yes
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		Vertical Sterilizer Training	24.06.2020	
		Scheduled Waste Training	22.11.2020	
		Oil Room Station Training	26.06.2020	
<b>4.4.6.2</b>	<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><b>- Major compliance -</b></p>	<p>The mill has conducted training need analysis for all employees, management and contractors. The need analysis was conducted base on the job designation and training required by the job type. 42 trainings were deemed required for workers in the mill.</p>		Yes
<b>4.4.6.3</b>	<p>A continuous training programme shall 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><b>- Minor compliance -</b></p>	<p>The mill has a training program which is updated annually. Sighted the Annual Training Program for FY 2020. The establishment of the program is guided by its Training Procedure (PCPOM/SOP/7.8; Issue: 03; Dated: 01.02.2018).</p>		Yes
<b>4.5 Principle 5: Environment, natural resources, biodiversity and ecosystem services</b>				
<b>Criterion 4.5.1: Environmental Management Plan</b>				
<b>4.5.1.1</b>	<p>An environmental policy and management plan shall be in line with the relevant country and state environmental laws shall be established, effectively communicated and implemented.</p> <p><b>- Major compliance -</b></p>	<p>Kulim (M) Plantation has established an Environmental Policy signed by Executive Director, Mr. Zulkifly Zakariah dated 01.05.2018. The policy has been established, communicated to all employees, displayed at notice board and continuously implemented by the management. The policy has been recently communicated to the workers and staffs of the mill on 25.10.2020. The policy can also be found at:</p>		Yes



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Criterion / Indicator		Assessment Findings	Compliance										
		<a href="http://www.kulim.com.my/ourpolicy.aspx?p_Id=0&amp;c_Id=2097">http://www.kulim.com.my/ourpolicy.aspx?p_Id=0&amp;c_Id=2097</a>											
4.5.1.2	<p>The environmental management plan shall cover the following:</p> <p>a) An environmental policy and objectives;</p> <p>b) The aspects and impacts analysis of all operations</p> <p><b>- Major compliance -</b></p>	<p>The mill has conducted aspect and impact analysis and documented in Environmental Impact Assessment. The analysis was reviewed on annually basis and as and when there are changes in the operations. Latest review was conducted on September 2020. Among the EIA verified were chemical mixing and storage, CPO Storage, FFB Receiving and Grading, Diesel Engine and Biogas &amp; Polishing Plant among others.</p>	Yes										
4.5.1.3	<p>An environmental improvement plan to mitigate the negative impacts and to promote the positive ones, shall be developed, implemented and monitored.</p> <p><b>- Major compliance -</b></p>	<p>The mill has established environmental improvement plan and documented in Environmental Improvement Plan 2020/2021. Latest review was conducted on 30.09.2020. The plan consists of improvement plans as below among others:</p> <table border="1"> <thead> <tr> <th>Environmental Impact</th> <th>Improvements</th> </tr> </thead> <tbody> <tr> <td>Emission of dust/ashes particles released to the air.</td> <td>To build electrostatic precipitator (ESP) for trap dust/ashes particles.</td> </tr> <tr> <td rowspan="3">Emission of dark smoke</td> <td>To build electrostatic precipitator (ESP) for trap dust/ashes particles.</td> </tr> <tr> <td>To install Thermal deaerator for boiler water supply. This to reduce the usage of solid fuel thus reducing smoke emission</td> </tr> <tr> <td>To install Biogas Bo.3 and No.4. this to reduce the usage of solid fuel thus reducing smoke emission.</td> </tr> <tr> <td>Collapse of retention bund due to erosion</td> <td>To repair the bund, complete with RC piling.</td> </tr> </tbody> </table>	Environmental Impact	Improvements	Emission of dust/ashes particles released to the air.	To build electrostatic precipitator (ESP) for trap dust/ashes particles.	Emission of dark smoke	To build electrostatic precipitator (ESP) for trap dust/ashes particles.	To install Thermal deaerator for boiler water supply. This to reduce the usage of solid fuel thus reducing smoke emission	To install Biogas Bo.3 and No.4. this to reduce the usage of solid fuel thus reducing smoke emission.	Collapse of retention bund due to erosion	To repair the bund, complete with RC piling.	Yes
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Collapse of retention bund due to erosion	To repair the bund, complete with RC piling.												

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Criterion / Indicator		Assessment Findings		Compliance
		Discharge of effluent into furrows over 100ppm BOD (license Limit)	To upgrade ETP with biogas Reactor and Polishing Plant To install sludge dewatering system for online desludging. This will improve the effluent retention time.	
		Scheduled Waste Management	To conduct refresher training on scheduled waste.	
<b>4.5.1.4</b>	A programme to promote the positive impacts should be included in the continual improvement plan. <b>- Minor compliance -</b>	The program to promote the positive impacts were documented in several management plans such as environmental management plan, energy management plan, pollution and emission management plan, water management plan and waste management plan.		Yes
<b>4.5.1.5</b>	An awareness and training programme shall be established and implemented to ensure that employees understand the policy, objectives and management plans and are working towards achieving objectives. <b>- Major compliance -</b>	The mill continues provided training to ensure the awareness regarding the environmental policy among the employee. The mill management has established annual training program which covers the environmental awareness and compliance related trainings to the executives, staffs and workers.  Sighted the training on environmental aspect as follows: <ul style="list-style-type: none"> <li>• Landfill Management Training – 12.11.2020</li> <li>• Environmental Policy Training – 25.10.2020</li> <li>• Scheduled Waste Training - 22.11.2020</li> </ul>		Yes
<b>4.5.1.6</b>	The management shall organize regular meetings with workers where concerns of workers about the environmental quality are discussed.	The Environmental Performance Monitoring Committee (EPMC) has been established to comply with the DOE requirement on Guidance Self-Regulation (GSR). The meeting was participated by mill manager, engineers, Supervisors and Engine Drivers to discuss		Yes

