

**MALAYSIAN SUSTAINABLE PALM OIL
ANNUAL SURVEILLANCE ASSESSMENT (ASA1_1)
Public Summary Report**

KERESA PLANTATIONS SDN BHD
Client company Address: Head Office: Level 5, Tun Jugah Tower 18, Jalan Tunku Abdul Rahman 93100 Kuching, Sarawak, Malaysia
Certification Unit: Keresa Palm Oil Mill, Sujan Estate and Jiba Estate Location of Certification Unit: Lot 1, Block 17, Lavang Land District 97000 Bintulu, Sarawak, Malaysia

Report prepared by:
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Report Number: 3240877

Assessment Conducted by:
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Section 1: Executive Summary

1.1 Organizational Information and Contact Person			
Company Name	Keresia Plantations Sdn Bhd		
Mill/Estate	MPOB License No.	Expiry Date	
	Keresia POM: 510557004000	31/3/2022	
	Sujan Estate: 503656102000	28/2/2022	
	Jiba Estate: 503656102000	28/2/2022	
Address	Lot 1, Block 17, Lavang Land District, 97000 Bintulu, Sarawak, Malaysia		
Certification Unit	Keresia Palm Oil Mill, Sujan Estate and Jiba Estate		
Contact Person Name	A.K. Kumaran		
Website	www.keresia.com.my	E-mail	kumaran@keresia.com.my
Telephone	012-8855870/74	Facsimile	N/A

1.2 Certification Information			
Certificate Number	Mill: MSPO 644920 Plantations: MSPO 644925 (Jiba Estate) : MSPO 644923 (Sujan Estate)		
Issue Date	11/11/2015	Expiry date	10/11/2025
Scope of Certification	Mill: Production of Sustainable Palm Oil and Palm Oil Products Estate: Production of Sustainable Oil Palm Fruits		
Standard	Mill: MS 2530-4:2013 Part 4: General principles for palm oil mills Estate: MS 2530-3:2013 Part 3: General principles for oil palm plantations and organized smallholders		
Recertification (RAV) 1	21-25/09/2020		
Continuous Assessment Visit Date (CAV) 1_1	Remote Audit: 21-23/09/2021		
Continuous Assessment Visit Date (CAV) 1_2	-		
Continuous Assessment Visit Date (CAV) 1_3	-		
Continuous Assessment Visit Date (CAV) 1_4	-		
Other Certifications			
Certificate Number	Standard(s)	Certificate Issued by	Expiry Date
EU-ISCC-Cert- DE104-11422001	ISCC EU	GUT-Cert	14/07/2022
GGC-KERPSB-RSPO-CA1-2020	RSPO Principles & Criteria of Sustainable Palm Oil Production:	Global Gateway Certifications Sdn Bhd	20/10/2021

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	2018; Malaysian National Interpretation: 2019		
MSPO 717982	MSPO Supply Chain Certification Standard (MSPO SCCS) 1 st October 2018.	BSI Services Malaysia Sdn Bhd	24/10/2024

1.3 Location of Certification Unit

Name of the Certification Unit (Palm Oil Mill/ Estate/ Smallholder/ Independent Smallholder)	Site Address	GPS Reference of the site office	
		Latitude	Longitude
Keresa Palm Oil Mill	Lot 1, Block 17, Lavang Land District, 97000 Bintulu, Sarawak, Malaysia	3.16399	113.60019
Jiba Estate	Lot 1, Block 17, Lavang Land District, 97000 Bintulu, Sarawak, Malaysia	3.15513	113.56311
Sujan Estate	Lot 1, Block 17, Lavang Land District, 97000 Bintulu, Sarawak, Malaysia	3.17618	113.60269

1.4 Certified Area

Estate	Total Planted (Mature + Immature) (ha)	HCV (ha)	Infrastructure & Other (ha)	Total Area (ha)	% of Planted
Jiba Estate	2,268.82	86.01	125.47	2,480.30	91.51%
Sujan Estate	3,078.08	17.59	447.03	3,542.70	86.89%
TOTAL	5,346.90	103.60	572.50	6,023.00	

1.5 Plantings & Cycle

Estate	Age (Years)					Mature	Immature
	0 - 3	4 - 10	11 - 20	21 - 25	26 - 30		
*Jiba Estate	708.91	0.00	0.00	1,559.91	0.00	1,559.91	708.91
Sujan Estate	0.00	0.00	0.00	3,078.08	0.00	3,078.08	0.00
Total	708.91	0.00	0.00	4,637.99	0.00	4,637.99	708.91

Note: *Jiba Estate has commenced replanting at 2020 with 708.91 ha.

1.6 Certified Tonnage of FFB

Estate	Tonnage / year		
	Estimated (Sept 2020 - Oct 2021)	Actual (Sept 2020 - Aug 2021)	Forecast (Sept 2021 - Oct 2022)

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Jiba Estate	35,708.00	30,057.20	32,000.00
Sujan Estate	62,170.00	51,898.91	55,000.00
Sg Kubud Estate	71,246.00	63,364.88	67,000.00
Wajang Estate Sdn Bhd	0.00	11,424.72	12,800.00
Azam Asiakom Sdn Bhd	0.00	1,119.82	1,500.00
Paul Teo	0.00	1,236.42	1,400.00
Smallholder	0.00	2,035.38	2,500.00
Total	169,124.00	161,137.33	172,200.00
Note: -			

1.7 Uncertified Tonnage of FFB

Estate	Tonnage / year		
	Estimated (Sept 2020 - Oct 2021)	Actual (Sept 2020 - Aug 2021)	Forecast (Sept 2021 - Oct 2022)
Goldenrise	130,000.00	149,946.65	160,000.00
Smallholder	9,500.00	7,731.85	7,100.00
Other Estate	13,000.00	0.00	0.00
Azam Asiakom Sdn Bhd	0.00	395.56	0.00
Total	152,500.00	158,074.06	167,100.00
Note: -			

1.8 Certified Tonnage

	Estimated (Sept 2020 - Oct 2021)	Actual (Sept 2020 - Aug 2021)	Forecast (Sept 2021 - Oct 2022)
	FFB	FFB	FFB
Mill Capacity: 45 MT/hr	169,124.00	161,137.33	172,200.00
SCC Model: MB	CPO (OER: 20.70%)	CPO (OER: 20.59%)	CPO (OER: 20.00 %)
	35,008.67	33,180.86	34,400.00
	PK (KER: 4.30%)	PK (KER: 4.15%)	PK (KER: 4.20%)
	7,272.33	6,679.14	7,224.00

1.9 Actual Sold Volume (CPO)

CPO (MT)	MSP0 Certified	Other Schemes Certified		Conventional	Total
		ISCC	RSPO		
33,180.86	N/A	N/A	13,611.27	19,569.59	33,180.86

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1.10 Actual Sold Volume (PK)					
PK (MT)	MSP0 Certified	Other Schemes Certified		Conventional	Total
		ISCC	RSPO		
6,679.14	N/A	N/A	3,086.81	3,592.33	6,679.14

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 full remote assessment was conducted due to Pandemic COVID-19 from 21-23/09/2021. The audit programme is included as Section 2.3. This remote audit has been conducted using Information and Communication Technologies including (Microsoft Teams, WhatsApp and phone call). The planned audit objectives have been achieved, there were no connectivity issues which adversely affected the audit. The approach to the audit was to treat the Keresu POM, Sujan Estate and Jiba Estate Certification Unit as a MSPO Certification Unit. A range of environmental and social factors were covered. This includes consideration of topography, palm age, proximity to areas with HBVs, declared conservation areas and local communities.

The methodology for collection of objective evidence included physical site inspections, observation of tasks and processes, interviews of staff, workers and their families and external stakeholders, review of documentation and monitoring data. MS 2530-3:2013 and MS 2530-4:2013 were used to guide the collection of information to assess compliance. The comments made by external stakeholders were also taken into account in the assessment.

The estates or smallholders sample were determined based on formula $S = r\sqrt{n}$ 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.

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

Structured worker interviews with male and female workers and staff were held in remotely. Field workers were interviewed informally in small groups remotely. 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 ASA1_1 assessment are detailed in Section 4.2.

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

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

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

Assessment Program					
Name (Mill / Plantation / Group smallholders)	Year 1 (Re-Certification)	Year 2 (ASA1_1)	Year 3 (ASA1_2)	Year 4 (ASA1_3)	Year 5 (ASA1_4)
Keresia Palm Oil Mill	X	X	X	X	X
Sujan Estate	X	X	X	X	X
Jiba Estate	X	X	X	X	X

Tentative Date of Next Visit: September 20, 2022 - September 22, 2022

Total No. of Mandays: 11 Mandays

2.1 BSI Assessment Team

Team Member Name	Role <i>(Team Leader or Team member)</i>	Qualifications <i>(Short description of the team members)</i>
Nor Halis Abu Zar (NHA)	Team Leader	He holds Bachelor of Science, Plantation Technology and Management, graduated from Universiti Teknologi Mara. He started his career as Assistant Manager at Kulim Plantations Sdn. Bhd. managing the day to day plantation operations. In his career at Kulim Plantation, He had accumulated more than 6 years of sustainability implementation experience including workers' welfare, workers' occupational, health & safety, environment conservation and protection at buffer areas and continuous improvement management plans. He is a qualified Lead Auditor for MS2530:2013 and has accumulated more than 300 audit days throughout his current career as the auditor for multiple disciplines covering Malaysia. He has completed ISO IMS 9001, 14001 Lead Auditor Course in January 2019, MSPO 2530:2013 Lead Auditor Course in February 2019 and endorsed RSPO Lead Auditor Course in October 2020. Fluent in Bahasa Malaysia and English languages. During this assessment, he assessed on the aspects of legal, social and stakeholder engagement.
Vijay Kanna Pakirisamy (VKP)	Team Member	He holds a Bachelor's Degree in Agribusiness Science Management with Honours from University Utara Malaysia in 2010. He gained his working 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&C Lead Auditor Course in October 2019 and endorsed MSPO Lead Auditor Course in November 2019. Fluent in

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		Bahasa Malaysia and English languages. During this assessment, he assessed on the aspects of Mill best practices, Estate best practices, workers welfare, stakeholder consultation, social, long-term economic viability.
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2.2 Accompanying Persons

No.	Name	Role
	N/A	

2.3 Assessment Plan

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

Date	Time	Subjects	(NHA)	(VKP)	ICT Planned
Wednesday, 01/09/2021	1030 - 1100	Communication on document preparation - Audit plan - Any additional Information	√	√	Teleconference, Microsoft Team Meeting, Email
Tuesday, 21/09/2021 Keresia POM	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 Policy and commitment, Transparency, communication, social aspects, legal requirements, employees' welfare and stakeholder management, 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 Policy and commitment, Transparency, communication, social aspects, legal requirements, employees' welfare and stakeholder management, mill best practice, legal requirements, OHS, environment and continual improvement	√	√	Teleconference, Microsoft Team Meeting, Email
	1230 - 1330	Lunch & Break	√	√	
	1330 - 1450	Assessment and documentation review on Policy and commitment, Transparency, communication, social aspects, legal requirements, employees' welfare and stakeholder management, mill best practice, legal requirements, OHS, environment and continual improvement	√	√	Teleconference, Microsoft Team Meeting, Email
	1450 - 1500	10-minute break	√	√	

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Date	Time	Subjects	(NHA)	(VKP)	ICT Planned
	1500 - 1700	Assessment and documentation review on Policy and commitment, Transparency, communication, social aspects, legal requirements, employees' welfare and stakeholder management, mill best practice, legal requirements, OHS, environment and continual improvement	√	√	Teleconference, Microsoft Team Meeting, Email
	1700 - 1730	Interim closing briefing	√	√	Teleconference, Microsoft Team Meeting, Email
Wednesday, 22/09/2021 Sujan Estate	0900 - 1030	Assessment and documentation review on Policy and commitment, Transparency, communication, social aspects, legal requirements, employees' welfare, stakeholder management, 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 Policy and commitment, Transparency, communication, social aspects, legal requirements, employees' welfare, stakeholder management, 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 Policy and commitment, Transparency, communication, social aspects, legal requirements, employees' welfare, stakeholder management, good agricultural practices, legal requirements, OHS, environment, biodiversity, and continual improvement	√	√	Teleconference, Microsoft Team Meeting, Email
	1450 - 1500	10-minute break	√	√	
	1500 - 1700	Assessment and documentation review on Policy and commitment, Transparency, communication, social aspects, legal requirements, employees' welfare, stakeholder management, good agricultural practices, legal requirements, OHS, environment, biodiversity, and continual improvement	√	√	Teleconference, Microsoft Team Meeting, Email
	1700 - 1730	Interim closing briefing	√	√	Teleconference, Microsoft Team Meeting, Email

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Date	Time	Subjects	(NHA)	(VKP)	ICT Planned
Thursday, 23/09/2021 Jiba Estate	0900 - 1030	Assessment and documentation review on Policy and commitment, Transparency, communication, social aspects, legal requirements, employees' welfare, stakeholder management, 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 Policy and commitment, Transparency, communication, social aspects, legal requirements, employees' welfare, stakeholder management, 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 Policy and commitment, Transparency, communication, social aspects, legal requirements, employees' welfare, stakeholder management, good agricultural practices, legal requirements, OHS, environment, biodiversity, and continual improvement	√	√	Teleconference, Microsoft Team Meeting, Email
	1450 - 1500	10-minute break	√	√	
	1500 - 1700	Assessment and documentation review on Policy and commitment, Transparency, communication, social aspects, legal requirements, employees' welfare, stakeholder management, good agricultural practices, legal requirements, OHS, environment, biodiversity, and continual improvement	√	√	Teleconference, Microsoft Team Meeting, Email
	1700 - 1730	Audit team discussion and 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

The nonconformity is listed below.

During the ASA1_1 there was one (1) Minor nonconformities raised. The Keresa Palm Oil Mill, Sujan Estate and Jiba Estate certification unit submitted Corrective Action Plans for the nonconformity. Corrective action plans with respect to the nonconformity was reviewed by the BSI audit team and accepted.

The implementation of the corrective action plans to address the minor nonconformity will be followed up during the next surveillance assessment.

Minor Nonconformities:		
Ref: 2108204-202109-N1	Area/Process: Sujan & Jiba Estate	Clause: 4.4.4.2 Part 3
	Issue Date: 23/09/2021	Due Date: Next Surveillance Audit
Requirements:	The occupational safety and health plan shall cover the following: b. The risks of all operations shall be assessed and documented.	
Statement of Nonconformity:	Risk identification were not conducted in accordance to Occupational Safety and Health Act 1994 – Occupational Safety & Health (Noise Regulations) 2019 requirements.	
Objective Evidence:	Jiba Estate and Sujan Estate has not identified whether their employees may be exposed to excessive noise in the place of work as stated in the Occupational Safety and Health Act 1994 – Occupational Safety & Health (Noise Regulations) 2019 which states under clause 3, “Employer shall identify whether his employee may be exposed to excessive noise in the place of work in the manner as determine by DG”.	
Corrections:	1) Safety and Health PIC to conduct and identify the risk assessment on the targeted operations for Jiba and Sujan Estate. 2) The assessment to be documented accordance to the standard regulated assessment accordingly.	
Root cause analysis:	Poor assessment and documentation of the risks assessment for the operations.	
Corrective Actions:	Safety and Health PIC to conduct annual assessment for identification of risk upon targeted operations for continual improvement.	
Assessment Conclusion:	Corrective action plan accepted. The effectiveness of corrective action will be verified during next surveillance audit.	

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Opportunity For Improvement		
Ref: N/A	Area/Process: N/A	Clause: N/A
Objective Evidence:	N/A	

Noteworthy Positive Comments	
1	Good positive comments from internal and external stakeholders
2	Good commitment by management

3.3 Status of Nonconformities Previously Identified and OFI

Minor Nonconformities:		
Ref: 1962394-202009-N1	Area/Process: Jiba Estate	Clause: Part 3 4.4.5.4
	Issue Date: 25/9/2020	Date of closure: 23/09/2021
Requirements:	Management should ensure employees of contractors are paid based on legal or industry minimum standards according to the employment contract agreed between the contractor and his employee.	
Statement of Nonconformity:	Payment Conditions by Jiba Estate’s Contractor to the contractor’s workers were not in accordance with the Contractor’s Contract Agreement and Legal Requirements.	
Objective Evidence:	<p>Labour Ordinance Chapter 76 (1958 Ed.); Chapter XIV; Lawful Deductions; (Section 114) No deductions shall be made by an employer from the wages of an employee otherwise than in accordance with this Ordinance. (4) The following deductions shall not be made except at the request in writing of the employee and with the prior permission in writing of the Director General: (b) deductions in respect of repayments of advances of wages made to an employee under section 103 where interest is levied on the advances and deductions in respect of the payments of the interest so levied; (e) deductions in respect of the rental for accommodation and the cost of services, food and meals provided by the employer to the employee at the employee’s request or under the terms of the employee’s contract of service.</p> <p>There were deductions done by Contractor PNS Jaya Sdn Bhd (1301698) – M on 2 of the sampled workers (IC Number: 840314-13-XXXX & 880403-01-XXXX) for the month of June 2020, July 2020 & Aug 2020. Deductions were stated in the pay slips as ‘advance of wages’ and ‘worker rations’. The contractor does not have the request in writing of the employee nor the prior permission in writing of the Director General to deduct the employee’s wages.</p>	
Corrections:	<p>Mechanism of monitoring by estate clerk and executive-in-charge and to be verification from the Estate Manager on monthly basis in order to avoid repeated occurrence.</p> <p>To brief the contractor on the legal regulations as stated in the Labour Ordinance Chapter 76 (1958 Ed.); Chapter XIV; Lawful Deductions; (Section 114). The contractor to adhere to legal requirements.</p>	
Root cause analysis:	Poor monitoring from the estate management / PIC accordance to the SOP.	
Corrective Actions:	An internal memorandum is given to the estate for continuous monitoring of pay slip of contractor’s employees.	

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	Estate clerk to check on any unlawful deductions by the contractor and report to the estate manager for further action. No unlawful deductions to be made by the contractor against the employees.
Assessment Conclusion:	The corrective action plan is accepted. The effectiveness of CAP implementation will be assessed during next assessment.
Verification Statement	<p>ASA 1_1 Verification:</p> <p>Sighted Internal Memorandum The Assistant General Manager, Operation/ Sustainability to contractors named Mr James Ling, Mr Wong Yuk Lung, Mr Chan Kai Chun, Mr Paul Teo Chung Chao and Mr Yong Soon Sin dated 28/09/2020 with Subject: Lawful Deduction by Contractors. Sighted Acknowledgment by Mr Paul Teo Chung Chao from PNS Jaya Sdn Bhd. No illegal deduction has been made that against Law and Regulation. Estate clerk has been monitored closely on pay slip employee of contractors. Verification has been made during this audit on mentioned contractors found that there is no illegal deduction has been made.</p> <p>Thus, Minor NC was effectively closed on 23/09/2021.</p>

Minor Nonconformities:		
Ref: 1962394-202009-N2	Area/Process: Keresa POM	Clause: Part 4: 4.5.3.3
	Issue Date: 25/9/2020	Date of closure: 23/09/2021
Requirements:	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.	
Statement of Nonconformity:	Mitigation measures to prevent/control spillage was not effectively implemented.	
Objective Evidence:	During the site visit at the Keresa Mill Laboratory, it was noted that the temporary storage of spent chemical (SW430) was not stored in an appropriate container and the mitigation measures to prevent/control spillage was not effectively implemented.	
Corrections:	A proper skid tray will be provided to cater for spent chemical (SW430) residues. Those containers shall be label properly and dispose to a spent chemical drum kept at schedule waste store.	
Root cause analysis:	Lack of training by the PIC to the laboratory personnel.	
Corrective Actions:	To conduct awareness training annually to all lab personnel. Weekly inspection to be carried out by the PIC and verified by the Senior Assistant Manager/ Mill Manager.	
Assessment Conclusion:	The corrective action plan is accepted. The effectiveness of CAP implementation will be assessed during next assessment.	
Verification Statement	<p>ASA 1_1 Verification:</p> <p>During the assessment, it was acknowledged that the management have taken appropriate measures to address the rained non-conformity as per the corrective action plans.</p> <p>1. Photographic evidence was available showing the containers well labelled and placed on skid trays.</p>	

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	<p>2. All lab personals were trained on 28/06/2021 on Chemical Handling and Scheduled Waste (Chemical) Handling. The records were available for verification.</p> <p>3. The SOP - Scheduled Waste (Doc Code: SOP/KMSB/Scheduled Waste/R3) was reviewed on 14/07/2021 to include proper storage of chemical containers and its mitigation measures. The revised SOP was available for verification.</p> <p>4. Weekly Hazardous Waste Container Inspection Checklist was available as a weekly inspection by the PIC to ensure the operations are in accordance with the SOP. The checklist for Jan 2021 to Sep 2021 was available for verification.</p> <p>Based on the evidence provided, the management have successfully addressed the non-conformity.</p> <p>Thus, Minor NC was effectively closed on 23/09/2021.</p>
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3.4 Summary of the Nonconformities and Status

CAR Ref.	CLASS	ISSUED	STATUS
1822366-201904-M1	Major	19/9/2019	Closed on 11/10/2019
1822366-201904-N1	Minor	19/9/2019	Closed on 25/9/2020
1822366-201904-N2	Minor	19/9/2019	Closed on 25/9/2020
1822366-201904-N3	Minor	19/9/2019	Closed on 25/9/2020
1822366-201904-N4	Minor	19/9/2019	Closed on 25/9/2020
1822366-201904-N5	Minor	19/9/2019	Closed on 25/9/2020
1962394-202009-N1	Minor	25/9/2020	Closed on 23/09/2021
1962394-202009-N2	Minor	25/9/2020	Closed on 23/09/2021
2108204-202109-N1	Minor	23/09/2021	Open

3.5 Issues Raised by Stakeholders

IS #	Description
1	<p>Issues: Ms. Ashly Eng Yean Peng (A & E Maju Sdn Bhd, CPO Transporter) – Contract agreement have mutually understood and sign by both parties. They have very good repo with Keresa’s Management. Payments are all done in a timely manner. The management often includes them in all stakeholder meetings. Training related MSP0 has been given to them. There is no complaint related management matters.</p> <p>Management Responses: Positive comments noted.</p> <p>Audit Team Findings: No further issue.</p>
2	<p>Issues: Mr Tu Thu Chu Kion (Aweventure Sdn Bhd, Transporter CPO) - Contract agreement have mutually understood and sign by both parties. They have very good repo with Keresa’s Management. Payments</p>

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	<p>are all done in a timely manner. The management often includes them in all stakeholder meetings. Training related MSPO has been given to them. There is no complaint related management matters.</p> <p>Management Responses: Positive comments noted.</p> <p>Audit Team Findings: No further issue.</p>
3	<p>Issues: Caroline Ering (Canteen Owner Keresa POM) – Management has given MSPO Training to Canteen Owner. Letter of acknowledgment has been signed after training given. During Pandemics, the business hours were less that usually due to government restriction. Dine in at canteen were restricted to avoid sporadic of cases. Management was supports the canteen business and aids with any assistance when required.</p> <p>Management Responses: Positive comments noted.</p> <p>Audit Team Findings: No further issue.</p>
4	<p>Issues: Tuai Rumah Majang (Tr Rh. Majang) – They have very good repo with Keresa’s Management. Jiba Estate and Sujan Estate has provided a lot of assistance to the neighbouring communities as and when required such as providing water tanks, chairs and machineries for works done at the villages. Awareness related MSPO has been given during stakeholder’s consultation. No complaint or grievances recorded.</p> <p>Management Responses: Positive comments noted.</p> <p>Audit Team Findings: No further issue.</p>
5	<p>Issues: Tuai Rumah Ticho Anak Anchai (Tr Rh. Ticho) - They have very good repo with Keresa’s Management. Jiba Estate and Sujan Estate has provided a lot of assistance to the neighbouring communities as and when required such as providing water tanks, chairs and machineries for works done at the villages. Awareness related MSPO has been given during stakeholder’s consultation. No complaint or grievances recorded.</p> <p>Management Responses: Positive comments noted.</p> <p>Audit Team Findings: No further issue.</p>

