

**MALAYSIAN SUSTAINABLE PALM OIL
3rd ANNUAL SURVEILLANCE ASSESSMENT (ASA3)
Public Summary Report**

KULIM (MALAYSIA) BERHAD
Client Company Address: K.B 705, Ulu Tiram Estate, 81900 Ulu Tiram Johor Bahru, Johor, Malaysia
Certification Unit: Pasir Panjang Palm Oil Mill & Plantations of Pasir Panjang Complex - Pasir Panjang Estate, Tunjuk Laut Estate, Bukit Payung Estate, Siang Estate, Bukit Kelompok Estate & Pasir Logok Estate
Date Final Report: 14/12/2021

Report prepared by:
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Report Number: 3566440

Assessment Conducted by:
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Section 1: Executive Summary

1.1 Organizational Information and Contact Person			
Company Name	Kulim (Malaysia) Berhad		
Mill/Estate	MPOB License No.		Expiry Date
	Pasir Panjang POM	592302004000	31/12/2021
	Pasir Panjang Estate	578736002000	30/11/2022
	Tunjuk Laut Estate	619676002000	30/09/2022
	Bukit Payung Estate	578736002000	30/11/2022
	Siang Estate	575783002000	31/08/2022
	Bukit Kelompok Estate	620166002000	31/03/2022
	Pasir Logok Estate	620145002000	31/03/2022
Address	K.B 705, Ulu Tiram Estate, 81900 Ulu Tiram, Johor Bahru, Johor, Malaysia		
Certification Unit	Pasir Panjang Palm Oil Mill, Pasir Panjang Estate, Tunjuk Laut Estate, Bukit Payung Estate, Siang Estate, Bukit Kelompok Estate & Pasir Logok Estate		
Contact Person Name	Salasah Elias		
Website	www.kulim.com.my	E-mail	salasah@kulim.com.my
Telephone	07-8611611	Facsimile	07-8631084

1.2 Certification Information			
Certificate Number	Mill: MSPO 696199 Estate: MSPO 696200		
Issue Date	08/03/2019	Expiry date	07/03/2024
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 General Principles for Palm Oil Mills Estate: MS 2530-3:2013 General Principles for Oil Palm Plantations and Organized Smallholders		
Stage 1 Date	Not applicable since the certification unit is RSPO certified.		
Stage 2 / Initial Assessment Visit Date (IAV)	03/12/2018 - 06/12/2018		
Continuous Assessment Visit Date (CAV) 1	11/11/2019 - 14/11/2019		
Continuous Assessment Visit Date (CAV) 2	07/12/2020 - 10/12/2020		
Continuous Assessment Visit Date (CAV) 3	Remote Audit: 08/11/2021 - 11/11/2021		
Continuous Assessment Visit Date (CAV) 4	-		
Other Certifications			

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Certificate Number	Standard(s)	Certificate Issued by	Expiry Date
EU-ISCC-Cert-PL214-60960621	ISCC EU	Bureau Veritas	13/06/2022
ISCC-PLUS-Cert-PL214-60960621	ISCC PLUS	Bureau Veritas	13/06/2022
RSPO 657192	RSPO Principles & Criteria of Sustainable Palm Oil Production: 2018; Malaysian National Interpretation:2019	BSI Services Malaysia Sdn Bhd	08/03/2022
A148857	MS 1500:2009	JAKIM	15/02/2023
BVC_MSPO/SC_0030	MSPO Supply Chain Certification Standard (MSPO SCCS) 1/10/2018	Bureau Veritas	10/03/2025

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
Pasir Panjang POM	PTD 558, HSD 35107, Mukim Kambau, Daerah Kota Tinggi, Johor, Malaysia	2° 1' 4.80" N	103° 56' 54.60" E
Pasir Panjang Estate	PTD 558, HSD 35107, Mukim Kambau, Daerah Kota Tinggi, Johor, Malaysia	2° 0' 34.56" N	103° 57' 15.84" E
Tunjuk Laut Estate	PTD 36, HSD 7747, Mukim Kambau, Daerah Kota Tinggi, Johor, Malaysia	1° 57' 41.40" N	103° 59' 9.24" E
Bukit Payung Estate	PTD 4143, HSD 35105, Mukim Kambau, Daerah Kota Tinggi, Johor, Malaysia	2° 0' 26.28" N	103° 55' 12.36" E
Siang Estate	PTD 105763, HSD 354243, Mukim Kambau, Daerah Kota Tinggi, Johor, Malaysia	1° 39' 19.41" N	104° 12' 37.63" E
Bukit Kelompok Estate	PTD 401, HSD 32182, Mukim Kambau, Daerah Kota Tinggi, Johor, Malaysia	2° 0' 24.12" N	103° 59' 54.24" E
Pasir Logok Estate	PTD 402, HSD 32183, Mukim Kambau, Daerah Kota Tinggi, Johor, Malaysia	2° 1' 53.04" N	104° 2' 20.04" E

1.4 Certified Area

Estate	Total Planted (Mature + Immature) (ha)	HCV (ha)	Infrastructure & Other (ha)	Total Area (ha)	% of Planted
Pasir Panjang Estate	1447.80	130.91	127.25	1706.00	84.86
Tunjuk Laut Estate	2648.79	29.23	189.78	2867.80	92.33

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Bukit Payung Estate	1924.24	293.65	89.74	2307.63	83.38
Siang Estate	3204.69	71.11	167.30	3443.10	93.07
Bukit Kelompok Estate	2437.75	41.19	134.86	2613.80	93.26
Pasir Logok Estate	1992.68	17.40	87.65	2097.73	94.99
TOTAL	13,655.95	583.49	796.58	15,036.06	

Note:

Pasir Logok Estate = Resurvey has been done due to replanting in area P20 (146.29Ha) Total 5.38 hectare has been declared under infrastructure for roads and drain.

1.5 Plantings & Cycle

Estate	Age (Years)					Mature	Immature
	0 - 3	4 - 10	11 - 20	21 - 25	26 - 30		
Pasir Panjang Estate	542.94	904.90	0	0	0	904.90	542.94
Tunjuk Laut Estate	0	1715.48	933.31	0	0	2648.79	0
Bukit Payung Estate	710.67	1213.57	0	0	0	1213.57	710.67
Siang Estate	0	889.79	2314.90	0	0	3204.69	0
Bukit Kelompok Estate	0	1132.23	1281.72	23.80	0	2347.75	0
Pasir Logok Estate	140.91	509.78	1341.99	0	0	1851.77	140.91
Total (ha)	1394.52	6365.75	5871.92	23.80	0	12171.47	1394.52

1.6 Certified Tonnage of FFB

Estate	Tonnage / year		
	Estimated (Dec 20 - Nov 21)	Actual (Dec 20 - Sept 21)	Forecast (Nov 21- Oct 22)
Pasir Panjang Estate	24,244.00	22,603.75	21,461.20
Tunjuk Laut Estate	57,654.00	53,042.12	51,764.10
Bukit Payung Estate	25,091.00	17,600.75	21575.23
Siang Estate	80,057.00	62,902.50	83,871.00
Bukit Kelompok Estate	59,960.00	47,374.32	62,471.00
Pasir Logok Estate	48,690.00	40,485.78	48,939.00
Basir Ismail Estate	0	3,648.53	0
REM Estate	0	297.07	0
Sungai Papan Estate	0	35,003.78	0
Ulu Tiram Estate	0	55.28	0
Total	295,696.00	283,013.88	290,081.53

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1.7 Uncertified Tonnage of FFB			
Estate	Tonnage / year		
	Estimated (Dec 20 - Nov 21)	Actual (Dec 20 - Sept 21)	Forecast (Nov 21 - Oct 22)
N/A			
Total			

1.8 Certified Tonnage			
	Estimated (Dec 20 - Nov 21)	Actual (Dec 20 - Sept 21)	Forecast (Nov 21 - Oct 22)
	FFB	FFB	FFB
Mill Capacity: 45 MT/hr	295,696.00	283,013.88	290,081.53
	CPO (OER: 22.60%)	CPO (OER: 21.90%)	CPO (OER: 24.87%)
SCC Model: SG	66,827.00	62,006.55	72,171.00
	PK (KER: 5.30%)	PK (KER: 5.55%)	PK (KER: 6.00%)
	15,672.00	15,665.31	17,337.00

1.9 Actual Sold Volume (CPO)					
CPO (MT)	MSPO Certified	Other Schemes Certified		Conventional	Total
		ISCC	RSPO		
62,006.55	0	314.55	42,124.74	17,338.74	59778.03

1.10 Actual Sold Volume (PK)					
PK (MT)	MSPO Certified	Other Schemes Certified		Conventional	Total
		ISCC	RSPO		
15,665.31	0	0	15,604.91	0	15,604.91

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 assessment was remotely conducted from 08-11/11/2021 due to the Movement Control Order (MCO) imposed by the Malaysian Government. Among the ICT plan used were MS Teams, WhatsApp, Share-drive and email. The audit programme is included in Section 2.3. The approach to the audit was to treat the Kulim (M) Berhad - Pasir Panjang Palm Oil Mill, Pasir Panjang Estate, Tunjuk Laut Estate, Bukit Payung Estate, Siang Estate, Bukit Kelompok Estate and Pasir Logok Estate as a MSPO Certification Unit. A range of environmental and social factors were covered. This includes consideration of topography, palm age, proximity to areas with HBVs, declared conservation areas and local communities. The planned audit objectives have been achieved, there were no connectivity issues which adversely affected the audit.

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.

Interview with stakeholders through phone call 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 online. A list of Stakeholders contacted is included as Appendix B.

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

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

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

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

Assessment Program					
Name (Mill / Plantation / Group smallholders)	Year 1 (Certification)	Year 2 (ASA 1)	Year 3 (ASA 2)	Year 4 (ASA 3)	Year 5 (ASA 4)
Pasir Panjang Palm Oil Mill	X	X	X	X	X
Pasir Panjang Estate	X		X		X
Tunjuk Laut Estate	X		X	X	
Bukit Payung Estate	X		X		X
Siang Estate		X		X	
Bukit Kelompok Estate		X			X
Pasir Logok Estate		X		X	

Tentative Date of Next Visit: November 8, 2022 - November 11, 2022

Total No. of Mandays: 15

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>
Mohd Razaleigh bin Mohamad (MRM)	Team Leader	He graduated in Bachelor (Scs.) Plantation Management and Agrotechnology from Universiti Teknologi Mara (UiTM) with more than 5 years' experience in oil palm plantation. He has been in the sustainability auditing line since 2017 for various standards such as RSPO, MSPO and Global G.A.P. He successfully completed MSPO Lead auditor course in year 2018, Quality Management System Lead Auditor Course ISO 9001-2015 and Environmental management system ISO 14001-2015, Safety management system, ISO 45001:2018, Social accountability (SA8000) training in year 2019, RSPO P&C Lead Auditor Course with Wild Asia in 2018. Able to speak and understand Bahasa Malaysia and English.
Ismadi Bin Ismail (II)	Team Member	He holds Diploma in Planting Industry Management from MARA Institute of Technology, Kuantan Pahang with 25 years of working experiences with various plantation companies. Vast experiences, knowledge and skills in establishing new Estates from Jungle or Forest and Best Agriculture Practices (GAP) for plantation either peat or mineral. Experienced and well versed on Recruitment of Foreign Workers Procedure from Source countries and handling with Ministry of Home Affairs and Ministry of Human Resource Procedure on workers related issues at Peninsular, Sabah and Sarawak.

		He had been involved in MSPO auditing since 2017 and fully trained and qualified as Lead Auditor/Auditor in CoP, MSPO, RSPO and SCCS .He completed the MSPO Auditor course in 2017 and SCCS in 2019 held by SGS (M) Sdn Bhd, Endorsed RSPO P&C Lead Auditor Course in 2019 and ISO 9001:2015 Lead Auditor course by TOMC. Apart from auditing, he is also certified MSPO Peer Reviewer by MPOCC since 2017. Able to speak and understand Bahasa Malaysia and English.
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2.2 Accompanying Persons

Not applicable.

2.3 Assessment Plan

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

Date	Time	Subjects	MRM	II	ICT Planned
03/11/2021, Wednesday	1000 - 1100	Communication on document preparation - Audit plan - Any additional Information	√		Teleconference, Microsoft Team Meeting, Email
08/11/2021, Monday Pasir Panjang 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 - 1300	Assessment and documentation review on estate best practice, legal requirements, OHS, environment and continual improvement Assessment and documentation review on social aspects, legal requirements, employees' welfare and stakeholder management	√	√	Teleconference, Microsoft Team Meeting, Email
	1300 - 1400	Lunch	√	√	
	1400 - 1630	Assessment and documentation review on estate best practice, legal requirements, OHS, environment and continual improvement Assessment and documentation review on social aspects, legal requirements, employees' welfare and stakeholder management	√	√	Teleconference, Microsoft Team Meeting, Email
	1630 - 1700	Interim closing meeting	√	√	Teleconference, Microsoft Team Meeting, Email

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Date	Time	Subjects	MRM	II	ICT Planned
09/11/2021, Tuesday Siang Estate	0900 - 1300	Assessment and documentation review on estate best practice, legal requirements, OHS, environment and continual improvement Assessment and documentation review on social aspects, legal requirements, employees' welfare and stakeholder management	√	√	Teleconference, Microsoft Team Meeting, Email
	1300 - 1400	Lunch	√	√	
	1400 - 1700	Assessment and documentation review on estate best practice, legal requirements, OHS, environment and continual improvement Assessment and documentation review on social aspects, legal requirements, employees' welfare and stakeholder management	√	√	Teleconference, Microsoft Team Meeting, Email
	1700 - 1730	Interim closing meeting	√	√	Teleconference, Microsoft Team Meeting, Email
10/11/2021, Wednesday Pasir Logok Estate	0915 - 1300	Assessment and documentation review on estate best practice, legal requirements, OHS, environment and continual improvement Assessment and documentation review on social aspects, legal requirements, employees' welfare and stakeholder management	√	√	Teleconference, Microsoft Team Meeting, Email
	1300 - 1400	Lunch	√	√	
	1400 - 1630	Assessment and documentation review on estate best practice, legal requirements, OHS, environment and continual improvement Assessment and documentation review on social aspects, legal requirements, employees' welfare and stakeholder management	√	√	Teleconference, Microsoft Team Meeting, Email
	1630 - 1700	Interim closing meeting	√	√	Teleconference, Microsoft Team Meeting, Email

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Date	Time	Subjects	MRM	II	ICT Planned
11/11/2021, Thursday Tunjuk Laut Estate	0915 - 1300	Assessment and documentation review on estate best practice, legal requirements, OHS, environment and continual improvement Assessment and documentation review on social aspects, legal requirements, employees' welfare and stakeholder management	√	√	Teleconference, Microsoft Team Meeting, Email
	1300 - 1400	Lunch	√	√	
	1400 - 1630	Assessment and documentation review on estate best practice, legal requirements, OHS, environment and continual improvement Assessment and documentation review on social aspects, legal requirements, employees' welfare and stakeholder management	√	√	Teleconference, Microsoft Team Meeting, Email
	1630 - 1700	Interim closing meeting	√	√	Teleconference, Microsoft Team Meeting, Email
	1700 - 1730	Closing meeting	√	√	Teleconference, Microsoft Team Meeting, Email

Section 3: Assessment Findings

3.1 Details of audit results

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

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

3.2 Details of Nonconformities and Opportunity for improvement

During the ASA3 Assessment, there were 0 Major, 0 Minor nonconformities and 2 OFI raised.

Major/Minor Nonconformities:		
Ref: N/A	Area/Process:	Clause:
	Issue Date:	Due Date:
Requirements:		
Statement of Nonconformity:		
Objective Evidence:		
Corrections:		
Root cause analysis:		
Corrective Actions:		
Assessment Conclusion:		

Opportunity For Improvement		
Ref: 2128369-202111-I1	Area/Process: Pasir Panjang POM	Clause: MSPO 2530 Part 4 - 4.6.3.2
Objective Evidence:	Contract agreement has been verified and signed by both parties for all contractors in each operation. The wording of the contract can be further improved for the contractor to be more understand on the terms and conditions stated.	

Opportunity For Improvement		
Ref:2128369-202111-I2	Area/Process: Pasir Panjang POM and estates	Clause: MSPO 2530 Part 3 & 4 - 4.4.5.6
Objective Evidence:	Verification has been made on employment contract for sample workers and there was an evidence that the employment contract has been signed by both parties and complied with legal requirements. It also has been verified based on interview that the copies of employment contract has been given to the workers for their reference. As per current practices, there is some information need to be referred to other document such as MAPA/NUPW agreement. It`s can be further improved by include	

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	certain important information (that did not stated in the legal requirement) into the employment contract.
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Noteworthy Positive Comments	
1	Good cooperation given to the audit team during the audit
2	Good positive feedback received from the stakeholders

3.3 Status of Nonconformities Previously Identified and OFI

Not applicable.

Major/Minor Nonconformities:		
Ref: N/A	Area/Process:	Clause:
	Issue Date:	Due Date:
Requirements:		
Statement of Nonconformity:		
Objective Evidence:		
Corrections:		
Root cause analysis:		
Corrective Actions:		
Assessment Conclusion:		
Verification Statement		

3.4 Summary of the Nonconformities and Status



CAR Ref.	CLASS	ISSUED	STATUS
1716200-201806-M1	Major	06/12/2018	Closed on 12/01/2019
1844763-201910-M1	Major	10/10/2019	Closed on 12/01/2020
1844763-201910-M2	Major	10/10/2019	Closed on 12/01/2020
1844763-201910-N1	Minor	10/10/2019	Closed on 10/12/2020
1844763-201910-N2	Minor	10/10/2019	Closed on 10/12/2020

3.5 Issues Raised by Stakeholders

IS #	Description
1	<p>Issues: Contractor/Supplier</p> <p>Alias Congo Enterprise, Mahar bin Yusoff and Pengangkutan Sempurna.</p> <p>Based on the stakeholder consultation that has been conducted, there is no issues has been highlighted by the stakeholders. Payment has been made by the operating units to the contractors on timely manner and good relationship has been maintained by the management with all stakeholders.</p>

	<p>Management Responses: The management is committed to maintain good relationship with all the stakeholders and to respond any consultation and consultation as per mentioned in the internal procedure.</p>
	<p>Audit Team Findings: No other issues.</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 Kulim (M) Berhad, Pasir Panjang POM and Pasir Panjang Group Estate's Certification Unit complies with the MS 2530-3:2013 and MS 2530-4:2013. It is recommended that the certification of Kulim (M) Berhad, Pasir Panjang POM and Pasir Panjang Group Estate's Certification Unit is approved and continued.	
Acknowledgement of Assessment Findings	Report Prepared by
Name: Salasah Elias	Name: Mohd Razaleigh bin Mohamad
Company name: Kulim Malaysia Berhad	Company name: BSI Services Malaysia Sdn Bhd
Title: Deputy General Manager	Title: Lead Auditor
<p>Signature:</p>  <p>Date: 13/11/ 2021</p>	<p>Signature:</p>  <p>Date: 13/11/2021</p>

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	A policy for the implementation of MSPO shall be established. - Major compliance -	The management of Kulim (M) Berhad has established internal policy for implementation of MSPO and has been documented in the document title “Kulim Malaysia Berhad, Malaysian Sustainable Palm Oil Policy” dated 30/11/2019 that has been signed by executive director, Mr Zulkifly Zakariah. Mentioned in the policy that the management is committed to implement all the requirement set out by the Malaysian Sustainable Palm Oil (MSPO) and cover all the element required. For Siang Estate, socialization for the policy has been done during the muster call briefing on 19/04/2021 by Mr Mohd Masnizam Abdul Ghani while for Tunjuk Laut Estate, socialization of the policy has been done on 28/09/2021.	Complied
4.1.1.2	The policy shall also emphasize commitment to continual improvement. - Major compliance -	Mentioned also in the policy that the management of Kulim (M) Berhad is committed to achieve balance between people, planet and profit in all management decision and operation through continual program in line with the commitment to produce sustainable palm oil products.	Complied
Criterion 4.1.2 – Internal Audit			
4.1.2.1	Internal audit shall be planned and conducted regularly to determine the strong and weak points and potential area for further improvement. - Major compliance -	Internal audit procedure has been established in the document title “Internal audit” document number SQD/SMS/3.2 dated 01/08/2020 issuance number 01. Stated in the procedure that the internal audit need to be conducted at	Complied

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Criterion / Indicator		Assessment Findings	Compliance
		<p>the frequency at least once within 12 months (before the expiry of the certificate).</p> <p>There is evidence of internal audit has been planned for year 2021 for all complex under Kulim (M) Berhad and has been verified based on audit plan that has been provided title "Internal remote audits plan for RSPO/MSPO/ISCC certification".</p> <p>For Tunjuk Laut Estate and Pasir Logok Estate which under Tunjuk Laut Complex, it has planned from 11/07/2021 until 05/08/2021. While for Siang Estate, the internal audit has been planned from 27/06/2021 until 11/07/2021 since the estate is under Siang complex.</p> <p>The audit plan has been prepared by Puan Munira binti Rahim and approved by Puan Salasah Binti Elias dated 10/06/2021.</p>	
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>Internal audit procedure has been established in the document title "Internal audit" document number SQD/SMS/3.2 dated 01/08/2020 issuance number 01.</p> <p>There is evidence of the internal audit checklist which listed has list down of document requirement and status of each indicator for each operating unit and has been verified by the auditor.</p> <p>The outcome of the audits has been compiled in the document title "Internal audit, non-conformance report". The audit results have been signed accepted by the estate manager.</p> <p>There is no nonconformity has been raised during the internal audit for all estates.</p>	Complied
4.1.2.3	<p>Report shall be made available to the management for their review.</p> <p>- Major compliance -</p>	<p>There is evidence of the internal audit checklist which listed has list down of document requirement and status of each indicator for each operating unit and has been verified by the auditor.</p>	Complied

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Criterion / Indicator		Assessment Findings	Compliance
		The outcome of the audits has been compiled in the document title "Internal audit, non-conformance report". The audit results have been signed accepted by the estate manager	
Criterion 4.1.3 – Management Review			
4.1.3.1	<p>The management shall periodically review the continuous suitability, adequacy and effectiveness of the requirements for effective implementation of MSPO and decide on any changes, improvement and modification.</p> <p>- Major compliance -</p>	<p>The management of Kulim (M) Berhad has established internal procedure for management review and has been document in the document number SQD/SMS/3.1 dated 01/08/2020 title "Management review". Mentioned in the procedure that management review needs to conducted at else once a year.</p> <p>Management review meeting for Siang Estate has been conducted on 24/10/2021 with attendance of 15 persons that lead by the estate management Mr Noryaazid Yakub.</p> <p>While for Pasir Logok Estate, management review meeting has been done on 06/09/2021 with attendance of 13 persons and chaired by Mr Syed Ismail bin Syed Hasim. Minutes meeting has been prepared by Mr Majid Mahasan and verified by Mr Syed Ismail bin Syed Hashim and for Tunjuk Laut, management review has been done 29/09/2021 with attendance of 14 persons.</p> <p>Issues that has been discussed during the management review are internal/external audit findings, any complaint and grievances, continual improvement, customer feedback, and performance/effectiveness of the sustainable management system. End of management review has conclude that certification systems have been effectively implemented.</p>	Complied
Criterion 4.1.4 – Continual Improvement			