Criterion / Indicator		Assessment Findings	Compliance																								
	- <b>Major compliance</b> -	environmental performance that include presentation by GSR sub-committee whose input include listening to concerns raised by workers, if any. Verified the EPMC Meeting minutes dated 10.08.2020 (03/2020). The Management also conducted Environmental Regulatory Compliance Monitoring Committee (ERCMC) Meetings. Verified the Minutes meeting dated 18.08.2020.																									
<b>Criterion 4.5.2:</b> Efficiency of energy use and use of renewable energy																											
<b>4.5.2.1</b>	Consumption of non-renewable energy shall be optimized and closely monitored by establishing baseline values and trends shall be observed within appropriate timeframe. There should be a plan to assess the usage of non-renewable energy including fossil fuel, electricity in the operations over the base period  - <b>Major compliance</b> -	<p>The Mill maintains records of energy usage, which is reported monthly to head office. The use of the steam turbine for electricity generation has been optimized in order to reduce the dependence on diesel fossil fuel. The monitoring of non-renewable energy usage was conducted on monthly basis. Sighted the sampled monitoring records for diesel usage for FY 2020 as follows:</p> <table border="1"> <thead> <tr> <th>Month</th> <th>Diesel (L)</th> <th>Diesel/FFB (L/Mt)</th> </tr> </thead> <tbody> <tr> <td>Jan 2020</td> <td>2645</td> <td>0.38</td> </tr> <tr> <td>Feb 2020</td> <td>3037</td> <td>0.32</td> </tr> <tr> <td>Mar 2020</td> <td>2713</td> <td>0.27</td> </tr> <tr> <td>Apr 2020</td> <td>3329</td> <td>0.25</td> </tr> <tr> <td>May 2020</td> <td>4068</td> <td>0.30</td> </tr> <tr> <td>Jun 2020</td> <td>5582</td> <td>0.31</td> </tr> <tr> <td>Jul 2020</td> <td>5915</td> <td>0.30</td> </tr> </tbody> </table>	Month	Diesel (L)	Diesel/FFB (L/Mt)	Jan 2020	2645	0.38	Feb 2020	3037	0.32	Mar 2020	2713	0.27	Apr 2020	3329	0.25	May 2020	4068	0.30	Jun 2020	5582	0.31	Jul 2020	5915	0.30	Yes
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Criterion / Indicator		Assessment Findings			Compliance
		Aug 2020	6412	0.29	
		Sept 2020	6286	0.28	
		Oct 2020	4864	0.27	
<b>4.5.2.2</b>	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. <b>- Major compliance -</b>	The estimate for the direct usage of non-renewable energy for their operations, including fossil fuel, and electricity to determine energy efficiency of their operations inclusive of fuel use by contractors, including all transport and machinery operations was available in the respective estate yearly budgets.			Yes
<b>4.5.2.3</b>	The use of renewable energy should be applied where possible. <b>- Minor compliance -</b>	Renewable energy used is from biofuel (shell and fiber) for boiler start-up. The mill monitors the usage of these energy source and the records were maintained and available for verification. The records are as below:			Yes
		Year	2018	2019	2020
		Fiber (mt)	28,388.57	30,087.19	22,154.18
		* Records for Year 2020 is from Jan 2020 till Oct 2020.			
<b>Criterion 4.5.3: Waste management and disposal</b>					
<b>4.5.3.1</b>	All waste products and sources of pollution shall be identified and documented. <b>- Major compliance -</b>	The identification of wastes products and sources of pollution were documented in EAI and also DOE's SW Second Schedule. In general, among the wastes identified were domestic wastes, recyclable wastes, scheduled wastes and sewerage waste water.			Yes