Section 4: Assessment Conclusion and Recommendation

Acknowledgement of Internal Responsibility and Formal Sign-off of Assessment Findings	
Based on the findings during the assessment Keresia Palm Oil Mill, Sujana Estate and Jiba Estate Certification Unit complies with the MS 2530-3:2013 and MS 2530-4:2013. It is recommended that the certification of Keresia Palm Oil Mill, Sujana Estate and Jiba Estate Certification Unit is approved and/or continued.	
Acknowledgement of Assessment Findings	Report Prepared by
Name: A. K. Kumaran	Name: Nor Halis Abu Zar
Company name: Keresia Plantations Sdn Bhd Keresia Mill Sdn Bhd	Company name: BSI Services Malaysia Sdn. Bhd.
Title: General Manager – Plantations & Mill	Title: Client Manager
Signature:  A.K. KUMARAN General Manager Plantations & Mill	Signature: 
Date: 28 / 09 / 2021	Date: 28/09/2021

Appendix A: Summary of the findings by Principles and Criteria

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

Criterion / Indicator	Assessment Findings	Compliance	
4.1 Principle 1: Management commitment & responsibility			
Criterion 4.1.1 – Malaysian Sustainable Palm Oil (MSPO) Policy			
4.1.1.1	<p>A policy for the implementation of MSPO shall be established.</p> <p>- Major compliance -</p>	<p>Keresa Plantations Sdn. Bhd. have established a policy for the implementation of MSPO undersigned by the Senior Group General Manager dated on April 2015.</p> <p>Latest policy communication to workers has been conducted on: Sujan Estate: 22/01/2021 Jiba Estate: 29/03/2021</p>	Complied
4.1.1.2	<p>The policy shall also emphasize commitment to continual improvement.</p> <p>- Major compliance -</p>	<p>The MSPO Policy emphasizes on the commitment to sustainable development and continuous improvement on growing and milling operations through MSPO implementations and principles as stated in the policy.</p>	Complied
Criterion 4.1.2 – Internal Audit			
4.1.2.1	<p>Internal audit shall be planned and conducted regularly to determine the strong and weak points and potential area for further improvement.</p> <p>- Major compliance -</p>	<p>The MSPO Internal Audit Procedure (KERESA/MSPO/QP-10; Rev 3; Revision date: 01/09/2020) has been established. The procedure states that the internal audit shall be conducted to ensure that the implementation of the Company’s Management System is in line with the defined policies, objectives, procedures and other applicable requirements. The procedure states the frequency of the audit is to be carried out at least once (1) yearly.</p>	Complied

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Criterion / Indicator		Assessment Findings	Compliance
		<p>As per the MSPO Internal Audit Procedure, Keresa Plantations have conducted MSPO internal audit for Jiba Estate and Sujan Estate on a yearly basis. The details of the Internal Audit are as below.</p> <ol style="list-style-type: none"> 1. Sujan Estate conducted the Internal Audit on 13/08/2021. The audit summary findings indicated that there were 2 Major findings from Principle 5. Lead auditor was Mr Abdul Azizi Zainal Abidin with 5 team members. 2. Jiba Estate conducted the Internal Audit on 13/08/2021. The audit summary findings indicated that there were 2 Major findings from Principle 2 and Principle 5 respectively. Lead auditor was Mr Abdul Azizi Zainal Abidin with 5 team members. 	
4.1.2.2	<p>The internal audit procedures and audit results shall be documented and evaluated, followed by the identification of strengths and root causes of nonconformities, in order to implement the necessary corrective action.</p> <p>- Major compliance -</p>	<p>The MSPO Internal Audit Procedure (KERESA/MSPO/QP-10; Rev 3; Revision date: 01/09/2020) has been documented and available for verification.</p> <ol style="list-style-type: none"> 1. Sujan Estate conducted the Internal Audit on 13/08/2021. The audit summary findings indicated that there were 2 Major findings from Principle 5. Lead auditor was Mr Abdul Azizi Zainal Abidin with 5 team members. A Corrective Action Request & Response for NC raised were stated the description of non-conformance, root cause analysis, corrective action plan and verification is identified and stated. The Corrective Action was produced, and the non-conformance was closed accordingly. 2. Jiba Estate conducted the Internal Audit on 13/08/2021. The audit summary findings indicated that there were 2 Major findings from Principle 2 and Principle 5 respectively. Lead auditor was Mr Abdul Azizi Zainal Abidin with 5 team members. A Corrective Action Request & Response for NC raised were stated the description of non-conformance, root cause analysis, corrective action plan and 	Complied

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Criterion / Indicator		Assessment Findings	Compliance
		verification is identified and stated. The Corrective Action was produced, and the non-conformance was closed accordingly.	
4.1.2.3	Report shall be made available to the management for their review. - Major compliance -	The MSPO Internal Audit Procedure (KERESA/MSPO/QP-10; Rev 3; Revision date: 01/09/2020) states that the internal audit report is to be provided to the auditee during the closing meeting or within 2 weeks of the date the audit is conducted. The MSPO Internal Audit Report was available at both estates for verification.	Complied
Criterion 4.1.3 – Management Review			
4.1.3.1	The management shall periodically review the continuous suitability, adequacy and effectiveness of the requirements for effective implementation of MSPO and decide on any changes, improvement and modification. - Major compliance -	The Management Review Procedure (First Editions; Version 2.0) dated January 2020 was established. MSPO Management Review was conducted simultaneously for Sujan Estate and Jiba Estate on 24/08/2021. The management review minutes meeting was available for verification. The meeting mainly discussed on the Internal Audit that had just been conducted in both the estates. Among agenda discussed were: <ol style="list-style-type: none"> 1. Welcome speech 2. Review Input: Follow up action from previous management review 3. Internal audit & External audit 4. Customer and stakeholder feedbacks: Complaint & grievances 5. Process performance & product conformity 6. Status of corrections and corrective action 7. Changes that could affect MSPO and MSPO SCCS System 8. MSPO Policy 	Complied

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Criterion / Indicator		Assessment Findings	Compliance
		9. Other matters or recommendation for improvement 10. Review output 11. Closing	
Criterion 4.1.4 – Continual Improvement			
4.1.4.1	<p>The action plan for continual improvement shall be based on consideration of the main social and environmental impact and opportunities of the company.</p> <p>- Major compliance -</p>	<p>Keresa Plantations Sdn Bhd have developed a Continuous Improvement Plan (Update 1st April 2021). Among the improvements that have been identified are:</p> <ol style="list-style-type: none"> 1. Economic Values: Better Management Systems. <ul style="list-style-type: none"> • Maintain documentation register & updates. • Plantation records register & updates • Monthly workplace inspections • Action requests systems introduced • Review if records & documentation 2. Social Values: Healthy & Safety at Workplace <ul style="list-style-type: none"> • OSH site audit & workplace assessment • OSH policy and plan drafted & issued • List of major infra works to improve OSH compliance • OSH Training: Chemical Handling, Safe Harvesting Practices & Emergency Response Plan. 3. Environmental Values: Control of Pollution & Significant Impacts on Environment (Action 2) <ul style="list-style-type: none"> • Waste management guidelines & Implementation • Water Quality • Environmental & Biodiversity review 	Complied

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Criterion / Indicator		Assessment Findings	Compliance
		<ul style="list-style-type: none"> • Buffer Zone & Riparian demarcation guidelines & implementation. • Trimester Environmental Audit <p>4. Social Values: Core Labour Standards</p> <ul style="list-style-type: none"> • Social Policies drafted & circulated grievance procedure, equal rights, OSH, Environment, FOA, JCC, Sexual Harassment, OSH & Grievance Procedures. • Training and re-training on social policies: sexual harassment, OSH & Grievance Procedures. • Annual Consultation with workers/staffs. • Monthly meeting with worker’s representatives <p>5. Community: Action Plan</p> <ul style="list-style-type: none"> • Improving recording of benefits/ investment in community. • Smallholder certification pilot initiative (POPSI) • Road & Fertilizer subsidy / support mechanism. 	
4.1.4.2	<p>The company shall establish a system to improve practices in line with new information and techniques or new industry standards and technology (where applicable) that are available and feasible for adoption.</p> <p>- Major compliance -</p>	<p>This is being made upon confirmation of any new projects. Employees were briefed of any new development in basic understanding during the weekly briefings. The management team will be informed of such development during the monthly management meetings. Dissemination of information by the General Manager are transacted during the monthly Managers meetings and emails.</p>	Complied
4.1.4.3	<p>An action plan to provide the necessary resources including training, to implement the new techniques or new industry standard or technology (where applicable) shall be established.</p> <p>- Major compliance -</p>	<p>Where introduction of new machines and new work method, all level of employees will be trained to handle /implement the new techniques and work changes. Monitoring is made by the Estate Managers and Assistants throughout the on-the-job training and familiarization.</p>	Complied

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Criterion / Indicator	Assessment Findings	Compliance	
4.2 Principle 2: Transparency			
Criterion 4.2.1 – Transparency of information and documents relevant to MSPO requirements			
4.2.1.1	The management shall communicate the information requested by the relevant stakeholders in the appropriate languages and forms, except those limited by commercial confidentiality or disclosure that could result in negative environmental or social outcomes. - Major compliance -	Verified that Sujan Estate and Jiba Estate management have maintained records of requests and responses, Land titles/user rights, Safety and health plan, assessments relating to environmental and social impact, Plan for pollution prevention, Records of complaints and grievances, Plan for continuous improvement. These documents are all available upon request.	Complied
4.2.1.2	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. - Major compliance -	Sujan Estate and Jiba Estate management holds copies of every management documents that are required to be publicly available. Copies of the document such as Impact Assessments relating to environmental and social, plan for pollution preventions, records of complaints and grievances were available on request. All these documents were kept in the estate offices. Requests for official documents through the estate office will have to go through the estate manager/assistant in charge, who will make the decision as to whether the information can be shared to or viewed by the person requesting the information or document.	Complied
Criterion 4.2.2 – Transparent method of communication and consultation			
4.2.2.1	Procedures shall be established for consultation and communication with the relevant stakeholders. - Major compliance -	Keresa Plantations Sdn. Bhd. Management have established Procedures for Communication of Social Policies (Chapter 3, Reference No: SOC 3.1, Date issue: Dec 2009, Version 1) and Complaints & Grievances Procedure (Reference No: SOC 3.2, Version 1) that define the responsibilities and actions required for receiving, recording and	Complied

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Criterion / Indicator		Assessment Findings	Compliance
		<p>responding to enquiries and requests from internal and external stakeholders.</p> <p>The procedure outlines the process of communication on the social policies, lodging grievances and monitoring implementation. The Standard Operating Procedure has identified mechanisms for consultation and communication with the relevant stakeholders.</p> <p>Jiba Estate and Sujan Estate have implemented the "Communication and Consultation Management Guidelines" as evidenced by the maintenance of filing systems for recording written requests for assistance and information. Sighted the file for Workers Complaints available at the estates.</p> <p>Regular communication with stakeholders was done through organized meetings. Refer JCC Meeting "Mesyuarat Ahli JKK Perunding Bersama" dated 08/05/2021.</p> <p>Estates has shown a good communication, by publishing the flow chart of Procedure "Pengurusan Aduan Pekerja/Stakeholder" at the notice board of estate office and housing complex. The feedback can be forwarded to the estate management or to Suggestion Box located at the muster ground and office.</p> <p>Interviews with Stakeholders confirmed that both estates have an open approach to communication with staff, workers and local communities.</p>	
4.2.2.2	<p>A management official should be nominated to be responsible for issues related to Indicator 1 at each operating unit.</p> <p>- Minor compliance -</p>	<p>The management has appointed Ms. Suzella Demie (Sustainability and Compliance Executive) as the Communication Representative for the mill as stated in the appointment letter as Social Management Representative dated 02/04/2021 undersigned by the Deputy General Manager – Operations/Sustainability.</p>	Complied

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4.2.2.3	<p>List of stakeholders, records of all consultation and communication and records of action taken in response to input from stakeholders should be properly maintained.</p> <p>- Major compliance -</p>	<p>Stakeholder list include the supplier, contractor, smallholders, external stakeholders, villagers, long house & government agency such as DOSH, MPOB, DOE, Labour department & etc has been established at Sujan Estate and Jiba Estate. Latest update of list of stakeholders has been made on 01/09/2021 for both estates.</p> <p>Meeting with stakeholders of Sujan Estate and Jiba Estate has been postponed due to Pandemic. However, estate and sent letter and email requisition to their stakeholders to gain any complaint or grievances related management. Sighted evidence of feedback from stakeholders found there is no issue recorded. Refer letter from Keresa Plantations Sdn Bhd dated 01/09/2021, KPSB/SH01/09/21 and sample feedback from stakeholders, Edwin Eddy (JTK Sarawak) dated 09/09/2021, Majang Ragan (RH Rumah Majang) dated 20/09/2021, and Pang Fan Di (Wagro Trading) dated 07/09/2021.</p> <p>Joint consultative committee (JCC) meeting, internal stakeholder meeting that involve worker representative and chaired by Mr. Abdul Aziz Zainal Abidin, Deputy General Manager. The latest meeting was conducted on 08/05/2021. All issues have been discussed with current action plan has been established.</p>	Complied
Criterion 4.2.3 – Traceability			
4.2.3.1	<p>The management shall establish, implement and maintain a standard operating procedure to comply with the requirements for traceability of the relevant product(s).</p> <p>- Major compliance -</p>	<p>Both the estates send their FFB to Keresa POM. Weighbridge tickets were available for verification and maintained for traceability of all FFBs sent to the mill. Weighbridge tickets were sampled for both estates. The weighbridge ticket provided the following details among others:</p> <ul style="list-style-type: none"> • Product (FFB or Loose fruit) 	Complied

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Criterion / Indicator		Assessment Findings	Compliance
		<ul style="list-style-type: none"> • Delivery note from estates stating the weight and fruit grade (A or B). • D.O Number • Date of the shipment <p>SOP on the Traceability of FFB Production (Doc Number: SOP/ISCC/KPSB/EST 1) was established dated 01 March 2011, reviewed on 25.10.2019. The procedure requires validation of certificate of supplying estates. The procedure had identified critical control points to prevent contamination of non-certified FFB. The responsible personal for the traceability is the Estate Manager of each supplying units.</p>	
4.2.3.2	The management shall conduct regular inspections on compliance with the established traceability system. - Major compliance -	<p>Traceability Audit was carried out on monthly basis by the Sustainably Department on the harvesting teams at both estates. Regular Inspections are done to ensure the traceability system is well implemented.</p> <p>The details of the records include Block No, FFB Driver Daily Collection (Bunch), Average Bunch Weight, Total Weight and division which show the traceability from estate field to the mill. Sighted the traceability audit report for Jiba Estate and Sujan Estate dated 11/08/2021.</p>	Complied
4.2.3.3	The management should identify and assign suitable employees to implement and maintain the traceability system. - Minor compliance -	The management has appointed Ms. Alicesa Anak Ramba (Sustainability & Compliance Executive) as the Traceability Representative for the estates as stated in the appointment letter dated 2 nd April 2021 undersigned by the Deputy General Manager.	Complied
4.2.3.4	Records of sales, delivery or transportation of FFB shall be maintained.	Delivery of FFB from Jiba Estate and Sujan Estate from field to Keresu POM was monitored closely by respective estate managements.	Complied

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Criterion / Indicator		Assessment Findings	Compliance
	- Major compliance -	Sighted the records of delivery or transportation of FFB. These records are maintained, and the documents are kept by the estates and mill.	
4.3 Principle 3: Compliance to legal requirements			
Criterion 4.3.1 – Regulatory requirements			
4.3.1.1	All operations are in compliance with the applicable local, state, national and ratified international laws and regulations. - Major compliance -	Keresa Plantations Sdn. Bhd has maintained the systems for documentation, checking and assessment of legal compliance with applicable laws and regulations. Inspection of records showed that the both estates has maintained legal compliance with statutory requirements. Sample of permit and license sighted as listed below: 1. MPOB License (FFB); License Number: 503656102000; License Expiry Date: 28/02/2022. 2. MPOB License (Nursery); License Number: 51606611000; License Expiry Date: 31/10/2021. 3. Permit Barang Kawalan Berjadual; Registration Number: BTU. P. 33.2007(D); Description: Diesel; License Expiry Date: 13/07/2023.	Complied
4.3.1.2	The management shall list all laws applicable to their operations in a legal requirements register. - Major compliance -	A Legal Compliance procedure has been established (KP 16 Mechanism for ensuring legal compliance dated 15 Mar 2010). All operating units have Legal & Other Requirements Register (LORR) covering all the necessary regulatory requirements. The management have reviewed and updated the LORR at both estates on 01/07/2021. All the new legal requirements were included in the legal register accordingly which includes: <ul style="list-style-type: none">• Minimum Wages 2020• Akta Pencegahan dan Pegawalan Penyakit Berjangkit 1988	Complied

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Criterion / Indicator		Assessment Findings	Compliance						
		<ul style="list-style-type: none"> Movement Control Order 2020 Malaysian Movement Control Order 2020 – 2021 (Perintah Kawalan Pergerakan 2020 - 2021) 							
4.3.1.3	<p>The legal requirements register shall be updated as and when there are any new amendments or any new regulations coming into force.</p> <p>- Major compliance -</p>	Tracking systems to identify changes in the relevant regulations are available through head office, website information and the information are communicated from the Group Head Office. On the site verification, interviews with office personnel and records indicate that the system is appropriate to the operations. Tracking system on any changes in the law been well implemented.	Complied						
4.3.1.4	<p>The management should assign a person responsible to monitor compliance and to track and update the changes in regulatory requirements.</p> <p>- Minor compliance -</p>	The management have appointed Ms. Julia AK Andrew (Sustainability & Compliance Executive) as the Legal Representative for the estates as stated in the appointment letter dated 02/04/2021 undersigned by the Deputy General Manager.	Complied						
Criterion 4.3.2 – Lands use rights									
4.3.2.1	<p>The management shall ensure that their oil palm cultivation activities do not diminish the land use rights of other users.</p> <p>- Major compliance -</p>	Based on the results of documentations, site visit and stakeholder consultation, no evidence that the oil palm cultivation activities diminished the land use rights of others.	Complied						
4.3.2.2	<p>The management shall provide documents showing legal ownership or lease, history of land tenure and the actual use of the land.</p> <p>- Major compliance -</p>	<p>The estate leased the land directly from Sarawak State government and the land title from Sarawak State government was available for review.</p> <table border="1" style="width: 100%; border-collapse: collapse;"> <thead> <tr> <th style="width: 50%;">Land Title</th> <th style="width: 25%;">Lot no.</th> <th style="width: 25%;">Ha</th> </tr> </thead> <tbody> <tr> <td>(H16-10 (5.2) & BP 9/12B</td> <td>Lot 1</td> <td>6023.00</td> </tr> </tbody> </table>	Land Title	Lot no.	Ha	(H16-10 (5.2) & BP 9/12B	Lot 1	6023.00	Complied
Land Title	Lot no.	Ha							
(H16-10 (5.2) & BP 9/12B	Lot 1	6023.00							
4.3.2.3	<p>Legal perimeter boundary markers should be clearly demarcated and visibly maintained on the ground where practicable.</p>	Legal perimeter boundary has been maintained by the management. Verification through photo evidence and interview with management. Sample of boundary marking as below;	Complied						

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Criterion / Indicator		Assessment Findings	Compliance
	- Major compliance -	<p><u>Sujan Estate</u> Legal boundary was clearly demarcated with wooden pole. Boundary marking Stapang 2, Field S06K2, boundary with Borneo Agro Estate</p> <p><u>Jiba Estate</u> Legal boundary was clearly demarcated with wooden pole. Boundary marking Maps, Field J9819, boundary with GP Pusaka</p>	
4.3.2.4	<p>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).</p> <p>- Minor compliance -</p>	<p>There were no land disputes noted during the audit at Sujan and Jiba Estate as the estates have the legal ownership documents which is under the Keresa Plantations Sdn. Bhd. Interview with the stakeholders also indicated that they did not have any disputes with the estates pertaining to legal acquisition of land title.</p>	Complied
Criterion 4.3.3 – Customary rights			
4.3.3.1	<p>Where lands are encumbered by customary rights, the company shall demonstrate that these rights are understood and are not being threatened or reduced.</p> <p>- Major compliance -</p>	<p>There is no customary land in or surrounding all the estates under Keresa Plantations Sdn. Bhd. There are also no land disputes or claims involving these estates. The estate has proper legal land titles for the land ownership.</p>	N/A
4.3.3.2	<p>Maps of an appropriate scale showing extent of recognized customary rights land, if any, should made available.</p> <p>- Minor compliance -</p>	<p>There is no customary land in or surrounding all the estates under Keresa Plantations Sdn. Bhd. There are also no land disputes or claims involving these estates. The estate has proper legal land titles for the land ownership.</p>	N/A
4.3.3.3	<p>Negotiation and FPIC shall be recorded and copies of negotiated agreements should be made available.</p> <p>- Major compliance -</p>	<p>There is no customary land in or surrounding all the estates under Keresa Plantations Sdn. Bhd. There are also no land disputes or claims involving these estates. The estate has proper legal land titles for the land ownership.</p>	N/A

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Criterion / Indicator	Assessment Findings	Compliance	
4.4 Principle 4: Social responsibility, health, safety and employment condition			
Criterion 4.4.1: Social Impact Assessment (SIA)			
4.4.1.1	<p>Social impact should be identified and plans are implemented to mitigate the negative impacts and promote the positive ones.</p> <p>- Minor compliance -</p>	<p>Social Impact Assessment is done annually by the Sustainability & Compliance Department by conducting a satisfaction survey among a sampled number of workers. The summary report is available in the Report of Satisfaction Survey – Social impact Assessment August 2021- August 2022. Details in the report consists of Introduction, Sample size, Methodology, Data Analysis, Survey Findings and Conclusion.</p> <p>Based on the report it was concluded that most of the workers were satisfied with the work terms and conditions, social provisions, environment, safety and health and communication. Besides that, they were unsatisfied on prices and quality of canteen and social activities. This was identified as mainly due to the SOPs implemented during the Movement Control Order 2020 and the COVID-19 Pandemic. Management has briefed on MCO issued by Malaysia Government and SOP for COVID-19 during muster call and Worker’s Monthly Dialogue.</p>	Complied
Criterion 4.4.2: Complaints and grievances			
4.4.2.1	<p>A system for dealing with complaints and grievances shall be established and documented.</p> <p>- Major compliance -</p>	<p>Keresa Plantations Sdn Bhd has established the procedure (Chapter 3: Complaints & Grievance Procedures dated: December 2009, Revised April 2019, Version 2 Ref. Number: SOC 3.2) to deal with complaints and grievances.</p> <p>The procedure clearly states the types of complaints that can be raised, who can make the complains and grievances, how the complaints can be made, cascading the complaints to the higher personals, recording</p>	Complied