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Criterion / Indicator		Assessment Findings	Compliance
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>All estates did document the Continuous Improvement Plan for year 2021 covering social, OSH and environmental. The detail as follows:</p> <p><u>Siang Estate</u></p> <ol style="list-style-type: none"> 1. RF30 Safety Door for Chemical Store, Contractor had been appointed and installation will be in middle of December. 2. Plant Tunera Subulata at P10 and work is still in progress expected to complete by November 2021. 3. Purchase CDA spray and mechanical buffalo, work is still progress. <p><u>Pasir Logok Estate</u></p> <ol style="list-style-type: none"> 1. Repainting Estate Main office and Security Guard, completed in June & October 2021. 2. Plant beneficial plant from Security guard post to main office. Completed in May 2021. 3. Purchase Vecon Spreader in September 2021. <p><u>Tunjuk Laut Estate</u></p> <ol style="list-style-type: none"> 1. Repainting 16 units workers quarter, 2-unit Executive Bungalows and 2-unit staff quarters, completed in August 2021. 2. Planting of Guatemala plant to prevent erosion at the drain near the ramp, completed in February 2021. 3. To purchase 10 units of fire extinguisher by November 2021. 	Complied
4.1.4.2	<p>The company shall establish a system to improve practices in line with new information and techniques or new industry standards and technology (where applicable) that are available and feasible for adoption.</p> <p>- Major compliance -</p>	<p>There is no new application of new technology implemented during the assessment period at Siang and Tunjuk Laut Estate. The current practices continued and guided by Standard Operation Procedure (SOP).</p>	Complied

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Criterion / Indicator		Assessment Findings	Compliance
		As for Pasir Logok Estate, Verion Mechanical Spreader being introduced to improve the productivity on fertilization and overcome the shortage of manpower.	
4.1.4.3	An action plan to provide the necessary resources including training, to implement the new techniques or new industry standard or technology (where applicable) shall be established. - Major compliance -	Training to workers in various aspects of plantation management were conducted throughout the year. As evidence, sighted the training programme for year 2021. Verion Mechanical Spreader training was conducted on 12/9/2021 for 19 participants at Pasir Logok Estate. Training conducted were recorded in the trainings record and completed with attendance records, training materials and photographs.	Complied
4.2 Principle 2: Transparency			
Criterion 4.2.1 – Transparency of information and documents relevant to MSPO requirements			
4.2.1.1	The management shall communicate the information requested by the relevant stakeholders in the appropriate languages and forms, except those limited by commercial confidentiality or disclosure that could result in negative environmental or social outcomes. - Major compliance -	The management of Kulim (M) Berhad has established internal procedure for transparency and has been documented in the document title “Transparency” document number SQD/SMS/1.0 dated 01/08/2020. The procedure has outlined the person responsible for transparency, types of information/document that can be request, and the mechanism to request any information or document. For Siang Estate, there is no request of information has been received for year 2020 and 2021. While for Pasir Logok Estate, there is one enquiries to use event equipment (canopy, table, and chair) in year 2019. There is no enquiries has been received in year 2020 and 2021. There is one enquiry has been received for Tunjuk Laut Estate from stakeholder, Chin Ting Lai on 06/11/2020 to request for desilting drain at the boundary of the estates. There is evidence that the request has been responded within the timeline.	Complied

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Criterion / Indicator		Assessment Findings	Compliance
4.2.1.2	<p>Management documents shall be publicly available, except where this is prevented by commercial confidentiality or where disclosure of information would result in negative environmental or social outcomes.</p> <p>- Major compliance -</p>	<p>The management of Kulim (M) Berhad has established internal procedure for transparency and has been documented in the document title "Transparency" document number SQD/SMS/1.0 dated 01/08/2020. The procedure has outlined the person responsible for transparency, types of information/document that can be request, and the mechanism to request any information or document.</p> <p>In clause 4, has listed all the document/information that can be requested by the interested parties but not limited to such as</p> <ul style="list-style-type: none"> a. Land title/ user rights b. Occupational safety and health plan c. HCV documentation d. Detail of complaint or grievances. e. Details of complaints or grievances f. Continuous improvement plan g. HCS documentation 	Complied
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>Procedure of consultation and communication has been established by the management and has been documented in the document title consultation and communication document number SQD/SMS/1.1 dated 01/08/2020 issue number 01. The procedure has categorized communication and consultation into 2 categories which are internal and external parties.</p> <p>For internal communication, the communication is through muster, meeting, notice board, inspection and others. While for external communication, through meeting, telephone, fax, email and others.</p>	Complied

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Criterion / Indicator		Assessment Findings	Compliance
		Communication internal and external will be done through the person in charge that has been appointed which basically the social person in charge. The PIC is responsible to disclose, implement, made available and explain consultation and communication procedure to all relevant stakeholders.	
4.2.2.2	A management official should be nominated to be responsible for issues related to Indicator 1 at each operating unit. - Minor compliance -	For Siang Estate, there is evidence persons that responsible for any enquiries or request has been identified and sighted base on the appointment letter dated 01/01/2021 to Mr Widodo Lamiran reference number LS/SPIC/2021 as social person in charge for Siang Estate and has been signed by the estate manager, Mr Noryazid bin Yaakub. Mr Majid bin Mahasan has been appointed as social person in-charge for Pasir Logok Estate and has been verified base on the appointment letter dated 20/01/2021 that has been signed the estate manager, Mr Syed Ismail bin Syed Hashim. While for Tunjuk Laut Estate, Mr Mohd Shawal bin Ab Rahim and Puan Susanti Ahmad has been appointed as social personal in charge base on the appointment on 01/10/2021.	Complied
4.2.2.3	List of stakeholders, records of all consultation and communication and records of action taken in response to input from stakeholders should be properly maintained. - Major compliance -	List of stakeholders has been document and maintained by the management for all estates and has been verified during the audit. List of stakeholders has classified into different category which are internal, external, contractor, supplier, clinic& hospital and government bodies. For Siang Estate, total 9 stakeholders that has been categorised under internal stakeholders has been listed which 6 of them are the owner of grocery store in the estate and 3 is palm oil mill which are Sedenak POM, Pasir Panjang POM and Sindora POM. Stakeholder consultation for Siang Complex has been conducted by the management on 18/10/2021 through online platform with attendance of stakeholder, POM and estate representative. During the stakeholder's consultation, the management has socialized all the policy and procedure	Complied

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Criterion / Indicator		Assessment Findings	Compliance
		<p>related to sustainability and any issues that arise. The minutes meeting has been prepared by Puan Fazliwati Zainal, stakeholder meeting coordinator, executive regional controller, Siang Complex.</p> <p>For Pasir Logok Estate, total 13 stakeholders has been classified as external supplier such as Kah Kuat Enterprise Sdn Bhd and Semai Alam Sdn Bhd. Total 10 contractors has been listed. Sample has been taken for Jeevendran Enterprise and RKP Enterprise.</p> <p>Total 5 stakeholders as been identified as neighbouring for Tunjuk Laut Estate which consist of neighbouring estate and village. Stakeholder that has been listed are, Ladang Kumpulan Melayu, Kambau Estate, Ladang YPJ, Kampung Teluk Hutan Lesong, and Kampung Baru Tunjuk Laut.</p> <p>Communication between the stakeholders and the management has been done through stakeholder consultation. For Tunjuk Laut Complex (Pasir Logok Estate and Tunjuk Laut Estate), stakeholder consultation has been done on 10/10/2021. Minutes meeting has been prepared by Norazimah Abas, RC executive for Tunjuk Laut Complex.</p>	
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>The traceability SOP; Sustainable Management System, Traceability, Doc: No: SQD/SMS/1.2 rev:5 dated 1/8/2020 is available and the scope is to outlines the preparations, dispatch and receive of FFB, CPO, Kernel and other by products at Kulim’s estate and mill, job assignments and recordings of transport productivity for payment purpose and statistics.</p> <p>The aim is to establish traceability of the FFB from the field (Block) to load and transport all harvested FFB from roadside platforms to the Mill within the shortest possible time, usually within 24 hours.</p> <p>The system being used in harvesting for FFB Tracking is In-Field Data Execution & Analytics Solution (IDEAS). Daily muster attendance, bunch</p>	Complied

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Criterion / Indicator		Assessment Findings	Compliance															
		count, productivity based on mill declared weight and yield statistic report could be retrieve from IDEAS.																
4.2.3.2	The management shall conduct regular inspections on compliance with the established traceability system. - Major compliance -	<p>The Estate Management team holds the responsibility on regular inspection of traceability system. Periodical inspections also being conducted through Plantation Inspectorate, Agronomist and Internal audit.</p> <p>The effectiveness of the monitoring will evidence in the internal audit and visit report findings. The latest visit by Plantation Inspectorate and Agronomist as follows: -</p> <table border="1"> <thead> <tr> <th colspan="2">Inspectorate Visit</th> <th>Agronomist</th> </tr> <tr> <th>Estate</th> <th>Date Visit</th> <th>Date Visit</th> </tr> </thead> <tbody> <tr> <td>Siang</td> <td>18-19/7/2021</td> <td>25-26/5/2021</td> </tr> <tr> <td>Pasir Logok</td> <td>30/5/2021</td> <td>21-22/2/2021</td> </tr> <tr> <td>Tunjuk Laut</td> <td>4-5/4/2021</td> <td>7-8/4/2021</td> </tr> </tbody> </table>	Inspectorate Visit		Agronomist	Estate	Date Visit	Date Visit	Siang	18-19/7/2021	25-26/5/2021	Pasir Logok	30/5/2021	21-22/2/2021	Tunjuk Laut	4-5/4/2021	7-8/4/2021	Complied
Inspectorate Visit		Agronomist																
Estate	Date Visit	Date Visit																
Siang	18-19/7/2021	25-26/5/2021																
Pasir Logok	30/5/2021	21-22/2/2021																
Tunjuk Laut	4-5/4/2021	7-8/4/2021																
4.2.3.3	The management should identify and assign suitable employees to implement and maintain the traceability system. - Minor compliance -	Person in charge for traceability system is Head of Operating Unit, refer to letter from Head of Plantation ref: SQD/ADMIN/019/21 dated 15/9/2021 signed by Head of Plantation Division, Tuan Mohamad Yami bin Bakar.	Complied															
4.2.3.4	Records of sales, delivery or transportation of FFB shall be maintained. - Major compliance -	<p>All production of the estate is being recorded on daily basis into In-Field Data Execution & Analytics Solution (IDEAS).</p> <p>FFB being sell to own mill, Pasir Panjang POM and being monitored by Headquarters. Sighted the records of sales, delivery or transportation of FFB. This record being maintained, and the documents are kept by the both site, estate and mill. Sample taken as follows:-</p> <ol style="list-style-type: none"> Siang Estate, Raw Material Reception - Estate FFB Delivery <ul style="list-style-type: none"> Date: 8/11/2021, Estate: Siang MPOB License: 575783002000 Ticket No: 121075 Transaction Type: Receiving 	Complied															

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Criterion / Indicator	Assessment Findings	Compliance
	<ul style="list-style-type: none"> • Vehicle No: JNY 6072 • Field No: P03,P04,P05,P06,P07,P08,P09 P10,P11,P12 • Delivery Note No: 102118 • Gross Wt: 59,650 kg, Tare Wt : 21,110 kg • Nett Wt Before Deduction: 38,540 Kg • Rain water deduction: 770 kg • Nett Wt: 37,770 kg <p>2. Pasir Logok Estate, Raw Material Reception - Estate FFB Delivery</p> <ul style="list-style-type: none"> • Date: 8/11/2021, Estate: Pasir Logok • MPOB License: 620145002000 • Ticket No: 121078 Transaction Type: Receiving • Vehicle No: JUL 9020 • Field No: P03, • Delivery Note No: 124083 • Gross Wt: 27,320 kg, Tare Wt : 12,920 kg • Nett Wt Before Deduction: 14,400 Kg • Rainwater deduction: 290 kg • Nett Wt: 14,110 kg <p>3. Tunjuk Laut Estate, Raw Material Reception - Estate FFB Delivery</p> <ul style="list-style-type: none"> • Date: 9/11/2021, Estate: Tunjuk Laut • MPOB License: 619676002000 	

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Criterion / Indicator		Assessment Findings	Compliance
		<ul style="list-style-type: none"> • Ticket No: 121122 Transaction Type: Receiving • Vehicle No: JLS 9965 • Field No: P08,P09, P12,P16 • Delivery Note No: 32297 • Gross Wt: 40,370 kg, Tare Wt : 18,420 kg • Nett Wt Before Deduction: 21,950 Kg • Rain water deduction: 260 kg • Nett Wt: 21,690 kg 	
4.3 Principle 3: Compliance to legal requirements			
Criterion 4.3.1 – Regulatory requirements			
4.3.1.1	<p>All operations are in compliance with the applicable local, state, national and ratified international laws and regulations.</p> <p>- Major compliance -</p>	<p>The legal compliance lists of permits & licenses are available and being monitored and updated periodically by person in charge of Legal Requirements. Details as below: -</p> <p><u>Siang Estate</u></p> <ol style="list-style-type: none"> 1. Air Compressor - JH PMT 22699 valid until 29/03/2022 2. Air Compressor - JH PMT 22700 valid until 29/03/2022 3. Energy Commission License, 2020/01181 (294 kwt) - (Siang Estate) valid until 26/05/2022 4. Energy Commission License,2020/01182 (110 kwt) - (Balau) valid until 26/05/2022 5. Diesel Permit; Reference Number: J 001290 (Siang Estate) valid until 24/2/2022 	Complied

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	<ol style="list-style-type: none"> 6. Diesel Permit; Reference Number: J 001291 (Balau) valid until 24/2/2022 7. Petrol- Special Permit; Reference Number: J 003621(Siang Estate) valid until 20/8/2021 - Renewal In Progress 8. Petrol- Special Permit; Reference Number: J 003620 (Balau) valid until 20/8/2021 - Renewal In Progress 9. MPOB License 575783002000 valid until 31/08/2022 10. Weighbridge, Equal Weighing B 1765823 (Siang Estate) Membuat, Membaiki dan Menjual Timbang, Sukat Atau Alat Timbang Atau Sukat - 60,000kg (Siang) valid until 14/07/2021 11. Weighbridge, Equal Weighing 2.1K Q005929 (Balau) Membuat, Membaiki dan Menjual Timbang, Sukat Atau Alat Timbang Atau Sukat - 80,000kg (Balau) valid until 04/07/2022 12. Suruhanjaya Perkhidmatan Air Negara (SPAN), SPAN/EKS/(PT)/800-4(1)/11/14 Notis Pendaftaran Bagi Lesen Kelas valid until 25/08/2023 13. BAKAJ, Enakmen Air (JOHOR) 1921 07/A/KT/016 Lesen Melancong Atau Mengabstrak Air Sungai (1160m3 /hari) valid until 31/12/2021 14. BAKAJ, Enakmen Air (JOHOR) 1921 07/A/KT/019 Lesen Melancong Atau Mengabstrak Air Sungai (430m3 /hari) valid until 31/12/2021 15. Jabatan Tenaga Kerja Malaysia Semenanjung Malaysia, TK(NJ)JB/43/9, Bekalan Air Persendirian Seksyen 6(1)(A) Akta Standard-Standard Minimum Perumahan Dan Kemudahan Pekerja 1990 valid until 02/02/2022 16. Firegun, 466961 B License valid until 25/11/2020, In Progress Changing Ownership of Asset & License 17. Firegun, 665053 A License valid until 09/09/2020, renewal will be arranged by HQ due to changing of name. 	

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Criterion / Indicator	Assessment Findings	Compliance
	<p><u>Pasir Logok Estate</u></p> <ol style="list-style-type: none"> 1. Energy Commission License, 2019/02123 (106.25 kwt) - valid 21/09/2021. Renewal in progress 2. MPOB License 620145002000 valid until 31/3/2022 3. Diesel Permit; 15,000 lt, Reference Number: J 000215 valid until 11/1/2022 4. BAKAJ, Enakmen Air (JOHOR) 1921 07/A/KT/009 Lesen Melancong Atau Mengabstrak Air Sungai (430m3 /hari) valid until 31/12/2021 5. Suruhanjaya Perkhidmatan Air Negara (SPAN), SPAN/EKS/(PT)/800-4(2)/6/54 Notis Pendaftaran Bagi Lesen Kelas valid until 25/08/2023 6. Air Compressor - JH PMT 22734 valid until 29/03/2022 7. Jabatan Tenaga Kerja Malaysia Semenanjung Malaysia, Ref. No.: TK(NJ)U-21 dated 31/03/2019 for Skim Khairat Keluarga Perbadanan Johor RM5.00/ month and premium paid of not more than RM 37.50 per month per worker <p><u>Tunjuk Laut Estate</u></p> <ol style="list-style-type: none"> 1. Energy Commission License, 39721 (168 kw) - valid 23/10/2022 2. MPOB License 501477102000 valid until 30/9/2022 3. Diesel Permit; 20,000 lt, Reference Number: BPGK JHKTG/ PERMIT 0046 PD valid until 29/9/2022 4. Petrol Permit; 200 lt per day, Reference Number: BPGK JHKTG/ PERMIT Khas 0731 PD valid until 12/7/2022 	

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Criterion / Indicator	Assessment Findings	Compliance
	<ol style="list-style-type: none"> 5. BAKAJ, Enakmen Air (JOHOR) BAKAJ/334/430/05/08/07/20 Div 1, Lesen Melancong Atau Mengabstrak Air Sungai (66m3 /hari) valid until 31/12/2021 6. BAKAJ, Enakmen Air (JOHOR) BAKAJ/334/430/2/8/1/1 Div 2, Lesen Melancong Atau Mengabstrak Air Sungai (45m3 /hari) valid until 31/12/2021 7. Weighbridge, Equal Weighing B 1913772 Membuat, Membaiki dan Menjual Timbang, Sukat Atau Alat Timbang Atau Sukat - 80,000kg (Siang) valid until 6/9/2022 8. Suruhanjaya Perkhidmatan Air Negara (SPAN), SPAN/EKS/(PT)/800-4(1)/5/10 dan SPAN/EKS/(PT)/800-4(2)/5/10- Div 1 Notis Pendaftaran Bagi Lesen Kelas valid until 15/08/2023 9. Suruhanjaya Perkhidmatan Air Negara (SPAN), SPAN/JKSP/(PT)/800-4(1)/4/15 dan SPAN/JKSP/(PT)/800-4(2)/4/15- Div 2 Notis Pendaftaran Bagi Lesen Kelas valid until 1/7/2021 10. Air Compressor - PMT JH 18/4413 valid until 29/03/2022 11. Jabatan Tenaga Kerja Malaysia Semenanjung Malaysia, Ref. No.: TK(NJ)U-21 dated 31/03/2019 for Skim Khairat Keluarga Perbadanan Johor RM5.00/ month and premium paid of not more than RM 37.50 per month per worker 12. Jabatan Tenaga Kerja Malaysia Semenanjung Malaysia, Ref. No.: PP3/29/168/2005 dated 1/11/2018 Permit potongan Gaji Pekerja - Surau 13. Jabatan Tenaga Kerja Malaysia Semenanjung Malaysia, Ref. No.: Bil (86) DLM JB/11123/30 dated 11/06/1996 Permit potongan Gaji Pekerja - Elektrik 	

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		<p>14. Jabatan Tenaga Kerja Malaysia Semenanjung Malaysia, Ref. No.: TK(NJ)U-21 dated 2/2/2017 for Kebenaran Pemetongan gaji - NUPW</p> <p>15. Jabatan Tenaga Kerja Malaysia Semenanjung Malaysia, Ref. No.: TK(NJ)U-21 dated 31/01/2017 for Kebenaran Pemetongan Gaji - Premium Insurance</p>	
4.3.1.2	<p>The management shall list all laws applicable to their operations in a legal requirements register.</p> <p>- Major compliance -</p>	<p>Kulim (Malaysia) Berhad has established and updated list of applicable laws and regulations that are applicable for the Mill in KULIM Group Compliance Framework. The legal register is prepared by Regional Siang Complex Executive, Puan Nurfazliwati Suzana binti Zainal for Siang Estate and Regional Tunjuk Laut Complex Executive, Puan Norazimah bt Abas for Pasir Logok Estate and Tunjuk Laut Estate.</p> <p>The Framework being updated every 3 months, latest on 30/8/2021. Some of applicable laws sighted includes: -</p> <ol style="list-style-type: none"> 1. Pesticides Act 1974 and Regulations, 2. Environmental Quality Act and Regulations 1974 3. Factories and Machinery Act and Regulations, 1967 4. Weights and Measures Regulations 1981 5. Electricity Regulations 1994 6. Immigration Act 1959 7. Employee Provident Fund 1991 8. Etc 	Complied
4.3.1.3	<p>The legal requirements register shall be updated as and when there are any new amendments or any new regulations coming into force.</p> <p>- Major compliance -</p>	<p>The mechanism used for tracking changes in laws/regulations is made through the following methods;</p> <ol style="list-style-type: none"> 1. News release through daily newspaper 2. Law change tracked by book publisher (MDC Book Publications) 	Complied

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		<p>3. Circulars from relevant association (e.g. MPOA, MPOB, MAPA)</p> <p>4. Internet (e-federal gazette, www.lawnet.com.my,www.e-warta.com.my)</p> <p>The Kulim (M) Berhad Legal Department from headquarters will update in Kulim Group Compliance Framework format and disseminate via email or Management meetings to Regional Office.</p>	
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>	<p>The Estate Senior Assistant Manager is responsible for the monitoring of compliance of the entire regulatory requirement needed for the Estate operations. Changes if any will be channelled to the Manager for further implementation in the Estate.</p> <p>In addition, Regional Siang Complex Executive, Puan Nurfaizliwati Suzana binti Zainal and Regional Tunjuk Laut Complex Executive, Puan Norazimah bt Abas will assist in the monitoring of the legal compliance.</p>	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>	<p>There is evidence that the management all estates that has been sampled ensure that their oil palm cultivation activities do not diminish the land use rights of other users. It had been verified base on the land title that has been provided to the auditor for verification.</p> <p>For Siang Estate, there are 2 land titles with total hectarage 3443.10Ha. Details of the land titles as per below:</p> <p>a. H.S.(D) 33258, PTD 532 total hectarage 3413.942Ha leased for 99 years until 23/01/2087 under Mahamurni Plantations Sdn Bhd subsidiary company of Kulim (M) Berhad</p> <p>b. H. S.(D) 35429, Lot 1221 total hectarage 29.119Ha leased for 99 years until 09/10/2112 under Kumpulan Penambang Johor Sdn Bhd, subsidiary company of Kulim (M) Berhad</p>	Complied