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Criterion / Indicator		Assessment Findings	Compliance
<b>4.5.3.2</b>	<p>A waste management plan shall be developed and implemented, to avoid or reduce pollution. The waste management plan should include measure for:</p> <p>a) Identifying and monitoring sources of waste and pollution. b) Improving the efficiency and recycling potential of mill by-products by converting them into value-added products.</p> <p><b>- Major compliance -</b></p>	<p>The mill has established Waste management Plan based on the identification and source of pollutions and documented in Waste Management Action Plan 2020. The action plans have been developed to ensure they comply to the legal requirements and to improve efficiency and potential recycling of byproducts wherever possible.</p>	Yes
<b>4.5.3.3</b>	<p>The palm oil mill management shall establish Standard Operating Procedure for handling of used chemicals that are classified under Environmental Quality Regulations (Scheduled Waste) 2005, Environmental Quality Act, 1974 to ensure proper and safe handling, storage and disposal. Scheduled waste shall be disposed as per Environmental Quality Act 1974 (Scheduled Waste) Regulations, 2005</p> <p><b>- Major compliance -</b></p>	<p>The procedures for handling used chemicals classified under Environment Quality Regulation (Scheduled Waste) 2005, Environmental Quality Act, 1974 are available in the Work Instruction; Scheduled Waste; Document Number: SPO/WI/06; Doc Date: 01.10.2020.</p> <p>Verification of consignment notes showed that the mill disposed their scheduled wastes such as spent oil and spent lab chemical through licensed schedule waste managers. Verified the latest consignment note as below:</p> <p>a) SW 409: Empty Container Disposal;</p> <ul style="list-style-type: none"> <li>• Consignment Number: 2020090710Z9L7T2</li> <li>• Name of Contractor: Kuality Alam Sdn Bhd</li> <li>• Quantity: 0.249 mt</li> <li>• Date of disposal: 07.09.2020</li> </ul> <p>b) SW 410: Contaminated Filter</p> <ul style="list-style-type: none"> <li>• Consignment Number: 2020090710SCOMW8</li> </ul>	Yes

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Criterion / Indicator		Assessment Findings	Compliance
		<ul style="list-style-type: none"> <li>Name of Contractor: Kuality Alam Sdn Bhd</li> <li>Quantity: 0.0188 mt</li> <li>Date of disposal: 07.09.2020</li> </ul> <p>c) SW 408: Contaminated Fiber</p> <ul style="list-style-type: none"> <li>Consignment Number: 2020090710ERC9NM</li> <li>Name of Contractor: Kuality Alam Sdn Bhd</li> <li>Quantity: 0.0052 mt</li> <li>Date of disposal: 07.09.2020</li> </ul> <p>d) SW 306: Spent Hydraulic Oil</p> <ul style="list-style-type: none"> <li>Consignment Number: 2020090710FJH04</li> <li>Name of Contractor: Kuality Alam Sdn Bhd</li> <li>Quantity: 0.0050 mt</li> <li>Date of disposal: 07.09.2020</li> </ul>	
<b>4.5.3.4</b>	Domestic waste should be disposed as such to minimize the risk of contamination of the environment and watercourse.  - <b>Minor compliance</b> -	Domestic wastes from the mill were buried in a designated landfill in the oil palm estate. Based on SOP, no toxic wastes such as spent lubricants, empty chemical containers, used lab chemical, etc. were permitted to be disposed in the rubbish pit. The location of the landfill was also far from residential area and water ways based on the estate map provided. The weekly domestic waste disposal records were available and verified.	Yes
<b>Criterion 4.5.4:</b> Reduction of pollution and emission			
<b>4.5.4.1</b>	An assessment of all polluting activities shall be conducted, including greenhouse gas emissions, particulate and soot emissions, scheduled wastes, solid wastes and effluent.	An assessment for all polluting activities were done and available in the Pollution and Emission Management Plan. Verified the Stack Emission Assessment done at the boiler with the report details available as below:	Yes

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Criterion / Indicator		Assessment Findings	Compliance		
	- Major compliance -	<p>Air Emission Monitoring Report (Stack Emission)</p> <p>- Boiler No.3</p> <ul style="list-style-type: none"> <li>• Report Ref. No: PAC-AE-200613</li> <li>• Date of Monitoring: 16<sup>th</sup> June 2020</li> <li>• Particulate Matter: (Limit 150 mg/m<sup>3</sup>, dry @ 12% CO<sub>2</sub>) Results – 148 mg/m<sup>3</sup>, dry @ 12% CO<sub>2</sub></li> <li>• Carbon Monoxide: (Limit 1000 mg/m<sup>3</sup>, dry @ 12% CO<sub>2</sub>) Results – 1883 mg/m<sup>3</sup>, dry @ 12% CO<sub>2</sub></li> </ul> <p>The emission of all parameters tested were complied with their respective limits as stipulated in the Environmental Quality (Clean Air) Regulations 2014 except for carbon monoxide (CO<sub>2</sub>) parameter.</p> <p>The mill has obtained a "Lesen Pelanggaran" which enables them to exceed the given parameter. The license was available and verified. License Number: 005335; License valid till 31.12.2020.</p>			
<b>4.5.4.2</b>	<p>An action plan to reduce identified significant pollutants and emissions shall be established and implemented.</p> <p>- Major compliance -</p>	<p>The management have developed the Pollution and Emission Management Plan 2020. The action plan based on the management plan are as below:</p> <table border="1" data-bbox="1086 1305 1854 1353"> <tr> <td>Pollution &amp; Emission</td> <td>Action Plan</td> </tr> </table>	Pollution & Emission	Action Plan	Yes
Pollution & Emission	Action Plan				

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Criterion / Indicator		Assessment Findings		Compliance
		Emission of Dark Smoke	Mill Stack - Installation of air pollution device	
			Inspection of Vehicle Conditions	
		Emission of Noise	Boundary parameter noise mapping data keeping	
			Routine maintenance to be carried out as per schedule - Running of vehicles - Diesel Engine	
		Emission of dust/ ashes particles	Shredded EFB Process - Routine maintenance to be carried out as per schedule	
			Boiler Ash -Placed in an area far from water source to prevent water pollution	
		GHG Emission	Fossil Fuel – Inspection of vehicle condition	
			POME - Methane captured and biogas generation - Palm Kernel shell sold to external – credit for mill emission.	