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Criterion / Indicator		Assessment Findings	Compliance
		<p>of the complaints, investigation of the complaints and action to be taken for the complaints.</p> <p>A flow chart is available to show the steps taken to address a complaint or grievances in the estates.</p>	
4.4.2.2	<p>The system shall be able to resolve disputes in an effective, timely and appropriate manner that is accepted by all parties.</p> <p>- Major compliance -</p>	<p>Verified record at Sujan Estate and Jiba Estate indicated that written communications were replied promptly, and the correspondence are kept in a file (File Aduan & Cadangan Pekerja). Complaints forms seen are responded and completed within 5 working days.</p> <p>Sighted samples of complaints as below:</p> <p><u>Sujan Estate</u></p> <p>Complainants: Saenab on 08/07/2021</p> <p>Issue: Lamp broken</p> <p>Management Response: Estate Manager on 08/07/2021</p> <p>Response: Management has replaced the lamp on 12/07/2021</p> <p><u>Jiba Estate</u></p> <p>Complainants: Veronica Drance dated 04/08/2021</p> <p>Issue: Door and lamp broken</p> <p>Management Response: Estate Manager on 04/08/2021</p> <p>Response: Management has replace the door and lamp on 12/08/2021</p>	Complied
4.4.2.3	<p>A complaint form should be made available at the premises, where employees and affected stakeholders can make a complaint.</p> <p>- Minor compliance -</p>	<p>The estate maintains a generic 'complaint form' and 'maintenance and repairing report' for receiving and responding to requests and complaints from employees and relevant stakeholders. This form is available in the estate office. Workers and relevant stakeholders are free to voice out their complaints or suggestions through this method.</p>	Complied

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Criterion / Indicator		Assessment Findings	Compliance
		The management have also made available a suggestion box at the muster ground for the workers and relevant stakeholders to write their complaints or suggestions. The written complaints or suggestions are recorded in a log book for further action to be taken by the management.	
4.4.2.4	<p>Employees and the surrounding communities should be made aware that complaints or suggestions can be made any time.</p> <p>- Minor compliance -</p>	<p>Employees & Stakeholders are made aware that the complaints or suggestions can be made at any time to the management. They are frequently reminded during the meetings conducted with the workers representatives and leaders of the long houses.</p> <p>During the interview with the employees and surrounding communities, it was understood that they are aware that complaints or suggestions can be made any time and the modes available for them to voice out the complaints or suggestions.</p> <p>Management has conducted Workers Monthly Dialogue to discuss any complaint and grievances among workers. The details in the minutes of meeting was Awareness Briefing on current issue, name of complainants, Division, Issue, Action Taken, Date of completion the issue and Remarks. Refer Workers Monthly Dialogue for the month of June 2021.</p>	Complied
4.4.2.5	<p>Complaints and resolutions for the last 24 months shall be documented and made available to affected stakeholders upon request.</p> <p>- Major compliance -</p>	The management retain complaints and resolution records for the last 24 months in accordance to the Complaints & Grievances Procedures. Sighted the Complaints and Grievances File consist of records for the last 24 months.	Complied
Criterion 4.4.3: Commitment to contribute to local sustainable development			

Criterion / Indicator		Assessment Findings	Compliance
4.4.3.1	Growers should contribute to local development in consultation with the local communities. - Minor compliance -	Both estates are have contributed to local development. The contribution was made to the internal and external stakeholders. Among the management contributions are as follows: 1. Donation of 32 units of water tank to RH Linchong dated 30/06/2021	Complied
Criterion 4.4.4: Employees safety and health			
4.4.4.1	An occupational safety and health policy and plan shall be documented, effectively communicated and implemented. - Major compliance -	Keresa Plantations Sdn. Bhd. has established Occupational Safety and Health Policy signed by the Managing Director dated 17/10/2017. The policy states the company's commitment towards ensuring and promoting a safe work environment for the workers and operations. The policy was communicated through trainings, briefings and displayed on notice boards. The estates have established Safety and Health Management Plan and documented in Environment, Safety and Health Plan FY 2021. The management plan includes the ESH risk management, Emergency Response Procedure, Chemical Safety Management, Noise Boundary Monitoring and Health monitoring.	Complied
4.4.4.2	The occupational safety and health plan shall cover the following: a) A safety and health policy, which is communicated and implemented. b) The risks of all operations shall be assessed and documented. c) An awareness and training programme which includes the following requirements for employees exposed to pesticides: i. all employees involved shall be adequately trained on safe working practices	The occupational safety and health plan cover the following: a. Keresa Plantations Sdn. Bhd. has established Occupational Safety and Health Policy signed by the Managing Director dated 17/10/2017. In the policy stated the company commitment to ensure and promote the safety work environment for the workers and operations. The policy was communicated through training, briefing and displayed on notice board. The policy has been briefed to all workers on 29/03/2021 (Jiba Estate) and 22/01/2021 (Sujan Estate)	Minor NC

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<ul style="list-style-type: none"> ii. all precautions attached to products shall be properly observed and applied d) The management shall provide the appropriate PPE at the place of work to cover all potentially hazardous operations as identified in the risk assessment and control such as Hazard Identification, Risk Assessment and Risk Control (HIRARC). e) The management shall establish Standard Operating Procedure for handling of chemicals to ensure proper and safe handling and storage in accordance to Occupational Safety Health (Classification Packaging and Labeling) Regulation 1997 and Occupational Safety Health (Use and Standard of Exposure of Chemical Hazardous to Health) Regulation 2000. f) The management shall appoint responsible person(s) for workers' safety and health. The appointed person(s) of trust must have knowledge and access to latest national regulations and collective agreements. g) The management shall conduct regular two-way communication with their employees where issues affecting their business such as employee's health, safety and welfare are discussed openly. Records from such meeting are kept and the concerns of the employees and any remedial actions taken are recorded. h) Accident and emergency procedures shall exist and instructions shall be clearly understood by all employees. 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. 	<ul style="list-style-type: none"> b. HIRARC was available for all operations within the estates to identify the hazards, assess and recommended control measures to minimize the risks. Among the HIRARC sampled were Harvesting, Spraying, manuring, Grass Cutting, general Store, Water Treatment, Workshop & Mechanics. All HIRARC were recently reviewed on 24/03/2020. <p>Chemical Health Risk Assessment (CHRA) was conducted in compliance with Occupational Safety and Health (USECHH) regulation 2000 on 26/01/2018 by DOSH Registered Assessor, Julin Anak Sujang (HQ/14/ASS/00/343) with the CHRA Report available for verification. The CHRA Report (Report Ref Number: HQ/14/ASS/00/343-2018/001) was available for verification.</p> <p>Medical Surveillance was conducted to establish workers health status when they work in an environment where they are exposed to hazardous chemicals. The estates have conducted the medical surveillance on 25/06/2021 for 4 workers from Sujan Estate and 4 workers from Jiba Estate at Pathology & Clinical laboratory (M) Sdn Bhd where all the workers were certified fit to work with no workers needed for Medical Removal Protection.</p> <p>Jiba Estate and Sujan Estate have not identified weather their employees may be exposed to excessive noise in the place of work as stated in the Occupational Safety and Health Act 1994 – Occupational Safety & Health (Noise Regulations) 2019 which states under clause 3, <i>“Employer shall identify whether his employee may be exposed to excessive noise in the place of work in the manner as determine by DG”</i>. Thus, Minor NC was raised</p> <ul style="list-style-type: none"> c. The estates have established a training and awareness program for employees exposed to chemicals used at the estate to ensure continuous awareness to the employees. The training was 	

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<p>j) Records shall be kept of all accidents and be reviewed periodically at quarterly intervals.</p> <p>- Major compliance -</p>	<p>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><u>Jiba Estate</u></p> <ul style="list-style-type: none"> - Chemical Handling & PPE Training – 12/04/2021 <p><u>Sujan Estate</u></p> <ul style="list-style-type: none"> - Chemical Handling & Briefing – 13/03/2021 - Warning Signages & SDS Training – 26/03/2021 <p>d. The estates have provided appropriate PPE to all workers according to the job type and requirements. The PPE given as per HIRARC requirements. Sighted the PPE issuance records documented in 'PPE Issuance Record' logbook. The PPE issued recorded by workers and job designation.</p> <p>e. Procedures of chemical handling is presented in several documents, such as in the Prosedur Kerja Dan Standard Operasi; 9.0 Bagi Kerja-Kerja Mencampur Racun Rumpai.</p> <p>f. The Sustainability and Compliance Executive, Norsafizie Myni was appointed to be the Safety and Health Representative at the estates as stated in the appointment letter dated 02/04/2021 undersigned by the Deputy General Manager. Estate management has appointed Safety Committee Members consists of OSH Coordinator, Secretary, representatives from Employer and representatives from Employee as per appointment letter by the Estate Manager.</p> <p>g. The Estate Management conducted regular OSH committee meetings on bimonthly basis and when necessary due to accidents that occur. In the meeting, discussed issue on employees' safety,</p>	

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	<p>health and welfare such as estate safety and health achievement report, estate security, safety compliance by contractors, workplace inspection, legal compliance, safety and health training. Sighted the latest OSH Meeting Minutes dated 24/04/2021, 05/06/2021 and 04/09/2021 available for verification.</p> <p>h. Accident and emergency procedures are available in the Prosedur Standard Operasi – Prosedur Tindakan Kecemasan; Reference Number: 1/2011; Document Number: ERP 1/2011; Dated: 23/08/2011.</p> <p>The estate has established Emergency Response Team lead by the Estate Managers. Emergency response Team training was conducted on 10/04/2021</p> <p>i. First aiders were present at various operations at the estates. The first aiders were responsible for first aid box at each operations/team assigned to them by the management. The first aid box was recently replenished with records of monthly monitoring available for verification. The latest First Aid Training was conducted on 10/04/2021</p> <p>j. Accident records are recorded and maintained in the estates and discussed during the bimonthly held JKPP Meetings. There was 1 accident reported for the year 2020 totaling to 7 days of LTA in the certification unit. Sighted the JKPP 8 form submission to JKPP for the year 2020 as well, submitted on 15/01/2021. There were 14 injuries reported at the estate for the year 2021 as of to date as well. All injuries involved LTA of less than 4 days.</p>	
<p>Criterion 4.4.5: Employment conditions</p>		

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4.4.5.1	<p>The management shall establish policy on good social practices regarding human rights in respect of industrial harmony. The policy shall be signed by the top management and effectively communicated to the employees.</p> <p>- Major compliance -</p>	<p>The management has established a policy on good social ethics regarding human rights such as Human Rights Policy dated 30/11/2017, Equal Rights Policy dated 01/12/2009, Prevention of Sexual Harassment & Domestic Violence in the Workplace Policy dated 01/12/2009, Freedom of Association Policy dated 01/12/2009, etc. has been signed off by Managing Director of the group.</p> <p>The "Keresas Sustainability Policy" is displayed in notice boards inside the office as well as outside the office. The policy also publicly available through the official website: http://www.keresas.com.my</p> <p>The policy has been communicated to all workers and stakeholders during morning muster briefings, displayed at strategic places such as office and line sites and communicated during meetings with the workers and relevant stakeholders.</p> <p>Latest policy communication to workers has been conducted on: Sujan Estate: 22/01/2021 Jiba Estate: 29/03/2021</p>	Complied
4.4.5.2	<p>The management shall not engage in or support discriminatory practices and shall provide equal opportunity and treatment regardless of race, colour, sex, religion, political opinion, nationality, social origin or any other distinguishing characteristics.</p> <p>- Major compliance -</p>	<p>Keresas Plantations Sdn. Bhd. has established Equal Rights Policy, signed by Managing Director dated 01/12/2009 to ensure equal opportunity and treatment regardless of race, colour, sex, religion, political opinion, nationality, social origin or any other distinguishing characteristics.</p> <p>Inspection of a sample of pay records and interviews of staff and workers at the both estates did not identify any issues related to discrimination.</p> <p>Latest policy communication to workers has been conducted on: Sujan Estate: 22/01/2021</p>	Complied

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Criterion / Indicator		Assessment Findings	Compliance
		Jiba Estate: 29/03/2021	
4.4.5.3	<p>Management shall ensure that employees' pay and conditions meet legal or industry minimum standards and as per agreed Collective Agreements. The living wage should be sufficient to meet basic needs and provide some discretionary income based on minimum wage.</p> <p>- Major compliance -</p>	<p>There is a contract and agreement for staff and workers including foreign workers and pay and conditions are documented and are in accordance with the industry minimum standard. Inspection of a sample of employee contracts confirmed that terms and conditions are clearly outlined and have been signed by the worker. During the interview with the staff and workers, it was confirmed that they are paid adequately in accordance with the legal and industry standards.</p> <p>Sampled Workers Employment Agreement and Pay slip month of January 2021, April 2021 and August 2021 were verified as below:</p> <p><u>Sujan Estate</u></p> <ol style="list-style-type: none"> 1. Employee ID: 11576 2. Employee ID: 63493 3. Employee ID: 11544 4. Employee ID: 23246 5. Employee ID: 10615 6. Employee ID: 10723 7. Employee ID: 10729 8. Employee ID: 10484 <p><u>Jiba Estate</u></p> <ol style="list-style-type: none"> 1. Employee ID: 11942 2. Employee ID: 12468 3. Employee ID: 11924 4. Employee ID: 12466 5. Employee ID: 12353 	Complied

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Criterion / Indicator		Assessment Findings	Compliance
		6. Employee ID: 12212 7. Employee ID: 12369 8. Employee ID: 12207	
4.4.5.4	Management should ensure employees of contractors are paid based on legal or industry minimum standards according to the employment contract agreed between the contractor and his employee. - Minor compliance -	Keresa Plantations Sdn. Bhd. have an agreed contract agreement with all contractors available for verification. The contract clearly stated that the contractor must strictly follow all applicable national and ratified international laws. Sighted evidence of employee of contractor’s agreement and pay slip. Verified pay slip month of January 2021, April 2021, and August 2021. <u>Jiba Estate</u> Contractor: PNS Jaya Sdn Bhd, Project: Replanting Works for the Year 2021 – Field No. J9707, Jiba Estate – 56.37 Ha dated 01/01/2021. Details of workers as below: 1. Koh Wei Jie NRIC 880403-XX-XXXX 2. Ayom Anak Nyandang NRIC 840314-XX-XXXX Sighted basic salary was according to Law and Regulation sighted evidence of KWSP, SOCSO and EIS deduction has been made both employer and employee.	Complied
4.4.5.5	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. - Major compliance -	Keresa Plantations Sdn. Bhd. has a register of all staffs and workers at the premise. The details includes full name, gender, date of birth, date joined and job title. The copy of passport and permit etc. were maintained in the employee’s personnel files.	Complied
4.4.5.6	All employees shall be provided with fair contracts that have been signed by both employee and employer. A copy of	There are Employment Contracts for all staffs and workers including foreign workers. Pay and conditions are documented in the	Complied

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Criterion / Indicator	Assessment Findings	Compliance
<p>employment contract is available for each and every employee indicated in the employment records.</p> <p>- Major compliance -</p>	<p>employment contract and are in accordance with the Minimum Wages Standards. Inspection of a sample of employee contracts confirmed that terms and conditions are clearly outlined and have been signed by the worker for the respective estates and the management representatives.</p> <p>Sampled Workers Employment Agreement and Pay slip month of January 2021, April 2021 and August 2021 were verified as below:</p> <p><u>Sujan Estate</u></p> <ol style="list-style-type: none"> 1. Employee ID: 11576 2. Employee ID: 63493 3. Employee ID: 11544 4. Employee ID: 23246 5. Employee ID: 10615 6. Employee ID: 10723 7. Employee ID: 10729 8. Employee ID: 10484 <p><u>Jiba Estate</u></p> <ol style="list-style-type: none"> 1. Employee ID: 11942 2. Employee ID: 12468 3. Employee ID: 11924 4. Employee ID: 12466 5. Employee ID: 12353 6. Employee ID: 12212 7. Employee ID: 12369 8. Employee ID: 12207 	

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Criterion / Indicator		Assessment Findings	Compliance
4.4.5.7	The management shall establish a time recording system that makes working hours and overtime transparent for both employees and employer. - Major compliance -	Working hours is 8 hours a day from Monday to Saturday. The overtime offered is a maximum of 104 hours which is in accordance to Malaysian Law. Both estates maintain a checkroll book to record the worker's attendance during the morning muster. The muster book is available for verification.	Complied
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. - Major compliance -	The working hours and break time have been clearly stated in the Employment Contract. Sighted in the Contract Agreement the rate of overtime which is agreed by both parties. There is no complaint received regarding payment or forced to work on overtime during site interview.	Complied
4.4.5.9	Wages and overtime payment documented on the pay slips shall be in line with legal regulations and collective agreements. - Major compliance -	Salary slips clearly shows the calculations of gross salary, all legal deductions and net salary of a worker. Workers interviewed confirmed that they are being paid in accordance with the minimum wage requirements. Individual payslips were distributed to all workers on salary day. A copy of payslip is also kept in the estate office. Sampled Workers Employment Agreement and Pay slip month of January 2021, April 2021 and August 2021 were verified as below: <u>Sujan Estate</u> 1. Employee ID: 11576 2. Employee ID: 63493 3. Employee ID: 11544 4. Employee ID: 23246 5. Employee ID: 10615	Complied

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Criterion / Indicator	Assessment Findings	Compliance
	6. Employee ID: 10723 7. Employee ID: 10729 8. Employee ID: 10484 <u>Jiba Estate</u> 1. Employee ID: 11942 2. Employee ID: 12468 3. Employee ID: 11924 4. Employee ID: 12466 5. Employee ID: 12353 6. Employee ID: 12212 7. Employee ID: 12369 8. Employee ID: 12207	
4.4.5.10	<p>Other forms of social benefits should be offered by the employer to employees, their families or the community such as incentives for good work performance, bonus payment, professional development, medical care and health provisions.</p> <p>- Minor compliance -</p> <p>Interviews with local and foreign workers indicated that they are satisfied with the standard of housing and facilities provided by Keresia Plantations Sdn. Bhd. Electricity and water are provided without charges. Keresia Plantations Sdn. Bhd. has provided transport from Jiba Estate, Sujan Estate and Keresia POM for children to school located at Jiba Estate. Health Clinic has been provided for the employees and family members with free treatment.</p> <p>Outturn incentive for daily attendance on the muster and incentive of contract extension for foreign workers if they renew for three year and above. Local employees have yearly bonus based on personal performance.</p> <p>Due to the COVID-19 Pandemic all workers are provided with Emergency Allowance to help them during the crisis.</p>	Complied

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Criterion / Indicator	Assessment Findings	Compliance
<p>4.4.5.11 In cases where on-site living quarters are provided, these quarters shall be habitable and have basic amenities and facilities in compliance with the Workers' Minimum Standards Housing and Amenities Act 1990 (Act 446) or any other applicable legislation.</p> <p>- Major compliance -</p>	<p>Residents at all estate housing have access to facilities established by the company, such as health clinic, sports field, community hall, crèche, and places of worship. The estates provide electricity and water to all workers for free. Additional to that, all workers are given monthly emergency allowance due to the ongoing COVID-19 Pandemic to manage the crisis.</p> <p>The Medical Assistant conducts weekly Labourline and Housing Inspection at the Workers Quarters to ensure that the area is maintained at an acceptable standard. Sighted the weekly Labourline and Housing Inspection Records in both estates. Latest inspection were recorded on 17/09/2021, 10/09/2021 and 03/09/2021. Free Sanitation of workers house has been conducted for free by the management.</p>	<p>Complied</p>
<p>4.4.5.12 The management shall establish a policy and provide guidelines to prevent all forms of sexual harassment and violence at the workplace.</p> <p>- Major compliance -</p>	<p>Keresa Plantations Sdn Bhd has established Prevention of Sexual Harassment & Domestic Violence in the Workplace Policy signed by Managing Director dated 01/12/2009 and displayed at strategic locations. Interviews of internal and external stakeholders confirmed awareness and understanding of the Policy.</p> <p>Woman & Children Association of Keresa Plantations Sdn Bhd conduct regular meetings to address the issues such as sexual harassment, domestic violence and also to organize activities among the women community of the estates. The latest Women & Children Association Meeting was conducted on 19/02/2021.</p> <p>Latest policy communication to workers has been conducted on: Sujan Estate: 22/01/2021 Jiba Estate: 29/03/2021</p>	<p>Complied</p>

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Criterion / Indicator	Assessment Findings	Compliance
<p>4.4.5.13 The management shall respect the right of all employees to form or join trade union and allow workers own representative(s) to facilitate collective bargaining in accordance with applicable laws and regulations. Employees shall be given the freedom to join a trade union relevant to the industry or to organize themselves for collective bargaining. Employees shall have the right to organize and negotiate their work conditions. Employees exercising this right should not be discriminated against or suffer repercussions.</p> <p>- Major compliance -</p>	<p>Keresia Plantations Sdn Bhd has established Freedom of Association Policy signed by Managing Director dated 1st December 2009 and displayed at strategic locations. Interviews of internal and external stakeholders confirmed awareness and understanding of the Policy.</p> <p>Interviews of staff and workers confirmed both estates support freedom of association. At the estates, there is a local committee made up of workers representatives elected by workers. Joint Consultative Committee Meeting has been conducted for the internal stakeholder with the company management staffs. The last meeting for all estates were conducted on 08/05/2021 at Jiba Estate Office, Chaired by Mr Abdul Aziz Zainal Abidin. Interview of Staff and Workers also confirmed their awareness of freedom of association but there were no worker unions being formed at the moment.</p> <p>Latest policy communication to workers has been conducted on: Sujan Estate: 22/01/2021 Jiba Estate: 29/03/2021</p>	<p>Complied</p>
<p>4.4.5.14 Children and young persons shall not be employed or exploited. The minimum age shall comply with local, state and national legislation. Work by children is acceptable on family farms, under adult supervision, and when not interfering with their education programmes. Children shall not exposed to hazardous working conditions.</p> <p>- Major compliance -</p>	<p>Keresia Plantations Sdn Bhd have a Minimum Age Policy dated 1 December 2009 undersigned by the managing Director that states the commitment of the organization to ensure that the plantations and mill will not use child labour, those below the age of 18.</p> <p>Inspection of a sample of personnel files at the estate’s office confirmed recruits’ ages were checked against their Identity Card for Malaysian workers or their passport in the case of foreign workers. Under-age persons were not observed at any of the work locations visited.</p> <p>Latest policy communication to workers has been conducted on: Sujan Estate: 22/01/2021</p>	<p>Complied</p>