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Criterion / Indicator		Assessment Findings	Compliance
		<p>For Pasir Logok Estate, there are 3 land title which has been combined with Bukit Kelompok Estate, total area for Pasir Logok Estate is 2097.73Ha. Details as per below</p> <ul style="list-style-type: none"> a. H.S.(D): 32182 PTD 401 leased for 60 years until 31/03/2070 under Johor Corporation total hectarage 2837.998Ha b. H.S.(D): 32183 PTD 402 leased for 60 years until 31/03/2070 under Johor Corporation total hectarage 1055.629Ha c. H.S.(D): 32184 PTD 403 leased for 60 years until 31/03/2070 under Johor Corporation total hectarage 144.20Ha <p>For Tunjuk Laut Estate, there are 2 land title with total hectarage of 2867.80Ha. Details as per below</p> <ul style="list-style-type: none"> a. H.S. (D) 7747 PTD 36 leased for 99 years until 09/01/2087 total hectare 2839.7879Ha under Perbadanan Johor b. H.S. (D) 13894 PTD 252 leased for 99 years until 09/06/2092 total hectare 28.02Ha 	
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>For Siang Estate, there are 2 land titles with total hectarage 3443.10Ha. Details of the land titles as per below:</p> <ul style="list-style-type: none"> a. H.S.(D) 33258, PTD 532 total hectarage 3413.942Ha leased for 99 years until 23/01/2087 under Mahamurni Plantations Sdn Bhd subsidiary company of Kulim (M) Berhad b. H. S.(D) 35429, Lot 1221 total hectarage 29.119Ha leased for 99 years until 09/10/2112 under Kumpulan Penambang Johor Sdn Bhd, subsidiary company of Kulim (M) Berhad <p>For Pasir Logok Estate, there are 3 land title which has been combined with Bukit Kelompok Estate, total area for Pasir Logok Estate is 2097.73Ha. Details as per below:</p>	Complied

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Criterion / Indicator		Assessment Findings	Compliance
		<p>a. H.S.(D): 32182 PTD 401 leased for 60 years until 31/03/2070 under Johor Corporation total hectarage 2837.998Ha</p> <p>b. H.S.(D): 32183 PTD 402 leased for 60 years until 31/03/2070 under Johor Corporation total hectarage 1055.629Ha</p> <p>c. H.S.(D): 32184 PTD 403 leased for 60 years until 31/03/2070 under Johor Corporation total hectarage 144.20Ha</p> <p>For Tunjuk Laut Estate, there are 2 land title with total hectarage of 2867.80Ha. Details as per below:</p> <p>a. H.S. (D) 7747 PTD 36 leased for 99 years until 09/01/2087 total hectare 2839.7879Ha under Perbadanan Johor</p> <p>b. H.S. (D) 13894 PTD 252 leased for 99 years until 09/06/2092 total hectare 28.02Ha</p>	
4.3.2.3	<p>Legal perimeter boundary markers should be clearly demarcated and visibly maintained on the ground where practicable.</p> <p>- Major compliance -</p>	<p>Procedure of boundary marker placement has been outlined base on the memo from Senior Manager, estate operations department- Malaysia dated 01/11/2007. Mentioned in the memo that estates need to mark the boundary using concrete pole and painted with red and white stripe.</p> <p>Legal perimeter boundary markers has been clearly demarcated and visibly maintained for all estates and has been verified base on the sample photo that has been provided the auditor.</p> <p>For Siang Estate, total 130 of boundary markers has been set up by the management and mark in the estate map title "Map boundary, boundary pegs". Sample of 3 boundary markers has been taken by the auditor and details as per below:</p> <ol style="list-style-type: none"> 1. No.59 - 1.598438N, 104.235183E 2. No. 87- 1.652264N,104.189355E 3. No.130 - 1.657735N,104.206022E 	Complied

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		<p>While for Pasir Logok Estate, total 144 boundary markers has been established and marked in the estate map. Sample of 3 boundary stone has been taken and verified. Details as per below</p> <ol style="list-style-type: none"> 1. No.144 -2.036589, 104.046562 2. No.62 -2.005076, 103.994902 3. No.39 -2.041291, 103.994327 <p>For Tujuk Laut Estate, total 200 boundary markers has been established and marked in the estate map. Sample of 3 boundary stone has been taken and verified.</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>The management of Kulim (M) Berhad has established internal procedure for land dispute in the document title Land encroachment: document number PROP/MP/5 dated 20/10/2014 and revised on 09/06/2020. The procedure has outline the process if there is any encroachment or land dispute has been identified.</p> <p>Not applicable for all estate since there is not dispute has been received. For Siang Estate, the land total hectarage 3443.10Ha has been leased for 99 years. Details of land title as per below</p> <ol style="list-style-type: none"> a. H.S.(D) 33258, PTD 532 total hectarage 3413.942Ha leased for 99 years until 23/01/2087 under Mahamurni Plantations Sdn Bhd subsidiary company of Kulim (M) Berhad b. H. S.(D) 35429, Lot 1221 total hectarage 29.119Ha leased for 99 years until 09/10/2112 under Kumpulan Penambang Johor Sdn Bhd, subsidiary company of Kulim (M) Berhad 	Not applicable

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Criterion / Indicator		Assessment Findings	Compliance
		<p>For Pasir Logok Estate, there are 3 land title which has been combined with Bukit Kelompok Estate, total area for Pasir Logok Estate is 2097.73Ha Details of land title as per below</p> <ul style="list-style-type: none"> a. H.S.(D): 32182 PTD 401 leased for 60 years until 31/03/2070 under Johor Corporation total hectarage 2837.998Ha b. H.S.(D): 32183 PTD 402 leased for 60 years until 31/03/2070 under Johor Corporation total hectarage 1055.629Ha c. H.S.(D): 32184 PTD 403 leased for 60 years until 31/03/2070 under Johor Corporation total hectarage 144.20Ha <p>For Tunjuk Laut Estate, there are 2 land title with total hectarage of 2867.80Ha. Details as per below</p> <ul style="list-style-type: none"> a. H.S. (D) 7747 PTD 36 leased for 99 years until 09/01/2087 total hectare 2839.7879Ha under Perbadanan Johor b. H.S. (D) 13894 PTD 252 leased for 99 years until 09/06/2092 total hectare 28.02Ha 	
Criterion 4.3.3 – Customary rights			
4.3.3.1	Where lands are encumbered by customary rights, the company shall demonstrate that these rights are understood and are not being threatened or reduced. - Major compliance -	Not applicable since there is no customary rights. Land has been legally owned by the company and has been verified by the land title.	Not applicable
4.3.3.2	Maps of an appropriate scale showing extent of recognized customary rights land, if any, should made available. - Minor compliance -	Not applicable since there is no customary rights. Land has been legally owned by the company and has been verified by the land title.	Not applicable
4.3.3.3	Negotiation and FPIC shall be recorded and copies of negotiated agreements should be made available.	Not applicable since there is no customary rights. Land has been legally owned by the company and has been verified by the land title.	Not applicable

Criterion / Indicator		Assessment Findings	Compliance
- Major compliance -			
4.4 Principle 4: Social responsibility, health, safety and employment condition			
Criterion 4.4.1: Social Impact Assessment (SIA)			
4.4.1.1	<p>Social impact should be identified and plans are implemented to mitigate the negative impacts and promote the positive ones.</p> <p>- Minor compliance -</p>	<p>The management of Kulim (M) Berhad has established internal procedure for social impact assessment and has been documented in the document number SQD/SMS/3.6 issues number 01 dated on 01/08/2020.</p> <p>For Siang Estate, Social Impact Assessment has been identified and documented in document title Daftar Impak Sosial Kulim (Malaysia) Berhad 2021 dated 13/09/2021. As per conversation, the input of the assessment has been collected base on the feedback form that has been provided to workers and stakeholders. The outcome of the assessment has been classified into 2 categories which are positive and negative outcome</p> <p>For negative outcome, there are 2 issues that has been highlighted which are late permit renewal for foreign workers and monitoring of the price list of groceries that need to be conducted at least once in 3 months.</p> <p>For negative issues, the management will be identified document for foreign workers and renewal process will be done 3 months before the expiry. Monitoring of renewal status will be done with MyEG Sdn Bhd.</p> <p>Monitoring of grocery price has been done by the management of Siang Estate in October 2021 for all the grocery shop. There is evidence that price is reasonable and affordable.</p> <p>While for Pasir Logok Estate, the assessment has been documented and concluded on 15/09/2021 where 2 negative outcomes has been identified which related to late of permit renewal and monitoring of grocery price for grocery store inside the estate. Identification of workers has been done where total 32 workers has been identified.</p>	Complied

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		<p>Monitoring of grocery price has been done by the management of Pasir Logok Estate in October 2021 for all the grocery shop. There is evidence that price is reasonable and affordable.</p> <p>Social Impact Assessment for Tunjuk Laut Estate has been finalized and documented in the title SIA and management plan dated 15/10/2021 where there is 2 negative issues that has been highlighted. There is evidence that action plan has been established and has been remarked as continuous action.</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>Standard Operating Procedure has been established by the management of Kulim (M) Berhad for complaint and grievance in the document title Grievance Procedure, Doc. No. SQD/SMS/4.1 issue: 1 dated 01/08/2020. This procedure is referred to when managing complaints and grievances raised by all parties including internal (employees) and external stakeholders (statutory bodies, local communities, smallholders and NGOs).</p>	Complied
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>Based on the procedure, the company's dispute resolution mechanism need to be resolve as per following: Employee – matter to be settled within 10 working days. Others – to obtain satisfaction within 7 working days. The Company's whistle blowing Policy which approved by Kulim (M) Berhad's board of director dated 10/09/2020 provides Complied PF824 MSPO Public Summary Report Revision 1 (Feb 2020) Page 31 of 131 anonymity and assurance against retaliation and immunity to the whistle blower.</p> <p>For Siang Estate, sample of one complaint has been received from the workers on the housing condition on 02/09/2021. The management has responded the complaint and action has been done on 04/10/2021. Evidence of action has been verified.</p>	Complied

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		For Pasir Logok Estate and Tunjuk Laut Estate, there is no complaint has been received for year 2020 and 2021.	
4.4.2.3	A complaint form should be made available at the premises, where employees and affected stakeholders can make a complaint. - Minor compliance -	Complaint and suggestion box have been established by the management at the office and complaint/suggestion form has been made available nearby the box.	Complied
4.4.2.4	Employees and the surrounding communities should be made aware that complaints or suggestions can be made any time. - Minor compliance -	<p>For Siang Estate, socialization on the procedure to the stakeholders has been made during the stakeholders' consultation has been conducted by the management on 18/10/2021 through online platform with attendance of stakeholder, POM and estate representative. During the stakeholder's consultation, the management has socialized all the policy and procedure related to sustainability and any issues that arise.</p> <p>While for workers, socialization on the procedure and policy has been conducted on 17/05/2021 with attendance of all workers during the muster call by Mr Mohd Masnizam Ad Ghani.</p> <p>Communication on the procedure to the stakeholders has been done through stakeholder consultation. For Tunjuk Laut Complex (Pasir Logok Estate and Tunjuk Laut Estate), stakeholder consultation has been done on 10/10/2021. Minutes meeting has been prepared by Norazimah Abas, RC executive for Tunjuk Laut Complex.</p> <p>While for workers in Pasir Logok Estate, socialization has been done on 24/06/2021 for all the workers during mustercall briefing and has been verified base on the training records title Polisi Kilanan dan rungutan & whistle blowing that has been done by Mr Luqman bin Mahasan and for Tunjuk Laut Estate, training has been done 07/10/2021.</p>	Complied

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4.4.2.5	Complaints and resolutions for the last 24 months shall be documented and made available to affected stakeholders upon request. - Major compliance -	For Siang Estate, there is evidence that complaint and resolutions has been maintained for last 24 months. Samples has been taken for complaint dated 04/11/ 2019. For Pasir Logok Estate and Tunjuk Laut Estate there is no complaint has been received since 2019.	Complied
Criterion 4.4.3: Commitment to contribute to local sustainable development			
4.4.3.1	Growers should contribute to local development in consultation with the local communities. - Minor compliance -	The management of Kulim (M) Berhad has contribute chicken to all workers during the Eid Fitri for all estates and has been verified base on the photo and document that has been provided. For Siang Estate, sighted also donation to SMK Bandar Penawar to organize parents and teacher meeting on 21/10/2021. While for Pasir Logok Estate, donation has been made to SK LKTP Tenggaraoh Selatan for Program Ihya Ramadhan.	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 -	The Group Occupational Safety & Health Management Policy had been established and implemented. The policy was signed by Tuan Zulkifly Zakariah, the Executive Director of Kulim (Malaysia) Berhad on 1/5/2018 and being displayed prominently on notice boards in English and local language Bahasa Malaysia. The Policy is implemented through the OSH activities by the SQD Executives and monitored by SQ Department at Head Office. Included in the policy is the commitment of the Company to; a) Comply or where practicable exceed applicable OSH legislation, regulations and codes of practices. b) Regularly review and audit the OSH management systems to ensure that	Complied

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	<p>they remain relevant and appropriate.</p> <p>c) Effective communication of this policy to all employees and other affected parties</p> <p>d) Regularly and continuously conduct education, training and awareness program on OSH to all parties concerned.</p> <p>The implementation of OSH plan was monitored by internal audits conducted by OSH executives from SQ Department and Regional Office.</p>																											
<p>4.4.4.2</p> <p>The occupational safety and health plan shall cover the following:</p> <p>a) A safety and health policy, which is communicated and implemented.</p> <p>b) The risks of all operations shall be assessed and documented.</p> <p>c) An awareness and training programme which includes the following requirements for employees exposed to pesticides:</p> <p style="margin-left: 20px;">i. all employees involved shall be adequately trained on safe working practices</p> <p style="margin-left: 20px;">ii. all precautions attached to products shall be properly observed and applied</p> <p>d) The management shall provide the appropriate PPE at the place of work to cover all potentially hazardous operations as identified in the risk assessment and control such as Hazard Identification, Risk Assessment and Risk Control (HIRARC).</p> <p>e) The management shall establish Standard Operating Procedure for handling of chemicals to ensure proper and</p>	<p>a) The Group Occupational Safety & Health Management Policy had been established and implemented. The policy was signed by Tuan Zulkifly Zakariah, the Executive Director of Kulim (Malaysia) Berhad on 1/5/2018 and being displayed prominently on notice boards in English and local language Bahasa Malaysia.</p> <p>b) Risk assessment was conducted by ESH Committee and being reviewed yearly and if any accident occurred. HIRARC sighted for the followings work operation:</p> <table border="1" data-bbox="1072 970 1854 1075"> <tr> <td>1</td> <td>Harvesting</td> <td>2</td> <td>Chemical Store</td> <td>3</td> <td>Workshop</td> </tr> <tr> <td>4</td> <td>Manuring</td> <td>5</td> <td>Rat Baiting</td> <td>6</td> <td>Nursery</td> </tr> <tr> <td>7</td> <td>Spraying</td> <td>8</td> <td>Transport to mill</td> <td>9</td> <td>Etc</td> </tr> </table> <p>The latest review of HIRARC as follows:</p> <table border="1" data-bbox="1072 1131 1624 1268"> <thead> <tr> <th>Estate</th> <th>Date Reviewed</th> </tr> </thead> <tbody> <tr> <td>Siang</td> <td>22/9/2021</td> </tr> <tr> <td>Pasir Logok</td> <td>1/4/2021</td> </tr> <tr> <td>Tunjuk Laut</td> <td>21/9/2021</td> </tr> </tbody> </table> <p>c) The Estate has a comprehensive OSH Annual Training Plan 2021 for the Staffs and Workers and this was sighted in the training records file for each staff and workers. Training Plan includes:</p>	1	Harvesting	2	Chemical Store	3	Workshop	4	Manuring	5	Rat Baiting	6	Nursery	7	Spraying	8	Transport to mill	9	Etc	Estate	Date Reviewed	Siang	22/9/2021	Pasir Logok	1/4/2021	Tunjuk Laut	21/9/2021	<p>Complied</p>
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	<p>safe handling and storage in accordance to Occupational Safety Health (Classification Packaging and Labeling) Regulation 1997 and Occupational Safety Health (Use and Standard of Exposure of Chemical Hazardous to Health) Regulation 2000.</p> <p>f) The management shall appoint responsible person(s) for workers' safety and health. The appointed person(s) of trust must have knowledge and access to latest national regulations and collective agreements.</p> <p>g) The management shall conduct regular two-way communication with their employees where issues affecting their business such as employee's health, safety and welfare are discussed openly. Records from such meeting are kept and the concerns of the employees and any remedial actions taken are recorded.</p> <p>h) Accident and emergency procedures shall exist and instructions shall be clearly understood by all employees.</p> <p>i) Employees trained in First Aid should be present at all field operations. A First Aid Kit equipped with approved contents should be available at each worksite.</p> <p>j) Records shall be kept of all accidents and be reviewed periodically at quarterly intervals.</p> <p>- Major compliance -</p>	<table border="1"> <thead> <tr> <th rowspan="2"></th> <th rowspan="2"></th> <th colspan="2">Siang Estate</th> <th colspan="2">Pasir Logok</th> <th colspan="2">Tunjuk Laut</th> </tr> <tr> <th>Program</th> <th>Actual</th> <th>Program</th> <th>Actual</th> <th>Program</th> <th>Actual</th> </tr> </thead> <tbody> <tr> <td>1</td> <td>Manuring - Manual application</td> <td>3/2021</td> <td>26/1/2021</td> <td>3/2021</td> <td>10/3/2021</td> <td>3/2021</td> <td>15/2/2021</td> </tr> <tr> <td>2</td> <td>Harvesting</td> <td>3/2021</td> <td>2/7/2021</td> <td>2/2021</td> <td>25/2/2021</td> <td>3/2021</td> <td>20/1/2021</td> </tr> <tr> <td>3</td> <td>Spraying</td> <td>2/2021</td> <td>1/2/2021</td> <td>1/2021</td> <td>11/1/2021</td> <td>2/2021</td> <td>15/2/2021</td> </tr> <tr> <td>4</td> <td>Waste Cleaning & Landfill</td> <td>2/2021</td> <td>30/9/2021</td> <td>5/2021</td> <td>25/5/2021</td> <td>8/2021</td> <td>25/7/2021</td> </tr> <tr> <td>5</td> <td>Water Treatment</td> <td>1/2021</td> <td>12/1/2021</td> <td>7/2021</td> <td>5/7/2021</td> <td>4/2021</td> <td>18/8/2021</td> </tr> <tr> <td>6</td> <td>ERP</td> <td>12/2021</td> <td>25/3/2021</td> <td>8/2021</td> <td>23/8/2021</td> <td>12/2021</td> <td></td> </tr> </tbody> </table> <p>d) Estate has provided appropriate PPE for all workers in their operations. Sighted PPE Issuance and replacement record of all Estates.</p> <table border="1"> <thead> <tr> <th></th> <th>Worker's category</th> <th>Type of PPE</th> </tr> </thead> <tbody> <tr> <td>1</td> <td>Harvesting</td> <td>Hand Glove, Wellington boots, Sickle & Chisel cover, Safety Helmet</td> </tr> <tr> <td>2</td> <td>Spraying</td> <td>Nitrile Glove, Wellington boots, Safety Helmet, Respirator, Goggles, Apron</td> </tr> </tbody> </table> <p>e) The Company had established the Safe Work Procedures for all activities and Scheduled Waste under Work Instruction; Document Number: SPO/WI/06; Issue No: 1, Revision:0 Doc Date: 01/10/2020.</p> <p>The Work Instruction is to ensure proper and safe handling and storage, in accordance to OSH (Classification Packaging and Labelling) Regulation 1997, OSH (Use and Standard of Exposure of Chemical Hazardous to Health) Regulation 2000 and EQ (Scheduled Wastes) Regulations 2005.</p> <p>The Estate do maintain and documented the Register of Chemicals Hazardous to Health. Details as below:</p>										Siang Estate		Pasir Logok		Tunjuk Laut		Program	Actual	Program	Actual	Program	Actual	1	Manuring - Manual application	3/2021	26/1/2021	3/2021	10/3/2021	3/2021	15/2/2021	2	Harvesting	3/2021	2/7/2021	2/2021	25/2/2021	3/2021	20/1/2021	3	Spraying	2/2021	1/2/2021	1/2021	11/1/2021	2/2021	15/2/2021	4	Waste Cleaning & Landfill	2/2021	30/9/2021	5/2021	25/5/2021	8/2021	25/7/2021	5	Water Treatment	1/2021	12/1/2021	7/2021	5/7/2021	4/2021	18/8/2021	6	ERP	12/2021	25/3/2021	8/2021	23/8/2021	12/2021			Worker's category	Type of PPE	1	Harvesting	Hand Glove, Wellington boots, Sickle & Chisel cover, Safety Helmet	2	Spraying	Nitrile Glove, Wellington boots, Safety Helmet, Respirator, Goggles, Apron	
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		<p>They will be tested on Physical examination, Renal Profile, Liver Profile & S. Cholinesterase.</p> <p>Noise Risk Identification has been conducted at Siang Estate dated 22/4/2021, Tunjuk Laut Estate on 26/4/2021 and 21/4/2021 at Pasir Logok Estate as per Occupational Safety and Health (Noise Exposure) Regulations 2019, Regulation (3)1. No hazardous to excessive noise level were recorded at all Estates.</p> <p>However, based on the letter from Managing Director, Kulim Safety Training & Services Sdn Bhd dated 1/11/2021 the Company will conduct the Noise Risk Assessment by the Appointed Assessor. Siang and Tunjuk Laut Complex the assessment will be conducting from 21-25/11/2021.</p> <p>f) OSH Committee Chart 2021 sighted. Seen, letter of appointment for committee members in the file. Estate Manager is the Chairman of OSH Committee and being appointed on 15/9/2021 by En. Kamarulzaman Othman, Chairman Safety and Health Committee. The committee meeting has been conducted on quarterly basis as sample follows:</p> <table border="1" style="width: 100%; border-collapse: collapse;"> <thead> <tr> <th></th> <th>Siang Estate</th> <th>Pasir Logok Estate</th> <th>Tunjuk Laut</th> </tr> </thead> <tbody> <tr> <td>1st</td> <td>23/9/2021</td> <td>10/9/2021</td> <td>23/9/2021</td> </tr> <tr> <td>2nd</td> <td>24/6/2021</td> <td>6/6/2021</td> <td>23/6/2021</td> </tr> <tr> <td>3rd</td> <td>18/3/2021</td> <td>3/3/2021</td> <td>25/3/2021</td> </tr> </tbody> </table>				Siang Estate	Pasir Logok Estate	Tunjuk Laut	1 st	23/9/2021	10/9/2021	23/9/2021	2 nd	24/6/2021	6/6/2021	23/6/2021	3 rd	18/3/2021	3/3/2021	25/3/2021		
	Siang Estate	Pasir Logok Estate	Tunjuk Laut																			
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3 rd	18/3/2021	3/3/2021	25/3/2021																			
		<p>g) The meeting to discuss all issues regarding worker's safety and health. All issues raised and discussed during conducted meeting has been</p>																				