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<b>4.5.4.3</b>	<p>Palm oil mill effluent (POME) shall be treated to ensure compliance with standards as stipulated in the relevant Environmental Quality (Prescribed Premises) (Crude Palm Oil) Regulations 1977. POME discharge limits and method should be in accordance with the respective state and national policies and regulations.</p> <p><b>- Major compliance -</b></p>	<p>The POME is treated with open anaerobic, aerobic and stabilization lagoon. Monthly monitoring on the final discharge is conducted. The effluent at the final discharge is tested to ensure it compliance to the DOE License discharge limits. The permitted limit for BOD of the effluent final discharge is 5,000 ppm. Based on the mill's four latest quarterly report, the BOD results were never exceeding the regulated limit.</p>	Yes
<b>Criterion 4.5.5: Natural water resources</b>			
<b>4.5.5.1</b>	<p>The management shall establish water management plans to maintain the quality and availability of natural water resources (surface and ground water). The water management plan may include:</p> <ul style="list-style-type: none"> <li>a) Assessment of water usage and sources.</li> <li>b) Monitoring of outgoing water which may have negative impacts into the natural waterways at a frequency that reflects the mill's current activities.</li> <li>c) Ways to optimize water and nutrient usage and reduce wastage (<i>e.g.</i> having in place systems for re-use, night application, maintenance of equipment to reduce leakage, collection of rainwater, etc.).</li> </ul> <p><b>- Major compliance -</b></p>	<p>Palong Cocoa has established a Water Management Plan date 01.08.2020 available for verification. The water management plan identifies the Source of water, activity, water use, possible threat, action plan, time frame, records and responsibility. Among the action plan that has been identified are as below:</p> <ul style="list-style-type: none"> <li>a) Upstream and Downstream Water Analysis</li> <li>b) Drinking Water analysis to monitor drinking water quality.</li> <li>c) Effluent analysis as required by DOE</li> <li>d) Follow work instruction and SOP for any activities done at the mill to avoid water pollution</li> <li>e) Follow Schedule Waste management to avoid any water pollution caused by scheduled waste.</li> <li>f) Desilting and desludging at effluent pond for effective POME treatment.</li> <li>g) Periodically monitoring and maintenance on effluent and furrow system</li> <li>h) Desilting of reservoir/pond to maintain water level.</li> </ul>	Yes

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Criterion / Indicator		Assessment Findings	Compliance
		<p>Water Analysis for Drinking Water were sampled by the management and the results are as below:</p> <ul style="list-style-type: none"> <li>- Decagon Lab &amp; Analytical Testing Sdn Bhd</li> <li>- Date: 02. June 2020</li> <li>- Reference Number: LW/333/20</li> <li>- Results:</li> </ul> <p><u>Drinking Water Collected at Inlet (Raw Water)</u></p> <ul style="list-style-type: none"> <li>• All parameters are within the limit as specified under the Regulations Limit follows the Raw Water Quality Standard, Ministry of Health Malaysia; Engineering Services Division; Year 2010</li> </ul> <p><u>Drinking Water Collected at Outlet (Treated Water)</u></p> <ul style="list-style-type: none"> <li>• All parameters are within the limit as specified under the Regulations Limit follows the Drinking Water Quality Standard, Ministry of Health Malaysia; Engineering Services Division; Year 2010. The water can be used as a drinking water.</li> </ul>	
4.5.5.2	<p>Where open discharge of POME into water course is practiced, mills should undertake to gradually phase it out in accordance to the applicable state or national regulations.</p> <p><b>- Major compliance -</b></p>	<p>Palong Cocoa POM discharges its POME to land application and composting plant as stipulated in its DOE's Compliance Scheduled, License No. 004720. The mill monitors the discharge to ensure it does not exceed the approved limit 960m<sup>2</sup>/day. Sampling is done to monitor the POME parameters with the results available for verification. Samples were taken from Cooling Pond 1, Cooling Pond 2, Anaerobic Pond 1, Anaerobic Pond 2, Anaerobic Pond 3, Bio Compost, Aerobic 1, Aerobic 2, Clarifier, Ultra Filter, PCD 1, PCD 3 and Biogas Reactor Outlet. The latest lab test results were dated</p>	Yes