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Criterion / Indicator		Assessment Findings	Compliance																										
		Jiba Estate: 29/03/2021																											
Criterion 4.4.6: Training and competency																													
4.4.6.1	<p>All employees, contractors and relevant smallholders are appropriately trained. A training programme (appropriate to the scale of the organization) that includes regular assessment of training needs and documentation, including records of training shall be kept.</p> <p>- Major compliance -</p>	<p>Both estates have 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 for the mill. Interview with the sampled workers and staff indicated that they were aware on the SOP during the MCO such as social distancing, regular sanitization and use of PPE (Face Mask).</p> <p>Records of trainings were maintained by the estates as below: -</p> <p><u>Jiba Estate</u></p> <table border="1"> <thead> <tr> <th>Training</th> <th>Date</th> </tr> </thead> <tbody> <tr> <td>Policy Training</td> <td>29/03/2021</td> </tr> <tr> <td>Fertilizer Handling & Storage Training</td> <td>29/03/2021</td> </tr> <tr> <td>First Aid Kit and ERP Training</td> <td>10/04/2021</td> </tr> <tr> <td>Chemical handling & PPE Training</td> <td>12/04/2021</td> </tr> <tr> <td>COVID-19 Training</td> <td>23/04/2021</td> </tr> <tr> <td>HCV & Riparian Zone Training</td> <td>23/04/2021</td> </tr> </tbody> </table> <p><u>Sujan Estate</u></p> <table border="1"> <thead> <tr> <th>Training</th> <th>Date</th> </tr> </thead> <tbody> <tr> <td>Policy Training</td> <td>22/01/2021</td> </tr> <tr> <td>HSE & Hygiene Policy Training</td> <td>22/01/2021</td> </tr> <tr> <td>Chemical handling & Briefing</td> <td>12/03/2021</td> </tr> <tr> <td>Warning Signage and Label (SDS) Training</td> <td>26/03/2021</td> </tr> <tr> <td>Grievance Procedure Training</td> <td>12/04/2021</td> </tr> </tbody> </table>	Training	Date	Policy Training	29/03/2021	Fertilizer Handling & Storage Training	29/03/2021	First Aid Kit and ERP Training	10/04/2021	Chemical handling & PPE Training	12/04/2021	COVID-19 Training	23/04/2021	HCV & Riparian Zone Training	23/04/2021	Training	Date	Policy Training	22/01/2021	HSE & Hygiene Policy Training	22/01/2021	Chemical handling & Briefing	12/03/2021	Warning Signage and Label (SDS) Training	26/03/2021	Grievance Procedure Training	12/04/2021	Complied
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Criterion / Indicator		Assessment Findings	Compliance
4.4.6.2	<p>Training needs of individual employees shall be identified prior to the planning and implementation of the training programmes in order to provide the specific skill and competency required to all employees based on their job description.</p> <p>- Major compliance -</p>	<p>Keresia Plantations Sdn Bhd has conducted training need analysis for all employees, management and contractors. The training need analysis was conducted based on the job designation and training required by the job type and available for verification.</p>	Complied
4.4.6.3	<p>A continuous training programme should be planned and implemented to ensure that all employees are well trained in their job function and responsibility, in accordance to the documented training procedure.</p> <p>- Minor compliance -</p>	<p>A training programme has been developed and available in Keresia Plantations Sdn Bhd – training Programme Tentative For Year 2021. The trainings were sighted to have also included Gender Specific Training and involves staffs, workers and contractors.</p>	Complied
4.5 Principle 5: Environment, natural resources, biodiversity and ecosystem services			
Criterion 4.5.1: Environmental Management Plan			
4.5.1.1	<p>An environmental policy and management plan in compliance with the relevant country and state environmental laws shall be developed, effectively communicated and implemented.</p> <p>- Major compliance -</p>	<p>Keresia Plantations Sdn. Bhd. has established Environmental Policy signed by the Managing Director dated 27/12/2016. The policy states the company’s commitments to ensure and promote clean environment for all its employees and operations. The policy was communicated to all workers through briefing and displayed on the notice boards. Verified the policy training for Jiba Estate (29/03/2021) and Sujana Estate (22/01/2021).</p>	Complied
4.5.1.2	<p>The environmental management plan shall cover the following:</p> <ul style="list-style-type: none"> a) An environmental policy and objectives; b) The aspects and impacts analysis of all operations. <p>- Major compliance -</p>	<p>The estates have established SOPs for aspect and impacts analysis and documented in Procedure Manual for Identification of Environmental Aspects and Evaluations of Environmental Impacts. Refer document no. KPSB 1/2012 dated 01/01/2012. The scoring and evaluation criteria were provided in the manual.</p>	Complied

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		<p>The estates have conducted the environmental aspects and impacts analysis documented in Environmental Aspects and Impacts Register. The assessment was reviewed on annually basis. Latest review was conducted on 08/01/2021.</p> <p>The management plan with mitigation measures has been established for each activity with significant impacts to the environment base on the Environmental Aspect and Impact Assessment and Environmental Monitoring Report.</p>	
4.5.1.3	<p>An environmental improvement plan to mitigate the negative impacts and to promote the positive ones, shall be developed, effectively implemented and monitored.</p> <p>- Major compliance -</p>	<p>The estates have documented improvement plans to mitigate negative impacts and promote activities with positive impacts in the Environment Improvement & Management Plan. Sighted sampled the implementation as follows:</p> <ol style="list-style-type: none"> 1. Loss of HCV areas and ERT species <ul style="list-style-type: none"> • Protection and demarcation of HCV areas within estate as sensitive areas. • Ensure plans are in place to enhance natural areas. 2. Dust and other particles from ungravelled roads caused by vehicle traffic <ul style="list-style-type: none"> • Ensure reduction plans are in place to reduce particulate emission. <ul style="list-style-type: none"> - watering daily during dry season - install hump to install vehicle speed - install speed limit signages - plant trees 3. Open burning <ul style="list-style-type: none"> • Enforce a no burning policy 	Complied

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Criterion / Indicator		Assessment Findings	Compliance
		4. Runoff (surface water or soil erosion to water courses) <ul style="list-style-type: none"> Avoid fertilizer application close to water bodies or on rainy days. Improve efficiency of fertilizer applications. 5. Leaching of chemicals and fertilizers into groundwaters <ul style="list-style-type: none"> Reduce chemical exposure in sensitive areas (line site, steep areas, waterways) 6. Oil spillage & leaking <ul style="list-style-type: none"> Reduce oil spilling Avoid ground spillage 7. Contributions to GHG emissions <ul style="list-style-type: none"> Ensure adequate water management structures are in place for peat areas, To ensure that minimal subsidence occurs in peat areas 8. Domestic and recyclable waste, Schedule waste <ul style="list-style-type: none"> Ensure adequate procedures, waste management plans and implementations are available Proper schedule waste management as per procedure 9. Workplace & housing <ul style="list-style-type: none"> Optimize usage and reduce wastage 	
4.5.1.4	A programme to promote the positive impacts should be included in the continual improvement plan. - Minor compliance -	The estates have established the environmental management plan based on the Environmental Aspect and Impact Assessment and Environmental Monitoring Report. The estates continue to promote activities that gives positive impact to the environment by continuously providing awareness to the	Complied

Criterion / Indicator		Assessment Findings	Compliance																								
		employees which was communicated through training, briefing and signages.																									
4.5.1.5	An awareness and training programme shall be established and implemented to ensure that all employees understand the policy and objectives of the environmental management and improvement plans and are working towards achieving the objectives. - Major compliance -	The estates continuously provided awareness training to all employees on environmental policy, objectives and management plan as per training plan established. Training record verified as stated in 4.4.6.1.	Complied																								
4.5.1.6	Management shall organize regular meetings with employees where their concerns about environmental quality are discussed. - Major compliance -	Environmental related matters were discussed during Environmental Meeting held quarterly. No issue related to environmental was raised during this meeting. Workers interview reveal that they are encouraged to discuss environmental issues with the management. Sighted the Environmental Meeting Minutes dated 20/08/2021 for both estates.	Complied																								
Criterion 4.5.2: Efficiency of energy use and use of renewable energy																											
4.5.2.1	Consumption of non-renewable energy shall be optimized and closely monitored by establishing baseline values and trends shall be observed within an appropriate timeframe. There should be a plan to assess the usage of non-renewable energy including fossil fuel, electricity and energy efficiency in the operations over the base period. - Major compliance -	<p>The monitoring of non-renewable energy usage is done on a monthly basis. Sighted the sampled monitoring records for diesel usage per FFB production for 2021 as follows:</p> <p><u>Jiba Estate</u></p> <table border="1"> <thead> <tr> <th>Month</th> <th>Diesel (Litres)</th> <th>Electricity (kWh)</th> <th>Water (m³)</th> </tr> </thead> <tbody> <tr> <td>Jan 2021</td> <td>15,252.00</td> <td>167,400.00</td> <td>2,061</td> </tr> <tr> <td>Feb 2021</td> <td>23,510.00</td> <td>162,000.00</td> <td>1,746</td> </tr> <tr> <td>Mar 2021</td> <td>27,706.00</td> <td>167,400.00</td> <td>2,060</td> </tr> <tr> <td>Apr 2021</td> <td>23,046.00</td> <td>167,400.00</td> <td>2,191</td> </tr> <tr> <td>May 2021</td> <td>21,804.00</td> <td>162,000.00</td> <td>2,421</td> </tr> </tbody> </table>	Month	Diesel (Litres)	Electricity (kWh)	Water (m ³)	Jan 2021	15,252.00	167,400.00	2,061	Feb 2021	23,510.00	162,000.00	1,746	Mar 2021	27,706.00	167,400.00	2,060	Apr 2021	23,046.00	167,400.00	2,191	May 2021	21,804.00	162,000.00	2,421	Complied
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Criterion / Indicator		Assessment Findings				Compliance	
		Jun 2021	26,880.00	167,400.00	2,050		
		Jul 2021	25,178.00	162,000.00	1,879		
		Aug 2021	21,455.00	167,400.00	2,191		
		<u>Sujan Estate</u>					
		Month	Diesel (Litres)	Electricity (kWh)	Water (m ³)		
		Jan 2021	21,061.00	-	-		
		Feb 2021	19,304.00	-	-		
		Mar 2021	21,130.00	-	-		
		Apr 2021	20,803.00	-	-		
		May 2021	19,717.00	-	-		
		Jun 2021	24,074.00	-	-		
		Jul 2021	17,841.00	-	-		
		Aug 2021	18,933.00	-	-		
		* Electricity and Water for Sujan Estate is supplied by Keresa POM and the figures have been included in the usage under Part 4.					
4.5.2.2	The oil palm premises shall estimate the direct usage of non-renewable energy for their operations, including fossil fuel, and electricity to determine energy efficiency of their operations. This shall include fuel use by contractors, including all transport and machinery operations. - Major compliance -	The estates estimate the usage of non-renewable energy (diesel) for genset and operations in the reduction Fossil Fuel Consumption plan (Diesel) The Estimation Diesel for 5 Years was available as below: Fossil Fuel Consumption plan				Complied	
		Estate	2021	2022	2023	2024	2025
		Jiba Estate	184831	275000	270000	265000	260000
		Sujan Estate	162863	185000	180000	175000	170000
4.5.2.3	The use of renewable energy should be applied where possible.	No renewable energy use at the estates visited.				Complied	

Criterion / Indicator		Assessment Findings	Compliance																						
- Minor compliance -																									
Criterion 4.5.3: Waste management and disposal																									
4.5.3.1	<p>All waste products and sources of pollution shall be identified and documented.</p> <p>- Major compliance -</p>	<p>All waste products and sources of pollution was identified and documented in the Waste management Procedure in Keresa Plantations Sdn Bhd. The waste has been identified as follows:</p> <table border="1"> <thead> <tr> <th>Source</th> <th>Types of Waste</th> </tr> </thead> <tbody> <tr> <td>Estate fields</td> <td>Palm biomass, Chemical containers, Fertiliser bags, Plastic Polybags</td> </tr> <tr> <td>Estate Nursery</td> <td>Plastic polybags, Bormal bins</td> </tr> <tr> <td>Store Chemicals</td> <td>Chemical containers, Cardboard boxes</td> </tr> <tr> <td>Store fertilizers</td> <td>Fertilizers bags</td> </tr> <tr> <td>Genset room</td> <td>Filters, Lubricant, Battery, Rags and gloves</td> </tr> <tr> <td>Water treatment plant</td> <td>chemical solution and solvents, chemical containers</td> </tr> <tr> <td>Workshop</td> <td>Filters, Lubricant, Battery, Rags and gloves, Tyres, Scrap iron, chemical solution and solvents, chemical containers</td> </tr> <tr> <td>Construction sites</td> <td>Construction sites i. Wood ii. Cement debris</td> </tr> <tr> <td>Linesite</td> <td>Sewage, Greywater</td> </tr> <tr> <td>Clinic</td> <td>Clinical waste</td> </tr> </tbody> </table>	Source	Types of Waste	Estate fields	Palm biomass, Chemical containers, Fertiliser bags, Plastic Polybags	Estate Nursery	Plastic polybags, Bormal bins	Store Chemicals	Chemical containers, Cardboard boxes	Store fertilizers	Fertilizers bags	Genset room	Filters, Lubricant, Battery, Rags and gloves	Water treatment plant	chemical solution and solvents, chemical containers	Workshop	Filters, Lubricant, Battery, Rags and gloves, Tyres, Scrap iron, chemical solution and solvents, chemical containers	Construction sites	Construction sites i. Wood ii. Cement debris	Linesite	Sewage, Greywater	Clinic	Clinical waste	Complied
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4.5.3.2	<p>A waste management plan to avoid or reduce pollution shall be developed and implemented. The waste management plan should include measures for:</p> <p>a) Identifying and monitoring sources of waste and pollution</p> <p>b) Improving the efficiency of resource utilization and recycling of potential wastes as nutrients or converting</p>	<p>The estates have established waste management plan base on the waste identification conducted and documented in Waste Management procedure in Keresa Plantations Sdn. Bhd. and Environmental Monitoring Report.</p> <p>SOP for scheduled waste management was established and available in the Prosedur Kerja Selamat - Pembuangan Terjadual; Date: 05/08/2019; Reference Code: SOP/KMSB/Schedule Waste/R3.</p>	Complied																						

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Criterion / Indicator		Assessment Findings	Compliance
	<p>them into value-added by-products</p> <p>- Major compliance -</p>	<p>Sighted the implementation of the management plan for both estates visited as follows:</p> <ul style="list-style-type: none"> i. Domestic were collected 3 time a week and disposed at designated landfill. Sighted the domestic was collection records for 2021 for both estates. ii. The estate monitors the Empty pesticide Container Records in the estates and recorded in the Daily Monitoring of Empty Spraying Jars form. Sighted the recycle waste monitoring for the month of August 2021. iii. The estate maintains the inventory of scheduled waste generated and documented in the Fifth Scheduled form in the ESWS System. Sighted the inventory records for the month of July and August 2021. 	
4.5.3.3	<p>The management shall establish Standard Operating Procedure for handling of used chemicals that are classified under Environment Quality Regulations (Scheduled Waste) 2005, Environmental Quality Act, 1974 to ensure proper and safe handling, storage and disposal.</p> <p>- Major compliance -</p>	<p>SOP for scheduled waste management was established and available in the Prosedur Kerja Selamat - Pembuangan Terjadual; Date: 05/08/2019; Reference Code: SOP/KMSB/Schedule Waste/R3.</p> <p>The estates also has a proper Scheduled Waste Store for storing use chemical drums until time of disposal by DOE authorized waste disposal contractor. Disposal was done by scheduled waste disposal company authorized and licensed by Department of Environment.</p> <p>Sighted the sampled of Scheduled Waste Disposal as below:</p> <p><u>Jiba Estate</u></p> <ul style="list-style-type: none"> 1. SW 102 – Waste of lead acid batteries in whole or crushed form; Quantity; 0.2980 Mt; Date: 04/08/2021; SW Contractor: E-Concern (M) Sdn Bhd; Consignment Note Number: 2021081110CDA2HJ 	Complied

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Criterion / Indicator		Assessment Findings	Compliance
		<p>2. SW305 - Spent lubricating oil; Quantity; 0.4000 Mt; Date: 04/08/2021; SW Contractor: E-Concern (M) Sdn Bhd; Consignment Note Number: 2021081110SERJV9</p> <p><u>Sujan Estate</u></p> <p>1. SW 102 – Waste of lead acid batteries in whole or crushed form; Quantity; 0.1080 Mt; Date: 04/08/2021; SW Contractor: E-Concern (M) Sdn Bhd; Consignment Note Number: 20210811106Z27HI</p> <p>2. SW305 - Spent lubricating oil; Quantity; 0.6000 Mt; Date: 04/08/2021; SW Contractor: E-Concern (M) Sdn Bhd; Consignment Note Number: 2021081110URVLHT</p> <p>3. SW307 - Spent mineral oil-water emulsion; Quantity; 0.6000 Mt; Date: 04/08/2021; SW Contractor: E-Concern (M) Sdn Bhd; Consignment Note Number: 20210811102BVYT4</p> <p>4. SW410 - Rags, plastics, papers or filters contaminated with scheduled wastes; Quantity; 0.0343 Mt; Date: 04/08/2021; SW Contractor: E-Concern (M) Sdn Bhd; Consignment Note Number: 2021081110IM2BEX</p>	
4.5.3.4	<p>Empty pesticide containers shall be punctured and disposed in an environmentally and socially responsible way, such that there is no risk of contamination of water sources or to human health. The disposal instructions on manufacturer’s labels should be adhered to. Reference should be made to the national programme on recycling of used HDPE pesticide containers.</p> <p>- Major compliance -</p>	<p>Excess chemical containers that were not used for premixing have been triple rinsed and punctured was categorized under scheduled waste and disposed through recycle waste contractor. The latest disposal of empty pesticide containers was done on 18/05/2021 to Ramsu Sdn Bhd (Ref. No: B0065) amounting to 99.70 Kgs of Used Chemical Containers.</p>	Complied

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Criterion / Indicator		Assessment Findings	Compliance
4.5.3.5	Domestic waste should be disposed as such to minimize the risk of contamination of the environment and watercourses. - Minor compliance -	Domestic waste was collected 3 times week and disposed at designated landfill located far from housing area. The collection records for the year 2021 were available for verification for both estates.	Complied
Criterion 4.5.4: Reduction of pollution and emission			
4.5.4.1	An assessment of all polluting activities shall be conducted, including greenhouse gas emissions, scheduled wastes, solid wastes and effluent. - Major compliance -	The established Environmental Management Plan has covered the environmental aspects and impacts based on both estates & mill. The Environmental Aspect & Impact assessment has been reviewed on 08/01/2021. The assessment was conducted according to the Procedure Manual – Identification of Environmental Aspects and Evaluations of Environmental Impacts Ref: KPSB 1/2012 dated 01/01/2012. The scoring and evaluation criteria were provided in the manual.	Complied
4.5.4.2	An action plan to reduce identified significant pollutants and emissions shall be established and implemented. - Major compliance -	Environmental Improvement Plan included assessments of all polluting activities within the estate operation such as waste, air emissions and water discharges as mentioned in 4.5.1.3.	Complied
Criterion 4.5.5: Natural water resources			
4.5.5.1	The management shall establish a water management plan to maintain the quality and availability of natural water resources (surface and ground water). The water management plan may include: a. Assessment of water usage and sources of supply. b. Monitoring of outgoing water which may have negative impacts into the natural waterways at a frequency that reflects the estate’s current activities.	Estates and mill has developed its Water Management Plan latest review on 01/09/2021. It monitored water quality of outgoing waters to identify any adverse effect from the mill and estate activities. The plan takes into account the efficient use of resources, ensure amongst others that the use of water did not impact on other users, avoid contamination of ground and surface water, and appropriate treatment of mill effluent. The WMP also promote to meet water conservation requirements under Sarawak Water Resource Enactment 1998 and	Complied

Criterion / Indicator	Assessment Findings	Compliance
<p>c. Ways to optimize water and nutrient usage to reduce wastage (e.g. having in place systems for re-use, night application, maintenance of equipment to reduce leakage, collection of rainwater, etc.).</p> <p>d. Protection of water courses and wetlands, including maintaining and restoring appropriate riparian buffer zones at or before planting or replanting, along all natural waterways within the estate.</p> <p>e. Where natural vegetation in riparian areas has been removed, a plan with a timetable for restoration shall be established and implemented.</p> <p>f. Where bore well is being use for water supply, the level of the ground water table should be measured at least annually.</p> <p>- Major compliance -</p>	<p>Interim National Water Standards for Malaysia. Sighted the implementation of the management plan as follows:</p> <ol style="list-style-type: none"> 1. The mill monitors the water consumption on monthly basis. Water consumption monitored include domestic usage and estate operation. The water consumption has been detailed out under indicator 4.5.2.1 2. Water for Domestic use is monitored on a monthly basis in accordance with the Drinking Water Quality Standards. The latest domestic water sampling was conducted by Envic Laboratory Sdn Bhd on 18/06/2021 which indicated that all the parameters were within the stipulated limits. 3. The estates have maintained their allocated riparian zones in accordance to their established guideline (Riparian/Buffer Zone management Guideline, dated Dec 2016). Records of Riparian Zone monitoring for both estates were available for the month of September 2019. Interview with the sampled workers showed that the workers understand the restriction and the consequence of agrochemicals application in the riparian zones. 4. The estates continuously monitor the river water quality. There were 6 water Sampling Points identified for Water Quality Monitoring. Latest report available was for the month of June 2021 for the samples taken in May 2021. The Certificate of Analysis (Reference Number: KPSB/11 – 05/056) indicated all criteria were within the accepted parameters. The results found complied with respective NWQS class IIA and IIB. 5. For peat area, Keresa Plantations Sdn Bhd management has established Best Management Practices of Oil Palm Cultivation on Peat Land Water Management. The estate monitors the peat 	

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Criterion / Indicator		Assessment Findings	Compliance
		subsidence level every 6 months. Piezometer reading were conducted on monthly basis. Sighted the Piezometer reading records as to date September FY 2021	
4.5.5.2	No construction of bunds, weirs and dams across main rivers or waterways passing through an estate. - Minor compliance -	There were no construction of bunds, weirs and dams across main rivers or waterways passing through an estate.	Complied
4.5.5.3	Water harvesting practices should be implemented (e.g. water from road-side drains can be directed and stored in conservation terraces and various natural receptacles). - Minor compliance -	Water management plan includes rainwater harvesting, desilting of roadside drains and etc. For housing complex, the rainwater harvesting was used for cleaning housing compound etc.	Complied
Criterion 4.5.6: Status of rare, threatened, or endangered species and high biodiversity value			
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 (<i>e.g.</i> The International Union on Conservation of Nature and Natural Resources (IUCN) status on legal protection, population status and habitat requirements of rare, threatened, or endangered species), that could be significantly affected by the grower(s) activities. - Major compliance -	Keresa Plantations Sdn Bhd has conducted biodiversity assessment and documented in report for Environmental and Biodiversity Review dated May 2010 conducted by Wild Asia. Based on the report, the site-specific short-term and long-term HCV Management Plans. There was no HCV and rare, threatened, or endangered species being identified within the estates area.	Complied