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Criterion / Indicator	Assessment Findings	Compliance														
	<p>resolve and taken action by management with proper action and target date.</p> <p>h) Sighted the emergency procedure for the Estate Emergency response plan available in local language (Malay and English). The ERP has been explained to all workers and staffs during training which has been conducted concurrently with MSPO Policy Briefing.</p> <p>Emergency response plan include the emergency contact number, and also have Guidelines on Accident, Emergency Procedures and Exit routes as well as assembly point in file and pasted on notice board.</p> <p>First Aid Box being placed in various stations or activity areas, namely:</p> <table border="1" data-bbox="1066 783 1883 930"> <thead> <tr> <th>No</th> <th>Estate</th> <th>No of Units</th> <th>Location</th> </tr> </thead> <tbody> <tr> <td>1</td> <td>Siang</td> <td>15</td> <td rowspan="3">Water treatment plant, surau, line site, store, workshop, mandore</td> </tr> <tr> <td>2</td> <td>Pasir Logok</td> <td>12</td> </tr> <tr> <td>3</td> <td>Tunjuk laut</td> <td>18</td> </tr> </tbody> </table> <p>i) 1st Aider for Pasir Logok is En. Hairudin Awang, who attended Course on Pertolongan Cemas Asas dan CPR dated 28/12/2018 organised by Persatuan Bulan Sabit Merah Malaysia. The certificate valid until 1/12/2021</p> <p>As for Siang Estate, En. Md Salleh Bin Don who attended Course on Pertolongan Cemas Asas dan CPR dated 28/12/2018 organised by Persatuan Bulan Sabit Merah Malaysia. The certificate valid until 1/12/2021.</p> <p>In Tunjuk Laut, En Ramli Effendi as the 1st aider who attended Course on Pertolongan Cemas Asas dan CPR dated 12/3/2020 organised by</p>	No	Estate	No of Units	Location	1	Siang	15	Water treatment plant, surau, line site, store, workshop, mandore	2	Pasir Logok	12	3	Tunjuk laut	18	
No	Estate	No of Units	Location													
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		<p>Persatuan Bulan Sabit Merah Malaysia. The certificate valid until 6/11/2022</p> <p>j) Records of all accidents are kept in all estates for a minimum of 10 years. Accident incidences are reviewed during safety meetings. Records in 2021 as extracted from the JKPP 8 submitted to DOSH as shown below:</p> <table border="1"> <thead> <tr> <th>Estate</th> <th>No of Cases</th> <th>LTI</th> <th>Non LTI</th> <th>JKPP 8 Submission</th> </tr> </thead> <tbody> <tr> <td>Siang</td> <td>11</td> <td>5</td> <td>6</td> <td>21/1/2021</td> </tr> <tr> <td>Pasir Logok</td> <td>31</td> <td>42</td> <td>0</td> <td>18/1/2021</td> </tr> <tr> <td>Tunjuk Laut</td> <td>2</td> <td>20</td> <td>0</td> <td>27/1/2021</td> </tr> </tbody> </table>	Estate	No of Cases	LTI	Non LTI	JKPP 8 Submission	Siang	11	5	6	21/1/2021	Pasir Logok	31	42	0	18/1/2021	Tunjuk Laut	2	20	0	27/1/2021	
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Criterion 4.4.5: Employment conditions																							
4.4.5.1	<p>The management shall establish policy on good social practices regarding human rights in respect of industrial harmony. The policy shall be signed by the top management and effectively communicated to the employees.</p> <p>- Major compliance -</p>	<p>All the operating units subscribe to Kulim (M) Berhad’s sustainability policy which newly revised and approved by Kulim’s Sustainability & Initiatives Council Meeting on 29/07/2021. Transition period for the (new MD) effective 01/10/2020. This Policy is documented and affirms the Company’s commitment to protect and advance human rights, including prohibiting retaliation, intimidation, and harassment against Human Rights Defenders, whistle blowers, complainants and community spokespersons.</p> <p>Other than that, the management has established internal policy on social that has been document in the document title core labour standard dated 01/05/2018. Mentioned in the policy that the management emphasize on employment of children and young persons, forced and bonded labour, occupational safety and health, remuneration and other.</p> <p>For Siang Estate, socialization on the procedure and policy to the stakeholders has been made during the stakeholders consultation has been conducted by the management on 18/10/2021 through online platform with attendance of stakeholder, POM and estate representative. While for</p>	Complied																				

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Criterion / Indicator		Assessment Findings	Compliance
		<p>employees, it has been done on 02/02/2021 during the mustercall briefing by Mr Mohd Masnizam Abdul Ghani.</p> <p>For Tunjuk Laut Complex (Pasir Logok Estate and Tunjuk Laut Estate), communication on the policy to the stakeholders has been done through stakeholder consultation which has been done on 10/10/2021. Minutes meeting has been prepared by Norazimah Abas, RC executive for Tunjuk Laut Complex.</p> <p>Socialization on the policy for workers of Pasir Logok Estate has been done on 11/08/2021 by Mr Majid Mahasan while for Tunjul Laut Estate, it has been done on 03/10/2021.</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>As per mentioned in the sustainability policy dated 01/10/2020 origin, caste, national origin, religion, disability, gender, sexual orientation, gender identity, union membership, political affiliation or age.</p> <p>For Siang Estate, socialization on the procedure and policy to the stakeholders has been made during the stakeholders consultation has been conducted by the management on 18/10/2021 through online platform with attendance of stakeholder, POM and estate representative. While for employees, it has been done on 02/02/2021 during the mustercall briefing by Mr Mohd Masnizam Abdul Ghani.</p> <p>For Tunjuk Laut Complex (Pasir Logok Estate and Tunjuk Laut Estate), communication on the policy to the stakeholders ahas been done through stakeholder consultation which has been done on 10/10/2021. Minutes meeting has been prepared by Norazimah Abas, RC executive for Tunjuk Laut Complex.</p> <p>Socialization on the policy for workers of Pasir Logok Estate has been done on 11/08/2021 by Mr Majid Mahasan while for Tunjul Laut Estate, it has been done on 03/10/2021.</p>	Complied

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Criterion / Indicator	Assessment Findings	Compliance
<p>4.4.5.3</p> <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>Siang Estate, Tunjuk Laut and Pasir Logok Estate is located in Kota Tinggi district when mentioned in the Minimum wages act 2020 that the minimum wages for daily rates is RM42.31/day.</p> <p>5 samples of workers has been taken for each estates for month December 2020, July 2021 and September 2021. Details of wages as per below:</p> <p><u>Siang Estate</u></p> <p><u>Workers BP0607xxxx</u></p> <p><u>December 2020</u></p> <p>Total Days work : 24 days Basic salary : RM 1020.24 Total hours overtime : 94 hours Total overtime paid : RM745.71 Gross salary : RM 2656.99 Deduction : RM 202 (mosque, advance) Nett Salary : RM 2464.90</p> <p><u>July 2021</u></p> <p>Total Days work : 25 days Basic salary : RM 1137.75 Total hours overtime : 94 hours Total overtime paid : RM 795.05 Gross salary : RM 2372.63 Deduction : RM 302.00 (Mosque, advance) Nett Salary : RM 2078.68</p>	<p>Complied</p>

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Criterion / Indicator	Assessment Findings	Compliance
	<p><u>Workers 670105-xx-xxxx</u> <u>July 2021</u> Total Days work : 22 days Basic salary: RM 1001.22 Total hours overtime : 0 hours Total overtime paid : RM0 Gross salary : RM 1046.33 Deduction : RM 333.35 (EPF, SOCSO, Mosque, advance) Nett Salary : RM 713.90</p> <p><u>September 2021</u> Total Days work : 21 days Basic salary : RM 1038.93 Total hours overtime : 0hours Total overtime paid : RM0 Gross salary : RM 1038.93 Deduction : RM 303.35 (EPF, SOCSO Mosque, advance) Nett Salary : RM 735.80</p> <p><u>Pasir Logok Estate</u> <u>Workers C082xxxx</u> <u>July 2021</u> Total Days work : 21 days</p>	

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Criterion / Indicator	Assessment Findings	Compliance
	<p>Basic salary : RM 1359.39 Total hours overtime : 0hours Total overtime paid : RM0 Gross salary : RM 1901.31 Deduction : RM 200 (advance) Nett Salary : RM 1701.30</p> <p><u>September 2021</u> Total Days work : 26 days Basic salary : RM 1542.55 Total hours overtime : 0hours Total overtime paid : RM0 Gross salary : RM 1840.84 Deduction : RM 200 (advance) Nett Salary : RM 1650.84</p> <p><u>Workers 910725-xx-xxxx</u> <u>December 2020</u> Total Days work : 21 days Basic salary : RM 1105.26 Total hours overtime : 90hours Total overtime paid : RM 798.36 Gross salary : RM 3027.41 Deduction : RM 600 (EPF, SOCSSO, khairat ,advance)</p>	

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Criterion / Indicator	Assessment Findings	Compliance
	<p>Nett Salary : RM 2427.10</p> <p><u>September 2021</u> Total Days work : 23 days Basic salary : RM 1042.13 Total hours overtime : 92hours Total overtime paid : RM 840.25 Gross salary : RM 2289.64 Deduction : RM 476.75 (EPF, SOCSSO, khairat, advance) Nett Salary : RM 1812.90</p> <p><u>Tunjuk Laut Estate</u> <u>Workers 573xxxx</u> <u>July 2021</u> Total Days work : 24 days Basic salary : RM 1092.24 Total hours overtime : 60hours Total overtime paid : RM 507.40 Gross salary : RM 1644.75 Deduction : RM 151.00 (mosque, advance) Nett Salary : RM 1493.75</p> <p><u>September 2021</u> Total Days work : 21 days</p>	

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Criterion / Indicator	Assessment Findings	Compliance
	<p>Basic salary : RM 888.51 Total hours overtime : 54hours Total overtime paid : RM 442.62 Gross salary : RM 1481.55 Deduction : RM 151.00 (mosque, advance) Nett Salary : RM 1330.55</p> <p><u>Workers BP 0181xxx</u> <u>December 2020</u> Total Days work : 26 days Basic salary : RM 1105.26 Total hours overtime : 83hours Total overtime paid : RM 658.45 Gross salary : RM 2543.45 Deduction : RM 156.00 (mosque, advance) Nett Salary : RM 2387.45</p> <p><u>September 2021</u> Total Days work : 21 days Basic salary: RM 888.51 Total hours overtime : 60 Total overtime paid : RM 491.78 Gross salary : RM 1530.71 Deduction: RM 201 (mosque, advance)</p>	

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Criterion / Indicator		Assessment Findings	Compliance
		Nett Salary : RM 1329.75	
4.4.5.4	<p>Management should ensure employees of contractors are paid based on legal or industry minimum standards according to the employment contract agreed between the contractor and his employee.</p> <p>- Minor compliance -</p>	<p>There is evidence that all employees of contractor has been paid based on local regulations and has been verified by the auditor. Employment contract, payslips, SOCSO and EPF has been reviewed.</p>	Complied
4.4.5.5	<p>The management shall establish records that provide an accurate account of all employees (including seasonal workers and subcontracted workers on the premises). The records should contain full names, gender, date of birth, date of entry, a job description, wage and the period of employment.</p> <p>- Major compliance -</p>	<p>There is evidence that the management of all estates has established records of information for all the workers in the document list employee which contain information such as employee number, name, job description, passport /identification card number, date of birth and date entry. The list has categorized the workers base on origin of the workers which are Indonesia, Bangladesh and Malaysia.</p>	Complied
4.4.5.6	<p>All employees shall be provided with fair contracts that have been signed by both employee and employer. A copy of employment contract is available for each and every employee indicated in the employment records.</p> <p>- Major compliance -</p>	<p>For all estates, total 20 samples of employment contract has been taken as sample for verification. There are evidences that employment contract has been signed by both parties, management and employee. Stated in the employment contract position of the workers, salary, overtime, working hours, resting hour, annual leave and contract period.</p> <p>Other than that, mentioned types of deduction that will be done on mainly basis. Details as per below</p> <ol style="list-style-type: none"> a. KWSP b. PERKESO c. Skim Khairat Keluarga d. NUPW e. Electricity if exceeds the limit 50kWh per house f. Water if exceeds the limit 35gallon per workers. 	OFI

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Criterion / Indicator		Assessment Findings	Compliance
		<p>Stated also benefits and accommodation that will be provided to the workers for free which are housing, transport to hospital, insurance, working equipment, electricity and water.</p> <p><u>OFI statement</u> Verification has been made on employment contract for sample workers and there was an evidence that the employment contract has been signed by both parties and complied with legal requirements. It also has been verified based on interview that the copies of employment contract has been given to the workers for their reference.</p> <p>As per current practices, there is some information need to be referred to other document such as MAPA/NUPW agreement. It`s can be further improved by include certain important information (that did not stated in the legal requirement) into the employment contract.</p>	
4.4.5.7	<p>The management shall establish a time recording system that makes working hours and overtime transparent for both employees and employer.</p> <p>- Major compliance -</p>	<p>As per conversation by the management, there time recording time system has been monitored through field supervisor that will records time start and end work. For overtime, each worker has their own log book to record their overtime and the data will be transfer to overtime time form that will be verified by field supervisor, assistant manager and manager.</p>	Complied
4.4.5.8	<p>The working hours and breaks of each individual employee as indicated in the time records shall comply with legal regulations and collective agreements. Overtime shall be mutually agreed and shall always be compensated at the rate applicable and shall meet the applicable legal requirement.</p> <p>- Major compliance -</p>	<p>As per mentioned in the employment contract, stated that working hours is from 6.30am until 2.30pm. Mentioned also breaking hours is from 11.00am-11.30am.</p> <p>Stated in the contract also, rate for overtime which stated 1.5 for normal hours rate, 2.0 from normal rate for rest days and 3.0 for public holiday and will not exceed 104 hours/ months.</p>	Complied

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Criterion / Indicator		Assessment Findings	Compliance
		For overtime, each worker has their own log book to record their overtime and the data will be transfer to overtime time form that will be verified by field supervisor, assistant manager and manager.	
4.4.5.9	<p>Wages and overtime payment documented on the pay slips shall be in line with legal regulations and collective agreements.</p> <p>- Major compliance -</p>	<p>Siang Estate, Tunjuk Laut and Pasir Logok Estate is located in Kota Tinggi district when mentioned in the Minimum wages act 2020 that the minimum wages for daily rates is RM42.31/day. There is evidence that wages and overtime payment documented on the pay slips in line with legal regulations and collective agreements.</p> <p>5 samples of workers has been taken for each estates for month December 2020, July 2021 and September 2021. Details of wages as per below:</p> <p><u>Siang Estate</u> <u>Workers BP0607xxxx</u> <u>December 2020</u> Total Days work : 24 days Basic salary : RM 1020.24 Total hours overtime : 94 hours Total overtime paid : RM745.71 Gross salary : RM 2656.99 Deduction : RM 202 (mosque, advance) Nett Salary : RM 2464.90</p> <p><u>July 2021</u> Total Days work : 25 days Basic salary : RM 1137.75 Total hours overtime : 94 hours</p>	Complied

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4.4.5.10	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. - Minor compliance -	Workers of estates under Kulim (M) Berhad receive various social benefits and this include free housing with amenities such as football field, badminton/takraw fields, surau/mosque, free medical treatment for workers and their dependents as well as creche facilities. Water and electricity were subsidized for 30 gallon and 50kWh per person and stated in the employment contract.	Complied
4.4.5.11	In cases where on-site living quarters are provided, these quarters shall be habitable and have basic amenities and facilities in compliance with the Workers' Minimum Standards Housing and Amenities Act 1990 (Act 446) or any other applicable legislation. - Major compliance -	Based on the photo that has been provided, there is evidence that it is habitable and have basic amenities and facilities. . Water and electricity were subsidized for 30 gallons and 50kWh per person and stated in the employment contract. Further verification has been made through the interview with the workers and records of complaint. There is no complaint from the workers and workers satisfied with the accommodation provided. There is evidence line site inspection has been conducted on weekly basis base on the records that has been provided.	Complied
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. - Major compliance -	All the estates under Kulim (M) Berhad subscribe to the sexual harassment policy signed by Executive Director on 1/5/2018. Kulim (M) Berhad is committed to ensure by providing safe workplace with no abuse and no sexual harassment to direct and indirectly to all workers and stakeholders.	Complied

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Criterion / Indicator		Assessment Findings	Compliance
		<p>For Siang Estate, socialization on the procedure and policy to the stakeholders has been made during the stakeholders consultation has been conducted by the management on 18/10/2021 through online platform with attendance of stakeholder, POM and estate representative. While for employees, it has been done on 02/02/2021 during the muster call briefing by Mr Mohd Masnizam Abdul Ghani.</p> <p>For Tunjuk Laut Complex (Pasir Logok Estate and Tunjuk Laut Estate), communication on the policy to the stakeholders ahas been done through stakeholder consultation which has been done on 10/10/2021. Minutes meeting has been prepared by Norazimah Abas, RC executive for Tunjuk Laut Complex.</p> <p>Socialization on the policy for workers of Pasir Logok Estate has been done on 11/08/2021 by Mr Majid Mahasan.</p> <p>The management of each estates has established WOW complaint panel which received any complaint especially sexual harassment from the women workers. While for men workers, sexual harassment complaint can be done through complaint and grievance procedure. Other mechanism is the management has established whistle blowing policy which has established channel for any improper conduct that has been discovered.</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	The management respected the right of all employees to form and join trade union and allow workers' own representative(s) to facilitate collective bargain in accordance with applicable laws and regulations. This was mentioned in the Core Labour Standard Policy dated 01/05/2018 and signed by the Executive director. The workers have their freedom to join the NUPW. This was evident form NUPW membership subscription deductions made in the pay slips. During the interview with workers, there no evidence to show that the management had restricted its workers and staff from joining a trade union.	Complied

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	repercussions. - Major compliance -	Union meeting has been done for Siang Estate and has been verified base on the minutes meetings dated 18/08/2021 with attendance representative by management and employees. Issues that has been discussed is workers salary, housing quarters, and implementation of COVID-19 SOPs. While for Pasir Logok Estate, it has been done on 08/09/2021 and Tunjuk Laut Estate on 23/09/2021.																																																																							
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 expose to hazardous working conditions. - Major compliance -	No workers less than 16 years old will be recruited and less than 18 years old for hazardous work. Verified the document Employee Master List confirmed that all the workers employed were above 18 years old.	Complied																																																																						
Criterion 4.4.6: Training and competency																																																																									
4.4.6.1	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. - Major compliance -	The Estate has a comprehensive annual training plan for its staff and workers and this was documented under Doc No: SQD/SMS/3.14 -FI Issue No:1 Revision No;0 dated 1/7/2018. Details as below: <table border="1" style="width: 100%; border-collapse: collapse;"> <thead> <tr> <th rowspan="2"></th> <th rowspan="2">Estate</th> <th colspan="2">Siang</th> <th colspan="2">Pasir Logok</th> <th colspan="2">Tunjuk Laut</th> </tr> <tr> <th>Program</th> <th>Actual</th> <th>Program</th> <th>Actual</th> <th>Program</th> <th>Actual</th> </tr> </thead> <tbody> <tr> <td>1</td> <td>Manuring - Manual application</td> <td>3/2021</td> <td>26/1/2021</td> <td>3/2021</td> <td>10/3/2021</td> <td>3/2021</td> <td>15/2/2021</td> </tr> <tr> <td>2</td> <td>Harvesting</td> <td>3/2021</td> <td>2/7/2021</td> <td>2/2021</td> <td>25/2/2021</td> <td>3/2021</td> <td>20/1/2021</td> </tr> <tr> <td>3</td> <td>Spraying</td> <td>2/2021</td> <td>1/2/2021</td> <td>1/2021</td> <td>11/1/2021</td> <td>2/2021</td> <td>15/2/2021</td> </tr> <tr> <td>4</td> <td>Waste Cleaning & Landfill</td> <td>2/2021</td> <td>30/9/2021</td> <td>5/2021</td> <td>25/5/2021</td> <td>8/2021</td> <td>25/7/2021</td> </tr> <tr> <td>5</td> <td>Water Treatment</td> <td>1/2021</td> <td>12/1/2021</td> <td>7/2021</td> <td>5/7/2021</td> <td>4/2021</td> <td>18/8/2021</td> </tr> <tr> <td>6</td> <td>ERP</td> <td>12/2021</td> <td>25/3/2021</td> <td>8/2021</td> <td>23/8/2021</td> <td>12/2021</td> <td></td> </tr> <tr> <td>7</td> <td>Zero Burning</td> <td>3/2021</td> <td>25/3/2021</td> <td>1/2021</td> <td>26/1/2021</td> <td>7/2021</td> <td>18/7/2021</td> </tr> </tbody> </table>		Estate	Siang		Pasir Logok		Tunjuk Laut		Program	Actual	Program	Actual	Program	Actual	1	Manuring - Manual application	3/2021	26/1/2021	3/2021	10/3/2021	3/2021	15/2/2021	2	Harvesting	3/2021	2/7/2021	2/2021	25/2/2021	3/2021	20/1/2021	3	Spraying	2/2021	1/2/2021	1/2021	11/1/2021	2/2021	15/2/2021	4	Waste Cleaning & Landfill	2/2021	30/9/2021	5/2021	25/5/2021	8/2021	25/7/2021	5	Water Treatment	1/2021	12/1/2021	7/2021	5/7/2021	4/2021	18/8/2021	6	ERP	12/2021	25/3/2021	8/2021	23/8/2021	12/2021		7	Zero Burning	3/2021	25/3/2021	1/2021	26/1/2021	7/2021	18/7/2021	Complied
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Criterion / Indicator		Assessment Findings								Compliance
		8	Schedule Waste	2/2021	11/8/2021	5/2021	30/5/2021	8/2021	5/7/2021	
		9	Chemical Handling	11/2021	11/2021	1/2022		4/2021	19/4/2021	
		10	Domestic waste	3/2022	9/2021	5/2022		7/2022	7/3/2021	
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>Training Need Analysis being documented for all employees under Doc No: PPM/SOP/6.8-F1, Issue No: 0, Rev:0 dated 7/2/2018.</p> <p>Seen, all the training need / matrix of all the personnel in the files. Training Need Analysis of all workers are based on their competencies and job description.</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>All workers involved in the operations have been adequately trained in safe working practice. The estate has a comprehensive Training Needs Analysis for staffs and workers and this was sighted in the training records file.</p> <p>Trainings conducted were recorded in the various trainings record and completed with attendance records, training materials and photographs of the training.</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>Kulim (Malaysia) Berhad do established the Environmental Management Policy issued on Group level signed by the Executive Director, Tuan Zulkifly Zakariah dated in 1/5/2018. Kulim Malaysia Berhad is committed to the creation through team effort of a quality environment as key factor in the continuous success of business. Among others the organization shall;</p> <p>a) Adhere to and comply with relevant environmental legislations of the country.</p>								Complied