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Criterion / Indicator		Assessment Findings	Compliance
		18.10.2020; Report Number: E1/2020/10/36; Conducted by: UTCL Laboratory.	
<b>4.6 Principle 6: Best Practices</b>			
<b>Criterion 4.6.1: Mill Management</b>			
<b>4.6.1.1</b>	Standard operating procedures shall be appropriately documented and consistently implemented and monitored.  - <b>Major compliance</b> -	Standard Operating Procedures were available for Palong Cocoa POM. The SOP's that were verified among others were: <ol style="list-style-type: none"> <li>1. Transparency; Doc No: SQD/SMS/1.0; Doc Date 01/08/2020</li> <li>2. Core labour Standard; Doc No: SQD/SMS/4.0; Doc Date: 01.08.2020</li> <li>3. Waste Management; Doc No: SQD/SMS/6.2; Doc Date: 01.08.2020.</li> <li>4. Agrochemicals Management; Doc No: SQD/SMS/6.1; Doc Date: 01.08.2020</li> <li>5. Grievance; Doc No: SQD/SMS/4.1; Doc Date: 01.08.2020</li> <li>6. Traceability; Doc No: SQD/SMS/1.2; Doc Date: 01.08.2020</li> <li>7. Consultation and Communication; Doc No: SQD/SMS/1.1; Doc Date: 01.08.2020</li> </ol> Regular Internal Audits are conducted to ensure all SOP's are implemented.	Yes
<b>4.6.1.2</b>	All palm oil mills shall implement best practices.  - <b>Major compliance</b> -	Implementation of Mills Best Practises in accordance with the SOPs are ensured through various methods. Among those are:  - Internal Audits	Yes

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Criterion / Indicator		Assessment Findings	Compliance
		<ul style="list-style-type: none"> <li>- Management Reviews</li> <li>- Operational Checklist</li> <li>- Worksite Inspection Report</li> <li>- Linesite Inspection</li> <li>- Third party Environmental Audit</li> <li>- Mill Inspection Visit</li> </ul>	
<b>Criterion 4.6.2: Economic and financial viability plan</b>			
<b>4.6.2.1</b>	<p>A documented business or management plan shall be established to demonstrate attention to economic and financial viability through long-term management planning.</p> <p><b>- Major compliance -</b></p>	<p>Annual business plan in the form of annual budget and the projection for 3 years prepared as guidance for future planning. The business plan for FY2020 contains FFB yield, CPO, OER, and KER, costs of production, milling utilization, FFB pricing etc. It also includes environment, social (workers and staff's welfare), and health and safety component.</p>	Yes
<b>Criterion 4.6.3: Transparent and fair price dealing</b>			
<b>4.6.3.1</b>	<p>Pricing mechanisms for the products and other services shall be documented and effectively implemented.</p> <p><b>- Major compliance -</b></p>	<p>Pricing mechanisms for the products and other services were clearly written in the contract and purchase order. For CPO transporter, fees of services is mentioned under the contract agreement. For supplier, specific terms and conditions are mentioned under notes and conditions on the transport and payment documentation.</p>	Yes
<b>4.6.3.2</b>	<p>All contracts shall be fair, legal and transparent and agreed payments shall be made in timely manner.</p> <p><b>- Major compliance -</b></p>	<p>This requirement is in compliance. All contracts and purchases are documented i.e in the form of purchase orders, invoices, contracts for the larger transaction. All documents are signed by both vendor and mill.</p>	Yes