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Criterion / Indicator		Assessment Findings	Compliance
4.5.6.2	<p>If rare, threatened or endangered species, or high biodiversity value, are present, appropriate measures for management planning and operations should include:</p> <p>b) Ensuring that any legal requirements relating to the protection of the species are met.</p> <p>c) Discouraging any illegal or inappropriate hunting, fishing or collecting activities; and developing responsible measures to resolve human-wildlife conflicts.</p> <p>- Major compliance -</p>	<p>There was no HCV and rare, threatened, or endangered species being identified within the estate area.</p> <p>Awareness to workforce generally given through briefing at the muster ground/induction. Signage to restrict hunting was put up at strategic places in the estates such as entrance gates and boundary with local community. Interview with workers showed that they were aware of the restrictions. The estate management records any sighting of wildlife in the estate premises in the Total Protected/ Protected/ Endangered Species Monitoring record book.</p>	Complied
4.5.6.3	<p>A management plan to comply with Indicator 1 shall be established and effectively implemented, if required.</p> <p>- Major compliance -</p>	<p>Since, there was no HCV and rare, threatened, or endangered species being identified within the estate area therefore management plan was not applicable.</p>	N/A
Criterion 4.5.7: Zero burning practices			
4.5.7.1	<p>Use of fire for waste disposal and for preparing land for oil palm cultivation or replanting shall be avoided except in specific situations, as identified in regional best practice.</p> <p>- Major compliance -</p>	<p>Both estates has established and implemented Best Management Practice (KP2) approach through its standard operations and procedures (KP2-4 SOPs – Field Policy Manual). Addressed in SOP no. 7 – Conservation Measures, under section iii. - Environment Conservation, version 2 dated 1 Jan 2009, all mitigations measures for plantation activities including land preparation or replanting shall be in compliance with the approved Environment Impact Assessment (EIA) by Natural Resource and Environmental Board of Sarawak.</p> <p>No open burning noted based on the records on the land clearing and felling for the replanting at the estates. Method of land clearing and preparation was used such as felling & chipping, cambering/land forming and path construction.</p>	Complied

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Criterion / Indicator		Assessment Findings	Compliance
4.5.7.2	A special approval from the relevant authorities shall be sought in areas where the previous crop is highly diseased and where there is a significant risk of disease spread or continuation into the next crop. - Major compliance -	Use of fire for waste disposal and for preparing land for oil palm cultivation or replanting was not practised by Sujan Estate and Jiba Estate. Furthermore, previous crop were not highly diseased and there was no significant risk of disease spread or continuation into the next crop.	N/A
4.5.7.3	Where controlled burning is allowed, it shall be carried out as prescribed by the Environmental Quality (Declared Activities) (Open Burning) Order 2003 or other applicable laws. - Major compliance -	Use of fire for waste disposal and for preparing land for oil palm cultivation or replanting was not practised by Sujan Estate and Jiba Estate. It was verified through interview that palms had been mechanically felled, chipped and windrowed; no burning was practiced.	N/A
4.5.7.4	Previous crops should be felled or mowed down, chipped and shredded, windrowed or pulverized or ploughed and mulched. - Minor compliance -	No open burning noted based on the records on the land clearing and felling for the replanting at visited estates. Method of land clearing and preparation was used such as felling & chipping, cambering/land forming and path construction.	Complied
4.6 Principle 6: Best Practices			
Criterion 4.6.1: Site Management			
4.6.1.1	Standard operating procedures shall be appropriately documented and consistently implemented and monitored. - Major compliance -	Both estates have established SOPs for the estates as a guidance on the daily estate operation. Refer Keresa Plantations Sdn. Bhd. – Standard Operations & Procedures, Ver. 2, Effective date 1/1/2009. The SOP covers Muster Call, Nursery, Establishment, General Maintenance, Harvesting and Pruning, Operational Procedures and Conservation Measures among others. Both estates has established system to monitor and control of best practice implementation at its estate. Among others includes	Complied

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Criterion / Indicator		Assessment Findings	Compliance												
		Sustainability and Compliances Department Visits and Internal Audits, Agronomist Visits and reports and General Manager visit reports.													
4.6.1.2	Where oil palm is grown within permitted levels on sloping land, appropriate soil conservation measures shall be implemented to prevent both soil erosion as well as siltation of drains and waterways. Measures shall be put in place to prevent contamination of surface and groundwater through runoff of either soil, nutrients or chemicals. - Major compliance -	The management strategy for planting on slopes is addressed in the Keresa Plantations Sdn Bhd SOP (Section 3.0 Development). Based on the SOP, terrace to be constructed at slopes exceeding 8° gradients. Cover crop shall also be planted to minimize erosion.	Complied												
4.6.1.3	A visual identification or reference system shall be established for each field. - Major compliance -	Visual identification has been established for each field and divided into division and blocks. Each block is named by road and visual identification (field marker) erected for reference. Cross checked with the records and the pictorial evidence provided found to be consistent.	Complied												
Criterion 4.6.2: Economic and financial viability plan															
4.6.2.1	A documented business or management plan shall be established to demonstrate attention to economic and financial viability through long-term management planning. - Major compliance -	Both estates has established 5 years business plan as a guidance for daily estate operations. Sighted the 5-year business plan FY 2021 – 2025 available for verification. The business plan contains Total mature ha, Estimated FFB Price/mt, Yield Per Hectare, Estimated FFB/mt, Upkeep & Maintenance, Harvesting, General Charges, Income and Profit Loss.	Complied												
4.6.2.2	Where applicable, an annual replanting programme shall be established. Long term replanting programme should be established and review annually, where applicable every 3-5 years. - Major compliance -	Both estates established a replanting program spanned over a 5-year period till 2025. All programs were available for verification <table border="1" style="width: 100%; border-collapse: collapse;"> <thead> <tr> <th>Year</th> <th>Jiba Estate</th> <th>Sujan Estate</th> </tr> </thead> <tbody> <tr> <td>2021</td> <td>928.07</td> <td>133.73</td> </tr> <tr> <td>2022</td> <td>560.95</td> <td>166.72</td> </tr> <tr> <td>2023</td> <td>349.07</td> <td>213.41</td> </tr> </tbody> </table>	Year	Jiba Estate	Sujan Estate	2021	928.07	133.73	2022	560.95	166.72	2023	349.07	213.41	Complied
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Criterion / Indicator		Assessment Findings			Compliance
		2024	487.95	-	
		2025	322.12	216.29	
4.6.2.3	<p>The business or management plan may contain:</p> <ul style="list-style-type: none"> a) Attention to quality of planting materials and FFB b) Crop projection: site yield potential, age profile, FFB yield trends c) Cost of production: cost per tonne of FFB d) Price forecast e) Financial indicators: cost benefit, discounted cash flow, return on investment <p>- Major compliance -</p>	<p>Both estates has established 5 years business plan as a guidance for daily estate operations. Sighted the 5-year business plan FY 2021 – 2025 available for verification. The busines plan contains Total mature ha, Estimated FFB Price/mt, Yield Per Hectare, Estimated FFB/mt, Upkeep & Maintenance, Harvesting, General Charges, Income and Profit Loss.</p>			Complied
4.6.2.4	<p>The management plan shall be effectively implemented and the achievement of the goals and objectives shall be regularly monitored, periodically reviewed and documented.</p> <p>- Major compliance -</p>	<p>The management plan was effectively implemented, and the achievement of the goals and objectives were regularly monitored, documented and reviewed through Monthly Progress Reports, Monthly Accounts Reports, Annual Financial Reports, Agronomist Visit Reports and Internal Audit Report.</p>			Complied
Criterion 4.6.3: Transparent and fair price dealing					
4.6.3.1	<p>Pricing mechanisms for the products and other services shall be documented and effectively implemented.</p> <p>- Major compliance -</p>	<p>The pricing method has been clearly stated in the contract and contractors are explained on the terms of contracts prior to the signing of contract.</p>			Complied
4.6.3.2	<p>All contracts shall be fair, legal and transparent and agreed payments shall be made in timely manner.</p> <p>- Major compliance -</p>	<p>Sample contract and payment record verification together with interviews of estates management found that the payments have been made as per contract.</p>			Complied

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Criterion / Indicator		Assessment Findings	Compliance
		<p>For Jiba Estate, Sampled Contractor (PNS JAYA Sdn. Bhd.). Refer to tax invoice Inv#Aug21 dated 13/09/2021</p> <p>For Sujan Estate, sample contractor (All Planters Tractor (Sarawak Sdn. Bhd). Refer to tax invoice #INV2007303072 dated 30/07/2020 amounted RM 23,250.00. Payment has been made on 08th September 2020 (Recipient’s Reference: 200908021450).</p>	
Criterion 4.6.4: Contractor			
4.6.4.1	<p>Where contractors are engaged, they shall understand the MSPO requirements and shall provide the required documentation and information.</p> <p>- Major compliance -</p>	<p>Keresa Plantations Sdn. Bhd. has educated the contractors on MSPO. Latest MSPO awareness briefing to contractors was conducted on 05/06/2020. Interview with the contractors found that they understood the MSPO requirements.</p> <p>All the contractors are aware that estate is certified under MSPO. Therefore, the contractors have been instructed by the estate management to follow the MSPO standard requirement.</p> <p>The policies were already communicated through the tender process and once the contract sign by both parties. The contractors shall be subjected to the management system audits by auditors assigned by the management as and when deemed necessary as stated in the contract agreement.</p>	Complied
4.6.4.2	<p>The management shall provide evidence of agreed contracts with the contractor.</p> <p>- Major compliance -</p>	<p>Keresa Plantations Sdn. Bhd. has prepared a standard contract for all the contractors. The signed copy of the contract available for verification. Sample of contract agreement as follows;</p> <p><u>Jiba Estate</u></p> <p>Contractor: PNS Jaya Sdn Bhd, Project: Replanting Works for the Year 2021 – Field No. J9707, Jiba Estate – 56.37 Ha dated 01/01/2021.</p> <p><u>Sujan Estate</u></p>	Complied

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Criterion / Indicator		Assessment Findings	Compliance
		Contractor: Sime Darby Industrial Sdn Bhd, Project: Machine Rental dated 01/10/2019.	
4.6.4.3	The management shall accept MSPO approved auditors to verify assessments through a physical inspection if required. - Minor compliance -	Contractors of Keresa Plantations Sdn. Bhd. has no objections to allow BSI auditors to verify the assessment through physical inspection as and when required in accordance with the MSPO Standards. Refer Contract Agreement Section B.10.5, B.11 Compliance with the Law / safety management / Insurance, Annexure 2 Sustainability Certification (RSPO, ISCC and MSPO) essentialities.	Complied
4.6.4.4	The management shall be responsible for the observance of the control points applicable to the tasks performed by the contractor, by checking and signing the assessment of the contractor for each task and season contracted. - Major compliance -	Sample contract and payment record verification together with interviews of estates management found that the payments have been made as per contract. The management monitored by checking and signing the assessment of the contractor for each task before the payment was made.	Complied
4.7 Principle 7: Development of new planting			
Criterion 4.7.1: High biodiversity value			
4.7.1.1	Oil palm shall not be planted on land with high biodiversity value unless it is carried out in compliance with the National and/or State Biodiversity Legislation. - Major compliance -	No development of new planting in the estates.	N/A
4.7.1.2	No conversion of Environmentally Sensitive Areas (ESAs) to oil palm as required under Peninsular Malaysia's National Physical Plan (NPP) and the Sabah Forest Management Unit under the Sabah Forest Management License Agreement. For Sabah and Sarawak, new planting or replanting of an area 500ha or more	No development of new planting in the estates.	N/A

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Criterion / Indicator		Assessment Findings	Compliance
	requires an EIA. For areas below 500ha but above 100ha, a Proposal for Mitigation Measures (PMM) is required. - Major compliance -		
Criterion 4.7.2: Peat Land			
4.7.2.1	New planting and replanting may be developed and implemented on peat land as per MPOB guidelines on peat land development or industry best practice. - Major compliance -	No development of new planting in the estates.	N/A
Criterion 4.7.3: Social and Environmental Impact Assessment (SEIA)			
4.7.3.1	A comprehensive and participatory social and environmental impact assessment shall be conducted prior to establishing new plantings or operations. - Major compliance -	No development of new planting in the estates.	N/A
4.7.3.2	SEIAs shall include previous land use or history and involve independent consultation as per national and state regulations, via participatory methodology which includes external stakeholders. - Major compliance -	No development of new planting in the estates.	N/A
4.7.3.3	The results of the SEIA shall be incorporated into an appropriate management plan and operational procedures developed, implemented, monitored and reviewed. - Major compliance -	No development of new planting in the estates.	N/A
4.7.3.4	Where the development includes smallholder schemes of above 500ha in total or small estates, the impacts and implications of	No development of new planting in the estates.	N/A

Criterion / Indicator		Assessment Findings	Compliance
	how each scheme or small estate is to be managed should be documented and a plan to manage the impacts developed, implemented, monitored and reviewed. - Minor compliance -		
Criterion 4.7.4: Soil and topographic information			
4.7.4.1	Information on soil types shall be adequate to establish the long-term suitability of the land for oil palm cultivation. - Major compliance -	No development of new planting in the estates.	N/A
4.7.4.2	Topographic information shall be adequate to guide the planning of planting programmes, drainage and irrigation systems, roads and other infrastructure. - Major compliance -	No development of new planting in the estates.	N/A
Criterion 4.7.5: Planting on steep terrain, marginal and fragile soils			
4.7.5.1	Extensive planting on steep terrain, marginal and fragile soils shall be avoided unless permitted by local, state and national laws. - Major compliance -	No development of new planting in the estates.	N/A
4.7.5.2	Where planting on fragile and marginal soils is proposed, plans shall be developed and implemented to protect them and to minimize adverse impacts (e.g. hydrological) or significantly increased risks (e.g. fire risk) in areas outside the plantation. - Major compliance -	No development of new planting in the estates.	N/A
4.7.5.3	Marginal and fragile soils, including excessive gradients and peat	No development of new planting in the estates.	N/A

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Criterion / Indicator		Assessment Findings	Compliance
	soils, shall be identified prior to conversion. - Major compliance -		
Criterion 4.7.6: Customary land			
4.7.6.1	No new plantings are established on recognised customary land without the owners’ free, prior and informed consent, dealt with through a documented system that enables indigenous peoples, local communities and other stakeholders to express their views through their own representative institutions. - Major compliance -	No development of new planting in the estates.	N/A
4.7.6.2	Where new plantings on recognised customary lands are acceptable, management plans and operations should maintain sacred sites. - Minor compliance -	No development of new planting in the estates.	N/A
4.7.6.3	Where recognized customary or legally owned lands have been taken-over, the documentary proof of the transfer of rights and of payment or provision of agreed compensation shall be made available. - Major compliance -	No development of new planting in the estates.	N/A
4.7.6.4	The owner of recognised customary land shall be compensated for any agreed land acquisitions and relinquishment of rights, subject to their free prior informed consent and negotiated agreement. - Major compliance -	No development of new planting in the estates.	N/A
4.7.6.5	Identification and assessment of legal and recognised customary	No development of new planting in the estates.	N/A

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

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

Criterion / Indicator		Assessment Findings	Compliance
4.1 Principle 1: Management commitment & responsibility			
Criterion 4.1.1 – Malaysian Sustainable Palm Oil (MSPO) Policy			
4.1.1.1	Policy for the implementation of MSPO shall be established. - Major compliance -	Keresia Plantations Sdn. Bhd. have established a policy for the implementation of MSPO undersigned by the Senior Group General Manager dated on April 2015. Latest communication on policy has been conducted to all workers, staffs, stakeholders and dated 23/07/2021.	Complied
4.1.1.2	The policy shall also emphasize on the commitment to continual improvement with the objective of improving the milling operation. - Major compliance -	The MSPO Policy emphasizes on the commitment to sustainable development and continuous improvement on growing and milling operations through MSPO implementations and principles as stated in the policy.	Complied
Criterion 4.1.2 – Internal Audit			
4.1.2.1	Internal audit shall be planned and conducted regularly to determine the strong and weak points and potential area for further improvement. - Major compliance -	The MSPO Internal Audit Procedure (KERESA/MSPO/QP-10; Rev 3; Revision date: 01/09/2020) has been established. The procedure states that the internal audit shall be conducted to ensure that the implementation of the Company’s Management System is in line with the defined policies, objectives, procedures and other applicable requirements. The procedure states the frequency of the audit is to be carried out at least once (1) yearly. As per the MSPO Internal Audit Procedure, Keresia Plantations have conducted MSPO internal audit for Keresia POM on a yearly basis.	Complied

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Criterion / Indicator		Assessment Findings	Compliance
		Keresia POM conducted the Internal Audit on 11/08/2021. The audit summary findings indicated that there was 1 Minor NC from Principle 4.	
4.1.2.2	The internal audit procedures and audit results shall be documented and evaluated, followed by the identification of strengths and root causes of nonconformities, in order to implement the necessary corrective action. - Major compliance -	The MSPO Internal Audit Procedure (KERESA/MSPO/QP-10; Rev 3; Revision date: 01/09/2020) has been documented and available for verification. The Internal Audit was led by Ms Julia Andrew (Lead Auditor). The Internal Audit dated 11/08/2021 raised 1 Minor findings. A Corrective Action Request & Response was raised where the description of non-conformance, root cause analysis, corrective action plan and verification is identified and stated. The Minor NC was closed accordingly.	Complied
4.1.2.3	Reports shall be made available to the management for their review. - Major compliance -	The MSPO Internal Audit Procedure (KERESA/MSPO/QP-10; Rev 3; Revision date: 01/09/2020) states that the internal audit report is to be provided to the auditee during the closing meeting or within 2 weeks of the date the audit is conducted. The MSPO Internal Audit Report was available at the mill for verification.	Complied
Criterion 4.1.3 – Management Review			
4.1.3.1	The management shall periodically review the continuous suitability, adequacy and effectiveness of the requirements for effective implementation of MSPO and decide on any changes, improvement and modification. - Major compliance -	The Management Review Procedure (First Editions; Version 2.0) dated January 2020 was established. MSPO Management Review was conducted on 24/08/2020. Refer MSPO & MSPO SCCS 20201 Minute Meeting Of Management Review. The management review minutes meeting was available for verification. Among agenda discussed were: 1. Welcome speech	Complied

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Criterion / Indicator		Assessment Findings	Compliance
		2. Review Input: Follow up action from previous management review 3. Internal audit & External audit 4. Customer and stakeholder feedbacks: Complaint & grievances 5. Process performance & product conformity 6. Status of corrections and corrective action 7. Changes that could affect MSPO and MSPO SCCS System 8. MSPO Policy 9. Other matters or recommendation for improvement 10. Review output 11. Closing	
Criterion 4.1.4 – Continual Improvement			
4.1.4.1	The action plan for continual improvement shall be based on a consideration of the main social and environmental impact and opportunities for the company. - Major compliance -	Keresa Plantations Sdn Bhd have developed a Continuous Improvement Plan (Update January 2021). Among the improvements that have been identified are: <ol style="list-style-type: none"> 1. Economic Value: Key Performance Indicators. <ul style="list-style-type: none"> • Focus on Mill technical areas (conveyors) • Gasifier • To increase OER value 2. Economic Values: Better Management Systems. <ul style="list-style-type: none"> • Maintain documentation register & updates. • Plantation/Mill records register & updates • Monthly managers workplace inspections 	Complied

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Criterion / Indicator	Assessment Findings	Compliance
	<ul style="list-style-type: none"> • Action requests systems introduced • Public Records board for Plantation/Mill <p>3. Social Values: Healthy & Safety at Workplace</p> <ul style="list-style-type: none"> • OSH site audit & workplace assessment • OSH policy and plan drafted & issued • List of major infra works to improve OSH compliance • OSH Training: Chemical Handling, Safe Harvesting Practices & Emergency Response Plan. <p>4. Environmental Values: Control of Pollution & Significant Impacts on Environment (Action 1)</p> <ul style="list-style-type: none"> • Waste management guidelines & Implementation • Water Quality • Environmental & Biodiversity review • Buffer Zone & Riparian demarcation guidelines & implementation. • Trimester Environmental Audit <p>5. Environmental Values: Control of Pollution & Significant Impacts on Environment (Action 2)</p> <ul style="list-style-type: none"> • Pome discharge (100% Compliance) • Stack (100 % Compliance) • Waste Management • Water Quality • Soil Erosion • Biodiversity 	

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Criterion / Indicator		Assessment Findings	Compliance
		<ul style="list-style-type: none"> Pesticides 	
4.1.4.2	<p>The company should establish a system to improve practices in line with new information and techniques; and for disseminating this information throughout the workforce.</p> <p>- Major compliance -</p>	<p>This is being made upon confirmation of any new projects. Employees were briefed of any new development in basic understanding during the morning briefings. The management team will be informed of such development during the monthly management meetings. Dissemination of information by the GM are transacted during the monthly Managers meetings and emails.</p>	Complied
4.2 Principle 2: Transparency			
Criterion 4.2.1 – Transparency of information and documents relevant to MSPO requirements			
4.2.1.1	<p>The management shall communicate adequate information to other stakeholder on environmental, social and legal issues relevant to sustainable practices in the relevant languages and forms.</p> <p>- Major compliance -</p>	<p>Keresia POM have maintained records of requests and responses, Land titles/user rights, Safety and health plan, assessments relating to environmental and social impact, Plan for pollution prevention, Records of complaints and grievances, Plan for continuous improvement. These documents are all available upon request.</p>	Complied
4.2.1.2	<p>The management documents shall be publicly available, except where this is prevented by commercial confidentiality or where disclosure of information would result in negative environmental or social outcomes.</p> <p>- Major compliance -</p>	<p>Keresia POM hold copies of every management documents that are required to be publicly available. Copies of the document such as Impact Assessments relating to environmental and social, plan for pollution preventions, records of complaints and grievances were available on request.</p> <p>All these documents were sighted in the mill offices. Requests for official documents through the mill office will have to go through the mill manager/assistant in charge, whom will make the decision as to whether the information can be shared to or viewed by the person requesting the information or document.</p>	Complied

Criterion / Indicator	Assessment Findings	Compliance	
Criterion 4.2.2 – Transparent method of communication and consultation			
4.2.2.1	<p>Procedures shall be established for consultation and communication with the relevant stakeholders.</p> <p>- Major compliance -</p>	<p>Keresia POM has established Procedures for Communication of Social Policies (Chapter 3, Reference No: SOC 3.1, Date issue: Dec 2009, Version 1) and Complaints & Grievances Procedure (Reference No: SOC 3.2, Version 1) that define the responsibilities and actions required for receiving, recording and responding to enquiries and requests from internal and external stakeholders.</p> <p>The procedure outlines the process of communication on the social policies, lodging grievances and monitoring implementation. The Standard Operating Procedure has identified mechanism for consultation and communication with the relevant stakeholders.</p> <p>Keresia POM implemented the “Communication and Consultation Management guidelines” as evidenced by the maintenance of filing systems for recording written requests for assistance and information. Inspection of a sample of records found that requests for information were received only from Government Departments (DOE, DOSH, MPOB) and complaint form from the local communities. Refer “Permintaan / Aduan (Stakeholders) 2021”</p> <p>Keresia POM has shown a good communication, by published the flow chart of Procedure “Pengurusan Aduan Pekerja/Stakeholder” at the notice board in front of the Mill office and housing complex. The feedback can be forward to the Mill management to Complain box muster ground and office. Verified through interview and photo evidence.</p>	<p>Complied</p>
4.2.2.2	<p>The management shall nominate management officials at the operating unit responsible for issues related to <i>indicator 1</i>.</p> <p>- Minor compliance -</p>	<p>The management has appointed Alicesa Anak Ramba as the Social Management Representative for the mill as stated in the</p>	<p>Complied</p>