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Criterion / Indicator		Assessment Findings	Compliance												
		<p>b) Strive for continual improvement on our environmental performance.</p> <p>c) Undertake to communicate our Environmental Policy to all stakeholders and educate the employees to practice and uphold the business commitment on caring for the environment.</p> <p>d) Continue to explore and implement cost effective technology in environmental Policy and the achievement of environmental objectives and targets.</p> <p>e) Review, adopt and implement Good Management Practices currently established in the industry.</p> <p>f) Plan, assess and take judicious actions to alleviate any potential negative impacts on the environment and local community with respect to any new development.</p> <p>g) Adopt and implement the principles of Reduction, Reuse and recycle in all matters pertaining to the use of resources and to pollution elimination.</p> <p>h) Continue to enhance the knowledge and skill for employees by briefing, training and exposure to relevant new technology with respect to any new improvement or development of the industry.</p> <p>i) Monitor and report to the Board of Directors on the implementation of this Environmental Policy, and the achievement of environmental objectives and targets.</p> <p>Communications to the internal were through briefing at muster grounds. The session conducted as sample follows: -</p> <table border="1"> <thead> <tr> <th>Estate</th> <th>Date Conducted</th> <th>No of participants</th> </tr> </thead> <tbody> <tr> <td>Siang</td> <td>19/4/2021</td> <td>165</td> </tr> <tr> <td>Pasir Logok</td> <td>17/2/2021</td> <td>124</td> </tr> <tr> <td>Tunjuk Laut</td> <td>28/9/2021</td> <td>112</td> </tr> </tbody> </table>	Estate	Date Conducted	No of participants	Siang	19/4/2021	165	Pasir Logok	17/2/2021	124	Tunjuk Laut	28/9/2021	112	
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Criterion / Indicator		Assessment Findings	Compliance
		External stakeholder briefing being conducted on 10/10/2021 through Virtual / Remote. The meeting was collaborated within estates and mill. Tuan Muhamad Fakhru Mukminin chaired the meeting which attended by 64 participants.	
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>Apart from Environmental Policy, Kulim (Malaysia) Berhad has established Sustainability Policy signed by the Managing Director, Tuan Mohd Faris Adli Shukery dated in 1/10/2020. The policy stated that Kulim is actively seeking continually improve environmental performance through:</p> <ul style="list-style-type: none"> • Pollution prevention by minimizing emissions to air, land and water. Optimal use of renewable resources, while minimizing the use of non-renewable resource. • Provision of adequate resources for effective implementation of Sustainable Management Programs • Ensuring integration of Sustainable programs with all other company policies. <p>The Estate has conducted Environmental Aspect and Impact Analysis and documented in Environmental Impact Assessment. The analysis was reviewed on annually basis and as and when there are changes in the operations.</p> <p>The Environmental Impact Assessment has covered 13 keys activities of the Mill such as:</p> <ol style="list-style-type: none"> 1. Harvesting 2. Office 3. Workshop 4. Manuring 5. Office 	Complied

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Criterion / Indicator		Assessment Findings					Compliance
		6. Etc					
4.5.1.3	An environmental improvement plan to mitigate the negative impacts and to promote the positive ones, shall be developed, effectively implemented and monitored. - Major compliance -	Sighted, Environmental Risk Assessment for the year 2021 in all Estates has been developed and the mitigation on the negative impacts and to promote the positive one being recorded under Waste & Pollution Management Plan. Sample taken at Siang Estate as follows on the ERA: -					Complied
		Process/ Area	Sub - Activity	Aspect	Impact	Existing Control Measures	
		Workshop	Welding	Disposal of welding rod and scrap iron	Land Pollution	Work instruction for maintenance works.	
		Harvesting	Harvesting	Spillage of oil from loose fruit into field drain when expose to rain	Water pollution	SOP Procedure	
		Manuring	Transport fertilizer to field	Emission of noise	Noise pollution	1. Work instruction. 2. Vehicle maintenance.	
4.5.1.4	A programme to promote the positive impacts should be included in the continual improvement plan. - Minor compliance -	Programme to promote positive impacts on environment was verified through Waste Management Plan and Pollution and Emission Management Plan. Sample taken as below: - a. Waste management Plan					Complied
		Waste Type	Source	Action Plan	Frequency		

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Criterion / Indicator		Assessment Findings				Compliance
		Kitchen waste	Line site	Disposed into landfill	Twice or thrice depending on situation	
		Broken computer equipments (SW 110)	Office	Collect and placed in the Scheduled Waste Store. When there is adequate quantity 20mt or due for 180 days, contact the licensed Contractor (refer to Procurement & Contract Department) for collection and disposal.	Within 180 days from date of waste generated	
		Batteries (SW 102)	Workshop	Collect and placed in Scheduled Waste Store.	Disposed to license DOE Contractors within 180 days from date of waste generated.	
		b. Emission Management Plan				
		Emission	Source	Action Plan	Frequency	
		Dark smoke	All running vehicles	Inspection of vehicle condition	Daily inspection on vehicles and machine	

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Criterion / Indicator		Assessment Findings				Compliance							
		<table border="1"> <tr> <td>Noise</td> <td>Running of vehicles and machine</td> <td>Inspection of vehicle condition</td> <td>Daily inspection on vehicles and machine</td> </tr> <tr> <td>Air pollutant</td> <td>Running of vehicles</td> <td>Inspection of vehicle condition</td> <td>Daily inspection on vehicles and machine</td> </tr> </table>	Noise	Running of vehicles and machine	Inspection of vehicle condition	Daily inspection on vehicles and machine	Air pollutant	Running of vehicles	Inspection of vehicle condition	Daily inspection on vehicles and machine			
Noise	Running of vehicles and machine	Inspection of vehicle condition	Daily inspection on vehicles and machine										
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		Records of periodical reporting of each of the above items were evident to support that the plans have been monitored. The plans were reviewed annually.											
4.5.1.5	<p>An awareness and training programme shall be established and implemented to ensure that all employees understand the policy and objectives of the environmental management and improvement plans and are working towards achieving the objectives.</p> <p>- Major compliance -</p>	<p>An Environmental training program is available in Training Plan updated on a yearly basis. Sample taken as below:</p> <ul style="list-style-type: none"> • Zero Burning Training dated 25/3/2021 by En. Mohd Reduan Mohd Nor, Siang Estate Assistant Manager attended by 160 participants. • Schedule Waste Training dated 11/08/2021 by Siang Estate Assistant Manager attended by 1 participant. • Biodiversity and HCV Area Briefing dated 28/06/2021 by Pasir Logok Estate Assistant Manager attended by 114 participants. • Buffer Zone Training dated 24/02/2021 by Pasir Logok Estate Assistant Manager attended by 122 participants. • Environmental Policy briefing at Tunjuk Laut Estate dated 6/10/2021 by Estate Assistant Manager to 111 workers. • Briefing on Zero Burning dated 10/7/2021 to 114 workers by the Assistant Manager. 				Complied							

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Criterion / Indicator		Assessment Findings	Compliance																																																		
4.5.1.6	<p>Management shall organize regular meetings with employees where their concerns about environmental quality are discussed.</p> <p>- Major compliance -</p>	<p>Environmental Performance Monitoring Committee (EPMC) being established in all Estates & Mill to discuss on environmental aspect. The latest meeting conducted as follows: -</p> <table border="1"> <thead> <tr> <th>Estate</th> <th>Date Meeting</th> <th>No of Participants</th> </tr> </thead> <tbody> <tr> <td>Siang</td> <td>24/10/2021</td> <td>15</td> </tr> <tr> <td>Pasir Logok</td> <td>22/8/2021</td> <td>20</td> </tr> <tr> <td>Tunjuk Laut</td> <td>14/10/2021</td> <td>12</td> </tr> </tbody> </table>	Estate	Date Meeting	No of Participants	Siang	24/10/2021	15	Pasir Logok	22/8/2021	20	Tunjuk Laut	14/10/2021	12	Complied																																						
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Criterion 4.5.2: Efficiency of energy use and use of renewable energy																																																					
4.5.2.1	<p>Consumption of non-renewable energy shall be optimized and closely monitored by establishing baseline values and trends shall be observed within an appropriate timeframe. There should be a plan to assess the usage of non-renewable energy including fossil fuel, electricity and energy efficiency in the operations over the base period.</p> <p>- Major compliance -</p>	<p>Monthly record on energy consumption for non-renewable sources were kept and documented. It is monitored to optimise use of renewable energy. Data is being compiled for comparison and control for future improvement. Following is the last 3 years data for diesel usage record at all sampled Estates: -</p> <table border="1"> <thead> <tr> <th rowspan="2"></th> <th colspan="3">Siang Estate</th> </tr> <tr> <th>FFB</th> <th>Diesel</th> <th>Lt/FFB</th> </tr> </thead> <tbody> <tr> <td>2018</td> <td>75,530</td> <td>248,557</td> <td>3.29</td> </tr> <tr> <td>2019</td> <td>76,272</td> <td>240,782</td> <td>3.16</td> </tr> <tr> <td>2020</td> <td>79,882</td> <td>229,657</td> <td>2.87</td> </tr> <tr> <td>2021</td> <td>60,948</td> <td>205,317</td> <td>3.37</td> </tr> <tr> <td></td> <td colspan="2">Baseline value</td> <td>3.11</td> </tr> </tbody> </table> <table border="1"> <thead> <tr> <th rowspan="2"></th> <th colspan="3">Pasir Logok Estate</th> </tr> <tr> <th>FFB</th> <th>Diesel</th> <th>Lt/FFB</th> </tr> </thead> <tbody> <tr> <td>2018</td> <td>45,806</td> <td>149,320</td> <td>3.26</td> </tr> <tr> <td>2019</td> <td>47,885</td> <td>158,580</td> <td>3.31</td> </tr> <tr> <td>2020</td> <td>53,940</td> <td>172,640</td> <td>3.20</td> </tr> <tr> <td>2021</td> <td>33,475</td> <td>138,191</td> <td>4.13</td> </tr> </tbody> </table>		Siang Estate			FFB	Diesel	Lt/FFB	2018	75,530	248,557	3.29	2019	76,272	240,782	3.16	2020	79,882	229,657	2.87	2021	60,948	205,317	3.37		Baseline value		3.11		Pasir Logok Estate			FFB	Diesel	Lt/FFB	2018	45,806	149,320	3.26	2019	47,885	158,580	3.31	2020	53,940	172,640	3.20	2021	33,475	138,191	4.13	Complied
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Criterion / Indicator		Assessment Findings			Compliance
			Baseline value	3.26	
		Tunjuk Laut Estate			
			FFB	Diesel	Lt/FFB
		2018	38,053	301,515	7.92
		2019	42,602	328,541	7.71
		2020	53,745	282,480	5.26
		2021	45,199	254,222	5.62
			Baseline value	6.96	
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 projection consumption of diesel for the mill has been documented on annual basis based on the Financial Year Budget with the latest available is for FY2021.			Complied
4.5.2.3	The use of renewable energy should be applied where possible. - Minor compliance -	There was no suitable area identified for the use of renewable energy at the sampled estates.			Not applicable
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 and pollution are identified and documented in the Waste & Pollution Management Plan 2021 updated on 1/8/2021. Details of waste generated from the mill activities among others as shown below; 1. Empty chemical containers 2. Batteries 3. Contaminated rags			Complied

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		4. Spent Oil 5. Pesticide Spillage 6. Contaminated Soil 7. Worn PPE 8. Liquid waste 9. Medical / Clinical 10. Domestic waste 11. Garden waste 12. Office Waste 13. Scraps 14. Mill By-Products 15. Rubber Materials 16. Emissions														
4.5.3.2	<p>A waste management plan to avoid or reduce pollution shall be developed and implemented. The waste management plan should include measures for:</p> <p>a) Identifying and monitoring sources of waste and pollution</p> <p>b) Improving the efficiency of resource utilization and recycling of potential wastes as nutrients or converting them into value-added by-products</p> <p>- Major compliance -</p>	<p>Details of the management plan as described below. This is a continuation of the 4.5.3.1 above.</p> <table border="1"> <thead> <tr> <th></th> <th>Source</th> <th>Waste Produce</th> <th>Action Plan</th> <th>Responsibility</th> </tr> </thead> <tbody> <tr> <td>1</td> <td>Pesticide Container</td> <td>Chemical store</td> <td> 1. Collect and placed in the Scheduled Waste store. For containers to be re-used for spraying, paint a red circle or "RACUN". 2. For containers that to be recycled, triple rinse the containers, </td> <td>M/ AM/ Field staff/ Storekeeper/ Foreman/ Mixing operator</td> </tr> </tbody> </table>					Source	Waste Produce	Action Plan	Responsibility	1	Pesticide Container	Chemical store	1. Collect and placed in the Scheduled Waste store. For containers to be re-used for spraying, paint a red circle or "RACUN". 2. For containers that to be recycled, triple rinse the containers,	M/ AM/ Field staff/ Storekeeper/ Foreman/ Mixing operator	Complied
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Criterion / Indicator		Assessment Findings				Compliance
					<p>puncture and securely placed in the empty pesticide container store.</p> <p>When there is adequate quantity, contact the licensed contractor (refer to Procurement & Contract Department) for collection.</p> <p>3. Only HDPE pesticide container can be recycled except pesticide containers Class I.</p> <p>4. Pesticide class I container must be disposed as SW 409.</p>	
		2	Waste water (cleaning-lubricant store, Workshop washdown)	Lubricant store, Workshop	<p>During scheduled cleaning of PCD, collect and place in the Scheduled Waste store. When there is adequate quantity, contact the licensed contractor (refer to Procurement & Contract Department) for collection</p>	Manager/ Assistant/ staff

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Criterion / Indicator		Assessment Findings					Compliance																											
		<p>Schedule Waste being disposed through the licensed contractor, Kualiti Alam Sdn Bhd within the Regulation timeframe of 180 days. Sample taken as follows: -</p> <table border="1"> <thead> <tr> <th>Estate</th> <th>SW</th> <th>Date Generate</th> <th>Date Disposed</th> <th>No of Days from date generated</th> </tr> </thead> <tbody> <tr> <td rowspan="3">Tunjuk Laut</td> <td>305</td> <td>10/1//2021</td> <td>22/6/2021</td> <td>163</td> </tr> <tr> <td>409</td> <td>10/1/2021</td> <td>22/6/2021</td> <td>163</td> </tr> <tr> <td>410</td> <td>10/1/2021</td> <td>22/6/2021</td> <td>163</td> </tr> <tr> <td rowspan="2">Pasir Logok</td> <td>305</td> <td>4/1/2021</td> <td>23/6/2021</td> <td>170</td> </tr> <tr> <td>408</td> <td>4/1/2021</td> <td>23/6/2021</td> <td>170</td> </tr> </tbody> </table>					Estate	SW	Date Generate	Date Disposed	No of Days from date generated	Tunjuk Laut	305	10/1//2021	22/6/2021	163	409	10/1/2021	22/6/2021	163	410	10/1/2021	22/6/2021	163	Pasir Logok	305	4/1/2021	23/6/2021	170	408	4/1/2021	23/6/2021	170	
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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>The Company had established the Safe Work Procedures for all activities and Scheduled Waste under Work Instruction; Document Number: SPO/WI/06; Issue No: 1, Revision: 0 Doc Date: 01/10/2020.</p> <p>The Work Instruction is to ensure proper and safe handling and storage, in accordance to OSH (Classification Packaging and Labelling) Regulation 1997, OSH (Use and Standard of Exposure of Chemical Hazardous to Health) Regulation 2000 and EQ (Scheduled Wastes) Regulations 2005.</p> <p>The estates have established SOP for chemical handling. This is available in Agriculture manual and SOP provided in the Company's documents – Operational Control Procedure under subject Chemical Safety Management. This includes compliance related to;</p> <ul style="list-style-type: none"> - Conduct/reassess CHRA - Review of chemical register - Chemical management assessment review - Conduct health surveillance 					Complied																											

Criterion / Indicator		Assessment Findings	Compliance																								
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>Kulim (Malaysia) Berhad adopted the guidelines provided by the Agriculture Department on the empty chemical's containers management. All empty chemical containers in all estates were triple rinsed, and disposed through approved licensed contractor G-Planter Sdn Bhd. Sighted record of disposal, Used Plastic Pesticides Container Recycling Collection Form (UPPCR) as follows by the estate: -</p> <table border="1"> <thead> <tr> <th></th> <th>Chemical Container</th> <th>Quantity Sold (unit)</th> </tr> </thead> <tbody> <tr> <td></td> <td>Date Sold</td> <td>6/1/2021</td> </tr> <tr> <td>1</td> <td>20 liters</td> <td>25</td> </tr> <tr> <td>2</td> <td>1 litre</td> <td>28</td> </tr> <tr> <td>3</td> <td>Ally 250gm</td> <td>240</td> </tr> <tr> <td>4</td> <td>4 liters</td> <td>280</td> </tr> <tr> <td>5</td> <td>Ally 500 gm</td> <td>366</td> </tr> <tr> <td>6</td> <td>Miracle</td> <td>45</td> </tr> </tbody> </table> <p>All the Empty Chemical Container being disposed as Scheduled Waste to appointed licensed Contractor at other sampled Estates.</p>		Chemical Container	Quantity Sold (unit)		Date Sold	6/1/2021	1	20 liters	25	2	1 litre	28	3	Ally 250gm	240	4	4 liters	280	5	Ally 500 gm	366	6	Miracle	45	Complied
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4.5.3.5	<p>Domestic waste should be disposed as such to minimize the risk of contamination of the environment and watercourses.</p> <p>- Minor compliance -</p>	<p>The estates having their own landfill to dispose all the domestic waste. Sites were visited and concluded maintained clean and tidy with proper signage displayed. The frequency of collection is twice a week The location of follows: -</p> <table border="1"> <thead> <tr> <th></th> <th>Estate</th> <th>Location</th> </tr> </thead> <tbody> <tr> <td>1</td> <td>Siang</td> <td>PO7 / Block 2</td> </tr> <tr> <td>2</td> <td>Pasir Logok</td> <td>PO2/ Block 3</td> </tr> <tr> <td>3</td> <td>Tunjuk Laut</td> <td>P09/ Block 2</td> </tr> </tbody> </table>		Estate	Location	1	Siang	PO7 / Block 2	2	Pasir Logok	PO2/ Block 3	3	Tunjuk Laut	P09/ Block 2	Complied												
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3	Tunjuk Laut	P09/ Block 2																									

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Criterion / Indicator	Assessment Findings	Compliance																									
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 -	<p>The polluting activities has been assessed during environmental aspect and impact assessment. The EAIA assessment findings including list of polluting sources are recorded in document titled "Environmental Aspect & Impact Assessment (EAIA) & Environmental Management Plan (EMP) & Waste Management plan (WMP).</p> <p>Identification of significant pollutants and greenhouse gas (GHG) emissions also be monitored through Approved GHG calculator, Palm GHG on Land conversion, Emissions from Fertilizer, Emissions from peat, Fuel Consumption, and crop sequestration.</p>	Complied																									
4.5.4.2 An action plan to reduce identified significant pollutants and emissions shall be established and implemented. - Major compliance -	<p>Details of action plan for identified pollutants as shown below and is a continuation from the 4.5.4.1 above.</p> <table border="1" data-bbox="1032 898 1921 1390"> <thead> <tr> <th>Emission</th> <th>Source</th> <th>Action</th> <th>Frequency</th> <th>Responsibility</th> </tr> </thead> <tbody> <tr> <td>Dark Smoke</td> <td>All running Vehicles</td> <td>Inspection of the vehicle condition</td> <td>Daily</td> <td>Manager/ Assistant/ Staff</td> </tr> <tr> <td>Noise</td> <td>Office – printing of paper</td> <td>To provide sound level test</td> <td>As and when required</td> <td>Manager/ Assistant/ CC</td> </tr> <tr> <td>Air Pollutant</td> <td>Operation of diesel engine</td> <td>Routine maintenance to be carried out as scheduled.</td> <td>As and when required</td> <td>Manager/ Assistant/ Foreman</td> </tr> <tr> <td>Green House Gas</td> <td>Use of Fossil oil</td> <td>Inspection of the vehicle condition</td> <td>Daily</td> <td>Manager/ Assistant/ Staff</td> </tr> </tbody> </table>	Emission	Source	Action	Frequency	Responsibility	Dark Smoke	All running Vehicles	Inspection of the vehicle condition	Daily	Manager/ Assistant/ Staff	Noise	Office – printing of paper	To provide sound level test	As and when required	Manager/ Assistant/ CC	Air Pollutant	Operation of diesel engine	Routine maintenance to be carried out as scheduled.	As and when required	Manager/ Assistant/ Foreman	Green House Gas	Use of Fossil oil	Inspection of the vehicle condition	Daily	Manager/ Assistant/ Staff	Complied
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Criterion / Indicator	Assessment Findings	Compliance															
Criterion 4.5.5: Natural water resources																	
<p>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:</p> <ul style="list-style-type: none"> a. Assessment of water usage and sources of supply. b. Monitoring of outgoing water which may have negative impacts into the natural waterways at a frequency that reflects the estate’s current activities. c. Ways to optimize water and nutrient usage to reduce wastage (e.g. having in place systems for re-use, night application, maintenance of equipment to reduce leakage, collection of rainwater, etc.). d. Protection of water courses and wetlands, including maintaining and restoring appropriate riparian buffer zones at or before planting or replanting, along all natural waterways within the estate. e. Where natural vegetation in riparian areas has been removed, a plan with a timetable for restoration shall be established and implemented. f. Where bore well is being use for water supply, the level of the ground water table should be measured at least annually. <p>- Major compliance -</p>	<p>The Water Management Plan has been established in all estates with the recent review made on 01/8/2021. The plan stated the source from the followings: -</p> <ul style="list-style-type: none"> a) Rain b) Water from pond and reservoir <p>In summary the details as tabulated below;</p> <table border="1" data-bbox="1032 767 1921 1385"> <thead> <tr> <th></th> <th>Source</th> <th>Activity</th> <th>Threat</th> <th>Action Plan</th> </tr> </thead> <tbody> <tr> <td>1</td> <td>Reservoir/ pond/ SAJ/Rain</td> <td>Chemical mixing</td> <td>Water pollution and degradation of water quality</td> <td>Buffer zone area where all the activity (spraying and manuring) not allowed in these areas. For areas near field drain including natural or artificial drain connected to natural waterways other than gazette as buffer zone, estate to monitor all activity to ensure no significant impact (such as erosion, bare land, water pollution) occur at near the drain and waterways.</td> </tr> <tr> <td></td> <td></td> <td>Line site</td> <td>Draught</td> <td>Every house is supplied</td> </tr> </tbody> </table>		Source	Activity	Threat	Action Plan	1	Reservoir/ pond/ SAJ/Rain	Chemical mixing	Water pollution and degradation of water quality	Buffer zone area where all the activity (spraying and manuring) not allowed in these areas. For areas near field drain including natural or artificial drain connected to natural waterways other than gazette as buffer zone, estate to monitor all activity to ensure no significant impact (such as erosion, bare land, water pollution) occur at near the drain and waterways.			Line site	Draught	Every house is supplied	<p>Complied</p>
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Criterion / Indicator		Assessment Findings					Compliance
						with containers. To schedule water supply to avoid wastage.	
			Drain upkeep	Interruption of water flow at field drainage system because of flood and rain		1. Upkeep drain by desilting drain periodically 2. Plant Guatemala, soft grasses to prevent erosion at affected area	
			Line site	Wastage of water		Monitor use of water. Awareness briefing on water usage efficiently.	
		<p>Kulim (Malaysia) Berhad has established Agricultural Manual first written in 1988. The Manual outlay the standard to be adhere by Management for instance to set aside a minimum of 5m riparian zone on each of the river bank and around the Water Catchment Ponds.</p> <p>Guidelines of the width of the rivers and natural courses to be protected have been illustrated in the Agricultural Manual revised dated 19/11/2018. Protection of water courses and wetlands, including maintaining and restoring appropriate riparian buffer zones has been verified at the estates where available. Riparian buffer zones have been identified and demarcated. Generally, no chemicals and fertilizer application observed been used in their maintenance. The buffer zones established are as following:</p>					