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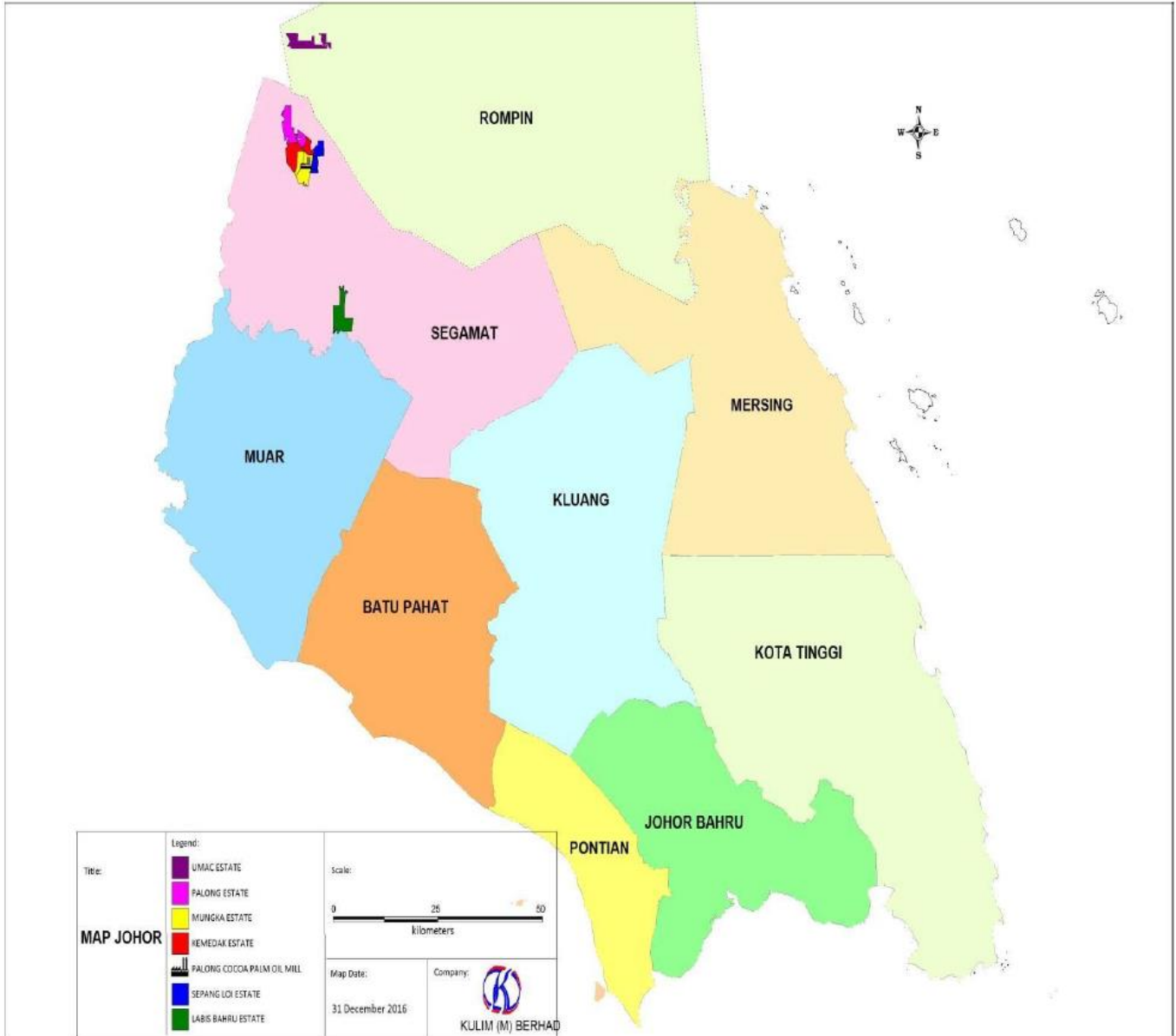
Criterion / Indicator		Assessment Findings	Compliance
		All contracts terms and conditions were made transparent with evidence of stamp duty for legalization and agreed from both parties. Sampling on Yewtan Enterprise Sdn Bhd ref: MPSB/G1/6/2(2000) dated 15 June 2020.	
<b>Criterion 4.6.4: Contractor</b>			
<b>4.6.4.1</b>	In case of the engagement of contractors, they shall be made to understand the MSPO requirements and shall provide the required documentation and information.  <b>- Major compliance -</b>	Palong Cocoa POM had informed its contractors Regarding the need to follow the MSPO requirements. Awareness briefing was done the stakeholders including contractors on the MSPO requirements. As for the CPO transporter, a revised contract agreement was sent to the transporter (Yewtan Enterprise Sdn Bhd) to include special clause on MSPO compliance.	Yes
<b>4.6.4.2</b>	The management shall provide evidence of agreed contracts with the contractor.  <b>- Major compliance -</b>	Evidence of agreed contracts (contract extension) with the contractors were verified. Signed document dated 28/2/18 was made available for verification.	Yes
<b>4.6.4.3</b>	The management shall accept MSPO approved auditors to verify the assessments through a physical inspection, if required.  <b>- Minor compliance -</b>	The requirement of accepting MSPO accredited auditors to audit against the contractors are being stated in the formal letter attachment to the contractors.	Yes

**Appendix B: List of Stakeholders Contacted**

<b>Government Officer:</b> Nil	<b>Community/neighbouring village:</b> Nil
<b>Suppliers/Contractors/Vendors:</b> Nil	<b>Worker's Representative/Gender Committee:</b> Nil