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Criterion / Indicator		Assessment Findings	Compliance
		appointment letter as Social Management Representative dated 01/01/2020 undersigned by the Deputy General Manager.	
4.2.2.3	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. - Major compliance -	Sighted latest stakeholders list updated on 01/09/2021. Stakeholder list include the supplier, contractor, smallholders, external stakeholders' plantation, villagers, long house & government agency such as DOSH, MPOB, DOE, Labour department & etc. Joint consultative committee (JCC) meeting, internal stakeholder meeting that involve worker representative and chaired by Mr. P. Shailendran. The latest meeting was conducted on 23/07/2021. All issued has been discussed with current action plan has been established. Request from government agency was made by visit logbook such as MPOB, DOE and DOSH. The action has been taken accordingly and recorded. Refer "Permintaan / Aduan (Stakeholders) 2021".	Complied
Criterion 4.2.3 – Traceability			
4.2.3.1	The management shall commit itself to implement and maintain the requirements for the traceability and shall establish a standard operation procedure for traceability. - Major compliance -	SOP on the Traceability of FFB Production (Doc Number: SOP/ISCC/KPSB/EST 1) was established dated 01 March 2011, reviewed on 25.10.2019.	Complied
4.2.3.2	The management shall conduct regular inspections on compliance with the established traceability system. - Major compliance -	Traceability Audit was carried out on monthly basis by the Sustainably Department at the mill. Regular Inspections are done to ensure the traceability system is well implemented. Sighted the traceability audit report for Keresu POM dated 11/08/2021.	Complied
4.2.3.3	The management shall identified and assign suitable employees to implement and maintain traceability system.	The management has appointed Ms. Alicesa Anak Ramba (Sustainability Executive) as the Traceability Representative for the	Complied

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Criterion / Indicator		Assessment Findings	Compliance
	- Minor compliance -	estates as stated in the appointment letter dated 01/01/2019 undersigned by the Deputy General Manager.	
4.2.3.4	Records of storage, sales, delivery or transportation of crude palm oil and palm kernel shall be maintained. - Major compliance -	Records of FFB received, storage and delivery of CPO and PK are well maintained in the mill. Sighted the records books and weighbridge tickets of incoming and outgoing product at the mill. Sampled the records of outgoing CPO and PK as below: 1. CPO <ul style="list-style-type: none"> • Customer: Bintulu Edible Oil Sdn Bhd • Transporter: Telly Transport • Product: CPO • Date: 05/01/2021 • Ticket Number: 012181 • Nett Weight: 40050 Kg 2. PKO <ul style="list-style-type: none"> • Customer: Sime Darby Oils Bintulu Sdn Bhd • Transporter: Keresia Transport Sdn Bhd • Product: PK • Date: 05/01/2021 • Ticket Number: 012183 • Nett Weight: 30420 Kg 	Complied
4.3 Principle 3: Compliance to legal requirements			
Criterion 4.3.1 – Regulatory requirements			

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Criterion / Indicator		Assessment Findings	Compliance
4.3.1.1	<p>All operations shall be in compliance with applicable local, state, national and ratified international laws and regulations.</p> <p>- Major compliance -</p>	<p>Keresa Plantations Sdn. Bhd has maintained the systems for documentation, checking and assessment of legal compliance with applicable laws and regulations.</p> <p>Inspection of records showed that the both estates has maintained legal compliance with statutory requirements.</p> <p>Sample of permit and license sighted as listed below:</p> <ol style="list-style-type: none"> 1. MPOB License; License Number: 510557004000; Processing Capacity: 330000 Mt FFB; License Validity Period: 05/08/2021 – 31/03/2022. 2. DOE License (Compliance Schedule); License Number: 003095; License Validity Period: 01/07/2021 – 30/06/2022. 3. Fire Certificate (BOMBA); Serial Number: 320010; Certificate Number: JBPM: 5K/7/267/2015; Certificate Validity Period: 02/10/2020 – 01/10/2021. 4. Permit Barang Kawalan Berjadual; Reference Number: BTU.P.02/2010 (D); Serial Number: p – Q003421; Description: Diesel; Storage Quantity: 28135 Litres; License Validity Period: 04/05/2021 – 03/05/2022. 5. JTK – Permit to Work Exceeding the Overtime Limit; Serial Number: JTK(O).JTKSWK.07(L27); Overtime Limit: 120 hours; Permit date: 17/08/2012. 	Complied
4.3.1.2	<p>The management shall list all relevant laws related to their operations in a legal requirements register.</p> <p>- Major compliance -</p>	<p>A Legal Compliance procedure has been established (KP 16 Mechanism for ensuring legal compliance dated 15/3/2010). All operating units have Legal & Other Requirements Register (LORR) covering all the necessary regulatory requirements. The management have reviewed and updated the LORR at the mill on</p>	Complied

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		<p>03/09/2021. All the new legal requirements were included in the legal register accordingly which includes:</p> <ul style="list-style-type: none"> • Minimum Wages 2020 • Akta Pencegahan dan Pegawalan Penyakit Berjangkit 1988 • Movement Control Order 2020 	
4.3.1.3	<p>The legal requirements register shall be updated as and when there are any new amendments or any new regulations coming into force.</p> <p>- Major compliance -</p>	<p>All legal requirements were 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 were reviewed/updated on a yearly basis / as and when needed for new updates/licenses. 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 Workers Minimum Standards of Housing and Amenities (Amendment) Act 2019, Minimum Wages Order 2020 and Auxiliary Police Regulations 1970 (Amendment), Movement Control Order 2020 & Akta Pencegahan & Pengawalan Penyakit Berjangkit 1988.</p>	Complied
4.3.1.4	<p>The management should assign a person responsible to monitor compliance and to track update the changes in regulatory requirements.</p> <p>- Minor compliance -</p>	<p>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>On the site verification, interviews with office personnel and records indicate that the system is appropriate to the operations. Tracking system on any changes in the law is well implemented.</p>	Complied

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Criterion / Indicator		Assessment Findings	Compliance
		The mill management has appointed the Chief Clerk, Rose Anak Gani on 01/01/2019 as the PIC to monitor any changes on the LORR and update the register as and when necessary as stated in the job functions as Compliance to Legal Requirement Representative undersigned by the Mill Manager.	
Criterion 4.3.2 – Lands use rights			
4.3.2.1	The management shall ensure that their oil palm milling activities do not diminish the land use rights of other users. - Major compliance -	Keresia POM operation is on lease land. There are documents in place showing legal ownership or lease and a history of land tenure. As reported during the last assessment, estate was developed on State Lease Land, issued by Department of Land and Survey; Bintulu Division dated 28/12/1996 for 99 years (between 01/01/1981 to 01/01/2080) over an area of 6,023 ha in Lot No. 1 Block 17 Lavang Land District, Bintulu Sarawak.	Complied
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. - Major compliance -	Keresia POM operation is on lease land. There are documents in place showing legal ownership or lease and a history of land tenure. As reported during the last assessment, estate was developed on State Lease Land, issued by Department of Land and Survey; Bintulu Division dated 28/12/1996 for 99 years (between 01/01/1981 to 01/01/2080) over an area of 6,023 ha in Lot No. 1 Block 17 Lavang Land District, Bintulu Sarawak.	Complied
4.3.2.3	Legal parameter boundary markers should be clearly demarcated and visibly maintained on the ground where practicable. - Major compliance -	Keresia POM was within the perimeter of Sujana Estate. The boundary between the mill and the estate was clearly separated using the perimeter fencing.	Complied
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	There were no land disputes noted during the audit at Keresia POM as the mill has the legal ownership documents which was under the Keresia Mill Sdn. Bhd.	N/A

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	and that these should have been accepted with free prior informed consent (FPIC). - Minor compliance -		
Criterion 4.3.3 – Customary rights			
4.3.3.1	Where lands are encumbered by customary rights, the company shall demonstrate that these rights are understood and are not being threatened or reduced. - Major compliance -	Keresas POM was built under Jiba Estate land titles area. There is no customary land within or surrounding the POM. There are also no land disputes or claims involving the POM. The company has proper legal land titles for the land ownership.	N/A
4.3.3.2	Maps of an appropriate scale showing extent of recognized customary rights shall be made available. - Minor compliance -	Keresas POM was built under Jiba Estate land titles area. There is no customary land within or surrounding the POM. There are also no land disputes or claims involving the Keresas POM. The company has proper legal land titles for the land ownership.	N/A
4.3.3.3	Negotiation and FPIC shall be recorded and copies of the relevant agreements should be made available. - Major compliance -	Keresas POM was built under Jiba Estate land titles area. There is no customary land within or surrounding the Keresas POM. There are also no land disputes or claims involving the Keresas POM. The company has proper legal land titles for the land ownership.	N/A
4.4 Principle 4: Social responsibility, health, safety and employment condition			
Criterion 4.4.1: Social Impact Assessment (SIA)			
4.4.1.1	Social impacts should be identified and plans should be implemented to mitigate the negative impacts and promote the positive ones. - Minor compliance -	Social Impact Assessment is done annually by the Sustainability & Compliance Department by conducting a satisfaction survey among a sampled number of workers. The summary report is available in the Report of Satisfaction Survey – Social impact Assessment dated 29/08/2021.	Complied

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		<p>Based on the report it was concluded that most of the workers were satisfied with the work terms and conditions, social provisions, environment, safety and health and communication. Positive and negative impact were recorded, and action has been taken by management.</p> <p>Besides that, they were unsatisfied on prices of goods at canteen more expensive compare to the price in town, dust emission that can damage respiratory system and landfill will full with solid waste. Control measure has been monitored by the management for the negative issue.</p>	
Criterion 4.4.2: Complaints and grievances			
4.4.2.1	<p>A system for dealing with complaints and grievances shall be established and documented.</p> <p>- Major compliance -</p>	<p>Keresa Plantations Sdn. Bhd. has established the procedure (Chapter 3: Complaints & Grievance Procedures dated: December 2009, Revised April 2019) to deal with complaints and grievances.</p> <p>The procedure clearly states the types of complaints that can be raised, who can make the complains and grievances, how the complaints can be made, cascading the complaints to the higher personals, recording of the complaints, investigation of the complaints and action to be taken for the complaints.</p> <p>A flow chart is available to show the steps taken to address a complaint or grievances in the mill.</p>	Complied
4.4.2.2	<p>The system shall be able to resolve dispute in an effective, timely and appropriate manner, which is accepted by all parties.</p> <p>- Major compliance -</p>	<p>Inspection of records at the mill indicated that written communications were replied promptly, and the correspondence are kept in a file (File Aduan & Cadangan Pekerja). Complaints forms seen are responded and completed within 5 working day.</p> <p>Sighted samples of complaints as below;</p>	Complied

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Criterion / Indicator		Assessment Findings	Compliance
		<p>Complaint By: Mr. Samson Saka dated 24/02/2021</p> <p>Issue: Broken lamp and switch.</p> <p>Response By: Mill Manager on 24/02/2021</p> <p>Response: Management has instructed the Electrical Personal to repair the faulty lamp. Repair was done on 24/02/2021.</p>	
4.4.2.3	<p>A complaint form should be made available at the premises, where employees and affected stakeholders can make complaints.</p> <p>- Minor compliance -</p>	<p>The mill maintains a generic 'complaint form' and 'maintenance and repairing report' for receiving and responding to requests and complaints from employees and relevant stakeholders. This form is available in the mill office. Workers and relevant stakeholders are free to voice out their complaints or suggestions through this method.</p> <p>The management have also made available a suggestion box at the muster ground for the workers and relevant stakeholders to write their complaints or suggestions. The written complaints or suggestions are recorded in a logbook for further action to be taken by the management.</p>	Complied
4.4.2.4	<p>Employees and surrounding communities should be made aware of its existence and that complaints or suggestions may be made at any time.</p> <p>- Minor compliance -</p>	<p>Employees & Stakeholders are made aware that the complaints or suggestions can be made at any time to the management. They are frequently reminded during the meetings conducted with the workers representatives and leaders of the long houses.</p> <p>Training on Request and Complaint Procedures was conducted by the mill management for the workers on 20/08/2021 attended by 44 workers.</p> <p>During the interview with the employees and surrounding communities, it was understood that they are aware that complaints or suggestions can be made any time and the modes available for them to voice out the complaints or suggestions.</p>	Complied

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4.4.2.5	Complaints and solutions within the past 24 months shall be documented and be made available to affected stakeholders upon request. - Major compliance -	The management retain complaints and resolution records for the last 24 months in accordance to the Complaints & Grievances Procedures. Sighted the Complaints and Grievances File consist of records for the last 24 months.	Complied
Criterion 4.4.3: Commitment to contribute to local sustainable development			
4.4.3.1	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. - Minor compliance -	Keresa POM have contributed to local development. The contribution was made to the internal and external stakeholders. Among the management contributions are as follows: - 1. Donation 100 units plastic chair to JKK RH Lichong dated 28/09/2021.	Complied
Criterion 4.4.4: Employees safety and health			
4.4.4.1	An occupational safety and health policy and plan which is in line with Occupational Safety and Health Act 1994 and Factories and Machinery Act 1967 (Act 139) shall be documented, effectively communicated and implemented. - Major compliance -	Keresa Plantations Sdn. Bhd. has established Occupational Safety and Health Policy signed by the Managing Director dated 17/10/2017. In the policy stated the company commitment to ensure and promote the safety work environment for the workers and operations. The policy was communicated through training, briefing and displayed on notice board. The mill has established Safety and Health Management Plan and documented in Environment, Safety and Health Plan FY 2021. The management plan includes the ESH risk management, Emergency Response Procedure, Chemical Safety Management, Noise Boundary Monitoring and Health monitoring.	Complied
4.4.4.2	The occupational safety and health plan should cover the following: a) A safety and health policy, which is communicated and implemented.	The occupational safety and health plan cover the following: a. Keresa Plantations Sdn. Bhd. has established Occupational Safety and Health Policy signed by the Managing Director dated	Complied

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Criterion / Indicator	Assessment Findings	Compliance
<ul style="list-style-type: none"> b) The risk of all operations shall be assessed and documented. c) An awareness and training programme which includes the following requirements for employees exposed to chemicals used at the palm oil mill: <ul style="list-style-type: none"> i. All employees involved are adequately trained on safe working practices; ii. All precautions attached to products should be properly observed and applied; d) The management shall provide the appropriate PPE at the place of work to cover all potentially hazardous operations as identified in the risk assessment and control such as Hazard Identification, Risk Assessment and Risk Control (HIRARC). e) The management shall establish Standard Operating Procedure for handling of chemicals to ensure proper and safe handling and storage in accordance to Occupational Safety Health (Classification Packaging and Labeling) Regulation 1997 Occupational Safety Health (Use and Standard of Exposure of Chemical Hazardous to Health) Regulation 2000. f) The management shall appoint responsible person(s) for workers' safety and health. The appointed person(s) of trust shall have knowledge and access to latest national regulations and collective agreements. g) The management shall conduct regular two-way communication with their employees where issues that affect their business such as those related to employees' safety, health and welfare are discussed openly. Records from such meeting shall be kept and the concerns of employees and any remedial actions taken shall be recorded. 	<p>17/10/2017. In the policy stated the company commitment to ensure and promote the safety work environment for the workers and operations. The policy was communicated through training, briefing and displayed on notice board. The policy has been briefed to all workers on 20/08/2021</p> <p>b. HIRARC was available for all operations within the Mill to identify the hazards, assess and recommended control measures to minimize the risks. Among the HIRARC sampled were Boiler, Despatch bay, Grass Cutter, Security, laboratory, Tank Cleaning, Shovel and Workshop. All HIRARC were recently reviewed on 05/08/2019.</p> <p>Chemical Health Risk Assessment (CHRA) was conducted in compliance with Occupational Safety and Health (USECHH) regulation 2000 on 13 July 2017 by DOSH Registered Assessor, Tiong Cia Ming (HQ/16/ASS/00/33) with the CHRA Report available for verification. The CHRA Report (Report Ref Number: HQ/16/ASS/00/33-2017/003) was available for verification.</p> <p>Medical Surveillance was conducted to establish workers health status when they work in an environment where they are exposed to particular hazards such as n-Hexane, Manganese, Chlorine, Mineral Dust and Mineral Oil. The Mill has conducted the medical surveillance on 30/07/2020 for 4 of the workers at Klinik Medan Sentral Sdn Bhd where all the workers were certified fit to work with no workers needed for Medical Removal Protection.</p> <p>Noise Risk Assessment (baseline) was conducted ESI Sampling Sdn Bhd on 2nd and 3rd October 2019 for Keresa POM by a Noise Risk Assessor, Wong Yie Sing (NRA Reg: HQ/15/PEB/00/149).</p>	

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<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>- Major compliance -</p>	<p>The NRA Report (Ref. No: HQ/15/PEB/00/149-2019/11) was available for verification.</p> <p>Audiometric test was conducted on September 2020 for all workers exposed to excessive noise. The results indicated that 22 workers had hearing impairment and 3 workers had Standard threshold Shifts.</p> <p>c. The mill has established a training and awareness program for employees exposed to chemicals used at the palm oil mill to ensure continuous awareness to the employees. 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>- Chemical Handling Training – 24/06/2021</p> <p>d. The mill has provided appropriate PPE to all workers according to the job type and requirements. The PPE given as per HIRARC requirements. Sighted the PPE issuance records documented in 'PPE Issuance Record' logbook. The PPE issued recorded by workers and job designation.</p> <p>e. Procedures of chemical handling is presented in several documents, such as in the SOP Boiler Station (Chemical); Dated 05/08/2019; Document Date: SOP/KMSB/Boiler (Chemical/RO.</p> <p>f. The Mill Manager, Mr. Shailendran was appointed to be the Chairman of OSH Committee at the Mill as stated in the appointment letter dated 01/05/2019 undersigned by the General Manager. Mill management has appointed Safety Committee Members consists of OSH Coordinator, Secretary, representatives from Employer and representatives from Employee as per appointment letter by the Mill Manager.</p>	

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	<p>g. The Mill Management conducted regular OSH committee meetings on bimonthly basis and when necessary due to accidents that occur. In the meeting, discussed issue on employees' safety, health and welfare such as mill safety and health achievement report, mill security, safety compliance by contractors, workplace inspection, legal compliance, safety and health training. Sighted the latest OSH Meeting Minutes dated 21/01/2021, 17/03/2021, 19/05/2021, 21/07/2021 and 04/08/2021 available for verification.</p> <p>h. Accident and emergency procedures are available in the Prosedur Standard Operasi – Prosedur Tindakan Kecemasan; Reference Number: 1/2011; Document Number: ERP 1/2011; Dated: 23/08/2011.</p> <p>The mill has established Emergency Response Team lead by the Mill Engineer. Fire Drill was conducted on 19/02/2021 at the mill.</p> <p>i. First aiders were present at various workstations at the mill. The first aiders were responsible for first aid box at each workstation assigned to them by the management. The first aid box was recently replenished with records of monthly monitoring available for verification. The latest First Aid Training was conducted on 30/07/2021.</p> <p>j. Accident records are recorded and maintained in the mill and discussed during the bimonthly held JKKP Meetings. There was no reported accident for the year 2020 in the mill. Sighted the JKKP 8 form submission to JKKP for the year 2020 as well, submitted on 05/01/2021. There were no accidents reported at the mill for the year 2021 as of to date as well.</p>	

Criterion / Indicator	Assessment Findings	Compliance	
Criterion 4.4.5: Employment conditions			
4.4.5.1	<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>- Major compliance -</p>	<p>The management has established a policy on good social ethics regarding human rights such as Human Rights Policy dated 30/11/2017, Equal Rights Policy dated 01/12/2009, Prevention of Sexual Harassment & Domestic Violence in the Workplace Policy dated 01/12/2009, Freedom of Association Policy dated 01/12/2009 has been signed off by Managing Director of the group.</p> <p>The "Keresas Sustainability Policy" is displayed in notice boards inside the office as well as outside the office. The policy also publicly available through the official website: http://www.keresas.com.my</p> <p>The policy has been communicated to all workers and stakeholders during morning muster briefings, displayed at strategic places such as office and line sites and communicated during meetings with the workers and relevant stakeholders.</p>	<p>Complied</p>
4.4.5.2	<p>The management shall not engage in or support discriminatory practices and shall provide equal opportunity and treatment regardless of race, colour, sex, religion, political opinion, nationality, social origin or any other distinguishing characteristics.</p> <p>- Major compliance -</p>	<p>Keresas Plantations Sdn. Bhd. has established Equal Rights Policy, signed by Managing Director dated 01/12/2009 to ensure equal opportunity and treatment regardless of race, colour, sex, religion, political opinion, nationality, social origin or any other distinguishing characteristics.</p> <p>Inspection of a sample of pay records and interviews of staff and workers at the mill identified that no workers were discriminated in any way.</p>	<p>Complied</p>
4.4.5.3	<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>There is a contract and agreement for staff and workers including foreign workers and pay and conditions are documented and are in accordance with the industry minimum standard. Inspection of a sample of employee contracts confirmed that terms and conditions are clearly outlined and have been signed by the worker. During</p>	<p>Complied</p>

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<p>- Major compliance -</p>	<p>the interview with the staff and workers, it was confirmed that they are paid adequately in accordance with the legal and industry standards.</p> <p>Sampled Workers Employment Agreement and Pay slip month of January 2021, April 2021 and August 2021 were verified as below:</p> <ol style="list-style-type: none"> 1. Employee ID: E0795 2. Employee ID: E0831 3. Employee ID: E0835 4. Employee ID: E0836 5. Employee ID: E0675 6. Employee ID: E0830 7. Employee ID: E0825 8. Employee ID: E0832 	
<p>4.4.5.4 Management should ensure employees of contractors are paid based on legal or industry minimum standards according to the employment contract agreed between the contractor and his employee.</p> <p>- Minor compliance -</p>	<p>Finance Department for Keresia POM is responsible for arranging contracts for the purchase of goods and services, including those with FFB suppliers. The contract clearly stated that the contractor must strictly follow all applicable national and ratified international laws. For Keresia POM, sampled contractor's agreement and employee of contractors agreement and pay slip details as below:</p> <p>Contractor: A & E Maju Sdn Bhd (1300783-W) Project: Crude Palm Oil and Palm Kernel Transport dated 01/09/2020 and valid until 31/08/2022.</p> <ol style="list-style-type: none"> 1. Meling Anak Putit NRIC 640901-XX-XXXX <p>Contractor: Aweventure Sdn Bhd (1314667-K) Project: Crude Palm Oil and Palm Kernel Transport dated 01/07/2021 and valid until 30/06/2023.</p>	<p>Complied</p>

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Criterion / Indicator		Assessment Findings	Compliance
		<p>1. Lawrence Kon NRIC 810126-XX-XXXX</p> <p>Verified contract agreement and pay slip month of January 2021, April 2021 and August 2021 found in line with applicable laws and regulations.</p>	
4.4.5.5	<p>The management shall establish records that provide an accurate overview of all employees (including seasonal workers and subcontracted workers on the premises). The records should contain full names, gender, date of birth, date of entry, a job description, wage and the period of employment.</p> <p>- Major compliance -</p>	<p>Keresa POM has a register of all staffs and workers at the premise. The detail includes full name, gender, date of birth, date joined and job title. The copy of passport and permit etc. were maintained in the employee's personnel files.</p>	Complied
4.4.5.6	<p>All employees shall be provided with fair contracts that have been signed by both employee and employer. A copy of employment contract shall be made available for each and every employee indicated in the employment records.</p> <p>- Major compliance -</p>	<p>There are Employment Contracts for all staffs and workers including foreign workers. Pay and conditions are documented in the employment contract and are in accordance with the Minimum Wages Standards. Inspection of a sample of employee contracts confirmed that terms and conditions are clearly outlined and have been signed by the worker for the respective estates and the management representatives.</p> <p>Sampled Workers Employment Agreement and Pay slip month of January 2021, April 2021 and August 2021 were verified as below:</p> <ol style="list-style-type: none"> 1. Employee ID: E0795 2. Employee ID: E0831 3. Employee ID: E0835 4. Employee ID: E0836 5. Employee ID: E0675 6. Employee ID: E0830 7. Employee ID: E0825 	Complied