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Criterion / Indicator		Assessment Findings				Compliance																																																						
			River width	Buffer zone																																																								
		1	>40 meters	50 meters																																																								
		2	20 - 40 meters	40 meters																																																								
		3	10 - 20 meters	20 meters																																																								
		4	5 - 10 meters	10 meters																																																								
		5	< 5 meters	5 meters																																																								
		<p>Water samples from the inlet and outlet point are taken for phosphate and nitrate analysis for detection of fertilizer application effect to the water courses. The samples being analyzed at at Mahamurni Plantations Sdn Bhd, UTCL Laboratory. Extracted record of the estates with details below;</p> <p>Siang Estate conducted on 12/10/2021</p> <table border="1"> <thead> <tr> <th>No</th> <th>Parameter</th> <th>Unit</th> <th>1</th> <th>2</th> <th>Limit</th> </tr> </thead> <tbody> <tr> <td>1</td> <td>Nitrate Nitrogen</td> <td>MgNO3- NL</td> <td><0.04</td> <td><0.04</td> <td>7</td> </tr> <tr> <td>2</td> <td>Phosphate</td> <td>MgPO4/L</td> <td><0.2</td> <td><0.2</td> <td>0.2</td> </tr> </tbody> </table> <p>Pasir Logok Estate, the test being conducted on 26/10/2021</p> <table border="1"> <thead> <tr> <th>No</th> <th>Parameter</th> <th>Unit</th> <th>1</th> <th>2</th> <th>Limit</th> </tr> </thead> <tbody> <tr> <td>1</td> <td>Nitrate Nitrogen</td> <td>MgNO3- NL</td> <td>0.17</td> <td><0.04</td> <td>7</td> </tr> <tr> <td>2</td> <td>Phosphate</td> <td>MgPO4/L</td> <td><0.2</td> <td><0.2</td> <td>0.2</td> </tr> </tbody> </table> <p>Tunjuk Laut Estate, the test being conducted on 1/10/2021</p> <table border="1"> <thead> <tr> <th>No</th> <th>Parameter</th> <th>Unit</th> <th>1</th> <th>2</th> <th>Limit</th> </tr> </thead> <tbody> <tr> <td>1</td> <td>Nitrate Nitrogen</td> <td>MgNO3- NL</td> <td>1.50</td> <td>0.68</td> <td>7</td> </tr> <tr> <td>2</td> <td>Phosphate</td> <td>MgPO4/L</td> <td><0.2</td> <td><0.2</td> <td>0.2</td> </tr> </tbody> </table> <p>Drinking water samples on own water treatment are taken twice a year. Sampled the following analysis at Decagon Lab & Analytical Testing Sdn Bhd.</p>				No	Parameter	Unit	1	2	Limit	1	Nitrate Nitrogen	MgNO3- NL	<0.04	<0.04	7	2	Phosphate	MgPO4/L	<0.2	<0.2	0.2	No	Parameter	Unit	1	2	Limit	1	Nitrate Nitrogen	MgNO3- NL	0.17	<0.04	7	2	Phosphate	MgPO4/L	<0.2	<0.2	0.2	No	Parameter	Unit	1	2	Limit	1	Nitrate Nitrogen	MgNO3- NL	1.50	0.68	7	2	Phosphate	MgPO4/L	<0.2	<0.2	0.2	
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		<p>All results conform to the specification.</p> <p>Siang Estate, tested on 25/5/2021</p> <table border="1"> <thead> <tr> <th></th> <th>P/meter</th> <th>Unit</th> <th>Results</th> <th>Regulation raw water</th> <th>Results</th> <th>Regulation drinking water</th> </tr> </thead> <tbody> <tr> <td>1</td> <td>PH</td> <td>-</td> <td>5.4</td> <td>5.5-9.0</td> <td>7.4</td> <td>6.5-9.0</td> </tr> <tr> <td>2</td> <td>Turbidity</td> <td>NTU</td> <td>0.76</td> <td>1000</td> <td>0.53</td> <td>5</td> </tr> <tr> <td>3</td> <td>Al</td> <td>Mg/L</td> <td>ND (<0.2)</td> <td>-</td> <td>ND (<0.2)</td> <td>0.2</td> </tr> <tr> <td>4</td> <td>Chorine</td> <td>Mg CL/L</td> <td>-</td> <td>-</td> <td>0.6</td> <td>0.2 - 5</td> </tr> <tr> <td>5</td> <td>Coliform</td> <td>MPN</td> <td>30</td> <td>5000</td> <td>ND (<10)</td> <td>NIL</td> </tr> <tr> <td>6</td> <td>E coli</td> <td>MPN</td> <td>70</td> <td>5000</td> <td>ND (<10)</td> <td>NIL</td> </tr> </tbody> </table> <p>Pasir Logok Estate, tested on 26/5/2021</p> <table border="1"> <thead> <tr> <th></th> <th>P/meter</th> <th>unit</th> <th>Results</th> <th>Regulation raw water</th> <th>Results</th> <th>Regulation drinking water</th> </tr> </thead> <tbody> <tr> <td>1</td> <td>PH</td> <td>-</td> <td>4.9</td> <td>5.5-9.0</td> <td>7.2</td> <td>6.5-9.0</td> </tr> <tr> <td>2</td> <td>Turbidity</td> <td>NTU</td> <td>1.36</td> <td>1000</td> <td>0.33</td> <td>5</td> </tr> <tr> <td>3</td> <td>Al</td> <td>Mg/L</td> <td>0.59</td> <td>-</td> <td>ND (<0.2)</td> <td>0.2</td> </tr> <tr> <td>4</td> <td>Chorine</td> <td>Mg CL/L</td> <td>-</td> <td>-</td> <td>1.2</td> <td>0.2 - 5</td> </tr> <tr> <td>5</td> <td>Coliform</td> <td>MPN</td> <td>ND (<10)</td> <td>5000</td> <td>ND (<10)</td> <td>NIL</td> </tr> <tr> <td>6</td> <td>E coli</td> <td>MPN</td> <td>ND (<10)</td> <td>5000</td> <td>ND (<10)</td> <td>NIL</td> </tr> </tbody> </table>						P/meter	Unit	Results	Regulation raw water	Results	Regulation drinking water	1	PH	-	5.4	5.5-9.0	7.4	6.5-9.0	2	Turbidity	NTU	0.76	1000	0.53	5	3	Al	Mg/L	ND (<0.2)	-	ND (<0.2)	0.2	4	Chorine	Mg CL/L	-	-	0.6	0.2 - 5	5	Coliform	MPN	30	5000	ND (<10)	NIL	6	E coli	MPN	70	5000	ND (<10)	NIL		P/meter	unit	Results	Regulation raw water	Results	Regulation drinking water	1	PH	-	4.9	5.5-9.0	7.2	6.5-9.0	2	Turbidity	NTU	1.36	1000	0.33	5	3	Al	Mg/L	0.59	-	ND (<0.2)	0.2	4	Chorine	Mg CL/L	-	-	1.2	0.2 - 5	5	Coliform	MPN	ND (<10)	5000	ND (<10)	NIL	6	E coli	MPN	ND (<10)	5000	ND (<10)	NIL	
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4.5.5.2	No construction of bunds, weirs and dams across main rivers or waterways passing through an estate. - Minor compliance -	Due to the COVID-19 ongoing pandemic, onsite verification was unable to be conducted. Based on interview with the management and workers, it has been verified that 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).	Due to the COVID-19 ongoing pandemic, onsite verification was unable to be conducted. Based on interview with the management and workers, it was noted that that many silt pits were prepared by the road sides to capture					Complied																																																	

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Criterion / Indicator		Assessment Findings	Compliance
	- Minor compliance -	rain water in order to maintain the moisture content in the field. At estate offices and workshop sighted the practice of rainwater harvesting.	
Criterion 4.5.6: Status of rare, threatened, or endangered species and high biodiversity value			
4.5.6.1	<p>Information shall be collated that includes both the planted area itself and relevant wider landscape-level considerations (such as wildlife corridors). This information should cover:</p> <p>a) Identification of high biodiversity value habitats, such as rare and threatened ecosystems, that could be significantly affected by the grower(s) activities.</p> <p>b) Conservation status (<i>e.g.</i> The International Union on Conservation of Nature and Natural Resources (IUCN) status on legal protection, population status and habitat requirements of rare, threatened, or endangered species), that could be significantly affected by the grower(s) activities.</p> <p>- Major compliance -</p>	<p>In Siang Estate, Rapid Biodiversity Assessment by A.J.F.M Dekker was conducted on 9/7/2008. There is not RTE recorded but the report states that the entire central portion of the estate is flat and prone to flooding. The estate used to be surrounded by forest, but these are rapidly being logged over (north) or cleared altogether (sea side, south). A thin wooded strip still separates Siang Estate from the FELDA estate in the west, and Spectacled Langurs were seen here.</p> <p>Though the estate still has elephant fencing installed along most of its western and southern boundary, the last known elephant in the area was caught and relocated in 2006.</p> <p>As for Pasir Logok Estate have conducted Rapid Biodiversity Assessment by A.J.F.M Dekker dated 8/7/2008. There is not RTE recorded and the report states tiger has been seen as early 2008 where the estate borders a substantial forested strip stretching possibly for 10-20km southwards. However, this strip is very narrow and at least in one place already cut through by smallholders.</p> <p>Furthermore, Tunjuk Laut Estate have conducted Rapid Biodiversity Assessment by A.J.F.M Dekker dated 3/7/2008. There is not RTE recorded and the report states along the boundaries the habitat of Asian Elephant, Tiger and Malayan Tapir was seriously affected by destructive logging.</p>	Complied
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>a. Ensuring that any legal requirements relating to the</p>	<p>There is not RTE recorded. Evidence to continuously prevent and discourage illegal or hunting, fishing or collecting activities were maintained and implemented.</p> <p>Signage as well as routine patrolling activities were utilized as part of creating</p>	Complied

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Criterion / Indicator		Assessment Findings	Compliance
	<p>protection of the species are met.</p> <p>b. 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>awareness among employees and maintain HCVs.</p>	
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>The Biodiversity Improvement Plan 2021 being established at all Estates and subsequently implement it effectively. The Plan were divided into two stages, Immediate and Long Term.</p> <p>a. Immediate</p> <ol style="list-style-type: none"> 1. Total Protection of substantial Mangrove (HCV) 2. On-site identification of all habitat areas.to mark the area in HCV map. 3. To brief workers on the RTE species sighted inside or nearby estate. 4. To immediate report any sight of RTE species to SQD / Jab. Perhilitan. <p>b. Long Term</p> <ol style="list-style-type: none"> 1. Protection of substation mangrove 2. To map area that falls into buffer zone base on Agriculture manual 3. To put buffer zone peg on the ground 4. To have erosion and road maintenance program 5. To map the bare area, Guatemala planting, vertivar planting, road maintenance, culvert and road side drain maintenance program. 	Complied
<p>Criterion 4.5.7: Zero burning practices</p>			

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Criterion / Indicator		Assessment Findings	Compliance
4.5.7.1	Use of fire for waste disposal and for preparing land for oil palm cultivation or replanting shall be avoided except in specific situations, as identified in regional best practice. - Major compliance -	The operating units adhered to the policy of “Zero open burning” for any replanting. From interviews with the workers there is no open burning being practiced in the estates. For replanting land preparation, palms are felled, chipped and windrowed as required in the company’s procedure.	Complied
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 -	Not applicable since there is no significant risk of disease has been identified for all estates.	Not Applicable
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 -	No controlled burning noted based on the records on the land clearing and felling for the replanting at sampled estates. Method of land clearing and preparation was used such as felling & chipping, cambering/land forming and path construction.	Not applicable
4.5.7.4	Previous crops should be felled or mowed down, chipped and shredded, windrowed or pulverized or ploughed and mulched. - Minor compliance -	Noted based on the records on the land clearing and felling for the replanting at sampled estates, method of land clearing and preparation was used such as felling & chipping, cambering/land forming and path construction.	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 -	Standard Operating Procedures were available for Pasir Panjang POM & its Supply Bases. Among the SOP’s that were sampled were: <u>Kulim Plantations (M) Sdn Bhd</u> 1. Transparency; Doc No: SQD/SMS/1.0; Doc Date 01/08/2020 2. Core labour Standard; Doc No: SQD/SMS/4.0; Doc Date: 01/08/2020	Complied

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Criterion / Indicator		Assessment Findings	Compliance										
		3. Waste Management; Doc No: SQD/SMS/6.2; Doc Date: 01/08/2020 4. Agrochemicals Management; Doc No: SQD/SMS/6.1; Doc Date: 01/08/2020 5. Immature/ Mature Area – Rat Baiting; Doc No: LR-SOP-W07 6. Grievance; Doc No: SQD/SMS/4.1; Doc Date: 01/08/2020 7. Traceability; Doc No: SQD/SMS/1.2; Doc Date: 01/08/2020 8. Consultation and Communication; Doc No: SQD/SMS/1.1; Doc Date: 01/08/2020											
4.6.1.2	<p>Where oil palm is grown within permitted levels on sloping land, appropriate soil conservation measures shall be implemented to prevent both soil erosion as well as siltation of drains and waterways. Measures shall be put in place to prevent contamination of surface and groundwater through runoff of either soil, nutrients or chemicals.</p> <p>- Major compliance -</p>	<p>Where planting is on slope, construction of terraces was in accordance to guidance in the Agricultural Manual. The guidance for planting on slope is as follows:</p> <table border="1"> <thead> <tr> <th>Slope (°)</th> <th>Terrace width (m)</th> </tr> </thead> <tbody> <tr> <td><2°</td> <td>Straight Planting</td> </tr> <tr> <td>2 – 5°</td> <td>Straight planting. Water Conservation terraces at 32m interval</td> </tr> <tr> <td>6 – 15°</td> <td>5.00</td> </tr> <tr> <td>16 – 25°</td> <td>3.60</td> </tr> </tbody> </table> <p>Areas with greater than 25-degree slope are not to be planted but be left for biodiversity purposes. Among the soil conservation measures implemented to prevent soil erosion and siltation were construction of terrace, planting of cover crop and construction of roadside drains. Planting terraces had been constructed where slope >10°. Field inspection showed groundcover with soft grass and soft weeds at all estates.</p>	Slope (°)	Terrace width (m)	<2°	Straight Planting	2 – 5°	Straight planting. Water Conservation terraces at 32m interval	6 – 15°	5.00	16 – 25°	3.60	Complied
Slope (°)	Terrace width (m)												
<2°	Straight Planting												
2 – 5°	Straight planting. Water Conservation terraces at 32m interval												
6 – 15°	5.00												
16 – 25°	3.60												
4.6.1.3	<p>A visual identification or reference system shall be established for each field.</p>	<p>Due to the ongoing COVID-19 Pandemic, onsite assessment was unable to be conducted and a remote assessment audit was conducted instead.</p>	Complied										

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Criterion / Indicator		Assessment Findings	Compliance																													
	- Major compliance -	Therefore, the fields were unable to be physically visited. Nevertheless, the management has provided photo evidence of Fields Identification which clearly states the Field Number and Hectarage.																														
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 3 years being prepared as guidance for future planning. The business plan for FY2021 contains FFB yield, CPO, OER, and KER, costs of production, FFB pricing etc. It also includes budgeting on environment and social.	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 -	All the estates-maintained record of replanting program until the year 2031. For purpose of auditing record the horizon is limited to 5 years. Details as follows; - <table border="1" data-bbox="1030 869 1915 1037"> <thead> <tr> <th rowspan="2">Estate</th> <th colspan="5">Replanting Year (Ha)</th> </tr> <tr> <th>2021</th> <th>2022</th> <th>2023</th> <th>2024</th> <th>2025</th> </tr> </thead> <tbody> <tr> <td>Siang</td> <td>0</td> <td>0</td> <td>0</td> <td>198.58</td> <td>0</td> </tr> <tr> <td>Pasir Logok</td> <td>0</td> <td>0</td> <td>0</td> <td>0</td> <td>0</td> </tr> <tr> <td>Tunjuk Laut</td> <td>0</td> <td>0</td> <td>0</td> <td>0</td> <td>0</td> </tr> </tbody> </table>	Estate	Replanting Year (Ha)					2021	2022	2023	2024	2025	Siang	0	0	0	198.58	0	Pasir Logok	0	0	0	0	0	Tunjuk Laut	0	0	0	0	0	Complied
Estate	Replanting Year (Ha)																															
	2021	2022	2023	2024	2025																											
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Pasir Logok	0	0	0	0	0																											
Tunjuk Laut	0	0	0	0	0																											
4.6.2.3	The business or management plan may contain: 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 - Major compliance -	All the estates audited possessed a similar budget format. Inclusive is a 3-year budget/forecast financial plan allocating categories among others; a) Crop yielding area b) Mature cost c) General charges/upkeep/collection/depreciation d) Cost/ha & cost /mt FFB e) CAPEX	Complied																													

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Criterion / Indicator		Assessment Findings	Compliance
4.6.2.4	<p>The management plan shall be effectively implemented and the achievement of the goals and objectives shall be regularly monitored, periodically reviewed and documented.</p> <p>- Major compliance -</p>	<p>The estates performance is recorded in the monthly progress report. Details on the actual vs budget i.e. crop production, fixed and direct cost are shown therein.</p> <p>The following mechanism is available and adopted as standard practices and procedures in the estate’s operations.</p> <ul style="list-style-type: none"> a) Plantation Inspectorate Visit b) Internal audit by Sustainability Unit c) Task Force visits d) Monthly and weekly ad hoc meeting e) Daily /monthly production & financial report f) Daily supervision by the field staff/Executives 	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 documentation of price mechanism for services received from contractors are contained in the respective contracts that has been verified during the audit.</p> <p>For Siang Estate, 2 contractors have been sample which are:</p> <ul style="list-style-type: none"> a. Sungai Rezeki Sdn Bhd for FFB transporting from ramp to Pasir Panjang POM/ Sedenak POM/ Sindora POM contract number MPSB/C1/13/26 (2020) dated 12/04/2020 commence from 01/04/2020 until 31/04/2023. Price of transportation has been set base on distance. b. Ventri Venot Sdn Bhd for harvesting of FFB in filed P10 and P11 at Siang Estate contract number MPSB/C1/13/13 (2021) dated 20/04/2021 and the pricing has been set base on the palm ages. <p>For Pasir Logok Estate, 2 contractors has been sampled and details as per below:</p>	Complied

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Criterion / Indicator		Assessment Findings	Compliance
		<p>a. Jeevendran Enterprise contract number MPSB/LPL 7/213/2020 dated 03/01/2021 for harvesting of FFB in field P09 works at Pasir Logok Estate. The price of the contract has been justified in the contract base on tonnage of FFB that has been harvested.</p> <p>b. RKP Enterprise contract number MPSB/LPL 6/213/2020 dated 03/01/2021 for harvesting of FFB in field P89 works at Pasir Logok Estate. The price of the contract has been justified in the contract base on tonnage of FFB that has been harvested.</p>	
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>There is evidence that all sample contracts have been made fair, legal and transparent and has been agreed by both parties. There is also evidence that payment has been made as per agreed in the contract.</p> <p>For Siang Estate, 2 contractors have been sample which are:</p> <p>a. Sungai Rezeki Sdn Bhd for FFB transporting from ramp to Pasir Panjang POM/ Sedenak POM/ Sindora POM contract number MPSB/C1/13/26 (2020) dated 12/04/2020 commence from 01/04/2020 until 31/04/2023. Price of transportation has been set base on distance. Price of transportation has been set base on distance. Sample payment has been taken for invoice number 0938 dated 30/09/2021 and payment has been made on 05/10/reference number 2100578</p> <p>b. Ventri Venot Sdn Bhd for harvesting of FFB in filed P10 and P11 at Siang Estate contract number MPSB/C1/13/13 (2021) dated 20/04/2021 and the pricing has been set base on the palm ages. Sample payment has been taken for invoice dated 30/09/2021 and has been paid on 05/10/201 payment number 21000683.</p> <p>For Pasir Logok Estate, 2 contractors has been sampled and details as per below:</p>	Complied

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Criterion / Indicator		Assessment Findings	Compliance
		<p>a. Jeevendran Enterprise contract number MPSB/LPL 7/213/2020 dated 03/01/2021 for harvesting of FFB in field P09 works at Pasir Logok Estate. The price of the contract has been justified in the contract base on tonnage of FFB that has been harvested. Evidence of payment has been taken for July 2021 invoice number JEEVAENT/138, JEEVAENT/143 dated 31/07/2021 and payment on 04/08/2021 base on payment voucher number 21000365</p> <p>b. RKP Enterprise contract number MPSB/LPL 6/213/2020 dated 03/01/2021 for harvesting of FFB in field P89 works at Pasir Logok Estate The price of the contract has been justified in the contract base on tonnage of FFB that has been harvested. Evidence of payment has been taken for invoice number RKPENT/163, RKPENT 173 and RKPENT/175 dated 30/06/2021. Payment has been made on 04/07/2021 payment voucher number 210000319</p>	
Criterion 4.6.4: Contractor			
4.6.4.1	Where contractors are engaged, they shall understand the MSPO requirements and shall provide the required documentation and information. - Major compliance -	Sighted during the audit was the inclusion of MSPO requirements into contracts. This insertion of this Policy is to ensure contractors are aware and comply with local, national laws such as payment of minimum wage, ratified international laws, and also with MSPO standards. This was also acknowledged by the contractors, and reiterated during the stakeholder meeting.	Complied
4.6.4.2	The management shall provide evidence of agreed contracts with the contractor. - Major compliance -	<p>There is evidence that all sample contracts have been made fair, legal and transparent and has been agreed by both parties.</p> <p><u>Siang Estate</u></p> <p>a. Sungai Rezeki Sdn Bhd for FFB transporting from ramp to Pasir Panjang POM/ Sedenak POM/ Sindora POM contract number MPSB/C1/13/26 (2020) dated 12/04/2020 commence from 01/04/2020 until 31/04/2023</p>	Complied

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Criterion / Indicator		Assessment Findings	Compliance
		<p>b. Ventri Venot Sdn Bhd for harvesting of FFB in filed P10 and P11 at Siang Estate contract number MPSB/C1/13/13 (2021) dated 20/04/2021</p> <p><u>Pasir Logok Estate</u></p> <p>a. Jeevendran Enterprise contract number MPSB/LPL 7/213/2020 dated 03/01/2021 for harvesting of FFB in field P09 works at Pasir Logok Estate.</p> <p>b. RKP Enterprise contract number MPSB/LPL 6/213/2020 dated 03/01/2021 for harvesting of FFB in field P89 works at Pasir Logok Estate.</p>	
4.6.4.3	<p>The management shall accept MSPO approved auditors to verify assessments through a physical inspection if required.</p> <p>- Minor compliance -</p>	<p>The auditors have been able to have access to the contractors' workers, documentations such as contracts and workers' pay slips for verification during this audit.</p>	Complied
4.6.4.4	<p>The management shall be responsible for the observance of the control points applicable to the tasks performed by the contractor, by checking and signing the assessment of the contractor for each task and season contracted.</p> <p>- Major compliance -</p>	<p>For harvesting works, there is evidence of observance of the control point applicable for the contractor through the bunch counter that has been appointed. The responsibilities of the bunch counter is to monitor any off spec FFB at the platform and to inform management for any off spec FFB harvested. Sample of records monitoring by bunch counter has been taken by the auditor for verification.</p> <p>While for other types of works observance of work done by the contractor has been monitored by the mandore that in charge for respective works. Any issues will be highlighted to management for further action.</p>	Complied
<p>4.7 Principle 7: Development of new planting-</p> <p>Kulim (M) Berhad group estates did not carry out any new plantings since January 2015. Therefore, Principle 7 is not applicable during this main assessment. The immature areas are replanted area.</p>			