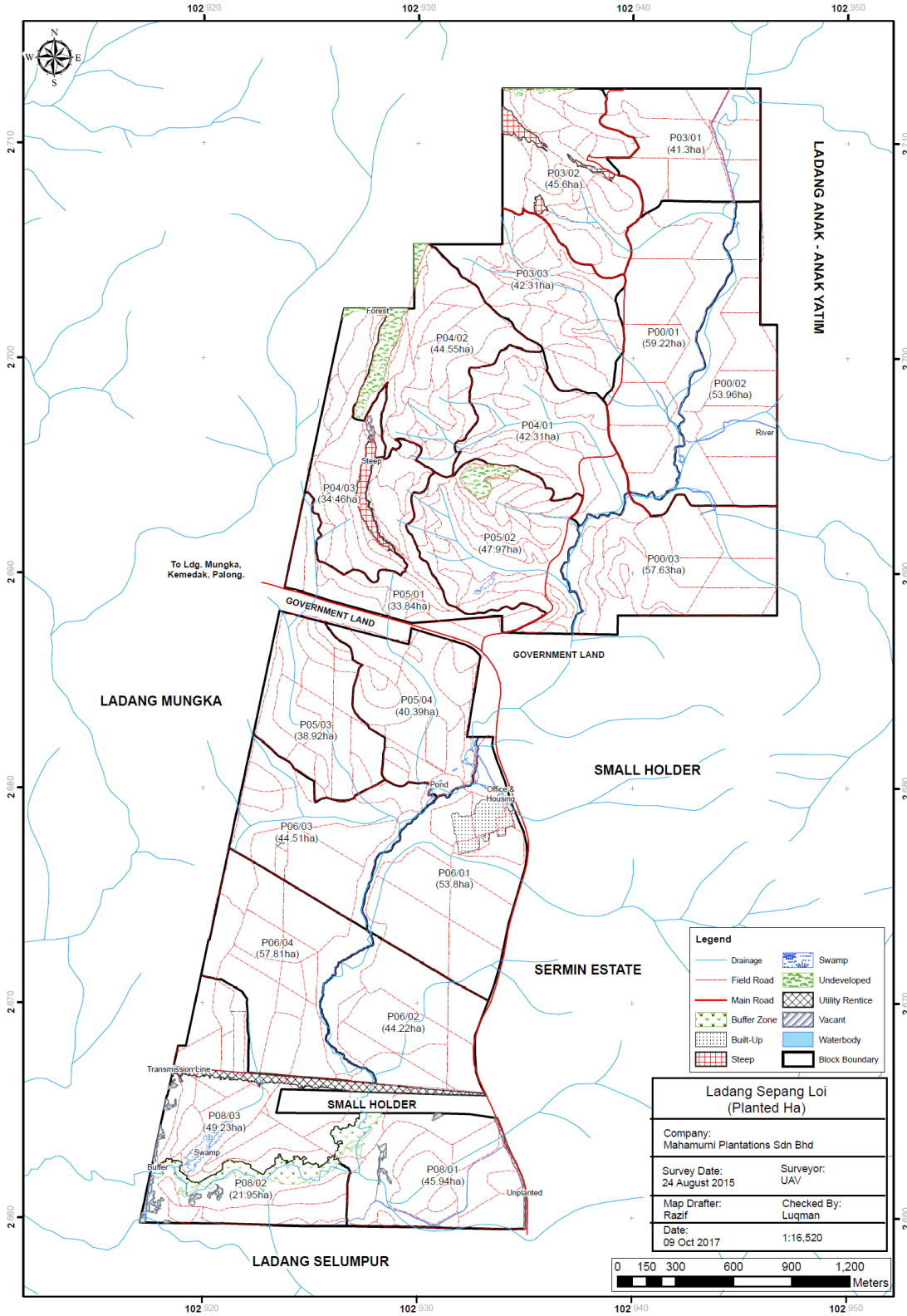


**Appendix D: Location and Field Map**

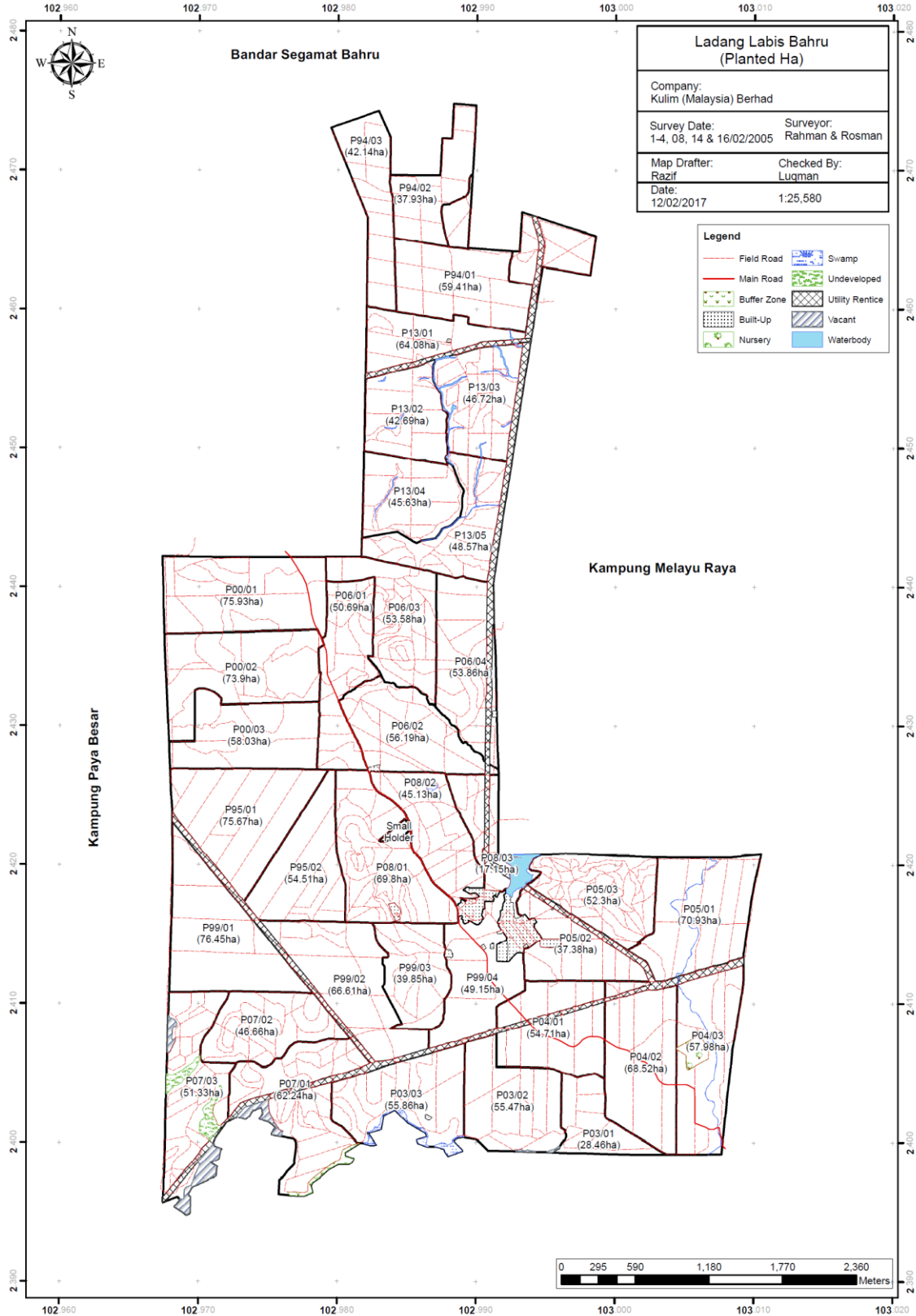




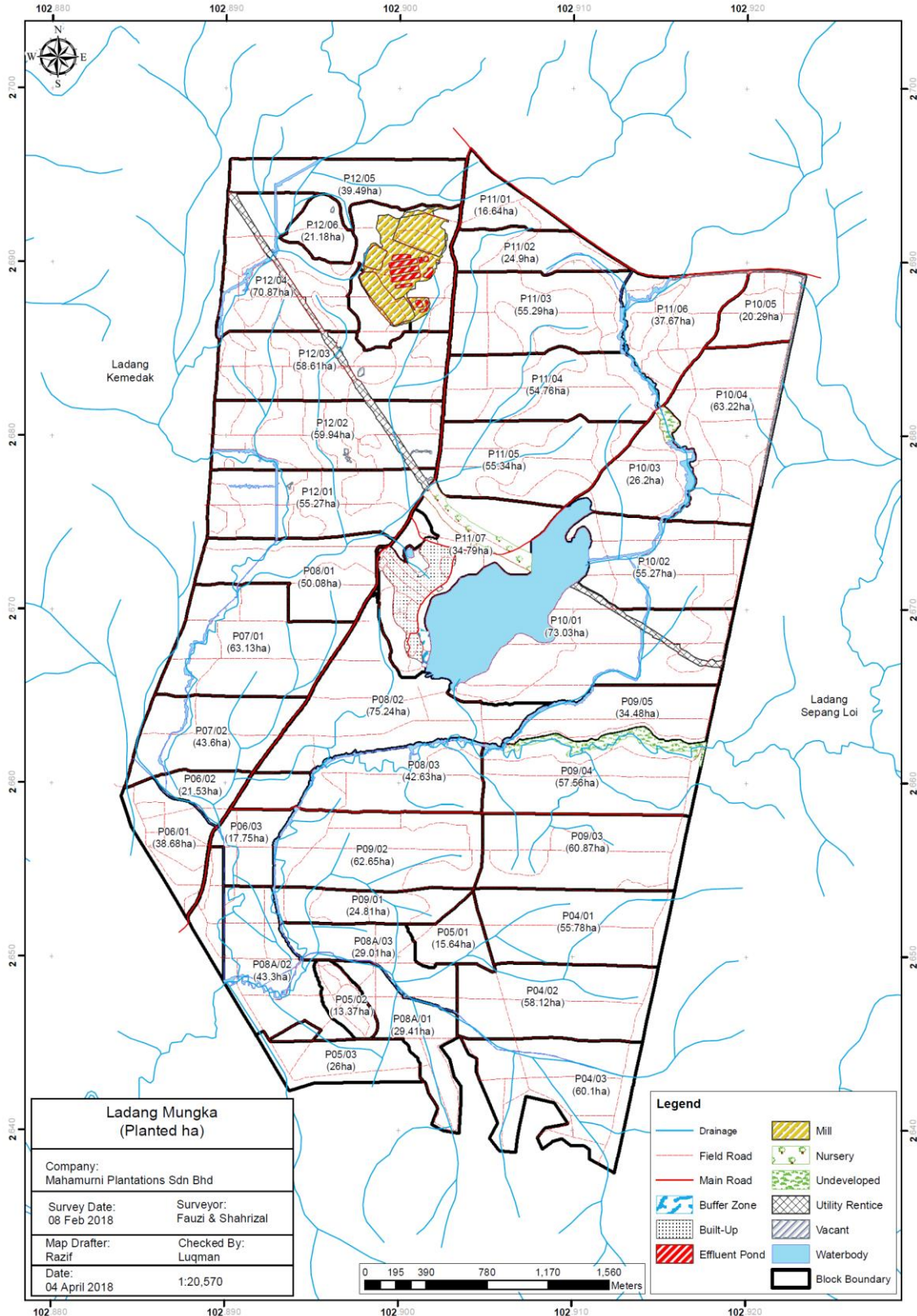
**Sepang Loi Estate**



**Labis Bahru Estate**



**Mungka Estate**



**Appendix E: List of Abbreviations**

BOD	Biochemical Oxygen Demand
CB	Certification Bodies
CHRA	Chemical Health Risk Assessment
COD	Chemical Oxygen Demand
CPO	Crude Palm Oil
EFB	Empty Fruit Bunch
EHS	Environmental, Health and Safety
EIA	Environmental Impact Assessment
EMS	Environmental Management System
FFB	Fresh Fruit Bunch
FPIC	Free, Prior, Informed and Consent
GAP	Good Agricultural Practice
GHG	Greenhouse Gas
GMP	Good Manufacturing Practice
GPS	Global Positioning System
HCV	High Conservation Value
IPM	Integrated Pest Management
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