Criterion / Indicator		Assessment Findings	Compliance
		8. Employee ID: E0832	
4.4.5.7	The management shall establish a time recording system that makes working hours and overtime transparent for both the employees and employers. - Major compliance -	Working hours is 8 hours a day from Monday to Saturday. Keresa POM has obtained approval from JTK (Sarawak) to increase the overtime maximum 120 hours. The mill maintains time recording system to record the worker's attendance. Each worker has their time recording card which is available for verification.	Complied
4.4.5.8	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. - Major compliance -	The working hours and break time have been clearly stated in the Employment Contract. Sighted in the Contract Agreement the rate of overtime which is agreed by both parties. There is no complaint received regarding payment or forced to work on overtime during site interview.	Complied
4.4.5.9	Wages and overtime payment documented on the pay slips shall be in line with legal regulations and collective agreements. - Major compliance -	Salary slips clearly shows the calculations of gross salary, all legal deductions and net salary of a worker. Workers interviewed confirmed that they are being paid in accordance with the minimum wage requirements. Individual pay slip was distributed to all workers on salary day. A copy of pay slip is also kept in the estate office. Payment to worker is pay by cash during pay day. Sampled Workers Employment Agreement and Pay slip month of January 2021, April 2021 and August 2021 were verified as below: 1. Employee ID: E0795 2. Employee ID: E0831 3. Employee ID: E0835 4. Employee ID: E0836	Complied

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Criterion / Indicator		Assessment Findings	Compliance
		5. Employee ID: E0675 6. Employee ID: E0830 7. Employee ID: E0825 8. Employee ID: E0832	
4.4.5.10	<p>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.</p> <p>- Minor compliance -</p>	<p>Interviews with local and foreign workers indicated that they are satisfied with the standard of housing and facilities provided by Keresia Plantations Sdn Bhd. Electricity and water are provided without charges. Keresia Plantations Sdn. Bhd. has provided transport from Jiba Estate, Sujan Estate and Keresia POM for children to school located at Jiba Estate. Health Clinic has been provided for the employees and family members with free treatment.</p> <p>Outturn incentive for daily attendance on the muster and incentive of contract extension for foreign workers if they renew for three year and above. Local employees have yearly bonus based on personal performance.</p> <p>Due to the COVID-19 Pandemic all workers are provided with Emergency Allowance to help them during the crisis.</p>	Complied
4.4.5.11	<p>In cases where on-site living quarters are provided, these quarters shall be habitable and have basic amenities and facilities.</p> <p>- Major compliance -</p>	<p>Residents at all estate housing have access to facilities established by the company, such as health clinic, sports field, community hall, crèche, and places of worship. The estates provide electricity and water to all workers for free. Additional to that, all workers are given monthly emergency allowance due to the ongoing COVID-19 Pandemic to manage the crisis.</p> <p>The Medical Assistant conducts weekly Labourline and Housing Inspection at the Workers Quarters to ensure that the area is</p>	Complied

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Criterion / Indicator		Assessment Findings	Compliance
		maintained at an acceptable standard. Sighted the weekly Labourline and Housing Inspection Records for the mill.	
4.4.5.12	The management shall establish a policy to prevent all forms of sexual harassment and violence at the workplace. - Major compliance -	Keresa Plantations Sdn. Bhd. has established Prevention of Sexual Harassment & Domestic Violence in the Workplace Policy signed by Managing Director dated 01/12/2009 and displayed at strategic locations. Interviews of internal and external stakeholders confirmed awareness and understanding of the Policy. Woman & Children Association of Keresa POM conduct regular meetings to address the issues such as sexual harassment, domestic violence and also to organize activities among the women community of the estates. The latest Women & Children Association Meeting was conducted on 19/02/2021.	Complied
4.4.5.13	The management shall respect the right of all employees to form and join trade union and allow workers' own representative(s) to facilitate collective bargain in accordance with applicable laws and regulations. Employees shall be given freedom to join trade unions relevant to the industry or organize themselves for collective bargaining. Employees shall have the right to organize and negotiate their work conditions. Employees exercising this right should not be discriminated against or suffer repercussions. - Major compliance -	Keresa Plantations Sdn. Bhd. has established Freedom of Association Policy signed by Managing Director dated 01/12/2009 and displayed at strategic locations. Interviews of internal and external stakeholders confirmed awareness and understanding of the Policy. Interviews of staff and workers confirmed that the mill supports freedom of association. At the estates, there is a local committee made up of workers representatives elected by workers. Joint Consultative Committee Meeting has been conducted for the internal stakeholder with the company management staffs. The last meeting for all estates were conducted on 23/07/2021 at Mill Conference Room, chaired by Mr. P. Shailendran (Mill Manager). Interview of Staff and Workers also confirmed their awareness of freedom of association but there were no worker unions being formed at the moment.	Complied

Criterion / Indicator		Assessment Findings	Compliance																
4.4.5.14	Children and young persons shall not be employed or exploited. The minimum age shall comply with local, state and national legislation. - Major compliance -	Keresia Plantations Sdn Bhd have a Minimum Age Policy dated 01/12/2009 undersigned by the managing Director that states the commitment of the organization to ensure that the plantations and mill will not use child labour, those below the age of 18. Verified of a sample of personnel files at the estate's office confirmed recruits' ages were checked against their Identity Card for Malaysian workers or their passport in the case of foreign workers. Under-age persons were not observed at any of the work locations visited.	Complied																
Criterion 4.4.6: Training and competency																			
4.4.6.1	All employees and contractors shall be appropriately trained. A training programme shall include regular assessment of training needs and documentation, including records of training. - Major compliance -	Keresia POM have 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 for the mill. Interview with the sampled workers and staff indicated that they were aware on the SOP during the MCO such as social distancing, regular sanitization and use of PPE (Face Mask). Records of trainings were maintained by the estates as below: - <table border="1" style="width: 100%; border-collapse: collapse;"> <thead> <tr> <th>Training</th> <th>Date</th> </tr> </thead> <tbody> <tr> <td>Policy Training</td> <td>20/08/2021</td> </tr> <tr> <td>Driver Shovel Training</td> <td>24/06/2021</td> </tr> <tr> <td>Loading Ramp Training</td> <td>25/06/2021</td> </tr> <tr> <td>Oil Room – SOP Training</td> <td>22/06/2021</td> </tr> <tr> <td>Sterilizer and Press – SOP Training</td> <td>24/06/2021</td> </tr> <tr> <td>Store Management Training</td> <td>14/07/2021</td> </tr> <tr> <td>Scheduled Waste Training</td> <td>14/07/2021</td> </tr> </tbody> </table>	Training	Date	Policy Training	20/08/2021	Driver Shovel Training	24/06/2021	Loading Ramp Training	25/06/2021	Oil Room – SOP Training	22/06/2021	Sterilizer and Press – SOP Training	24/06/2021	Store Management Training	14/07/2021	Scheduled Waste Training	14/07/2021	Complied
Training	Date																		
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Scheduled Waste Training	14/07/2021																		

Criterion / Indicator		Assessment Findings	Compliance
4.4.6.2	<p>Training needs of individual employees shall be identified prior to the planning and implementation of the training programmes in order to provide the specific skill and competency required to all employees based on their job description.</p> <p>- Major compliance -</p>	<p>Keresia POM has conducted training need analysis for all employees, management and contractors. The training need analysis was conducted based on the job designation and training required by the job type and available for verification.</p>	Complied
4.4.6.3	<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>- Minor compliance -</p>	<p>A training programme has been developed and available in Annual Training Schedule For Keresia POM (Year: 2021). The trainings were sighted to have also included Gender Specific Training and involves staffs, workers and contractors.</p>	Complied
4.5 Principle 5: Environment, natural resources, biodiversity and ecosystem services			
Criterion 4.5.1: Environmental Management Plan			
4.5.1.1	<p>An environmental policy and management plan shall be in line with the relevant country and state environmental laws shall be established, effectively communicated and implemented.</p> <p>- Major compliance -</p>	<p>Keresia POM has established Environmental Policy signed by the Managing Director dated 27/12/2016. In the policy stated the company commitment to ensure and promote clean environment for all its employee and operations. The policy was communicated to all workers through briefing and displayed on the notice board. The policy has been briefed to all workers on 20/08/2021.</p>	Complied
4.5.1.2	<p>The environmental management plan shall cover the following:</p> <p>a) An environmental policy and objectives;</p> <p>b) The aspects and impacts analysis of all operations</p> <p>- Major compliance -</p>	<p>The mill has conducted the aspects and impacts analysis of all operations and documented in Risk Assessment control and Environmental Aspect/Impact.</p> <p>The mill has established the environmental management plan and documented in Significant Impact Register List and Environmental Management Plan 2021.</p>	Complied

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4.5.1.3	<p>An environmental improvement plan to mitigate the negative impacts and to promote the positive ones, shall be developed, implemented and monitored.</p> <p>- Major compliance -</p>	<p>The mill has established the environmental management plan and documented in Significant Impact Register List and Environmental Management Plan 2021. Sighted the implementation of the management plan as follows:</p> <ol style="list-style-type: none"> 1. Dust and other particles from un-gravelled roads caused by vehicle traffic - Ensure reduction plans are in place to reduce particulate emission; watering daily during dry season; install hump to install vehicle speed; install speed limit signages; regular service and maintenance of vehicle and machinery; plant trees. 2. Open Burning – Enforce a No Burning Policy. 3. Palm Oil Mill Effluent - Treatment of raw POME to reduce BOD to regulated levels and/or safe disposal/application of POME. 4. Contributions to GHG emissions - Ensure adequate water management structures are in place for peat areas, to ensure that minimal subsidence occurs in peat areas. 5. Domestic and recyclable waste (Schedule waste) - Ensure adequate procedures, waste management plans and implementations are available; Proper schedule waste management as per procedure. 6. Workplace & Housing - Optimize usage and reduce wastage. 7. Pollution from workplaces (e.g. chemical store, workshops, etc) - Provide measures to contain all pollution waste (bunds, oil traps etc) 	Complied
4.5.1.4	<p>A programme to promote the positive impacts should be included in the continual improvement plan.</p> <p>- Minor compliance -</p>	<p>The mill has established program to promote the positive impacts and documented in Significant Impact Register List and</p>	Complied

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Criterion / Indicator		Assessment Findings	Compliance												
		Environmental Management Plan 2021 and GHG Emission - Reduction/Minimization Plan.													
4.5.1.5	An awareness and training programme shall be established and implemented to ensure that employees understand the policy, objectives and management plans and are working towards achieving objectives. - Major compliance -	The mill continuously provided awareness training to all employee on environmental policy, objectives and management plan as per training plan established. Training record verified as stated in 4.4.6.1.	Complied												
4.5.1.6	The management shall organize regular meetings with workers where concerns of workers about the environmental quality are discussed. - Major compliance -	The mill has established the Environmental Regulatory Compliance Monitoring Committee. The committee conducted meeting to discuss matters related to the environmental issue on quarterly basis. The EMC Meeting Minutes were available for verification dated 17/07/2021, 21/04/2021 and 10/02/2021.	Complied												
Criterion 4.5.2: Efficiency of energy use and use of renewable energy															
4.5.2.1	Consumption of non-renewable energy shall be optimized and closely monitored by establishing baseline values and trends shall be observed within 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 - Major compliance -	<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.</p> <p>Keres a POM has established baseline for non-renewable energy base on average of last 3 years usage/FFB produce. The monitoring of non-renewable energy usage was conducted annually.</p> <p>Sighted the sampled monitoring records for diesel, electricity, and water usage at Keres a POM for 2021 as follows:</p> <table border="1"> <thead> <tr> <th>Month</th> <th>Diesel (L)</th> <th>Electricity (kWh)</th> <th>Water (m³)</th> </tr> </thead> <tbody> <tr> <td>Jan 2021</td> <td>18,118.00</td> <td>76,250.00</td> <td>67,134.00</td> </tr> <tr> <td>Feb 2021</td> <td>14,708.00</td> <td>67,760.00</td> <td>49,357.00</td> </tr> </tbody> </table>	Month	Diesel (L)	Electricity (kWh)	Water (m ³)	Jan 2021	18,118.00	76,250.00	67,134.00	Feb 2021	14,708.00	67,760.00	49,357.00	Complied
Month	Diesel (L)	Electricity (kWh)	Water (m ³)												
Jan 2021	18,118.00	76,250.00	67,134.00												
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		Mar 2021	15,869.00	84,850.00	61,543.00											
		Apr 2021	14,390.00	82,980.00	58,731.00											
		May 2021	13,030.00	94,600.00	68,944.00											
		Jun 2021	11,860.00	83,860.00	68,082.00											
		Jul 2021	16,543.00	73,310.00	63,500.00											
		Aug 2021	14,979.00	84,560.00	68,944.00											
4.5.2.2	<p>The oil palm premises shall estimate the direct usage of non-renewable energy for their operations, including fossil fuel, and electricity to determine energy efficiency of their operations. This shall include fuel use by contractors, including all transport and machinery operations.</p> <p>- Major compliance -</p>	<p>The mill estimates the usage of non-renewable energy (diesel) for genset and mobile machineries in annual budget as sighted in Keresa POM Annual Budget FY 2021.</p> <p>The Estimation Diesel for 5 Years was available as below:</p> <p>Fossil Fuel Consumption plan</p> <table border="1"> <thead> <tr> <th>2021</th> <th>2022</th> <th>2023</th> <th>2024</th> <th>2025</th> </tr> </thead> <tbody> <tr> <td>119497</td> <td>200000</td> <td>19000</td> <td>195000</td> <td>200000</td> </tr> </tbody> </table>				2021	2022	2023	2024	2025	119497	200000	19000	195000	200000	Complied
2021	2022	2023	2024	2025												
119497	200000	19000	195000	200000												
4.5.2.3	<p>The use of renewable energy should be applied where possible.</p> <p>- Minor compliance -</p>	<p>Monthly record on energy consumption for both renewable and non-renewable sources were kept and documented. It is monitored to optimize use of renewable energy. Data is being compiled for comparison and control for future improvement. Apart from use of diesel for electricity, palm fiber and shells were also used to generate electricity through steam turbine and boiler.</p> <p>The use of energy in palm oil mill and line site was monitored monthly to compare the energy usage against the production of CPO. Electricity generation was through steam turbine and boiler where Palm fibre and PK shells were used as renewable energy/fuel. Monthly records of energy consumption of non-renewable and renewable fuel per metric ton of palm product at the Mill were available.</p> <p><u>Renewable Energy Summary</u></p>				Complied										

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		Month	Fibre	Shell	
		Jan 2021	3531.12	1513.34	
		Feb 2021	3320.19	1422.94	
		Mar 2021	3794.07	1626.03	
		Apr 2021	3698.24	1584.96	
		May 2021	3816.28	1635.55	
		Jun 2021	3850.15	1650.06	
		Jul 2021	3371.71	1445.02	
		Aug 2021	3804.79	1630.62	
Criterion 4.5.3: Waste management and disposal					
4.5.3.1	All waste products and sources of pollution shall be identified and documented. - Major compliance -	All waste products and sources of pollution was identified and documented in the Waste management Procedure in Keresa Plantations Sdn Bhd. The waste has been identified as follows:			Complied
		Source	Types of Waste		
		Mill Plant	EFB, Shell, Fibre, Decanter solid, Boiler Ash, Waste oils, lubricants		
		Mill Chemical labs	Chemical containers, chemical solution and solvents		
		Store Chemicals	Chemical containers, chemical solution and solvents		
		Store fertilizers	Fertilizers bags		
		Genset room	Filters, Lubricant, Battery, Rags and gloves		
		Water treatment plant	chemical solution and solvents, chemical containers		
		Workshop	Filters, Lubricant, Battery, Rags and gloves, Tyres, Scrap iron, chemical solution and solvents, chemical containers		

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Criterion / Indicator		Assessment Findings		Compliance
		Construction sites	Construction sites i. Wood ii. Cement debris	
		Linesite	Sewage, Greywater	
		Clinic	Clinical waste	
4.5.3.2	<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.</p> <p>b) Improving the efficiency and recycling potential of mill by-products by converting them into value-added products.</p> <p>- Major compliance -</p>	<p>SOP for scheduled waste management was established and available in the Prosedur Kerja Selamat - Pembuangan Terjadual; Date: 05/08/2019; Reference Code: SOP/KMSB/Schedule Waste/R3.</p> <p>For scheduled wastes, the handling was done according to the legal requirement where a scheduled waste store was constructed in each operating unit for storage.</p> <p>The mill also has a proper Scheduled Waste Store for storing scheduled waste until time of disposal by DOE authorized waste disposal contractor. Disposal was done by scheduled waste disposal company authorized and licensed by Department of Environment.</p> <p>Sighted the sampled of Scheduled Waste Disposal as below:</p> <ol style="list-style-type: none"> 1. SW 305 – Used Lubricant Oil; Quantity; 55 Gallon Drum x 1; Date: 04/08/2021; SW Contractor: E-Concern (M) Sdn Bhd; Receipt Number: 06763. 2. SW 306 – Used Hydraulic Oil; Quantity; 55 Gallon Drum x 2; Date: 04/08/2021; SW Contractor: E-Concern (M) Sdn Bhd; Receipt Number: 06764. 3. SW 307 – Used Mineral Oil Water; Quantity; 55 Gallon Drum x 3; Date: 04/08/2021; SW Contractor: E-Concern (M) Sdn Bhd; Receipt Number: 06765. 4. SW 430 – Used Chemical; Quantity; 55 Gallon Drum x 1; Date: 04/08/2021; SW Contractor: E-Concern (M) Sdn Bhd; Receipt Number: 06766. 		Complied

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Criterion / Indicator		Assessment Findings	Compliance
4.5.3.3	<p>The palm oil mill management shall establish Standard Operating Procedure for handling of used chemicals that are classified under Environmental Quality Regulations (Scheduled Waste) 2005, Environmental Quality Act, 1974 to ensure proper and safe handling, storage and disposal. Scheduled waste shall be disposed as per Environmental Quality Act 1974 (Scheduled Waste) Regulations, 2005</p> <p>- Major compliance -</p>	<p>SOP for scheduled waste management was established and available in the Prosedur Kerja Selamat - Pembuangan Terjadual; Date: 05/08/2019; Reference Code: SOP/KMSB/Schedule Waste/R3.</p> <p>The mill also has a proper Scheduled Waste Store for storing use chemical drums until time of disposal by DOE authorized waste disposal contractor. Disposal was done by scheduled waste disposal company authorized and licensed by Department of Environment.</p> <p>Sighted the sampled of Empty Chemical Container disposal as below:</p> <p>SW 430 – Used Chemical; Quantity; 55 Gallon Drum x 1; Date: 04/08/2021; SW Contractor: E-Concern (M) Sdn Bhd; Receipt Number: 06766.</p>	Complied
4.5.3.4	<p>Domestic waste should be disposed as such to minimize the risk of contamination of the environment and watercourse.</p> <p>- Minor compliance -</p>	<p>Method of handling the domestic/general wastes are segregation at the collection point from offices and housing area before being disposed through Sujan Estate landfill.</p>	Complied
Criterion 4.5.4: Reduction of pollution and emission			
4.5.4.1	<p>An assessment of all polluting activities shall be conducted, including greenhouse gas emissions, particulate and soot emissions, scheduled wastes, solid wastes and effluent.</p> <p>- Major compliance -</p>	<p>An assessment plan for all identified polluting activities was established based on the Environment Aspect and Impact assessment. Polluting activities were monitored based on DOE license compliance schedule which include scheduled waste storage and disposal record, POME final discharge BOD and boiler stack sampling. Besides that, the mill also monitors the Green House Gas emission and recyclable waste.</p> <p>Observed the dust emission monitoring report conducted by Sonique Engineering Sdn Bhd. as follows:</p>	Complied

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Criterion / Indicator		Assessment Findings			Compliance												
		<table border="1" style="width: 100%; border-collapse: collapse;"> <tr> <td style="width: 33%;">Descriptions</td> <td style="width: 33%;">Boiler No.1</td> <td style="width: 33%;">Boiler No.1</td> </tr> <tr> <td>Date of Measurement</td> <td>12/04/2021</td> <td>24/02/2021</td> </tr> <tr> <td>Reference Number</td> <td>SESB/KMSB/SS/A PRIL/2021/QTR2</td> <td>SESB/KMSB/SS/F EBRUARY/2021/ QTR1(B1)</td> </tr> <tr> <td>Dust Emission Load (mg/Nm³, dry, @ 12% CO₂)</td> <td>302</td> <td>329</td> </tr> </table> <p>The emission level of Total Particulate matter @ 12% CO₂ for the boilers monitored were within the Standard limit based on DOE License Approval (Ref: JPLP(UB)/2020/003422)</p>	Descriptions	Boiler No.1	Boiler No.1	Date of Measurement	12/04/2021	24/02/2021	Reference Number	SESB/KMSB/SS/A PRIL/2021/QTR2	SESB/KMSB/SS/F EBRUARY/2021/ QTR1(B1)	Dust Emission Load (mg/Nm ³ , dry, @ 12% CO ₂)	302	329			
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Dust Emission Load (mg/Nm ³ , dry, @ 12% CO ₂)	302	329															
4.5.4.2	<p>An action plan to reduce identified significant pollutants and emissions shall be established and implemented.</p> <p>- Major compliance -</p>	<p>The mill has conducted assessment of all polluting activities in the Environmental Aspect Impact analysis. A management plan has been established based on the significant aspect and DOE license compliance schedule which include scheduled waste storage and disposal record, POME final discharge BOD and boiler stack sampling. The plan was reviewed on annual basis.</p> <p>Verified the Diesel Reduction Plan as follows:</p> <ol style="list-style-type: none"> 1. Continuously running engine by shovel. <ul style="list-style-type: none"> • To educate the driver • Monitor diesel usage for reduction • Monitor the condition of shovel batteries, starters and other maintenance. 2. High diesel consumption by genset. <ul style="list-style-type: none"> • Constant service for gensets to avoid over consumption of diesel due to inefficiency of genset. 			Complied												