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Criterion / Indicator		Assessment Findings	Compliance
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 -	Kulim (M) Berhad group estates did not carry out any new plantings since January 2015. Therefore, Principle 7 is not applicable during this main assessment. The immature areas are replanted area.	Not applicable
4.7.1.2	No conversion of Environmentally Sensitive Areas (ESAs) to oil palm as required under Peninsular Malaysia's National Physical Plan (NPP) and the Sabah Forest Management Unit under the Sabah Forest Management License Agreement. For Sabah and Sarawak, new planting or replanting of an area 500ha or more requires an EIA. For areas below 500ha but above 100ha, a Proposal for Mitigation Measures (PMM) is required. - Major compliance -	Kulim (M) Berhad group estates did not carry out any new plantings since January 2015. Therefore, Principle 7 is not applicable during this main assessment. The immature areas are replanted area.	Not applicable
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 -	Kulim (M) Berhad group estates did not carry out any new plantings since January 2015. Therefore, Principle 7 is not applicable during this main assessment. The immature areas are replanted area.	Not applicable
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 -	Kulim (M) Berhad group estates did not carry out any new plantings since January 2015. Therefore, Principle 7 is not applicable during this main assessment. The immature areas are replanted area.	Not applicable

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Criterion / Indicator		Assessment Findings	Compliance
4.7.3.2	SEIAs shall include previous land use or history and involve independent consultation as per national and state regulations, via participatory methodology which includes external stakeholders. - Major compliance -	Kulim (M) Berhad group estates did not carry out any new plantings since January 2015. Therefore, Principle 7 is not applicable during this main assessment. The immature areas are replanted area.	Not applicable
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 -	Kulim (M) Berhad group estates did not carry out any new plantings since January 2015. Therefore, Principle 7 is not applicable during this main assessment. The immature areas are replanted area.	Not applicable
4.7.3.4	Where the development includes smallholder schemes of above 500ha in total or small estates, the impacts and implications of how each scheme or small estate is to be managed should be documented and a plan to manage the impacts developed, implemented, monitored and reviewed. - Minor compliance -	Kulim (M) Berhad group estates did not carry out any new plantings since January 2015. Therefore, Principle 7 is not applicable during this main assessment. The immature areas are replanted area.	Not applicable
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 -	Kulim (M) Berhad group estates did not carry out any new plantings since January 2015. Therefore, Principle 7 is not applicable during this main assessment. The immature areas are replanted area.	Not applicable
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 -	Kulim (M) Berhad group estates did not carry out any new plantings since January 2015. Therefore, Principle 7 is not applicable during this main assessment. The immature areas are replanted area.	Not applicable
Criterion 4.7.5: Planting on steep terrain, marginal and fragile soils			

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Criterion / Indicator		Assessment Findings	Compliance
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 -	Kulim (M) Berhad group estates did not carry out any new plantings since January 2015. Therefore, Principle 7 is not applicable during this main assessment. The immature areas are replanted area.	Not applicable
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 -	Kulim (M) Berhad group estates did not carry out any new plantings since January 2015. Therefore, Principle 7 is not applicable during this main assessment. The immature areas are replanted area.	Not applicable
4.7.5.3	Marginal and fragile soils, including excessive gradients and peat soils, shall be identified prior to conversion. - Major compliance -	Kulim (M) Berhad group estates did not carry out any new plantings since January 2015. Therefore, Principle 7 is not applicable during this main assessment. The immature areas are replanted area.	Not applicable
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 -	Kulim (M) Berhad group estates did not carry out any new plantings since January 2015. Therefore, Principle 7 is not applicable during this main assessment. The immature areas are replanted area.	Not applicable
4.7.6.2	Where new plantings on recognised customary lands are acceptable, management plans and operations should maintain sacred sites. - Minor compliance -	Kulim (M) Berhad group estates did not carry out any new plantings since January 2015. Therefore, Principle 7 is not applicable during this main assessment. The immature areas are replanted area.	Not applicable

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Criterion / Indicator		Assessment Findings	Compliance
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 -	Kulim (M) Berhad group estates did not carry out any new plantings since January 2015. Therefore, Principle 7 is not applicable during this main assessment. The immature areas are replanted area.	Not applicable
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 -	Kulim (M) Berhad group estates did not carry out any new plantings since January 2015. Therefore, Principle 7 is not applicable during this main assessment. The immature areas are replanted area.	Not applicable
4.7.6.5	Identification and assessment of legal and recognised customary rights shall be documented. - Major compliance -	Kulim (M) Berhad group estates did not carry out any new plantings since January 2015. Therefore, Principle 7 is not applicable during this main assessment. The immature areas are replanted area.	Not applicable
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 -	Kulim (M) Berhad group estates did not carry out any new plantings since January 2015. Therefore, Principle 7 is not applicable during this main assessment. The immature areas are replanted area.	Not applicable
4.7.6.7	The process and outcome of any compensation claims shall be documented and made publicly available. - Major compliance -	Kulim (M) Berhad group estates did not carry out any new plantings since January 2015. Therefore, Principle 7 is not applicable during this main assessment. The immature areas are replanted area.	Not applicable
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 -	Kulim (M) Berhad group estates did not carry out any new plantings since January 2015. Therefore, Principle 7 is not applicable during this main assessment. The immature areas are replanted area.	Not applicable

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 -	The management of Kulim (M) Berhad has established internal policy for implementation of MSPO and has been documented in the document title “Kulim Malaysia Berhad, Malaysian Sustainable palm oil policy” dated 30/11/2019 that has been signed by executive director, Mr Zulkifly Zakariah. Mentioned in the policy that the management is committed to implement all the requirement set out by the Malaysian Sustainable Palm Oil (MSPO) and cover all the element required. Socialization on the policy has been done by the management on 02/05/2021 for both shift A and shift B by Mr Muhammad Syahmi bin Ramli.	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 -	Mentioned also in the policy that the management of Kulim (M) Berhad is committed to achieve balance on 3P`s concept which are people, planet and profit in all management decision and operation through continual program in line with the commitment to produce sustainable palm oil products.	Complied
Criterion 4.1.2 – Internal Audit			
4.1.2.1	Internal audit shall be planned and conducted regularly to determine the strong and weak points and potential area for further improvement. - Major compliance -	Internal audit procedure has been established in the document title “Internal audit” document number SQD/SMS/3.2 dated 01/08/2020 issuance number 01. Mentioned in the procedure that the internal audit need to been conducted at the frequency at least once within 12 months (before the expiry of the certificate.)	Complied

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Criterion / Indicator		Assessment Findings	Compliance
		<p>There is evidence of internal audit has been planned for year 2021 for all complex under Kulim (M) Berhad and has been verified base on audit plan that has been provided title "Internal remote audits plan for RSPO/MSPO/ISCC' certification". For Pasir Panjang POM, it has been planned from 11/07/2021- 05/08/2021 under Tunjuk Laut Complex. The audit plan has been prepared by Puan Munira binti Rahim and approved by Puan Salasah Binti Elias dated 10/06/2021.</p> <p>As per discussion, the internal audit has been done base on 2 stages which the 1st stage is for document submission form 11 -15/07 2021 and the 2nd stages for document review from 1-5/8/2021. Closing meeting has been planned and conducted on 09/08/2021</p>	
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>Internal audit procedure has been established in the document title "Internal audit" document number SQD/SMS/3.2 dated 01/08/2020 issuance number 01.</p> <p>There is evidence of the internal audit checklist which listed has list down of document requirement and status of each indicator.</p> <p>The outcome of the audits has been compiled in the document title Internal audit, non-conformance report for Pasir Panjang POM. Based on the report, there is no nonconformities has been raised for MSPO. The document has been signed accepted by Mr Amir Muslimin bin Mohamed.</p>	Complied
4.1.2.3	<p>Reports shall be made available to the management for their review.</p> <p>- Major compliance -</p>	<p>There is evidence of the internal audit checklist which listed has list down of document requirement and status of each indicator.</p> <p>The outcome of the audits has been compiled in the document title Internal audit, non-conformance report for Pasir Panjang POM. Base on the report, there is no nonconformities has been raised for MSPO. The document has been signed accepted by Mr Amir Muslimin bin Mohamed.</p>	Complied

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Criterion / Indicator		Assessment Findings	Compliance
Criterion 4.1.3 – Management Review			
4.1.3.1	<p>The management shall periodically review the continuous suitability, adequacy and effectiveness of the requirements for effective implementation of MSPO and decide on any changes, improvement and modification.</p> <p>- Major compliance -</p>	<p>Management review meeting has been conducted by the management and has been verified base on the minutes meeting dated 18/10/2021 with attendance of 13 persons lead by the POM manager, Mr Amir Muslimin bin Mohamed. There is no action required for internal audit since there is no nonconformities has been raised. During the management review has discussed operation status and product compliance such as compliance of legal requirement and monitoring of environment as per environmental management plan.</p> <p>Other than that, the management has discussed any complaint or suggestion received through the complaint and suggestion box. As per date of management review, there 2 complaint has been received on crude palm oil from the customer and mentioned in the minutes that the complaint has been responded and necessary action to rectify the issues has been taken.</p>	Complied
Criterion 4.1.4 – Continual Improvement			
4.1.4.1	<p>The action plan for continual improvement shall be based on a consideration of the main social and environmental impact and opportunities for the company.</p> <p>- Major compliance -</p>	<p>Continual Improvement Plan for the mill has been documented and developed based on consideration of the social, productivity and environmental impact. Details as follow: -</p> <ol style="list-style-type: none"> 1. Building and drainage repair at workers quarters, Completed in August 2021. 2. Utilisation of Biogas for Power Produce for Mill and Residential area, Completed in January 2021 3. To install Computerized Maintenance Monitoring System (CMMS), Completed in August 2021 	Complied

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Criterion / Indicator		Assessment Findings	Compliance
		4. Resurfaced Hard Standing at Loading ramp, Work in progress and expected to complete by November 2021. Deliver Pad lock to all related worker for LOTO system, completed in March 2021.	
4.1.4.2	The company should establish a system to improve practices in line with new information and techniques; and for disseminating this information throughout the workforce. - Major compliance -	There is no new application of new technology implemented during the assessment period. The current practices continued and guide by Standard Operation Procedure (SOP)	Complied
4.2 Principle 2: Transparency			
Criterion 4.2.1 – Transparency of information and documents relevant to MSPO requirements			
4.2.1.1	The management shall communicate adequate information to other stakeholder on environmental, social and legal issues relevant to sustainable practices in the relevant languages and forms. - Major compliance -	The management of Kulim (M) Berhad has established internal procedure for transparency and has been documented in the document title "Transparency" document number SQD/SMS/1.0 dated 01/08/2020. The procedure has outlined the person responsible for transparency, types of information/document that can be request, and the mechanism to request any information or document. As per date of audit, there is only one request received on 07/01/2019 for Malaysia Palm Oil Board (MPOB) for a visit to increase the production capacity.	Complied
4.2.1.2	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. - Major compliance -	The management of Kulim (M) Berhad has established internal procedure for transparency and has been documented in the document title "Transparency" document number SQD/SMS/1.0 dated 01/08/2020. The procedure has outlined the person responsible for transparency, types of information/document that can be request, and the mechanism to request any information or document.	Complied

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Criterion / Indicator		Assessment Findings	Compliance
		In clause 4, has listed all the document/information that can be requested by the interested parties such as: a. Land title/ user rights b. Occupational safety and health plan c. HCV documentation d. Detail of complaint or grievances.	
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 -	Procedure of consultation and communication has been established by the management and has been documented in the document title consultation and communication document number SQD/SMS/1.1 dated 01/08/2020 issue number 01. The procedure has categorized communication and consultation into 2 categories which are internal and external parties. For internal communication, the communication is through muster, meeting, notice board, inspection and others. While for external communication, through meeting, telephone, fax, email and others. Communication internal and external will be done through the person in charge that has been appointed which basically the social person in charge. The PIC is responsible to disclose, implement, made available and explain consultation and communication procedure to all relevant stakeholders.	Complied
4.2.2.2	The management shall nominate management officials at the operating unit responsible for issues related to <i>indicator 1</i> . - Minor compliance -	The management of Pasir Panjang POM has identified person in charge for communication and consultation procedure and has been verified base on the appointment letter dated 01/02/2021 to Mr Muhammad Syahmi bin Ramli signed by Mr Amir Muslimin bin Mohamed, as Pasir Panjang POM.	Complied
4.2.2.3	A list of stakeholders, records of all consultation and communication and records of action taken in response to input	Pasir Panjang POM has established stakeholder list and has been verified by the auditor. These lists comprise their external stakeholders such as: - Relevant government agencies (e.g. DOE, DOA, Immigration Department,	Complied

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Criterion / Indicator		Assessment Findings	Compliance
	from stakeholders shall be properly maintained. - Major compliance -	Department of Safety and Health, Labour Department) - Contractors - Suppliers - Consultants - Neighbouring estates - Clinics, hospitals, fire brigade, police, etc. Correspondence with stakeholders are properly maintained and records of all consultation and communication during the past one year and records of action taken are also properly maintained. Stakeholder consultation has been conducted by the management on 10/10/2021 through online platform with attendance of stakeholder, POM and estate representative. During the stakeholder’s consultation, the management has socialize all the policy and procedure related to sustainability and any issues that arise.	
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 -	The traceability SOP; Sustainable Management System, Traceability, Doc: No: SQD/SMS/1.2 rev:5 dated 1/8/20 is available and the scope is to outlines the preparations, dispatch and receive of FFB, CPO, Kernel and other by products at KULIM’s estate and mill, job assignments and recordings of transport productivity for payment purpose and statistics. The aim is to weigh and record in-take of raw material (FFB), dispatch of products (CPO & Kernel), other by products like sludge oil, empty bunch and miscellaneous items like diesel, scrap iron, etc. 1. Raw Material Reception - Estate FFB Delivery Date: 7/11/2021, Estate: Bukit Kelompok MPOB License: 592302004000 Ticket No: 120988 Transaction Type: Receiving Vehicle No: JRB 1963 Field No: P10/1 Delivery Note No: 14705	Complied

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Criterion / Indicator		Assessment Findings	Compliance
		Gross Wt: 32990 kg, Tare Wt : 15,680 kg Nett Wt Before Deduction: 17,310 Kg Rain water deduction: 350 kg Nett Wt: 16,960 kg	
4.2.3.2	The management shall conduct regular inspections on compliance with the established traceability system. - Major compliance -	The POM Management team holds the responsibility on regular inspection of traceability system. Periodical inspections also being conducted through Plantation Inspectorate, Mill Advisor and Internal audit. The effectiveness of the monitoring will evidence in the internal audit and visit report findings. The latest visit by Plantation Inspector was on 18-19/4/2021 by Tuan Mohd Khairudin Idris.	Complied
4.2.3.3	The management shall identified and assign suitable employees to implement and maintain traceability system. - Minor compliance -	Person in charge for traceability system is Head of Operating Unit, refer to letter from Head of Plantation ref: SQD/ADMIN/019/21 dated 15/9/2021 signed by Head of Plantation Division, Tuan Mohamad Yami bin Bakar.	Complied
4.2.3.4	Records of storage, sales, delivery or transportation of crude palm oil and palm kernel shall be maintained. - Major compliance -	Purchases and sales will be based on demand and the despatch of the CPO and PK are determined by HQ Marketing. The mill records all FFB received and processed, CPO & PK produced and CPO & PK Stock. The Recording of storage, sales and deliveries are stored in the Domain System. Further, the tracking of sales, delivery and transportation will also be tracked/monitored by the weighbridge tickets. Monthly summary of storage, sales, delivery or transportation of crude palm oil and palm kernel reported to MPOB via https://e-kilang.mpob.gov.my/ekilang_main/ (Monthly Mill Statement)	Complied
4.3 Principle 3: Compliance to legal requirements			

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Criterion / Indicator	Assessment Findings	Compliance	
Criterion 4.3.1 – Regulatory requirements			
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>The legal compliance lists of permits & licenses are available and being monitored and updated periodically by person in- charge of Legal Requirements. Details as below: -</p> <ol style="list-style-type: none"> 1. MPOB License; License Number: 59232004000; License Valid from: 1/1/2021 till 31/12/2021. 2. Licence to Occupy or Use Prescribed Premises, Section 18(1) DOE Act 1974, License Number: 004649; License Valid from 01/07/2021 till 30/06/2022 3. Diesel Permit; Reference Number: KPDNKK.J.KTG/PERMIT0028 (PD)(R); Maximum Capacity: 20, 000 litres valid until 2/2/2022. 4. Energy Commission License; License Number: 46756; Valid from 6/7/2021 till 5/7/2022; Installation Capacity: 1600.55 kilowatt 5. Ref. No.: TK(NJ)U-21 dated 31/03/2019 for Skim Khairat Keluarga RM5.00/ month and premium paid of not more than RM 37.50 per month per worker 6. Ref. No.: TK(NJ)U-21 dated 31/03/2019 for sport club fee of not more than RM 10 per worker 7. Water Services Industry Act 2006 - Suruhanjaya Perkhidmatan Air Negara (SPAN) Act 655, 2006, SPAN/EKS/ (PT)/800-4(1)/11/15. License Valid from 15/1/2019 till 14/01/2022 8. Permit bekerja melebihi sekatan kerja lebih masa (Seksyen 60A(4)(a) Akta Kerja 1955), Overtime more than 104 hours. License Valid from 3/12/2020 till 31/12/2022 9. Lesen Melencong atau Mengabstrak Air Sungai (Enakmen Air No.66(Johor), 	<p>Complied</p>

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Criterion / Indicator		Assessment Findings	Compliance
		<p>a. 07/A/KT/117, valid until 31/12/2021</p> <p>b. 08/A/KT/050, valid until 14/1/2022</p> <p>10. Weighbridge, Certificate of Determination Weights and Measures (Weights and Measures Act 1972), Weights and Measures Regulation 1981. Permit No: B 1505744 valid until 26/1/2022.</p> <p>11. Boiler, JH PMD 1712 valid until 29/4/2022.</p> <p>12. 90 litre Horizontal Air Receiver Tank, JH PMT 24785 valid until 29/4/2022.</p> <p>13. Pro Auto Sterilizer, JH PMT 25364 valid until 29/4/2022.</p> <p>14. Pro Auto Sterilizer, JH PMT 25365 valid until 29/4/2022.</p> <p>15. Pro Auto Sterilizer, JH PMT 25366 valid until 29/4/2022.</p> <p>16. Horizontal Air Receiver Tank, JH PMT 25373 valid until 29/4/2022.</p> <p>17. Back Pressure Steam Receiver, PMT 78982 valid until 29/4/2022.</p>	
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>Kulim (Malaysia) Berhad has established and updated list of applicable laws and regulations that are applicable for the Mill in Kulim Group Compliance Framework. The legal register is prepared by Regional Complex Executive, Puan Norazimah bt Abas and being updated every 3 months, latest on 31/8/2021. Some of applicable laws sighted includes: -</p> <ul style="list-style-type: none"> • Pesticides Act 1974 and Regulations, • Environmental Quality Act and Regulations 1974 • Factories and Machinery Act and Regulations, 1967 • Weights and Measures Regulations 1981 • Electricity Regulations 1994 • Immigration Act 1959 • Employee Provident Fund 1991 	Complied

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Criterion / Indicator		Assessment Findings	Compliance
		<ul style="list-style-type: none"> Etc 	
4.3.1.3	<p>The legal requirements register shall be updated as and when there are any new amendments or any new regulations coming into force.</p> <p>- Major compliance -</p>	<p>The mechanism used for tracking changes in laws/regulations is made through the following methods;</p> <ol style="list-style-type: none"> News release through daily newspaper. Law change tracked by book publisher (MDC Book Publications). Circulars from relevant association (e.g. MPOA, MPOB, MAPA) Internet (e-federal gazette, www.lawnet.com.my, www.e-warta.com.my) <p>The Kulim (M) Berhad Legal Department from headquarters will update in Kulim Group Compliance Framework format and disseminate via email or Management meetings to Regional Office.</p>	Complied
4.3.1.4	<p>The management should assign a person responsible to monitor compliance and to track update the changes in regulatory requirements.</p> <p>- Minor compliance -</p>	<p>The Mill Senior Assistant Manager is responsible for the monitoring of compliance of the entire regulatory requirement needed for the mill operations. Changes if any will be channelled to the Manager for further implementation in the mill.</p> <p>In addition, Regional Tunjuk Laut Complex Executive, Puan Norazimah bt Abas will assist in the monitoring of the legal compliance.</p>	Complied
Criterion 4.3.2 – Lands use rights			
4.3.2.1	<p>The management shall ensure that their oil palm milling activities do not diminish the land use rights of other users.</p> <p>- Major compliance -</p>	<p>As per verification made by the auditor, Pasir Panjang POM is located in the Pasir Panjang Estate and has been verified base on the land title number PTD 558 HS(D) 35107 with total hectarage 1609.87Ha and clearly mentioned that the land has been owned by Mahamurni Plantations Sdn Bhd, one of subsidiary company of Kulim (M) Berhad.</p>	Complied

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Criterion / Indicator		Assessment Findings	Compliance
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 -	As per verification made by the auditor, Pasir Panjang POM is located in the Pasir Panjang Estate and has been verified base on the land title number PTD 558 HS(D) 35107 with total hectarage 1609.87 Ha and clearly mentioned that the land has been owned by Mahamurni Plantations Sdn Bhd, one of subsidiary company of Kulim (M) Berhad.	Complied
4.3.2.3	Legal parameter boundary markers should be clearly demarcated and visibly maintained on the ground where practicable. - Major compliance -	There is evidence of photo provided that parameter has been demarcated using bulb wire. Clear identification has been made by the management.	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 and that these should have been accepted with free prior informed consent (FPIC). - Minor compliance -	The management of Kulim (M) Berhad has established internal procedure for land dispute in the document title Land encroachment: document number PROP/MP/5 dated 20/10/2014 and revised on 09/06/2020. The procedure has outline the process if there is any encroachment or land dispute has been identified. Not applicable since there is no dispute and land directly owned by Mahamurni Plantations Sdn Bhd one of subsidiary company of Kulim (M) Berhad and has been verified base on the land title number PTD 558 HS(D) 35107 with total hectarage 1609.87 Ha.	Not applicable
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 -	No applicable since there is no customary rights. Pasir Panjang POM is located in the Pasir Panjang Estate and has been verified base on the land title number PTD 558 HS(D) 35107 with total hectarage 1609.87 Ha and clearly mentioned that the land has been owned by Mahamurni Plantations Sdn Bhd, one of subsidiary company of Kulim (M) Berhad.	Not applicable
4.3.3.2	Maps of an appropriate scale showing extent of recognized customary rights shall be made available.	No applicable since there is no customary rights. Pasir Panjang POM is located in the Pasir Panjang Estate and has been verified base on the land	Not applicable