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Criterion / Indicator		Assessment Findings	Compliance																																								
		<ul style="list-style-type: none"> • Proper arrangement for more crops intake from outside supplier to ensure mill is running/operating as much possible to minimize usage of genset (reduce consumption of diesel). • Application of SRBC press cutter to cut EFB for boiler fuel (reduce consumption of diesel) 																																									
4.5.4.3	<p>Palm oil mill effluent (POME) shall be treated to ensure compliance with standards as stipulated in the relevant Environmental Quality (Prescribed Premises) (Crude Palm Oil) Regulations 1977. POME discharge limits and method should be in accordance with the respective state and national policies and regulations.</p> <p>- Major compliance -</p>	<p>Treated POME discharge was regularly monitored as prescribed under "Jadual Pematuhan". Limit of Biochemical Oxygen Demand (BOD) discharge is 20 mg/l. Regular monitoring was done on monthly basis and every quarterly via "Borang Penyata Suku Tahun" to DOE for compliance. Sighted the quarterly return form FY 2021 as follows:</p> <p>1st Quarter</p> <table border="1"> <thead> <tr> <th></th> <th>Jan 2021</th> <th>Feb 2021</th> <th>Mar 2021</th> </tr> </thead> <tbody> <tr> <td>pH</td> <td>8.6</td> <td>8.2</td> <td>8.2</td> </tr> <tr> <td>BOD</td> <td>43.9</td> <td>14</td> <td>17</td> </tr> <tr> <td>COD</td> <td>260</td> <td>280</td> <td>310</td> </tr> <tr> <td>Suspended Solid</td> <td>30</td> <td>14</td> <td>21</td> </tr> </tbody> </table> <p>2nd Quarter</p> <table border="1"> <thead> <tr> <th></th> <th>Apr 2021</th> <th>May 2021</th> <th>Jun 2021</th> </tr> </thead> <tbody> <tr> <td>pH</td> <td>8.4</td> <td>8.4</td> <td>8.1</td> </tr> <tr> <td>BOD</td> <td>15</td> <td>14</td> <td>15</td> </tr> <tr> <td>COD</td> <td>290</td> <td>290</td> <td>320</td> </tr> <tr> <td>Suspended Solid</td> <td>22</td> <td>12</td> <td>29</td> </tr> </tbody> </table>		Jan 2021	Feb 2021	Mar 2021	pH	8.6	8.2	8.2	BOD	43.9	14	17	COD	260	280	310	Suspended Solid	30	14	21		Apr 2021	May 2021	Jun 2021	pH	8.4	8.4	8.1	BOD	15	14	15	COD	290	290	320	Suspended Solid	22	12	29	Complied
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Criterion 4.5.5: Natural water resources																																											

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Criterion / Indicator		Assessment Findings	Compliance																																									
<p>4.5.5.1</p>	<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"> a) Assessment of water usage and sources. b) Monitoring of outgoing water which may have negative impacts into the natural waterways at a frequency that reflects the mill's current activities. c) Ways to optimize water and nutrient usage and reduce wastage (<i>e.g.</i> having in place systems for re-use, night application, maintenance of equipment to reduce leakage, collection of rainwater, etc.). <p>- Major compliance -</p>	<p>Keresa POM has established and documented the water management plan in Keresa POM Water Management Plan (WMP) dated 20/07/2017. The management plan includes specific parameters for WMP to promote efficient use of water and meet water conservation requirements under Sarawak Water Resource Enactment 1998 and Interim National Water Standards for Malaysia. Sighted the implementation of the management plan as follows:</p> <ul style="list-style-type: none"> a. The mill monitors the water consumption on monthly basis. Water consumption monitored include firefighting, housing, boiler and mill operation. The water consumption has been detailed out under indicator 4.5.2.1 b. Water for Domestic use is monitored on a monthly basis in accordance with the Drinking Water Quality Standards. The latest domestic water sampling was conducted by Qwatso Chemical Sdn Bhd on 10/09/2021 which indicated that all the parameters were within the stipulated limits. c. The mill monitored water quality at Sg. Sujan on monthly basis by conducting water analysis. Sighted the water analysis record dated 04/08/2021 as follows: <table border="1" style="width: 100%; border-collapse: collapse;"> <thead> <tr> <th rowspan="2">Parameter</th> <th colspan="2">pH</th> <th colspan="2">BOD</th> <th colspan="2">COD</th> </tr> <tr> <th>Upstream</th> <th>Downs tream</th> <th>Upstrea m</th> <th>Downs tream</th> <th>Upstrea m</th> <th>Downs tream</th> </tr> </thead> <tbody> <tr> <td>May 21</td> <td>5.4</td> <td>6</td> <td><2.0</td> <td>2</td> <td>16</td> <td>22</td> </tr> <tr> <td>Jun 21</td> <td>7.4</td> <td>7.1</td> <td><2.0</td> <td>6.6</td> <td>9</td> <td>36</td> </tr> <tr> <td>Jul 21</td> <td>5.8</td> <td>7.6</td> <td><2.0</td> <td>8.1</td> <td>12.6</td> <td>56.5</td> </tr> <tr> <td>Aug 21</td> <td>5.5</td> <td>6.5</td> <td><2.0</td> <td><2.0</td> <td>34.3</td> <td>26.7</td> </tr> </tbody> </table>	Parameter	pH		BOD		COD		Upstream	Downs tream	Upstrea m	Downs tream	Upstrea m	Downs tream	May 21	5.4	6	<2.0	2	16	22	Jun 21	7.4	7.1	<2.0	6.6	9	36	Jul 21	5.8	7.6	<2.0	8.1	12.6	56.5	Aug 21	5.5	6.5	<2.0	<2.0	34.3	26.7	<p>Complied</p>
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Criterion / Indicator		Assessment Findings	Compliance
4.5.5.2	Where open discharge of POME into water course is practiced, mills should undertake to gradually phase it out in accordance to the applicable state or national regulations. - Major compliance -	Treated POME discharge was regularly monitored as prescribed under "Jadual Pematuhan". Limit of Biochemical Oxygen Demand (BOD) discharge is 20 mg/l. Regular monitoring was done on monthly basis and every quarterly via "Borang Penyata Suku Tahun" to DOE for compliance.	Complied
4.6 Principle 6: Best Practices			
Criterion 4.6.1: Mill Management			
4.6.1.1	Standard operating procedures shall be appropriately documented and consistently implemented and monitored. - Major compliance -	Keresia POM has established SOP for the as a guidance on the daily mill operation. Refer Keresia Mill Sdn. Bhd. SOP for Mill Operation. The SOP covers all stations and operations in the mill.	Complied
4.6.1.2	All palm oil mills shall implement best practices. - Major compliance -	External Mill Advisor and Sustainability and Compliance Department inspect and report on the operations on annual basis. The on-site managers develop Action Plans from the Advisory Reports for improvement of the operations. Review of Advisory Reports, Action Plans and site inspections confirmed consistent records of implementation of SOPs. This to ensure that performance is on track and best practices being consistently implemented.	Complied
Criterion 4.6.2: Economic and financial viability plan			
4.6.2.1	A documented business or management plan shall be established to demonstrate attention to economic and financial viability through long-term management planning. - Major compliance -	Annual business plan in the form of annual budget and the projection for 5 years prepared as guidance for future planning. Sighted the Business Plan of Keresia Mill Sdn. Bhd. FY 2021 to 2025. The business plan contains FFB processed, Sales Volume (CPO and PK), Income (Sales of CPO and PK), Cost of Sale, Gross Profit, Financing cost and Other income.	Complied

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Criterion / Indicator		Assessment Findings	Compliance
Criterion 4.6.3: Transparent and fair price dealing			
4.6.3.1	Pricing mechanisms for the products and other services shall be documented and effectively implemented. - Major compliance -	The pricing method has been clearly stated in the contract and contractors are explained on the term of contracts prior to the signing of contract. Sample contract and payment record verification of POM management found that the payments have been made as per contract.	Complied
4.6.3.2	All contracts shall be fair, legal and transparent and agreed payments shall be made in timely manner. - Major compliance -	Sample contract and payment record verification together with interviews of Mill management found that the payments have been made as per contract. For Keresa POM, sampled contractor's agreement and payment details as below: a) Contractor: A & E Maju Sdn Bhd (1300783-W) Project: Crude Palm Oil and Palm Kernel Transport dated 01/09/2020 and valid until 31/08/2022. Pricing mechanism was stated at Schedule B: Payment Term. Refer payment evidence dated 10/09/2021 Official receipt No. RV21/09/001. b) Contractor: Aweventure Sdn Bhd (1314667-K) Project: Crude Palm Oil and Palm Kernel Transport dated 01/07/2021 and valid until 30/06/2023. Pricing mechanism was stated at Schedule B: Payment Term. Refer payment evidence dated 31/07/2021 Official receipt No. A21KM007.	Complied
Criterion 4.6.4: Contractor			
4.6.4.1	In case of the engagement of contractors, they shall be made to understand the MSPO requirements and shall provide the required	Keresa POM has cascaded the MSPO awareness to all its contractors. Latest MSPO awareness briefing to contractors was	Complied

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Criterion / Indicator		Assessment Findings	Compliance
	documentation and information. - Major compliance -	conducted on 01/09/2021 by Sustainability and Compliance Team. Interview with the contractors found that they understand the MSPO requirements. All the contractors aware that POM is certified under MSPO. Therefore, the contractor has been instructed by POM management to follow the MSPO standard requirement.	
4.6.4.2	The management shall provide evidence of agreed contracts with the contractor. - Major compliance -	Keresa Plantations Sdn Bhd has prepared a standard contract for all the contractors. The signed copy of the contract available at the estate office. Sample of contract agreement as follows; For Keresa POM, sampled contractor's agreement and payment details as below: a) Contractor: A & E Maju Sdn Bhd (1300783-W) Project: Crude Palm Oil and Palm Kernel Transport dated 01/09/2020 and valid until 31/08/2022. Pricing mechanism was stated at Schedule B: Payment Term. Refer payment evidence dated 10/09/2021 Official receipt No. RV21/09/001. b) Contractor: Aweventure Sdn Bhd (1314667-K) Project: Crude Palm Oil and Palm Kernel Transport dated 01/07/2021 and valid until 30/06/2023. Pricing mechanism was stated at Schedule B: Payment Term. Refer payment evidence dated 31/07/2021 Official receipt No. A21KM007.	Complied
4.6.4.3	The management shall accept MSPO approved auditors to verify the assessments through a physical inspection, if required. - Minor compliance -	Contractors at Keresa Plantations Sdn. Bhd. has no objections to allow BSI auditors to verify the assessment through physical inspection as and when required in accordance with the MSPO Standards. Refer letter of "Information & Acknowledgment RSPO and MSPO Standard" dated 01/05/2020.	Complied

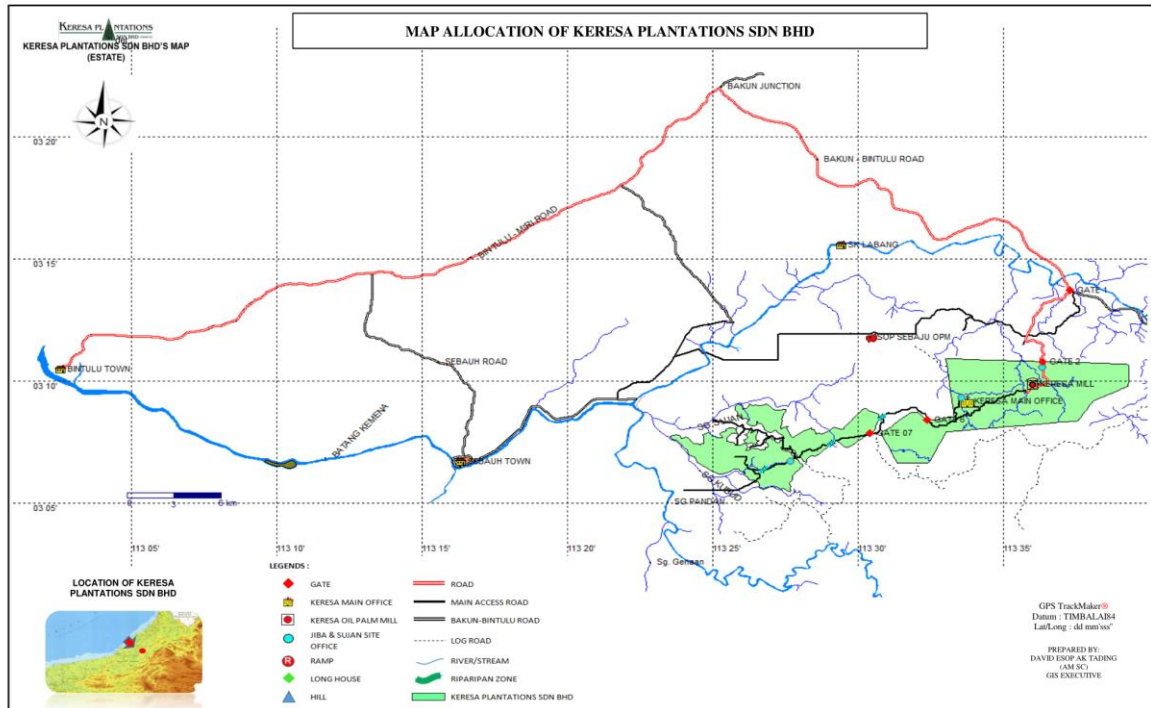
Appendix B: List of Stakeholders Contacted

<p>Government Officer: N/A</p>	<p>Community/neighbouring village: Rh. Majang</p>
<p>Suppliers/Contractors/Vendors: Wagro Trading S/B K.C. Chan Paul Tao Chung Chao Wong Yuk Zung PNS Jaya Sdn Bhd</p>	<p>Worker’s Representative/Gender Committee: Gender Committee Representatives Foreign & local workers NUPW Representatives</p>

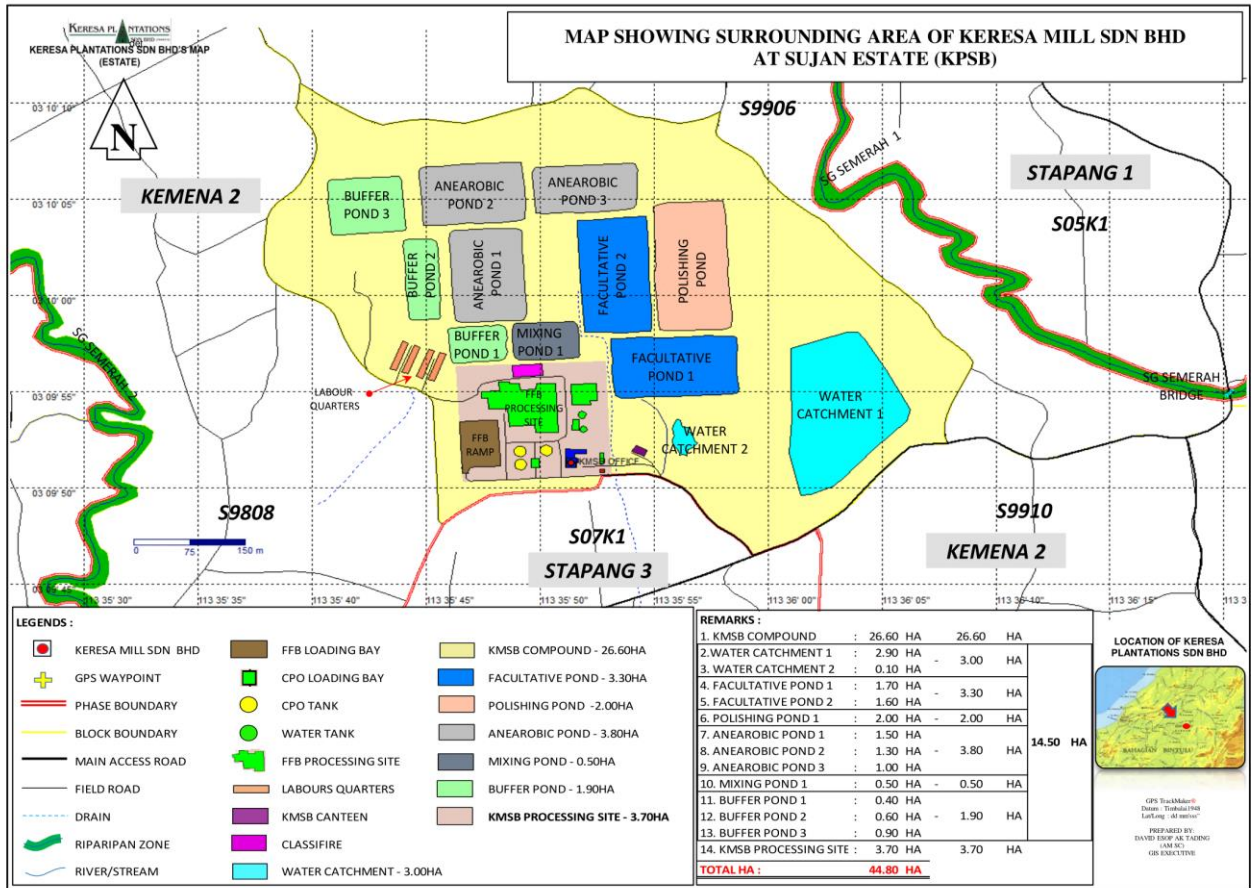
Appendix C: Smallholder Member Details

No.	Smallholder		Location of Planted Area (District)	GPS Coordinates	Certified Area (ha)	Planted Area (ha)
	Name	MPOB License Number				
	N/A					

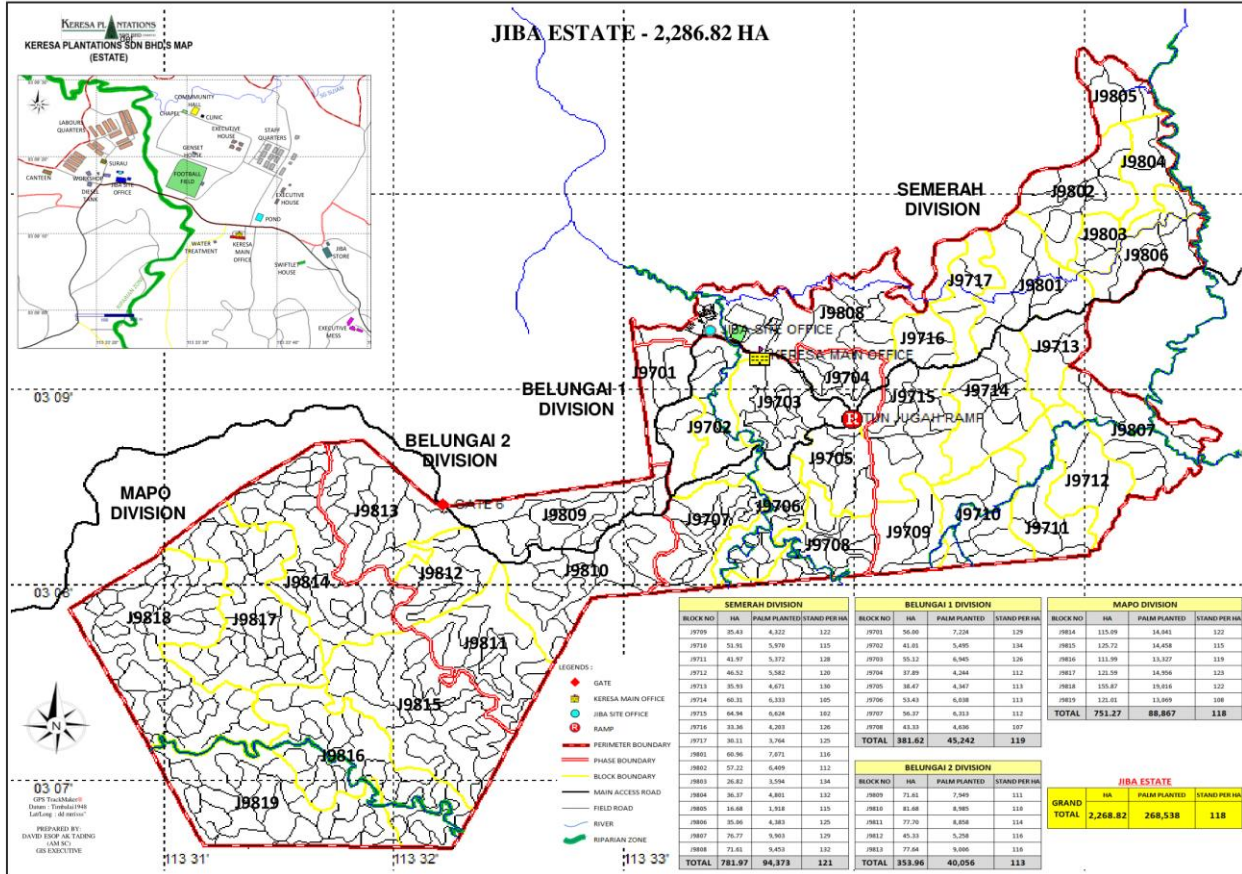
Appendix D: Location and Field Map



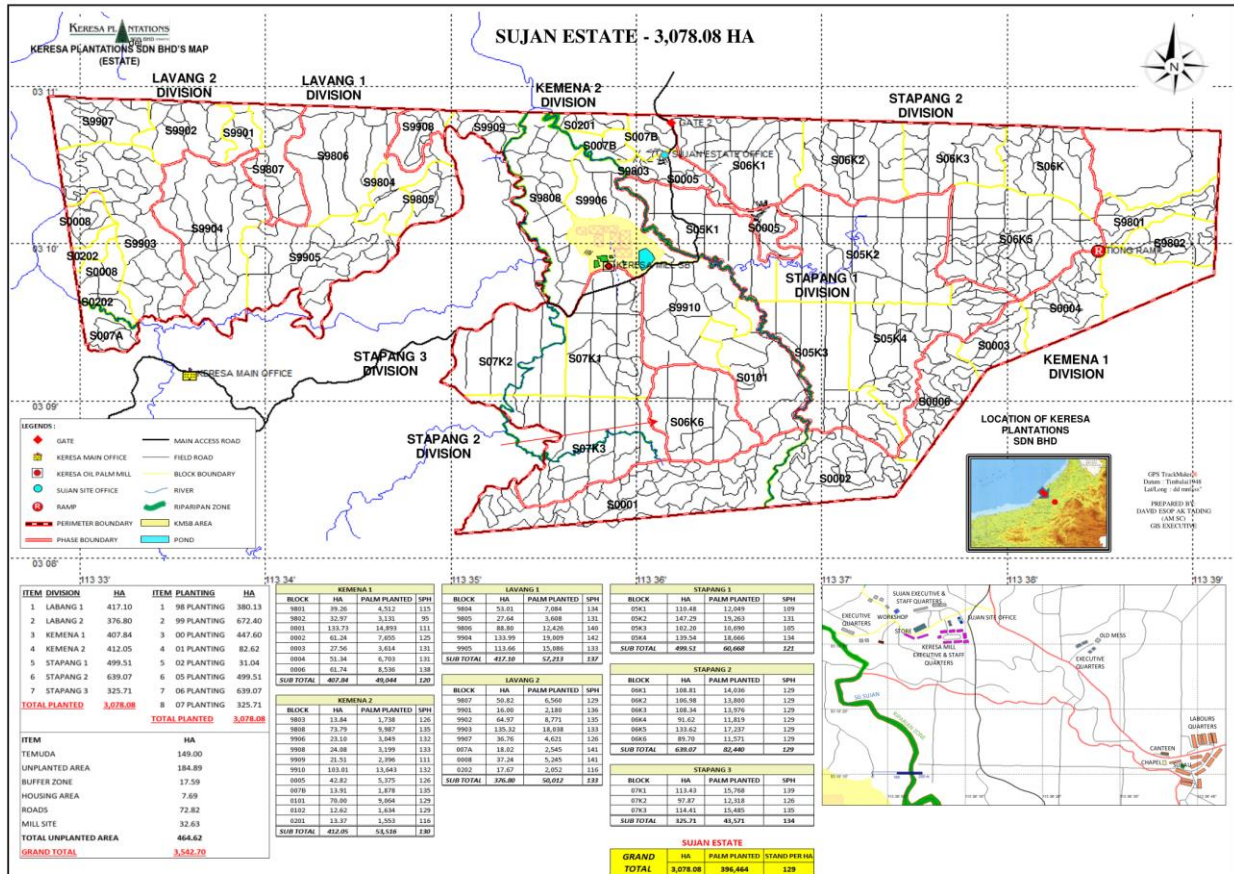
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Appendix E: List of Abbreviations

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