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	- Minor compliance -	title number PTD 558 HS(D) 35107 with total hectarage 1609.87 Ha and clearly mentioned that the land has been owned by Mahamurni Plantations Sdn Bhd, one of subsidiary company of Kulim (M) Berhad.	
4.3.3.3	Negotiation and FPIC shall be recorded and copies of the relevant agreements should be made available. - Major compliance -	No applicable since there is no customary rights. Pasir Panjang POM is located in the Pasir Panjang Estate and has been verified base on the land title number PTD 558 HS(D) 35107 with total hectarage 1609.87 Ha and clearly mentioned that the land has been owned by Mahamurni Plantations Sdn Bhd, one of subsidiary company of Kulim (M) Berhad.	Not applicable
4.4 Principle 4: Social responsibility, health, safety and employment condition			
Criterion 4.4.1: Social Impact Assessment (SIA)			
4.4.1.1	Social impacts should be identified and plans should be implemented to mitigate the negative impacts and promote the positive ones. - Minor compliance -	The management of Kulim (M) Berhad has established internal procedure for social impact assessment and has been documented in the document number SQD/SMS/3.6 issues number 01 dated on 01/08/2020. Social impact assessment has been identified and documented in document title "Daftar Impak Sosial Kulim (Malaysia) Berhad 2021 dated 15/10/2021. As per conversation, the input of the assessment has been collected base on the feedback form that has been provided to workers and stakeholders. SIA has highlighted 2 types of outcome which are positive and negative outcome. There are several positive outcomes that has been received such as family day, donation of chicken during the Eid celebration, donation of school uniform and job opportunities for the local communities. For negative outcome, there are 2 issues that has been highlighted which are late permit renewal for foreign workers and workers understanding on LOTO system to avoid any accident.	Complied

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		<p>Management plan has been established by the management of Pasir Panjang POM and has been categorized into 2 categories which are negative and positive issues.</p> <p>For negative issues, the management will be identified document for foreign workers and renewal process will be done 3 months before the expiry. Monitoring of renewal status will be done with MyEG Sdn Bhd.</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>Standard Operating Procedure has been established by the management of Kulim (M) Berhad for complaint and grievance in the document title Grievance Procedure, Doc. No. SQD/SMS/4.1 issue:1 dated 01/08/2020. This procedure is referred to when managing complaints and grievances raised by all parties including internal (employees) and external stakeholders (statutory bodies, local communities, smallholders and NGOs)</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>Based on the procedure, timeline for resolution as per the following: Employee – matter to be settled within 10 working days. Others – to obtain satisfaction within 7 working days. The Company’s whistle blowing Policy which approved by Kulim (M) Berhad’s board of director dated 10/09/2020 provides Complied PF824 MSPO Public Summary Report Revision 1 (Feb 2020) Page 31 of 131 anonymity and assurance against retaliation and immunity to the whistle blower.</p> <p>As per verification, there is no complaint has been received from the workers and during the stakeholder consultation.</p>	Complied
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>Complaint and suggestion box has been established by the management at the office and complaint/suggestion form has been made available nearby the box.</p>	Complied

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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>There is evidence that employees are made aware that complaints or suggestions can be made anytime during muster briefings on 01/10/2021. For external stakeholders, this was made aware during the stakeholder meeting held on 01/10/2021. Verification has been made through interview with workers and stakeholders and verified their understanding on the procedure.</p>	Complied
4.4.2.5	<p>Complaints and solutions within the past 24 months shall be documented and be made available to affected stakeholders upon request.</p> <p>- Major compliance -</p>	<p>There is evidence that all complaints and solutions that has been received for the past 24 months has been maintained by the management of Pasir Panjang POM.</p>	Complied
Criterion 4.4.3: Commitment to contribute to local sustainable development			
4.4.3.1	<p>Palm oil miller should contribute to local development in consultation with the local communities. Where the mill is an integral part of plantation, such contribution to local community development may be regarded as a joint effort by the mill and the plantation.</p> <p>- Minor compliance -</p>	<p>There are 2 contributions has been made by the management of Pasir Panjang POM year 2021. Contribution has been made for Klinik Ibu Anak that has been requested from Pengerusi Kelab Wanita on 14/04/2021 to purchase chair. Total RM 200 has been donated and has been verified base on the petty cash voucher. Other than that, the management also donated chicken to all workers during Hari Raya Aidilfitri.</p>	Complied
Criterion 4.4.4: Employees safety and health			
4.4.4.1	<p>An occupational safety and health policy and plan which is in line with Occupational Safety and Health Act 1994 and Factories and Machinery Act 1967 (Act 139) shall be documented, effectively communicated and implemented.</p> <p>- Major compliance -</p>	<p>The Group Occupational Safety & Health Management Policy had been established and implemented. The policy was signed by the Managing Director of Kulim (Malaysia) Berhad, Tuan Mohd Faris Adli Shukery on 1/10/2021 and displayed prominently on notice boards in English and local language Bahasa Malaysia.</p> <p>The Policy is implemented through the OSH activities by the SQD Executives and monitored by SQ Department at Head Office. Included in the policy is</p>	Complied

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Criterion / Indicator		Assessment Findings	Compliance
		<p>the commitment of the Company to;</p> <ul style="list-style-type: none"> a) Comply as reasonably practicable on Occupational Safety and Health (OSH), legislations, regulations and Codes of Practices. b) Regularly review and audit the OSH management systems to ensure that they remain relevant and appropriate. c) Effective communication of this policy to all employees and other affected parties d) Regularly and continuously conduct education, training and awareness program on OSH to all parties concerned. <p>The implementation of OSH plan was monitored by internal audits conducted by OSH Executives from SQ Department.</p>	
4.4.4.2	<p>The occupational safety and health plan should cover the following:</p> <ul style="list-style-type: none"> a) A safety and health policy, which is communicated and implemented. b) The risk of all operations shall be assessed and documented. c) An awareness and training programme which includes the following requirements for employees exposed to chemicals used at the palm oil mill: <ul style="list-style-type: none"> i. All employees involved are adequately trained on safe working practices; ii. All precautions attached to products should be properly observed and applied; 	<ul style="list-style-type: none"> a) The Group Occupational Safety & Health Management Policy had been established and implemented. The policy was signed by the Managing Director of Kulim (Malaysia) Berhad, Tuan Mohd Faris Adli Shukery on 1/10/2021 and displayed prominently on notice boards in English and local language Bahasa Malaysia. The Policy being communicated to Internal and External Stakeholders through the following medium: <ol style="list-style-type: none"> 1. Sustainability and MSPO Policy briefing was conducted by Assistant Manager to all workers and staffs comprising 91 participants dated 2/5/2021 at Pasir Panjang POM 2. External stakeholder briefing being conducted on 10/10/2021 through Virtual / Remote. The meeting was collaborated within Estates and Mill. Tuan Muhamad Fakhru Mukminin chaired the meeting which attended by 64 participants 	Complied

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<p>d) The management shall provide the appropriate PPE at the place of work to cover all potentially hazardous operations as identified in the risk assessment and control such as Hazard Identification, Risk Assessment and Risk Control (HIRARC).</p> <p>e) The management shall establish Standard Operating Procedure for handling of chemicals to ensure proper and safe handling and storage in accordance to Occupational Safety Health (Classification Packaging and Labeling) Regulation 1997 Occupational Safety Health (Use and Standard of Exposure of Chemical Hazardous to Health) Regulation 2000.</p> <p>f) The management shall appoint responsible person(s) for workers' safety and health. The appointed person(s) of trust shall have knowledge and access to latest national regulations and collective agreements.</p> <p>g) The management shall conduct regular two-way communication with their employees where issues that affect their business such as those related to employees' safety, health and welfare are discussed openly. Records from such meeting shall be kept and the concerns of employees and any remedial actions taken shall be recorded.</p> <p>h) Accident and emergency procedures shall exist and instructions shall be clearly understood by all employees.</p> <p>i) Employees trained in First Aid shall be present at all mill operations. First Aid equipment should be available at each worksite.</p>	<p>b) Risk assessment was conducted by ESH Committee and being reviewed yearly and if any accident occurred. HIRARC sighted for the followings 35 work operation and activities: -</p> <ol style="list-style-type: none"> 1. Loading Ramp 2. Vertical steriliser 3. Threshing 4. Press station 5. Clarification 6. Kernel plant station 7. Empty Bunch Press Station 8. Water Treatment Plant 9. Boiler Station 10. Etc <p>Latest reviewed was in 25/7/2021.</p> <p>c) The Mill has a comprehensive OSH Annual Training Plan 2021 for the Staffs and Workers and this was sighted in the training records file for each staff and workers. Training Plan includes: -</p> <table border="1" style="width: 100%; border-collapse: collapse;"> <thead> <tr> <th></th> <th style="text-align: center;">Topic</th> <th style="text-align: center;">Month programme</th> <th style="text-align: center;">Status</th> </tr> </thead> <tbody> <tr> <td style="text-align: center;">1</td> <td>Chemical Handling</td> <td style="text-align: center;">September</td> <td style="text-align: center;">2/2/2021</td> </tr> <tr> <td style="text-align: center;">2</td> <td>ERP and CPR</td> <td style="text-align: center;">October</td> <td style="text-align: center;">1/4/2021</td> </tr> <tr> <td style="text-align: center;">3</td> <td>Fire Drill</td> <td style="text-align: center;">February</td> <td style="text-align: center;">1/4/2021</td> </tr> <tr> <td style="text-align: center;">4</td> <td>First Aid</td> <td style="text-align: center;">June</td> <td style="text-align: center;">8/10/2021</td> </tr> <tr> <td style="text-align: center;">5</td> <td>Safety at Workshop</td> <td style="text-align: center;">August</td> <td style="text-align: center;">3/3/2021</td> </tr> <tr> <td style="text-align: center;">6</td> <td>PPE Usage</td> <td style="text-align: center;">March</td> <td style="text-align: center;">3/3/2021</td> </tr> </tbody> </table>		Topic	Month programme	Status	1	Chemical Handling	September	2/2/2021	2	ERP and CPR	October	1/4/2021	3	Fire Drill	February	1/4/2021	4	First Aid	June	8/10/2021	5	Safety at Workshop	August	3/3/2021	6	PPE Usage	March	3/3/2021	
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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>d) Mill has provided appropriate PPE for all workers in their operations. Sighted PPE Issuance and replacement in their individual record namely Surat Akuan Serah/Terima Peralatan Keselamatan (PPE).</p> <p>Sample taken on the following workers: -</p> <ol style="list-style-type: none"> 1. En. Muhamad Khairul Anuar 2. En. Muhamad Faris Hakimi 3. En. Muhammad Hazwan <p>e) Pasir Panjang POM had established the procedures for handling of chemicals classified under Work Instruction; Document Number: PPM/WI/9; Rev No: 0, Doc Date: 01/7/2016 and Scheduled Waste under Work Instruction; Document Number: SPO/WI/06; Issue No: 1, Revision: 0 Doc Date: 01/10/2020.</p> <p>The Work Instruction is to ensure proper and safe handling and storage, in accordance to OSH (Classification Packaging and Labelling) Regulation 1997, OSH (Use and Standard of Exposure of Chemical Hazardous to Health) Regulation 2000 and EQ (Scheduled Wastes) Regulations 2005.</p> <p>The Mill do maintain and documented the Register of Chemicals Hazardous to Health. Sample taken for the month of January 2021 which registered 49 chemicals and reviewed on 17/1/2021 by Mill Assistant Manager.</p> <p>CHRA report dated 27/10/2018 reported by Mr Yeow Liang Ming – JKPP HQ/14/ASS/00/350 from KULIM Safety Training and Services Sdn Bhd. The assessment covering 5 works unit, namely:</p> <ol style="list-style-type: none"> 1. Boiler 2. Diesel Handler 	

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	<p>3. Laboratory 4. Water Treatment 5. Workshop</p> <p>Sighted the Manager’s Response to Assessor Recommendation in Form F and action need to be taken on yearly basis. Latest reviewed was on 1/11/2021.</p> <p>Kulim Safety Training and Services Sdn Bhd will organised Medical Surveillance programme to all Estates and Mill. As for Pasir Panjang POM will be conducted on 16/11/2021 for 32 workers.</p> <p>Noise Risk Assessment being conducted by Dr. Syed Abdul Hamid bin Syed Hassan, JKPP HIE 127/5/3 -1 (No 169) dated 4/2/2020. Based on the Assessment, Kernel Plant, Oil Room, Engine Room, Boiler Room, Press Station and Sterilization Area recorded higher noise level.</p> <p>Audiometry Test was conducted on 28/3/2021 by PAC Testing and Consulting Sdn Bhd to 80 workers. Finally, 4 having hearing impairment, 12 NIHL and 2 workers on Standard Threshold Shift. The re-test was executed on 18/6/2021 by Falck Bestari Healthcare Sdn Bhd, Dr Muzaffar Salim. The result shown that 2 workers are on Permanent Standard Threshold Shift. Both workers have been shifted from working at Process area to Biogas Plant as safer condition.</p> <p>f) OSH Committee Chart 2021 sighted. Seen, letter of appointment for committee members and Mill Manager is the Chairman of OSH Committee and being appointed on 15/9/2021 by Mr. Kamarulzaman Othman, Chairman Safety and Health. The committee meeting has been conducted on quarterly basis as follows: -</p> <ol style="list-style-type: none"> 1. 25/3/2021 2. 29/7/2021 	

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	<p>3. 25/9/2021</p> <p>g) The meeting discusses all issues regarding worker’s safety and health. All issues raised and discussed during conducted meeting has been resolve and taken action by mill management with proper action and target date.</p> <p>h) Sighted the emergency procedure for the Mill, Emergency response plan available in local language (Malay and English). The ERP has been explained to all workers and staffs during training which has been conducted.</p> <p>Emergency response plan include the emergency contact number, and also have Guidelines on Accident, Emergency Procedures and Exit routes as well as assembly point in file and pasted on notice board.</p> <p>i) First Aid Box being placed in 9 stations namely security guard, office, laboratory, workshop, engine room, store and etc. The 1st Aid Box being equipped in accordance with the Fourth Schedule, (Regulation 38 (2) (i)) First-Aid Box</p> <p>1st Aider for Mill is En. Nasrullah bin Adris, who attended Course on Pertolongan Cemas Asas dan CPR dated 12/3/2020 organised by Persatuan Bulan Sabit Merah Malaysia. The certificate valid until 6/11/2022.</p> <p>Seen, the Fire Extinguisher Location Map of Mill and the details as below: -</p> <table border="1" data-bbox="1093 1193 1731 1396"> <thead> <tr> <th>No</th> <th>Area</th> <th>No of Units</th> </tr> </thead> <tbody> <tr> <td>1</td> <td>Office</td> <td>1</td> </tr> <tr> <td>2</td> <td>Guard House</td> <td>1</td> </tr> <tr> <td>3</td> <td>Store</td> <td>3</td> </tr> <tr> <td>4</td> <td>Workshop</td> <td>4</td> </tr> <tr> <td>5</td> <td>Engine Room</td> <td>2</td> </tr> </tbody> </table>	No	Area	No of Units	1	Office	1	2	Guard House	1	3	Store	3	4	Workshop	4	5	Engine Room	2	
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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>Pasir Panjang POM subscribe to Kulim (M) Berhad’s sustainability policy which newly revised and approved by Kulim’s Sustainability & Initiatives Council Meeting on 29/07/2020. Transition period for the (new MD) effective 01/10/2020. This Policy is documented and affirms the Company’s commitment to protect and advance human rights, including prohibiting retaliation, intimidation, and harassment against Human Rights Defenders, whistle blowers, complainants and community spokespersons.</p> <p>Other than that, the management has established internal policy on social that has been document in the document title core labour standard dated</p>			Complied																											

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Criterion / Indicator		Assessment Findings	Compliance
		01/05/2018. Mentioned in the policy that the management emphasize on employment of children and young persons, forced and bonded labour, occupational safety and health, remuneration and other. Communication on policy has been done on 01/10/2020 with attendance of all the workers during the morning briefing.	
4.4.5.2	The management shall not engage in or support discriminatory practices and shall provide equal opportunity and treatment regardless of race, colour, sex, religion, political opinion, nationality, social origin or any other distinguishing characteristics. - Major compliance -	As per mentioned in the sustainability policy dated 01/10/2021 mentioned that the management did not engage in discrimination of race, ethnic origin, caste, national origin, religion, disability, gender, sexual orientation, gender identity, union membership, political affiliation or age. Communication on policy has been done on 01/10/ 2021 with attendance of all the workers during the morning briefing.	Complied
4.4.5.3	Management shall ensure that employees' pay and conditions meet legal or industry minimum standards as per Collective Agreements. The living wage should be sufficient to meet basic needs and provide some discretionary income based on minimum wage. - Major compliance -	Total 5 samples of pay slips has been taken for 3 different months (December 2020, July 2020 and September 2021). There is evidence that all sample workers has been paid base on minimum wages act 2020 total RM42.31/days as Pasir Panjang is located in Kota Tinggi district. Details of sample pay slips as per below: <u>Workers number 640xx</u> <u>December 2020</u> Total Days work : 26 days Basic salary : RM 1105.26 Total hours overtime : 75 hours Total overtime paid : RM 641.95 Gross salary : RM 2792.60 Deduction : RM 218.00 (NUPW, Sport club, advance) Nett Salary : RM 2574.60	Complied

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Criterion / Indicator	Assessment Findings	Compliance
	<p><u>July 2021</u> Total Days work : 25 days Basic salary : RM 1137.75 Total hours overtime : 52.50 hours Total overtime paid : RM 486.32 Gross salary : RM 2235.20 Deduction : RM 218.00 (NUPW, Sport club, advance) Nett Salary : RM 2018.20 Workers number 640xx</p> <p><u>December 2020</u> Total Days work : 26 days Basic salary : RM 1105.26 Total hours overtime : 50 hours Total overtime paid : RM 400.03 Gross salary : RM 2170.94 Deduction : RM 218.00 (NUPW, Sport club, advance) Nett Salary : RM 1952.95</p> <p><u>September 2021</u> Total Days work : 24 days Basic salary : RM 1087.44 Total hours overtime : 91.50 hours Total overtime paid : RM 714.50</p>	

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Criterion / Indicator		Assessment Findings	Compliance
		<p>Gross salary : RM 2217.35 Deduction : RM 218.00 (NUPW, Sport club, advance) Nett Salary : RM 1999.35</p> <p><u>Workers number 640xx</u> <u>July 2021</u> Total Days work : 25 days Basic salary: RM 1137.75 Total hours overtime : 0 hours Total overtime paid : RM0 Gross salary : RM 1182.88 Deduction : RM 314.05 (EPF, khairat, Sport club, advance) Nett Salary : RM 800.85</p> <p><u>September 2021</u> Total Days work : 21 days Basic salary : RM 951.51 Total hours overtime : 0 hours Total overtime paid : RM0 Gross salary : RM 1038.93 Deduction : RM 282.35 (EPF, khairat, Sport club, advance) Nett Salary : RM 756.60</p>	
4.4.5.4	Management should ensure employees of contractors are paid based on legal or industry minimum standards according to the	There is no contractor work permanently at POM except for ad-hoc work for equipment repair and engineering project.	Complied

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	<p>employment contract agreed between the contractor and his employee.</p> <p>- Minor compliance -</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>The management of Pasir Panjang POM has records of all employees including contractors' employees. The record containing details such as full name, gender, nationality, date of birth, date of employment, job description, wage and period of employment.</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>All employees (local and foreign) sign employment contracts which contents comply with Employment Act 1955. All contracts are signed by both the employer and the employee and are made available for all workers. The employment contracts of local workers state that the duration as until retirement age, in accordance with the Minimum Retirement Age Act 2012. For foreign workers, the duration is for 2 years. Among the other terms and conditions in the employment contract include overtime pay, rest day, working hours, rate for working on rest day, termination notice period, public holidays, paid annual leave, paid medical leave, etc. Based on review, the contracts are deemed fair.</p> <p><u>OFI statement</u></p> <p>Verification has been made on employment contract for sample workers and there was an evidence that the employment contract has been signed by both parties and complied with legal requirements. It also has been verified based on interview that the copies of employment contract has been given to the workers for their reference.</p>	OFI

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		As per current practices, there is some information need to be referred to other document such as MAPA/NUPW agreement. It`s can be further improved by include certain important information (that did not stated in the legal requirement) into the employment contract.	
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 -	The management has established time recording system through punch card for all the workers. There is evidence of implementation base on sample punch card that has been taken by the auditor. Working hours and overtime has been made transparent for both parties. Sample of punch card has been taken by the auditor 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 breaks of each individual employee is recorded in their respective employment contracts which clearly stipulate that working hours is 8 hours from 8 AM to 4 PM inclusive of 30 minutes of break time. Any overtime work is paid in accordance with the provisions of the Employment Act 1955. Based on sample payslips provided, there were an evidences that wages and overtime documented are in line with legal regulations and collective agreements. Payslips were details on the basic salary, overtime, working on rest day, working public holiday and also has list down all deductions that has been made.	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 -	Based on sample payslip provided there were an evidences that wages and overtime has been documented is in line with legal regulations and collective agreement. Payslips has details about the basic salary, overtime, working on rest day, working public holiday and has list down all deduction that has been made. Total 5 samples of pay slips has been taken for 3 different months (December 2020, July 2020 and September 2021). There were an evidences that all sample workers has been paid based on minimum wages	Complied

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	<p>act 2020 total RM42.31/days as Pasir Panjang is located in Kota Tinggi district. Details of sample pay slips as per below:</p> <p><u>Workers number 640xx</u></p> <p><u>December 2020</u></p> <p>Total Days work : 26 days Basic salary : RM 1105.26 Total hours overtime : 75 hours Total overtime paid : RM 641.95 Gross salary : RM 2792.60 Deduction : RM 218.00 (NUPW, Sport club, advance) Nett Salary : RM 2574.60</p> <p><u>July 2021</u></p> <p>Total Days work : 25 days Basic salary : RM 1137.75 Total hours overtime : 52.50 hours Total overtime paid : RM 486.32 Gross salary : RM 2235.20 Deduction : RM 218.00 (NUPW, Sport club, advance) Nett Salary : RM 2018.20</p> <p><u>Workers number 640xx</u></p> <p><u>December 2020</u></p> <p>Total Days work : 26 days</p>	

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		<p>Nett Salary : RM 800.85</p> <p><u>September 2021</u></p> <p>Total Days work : 21 days</p> <p>Basic salary : RM 951.51</p> <p>Total hours overtime : 0 hours</p> <p>Total overtime paid : RM0</p> <p>Gross salary : RM 1038.93</p> <p>Deduction : RM 282.35 (EPF, khairat, Sport club, advance)</p> <p>Nett Salary : RM 756.60</p>	
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>Workers of Pasir Panjang POM receive various social benefits and this include free housing with amenities such as treatment for workers and their dependents by the hospital assistant, free treatment transportation to clinic, PERKESO . Water and electricity were subsidized for 30 gallon and 50kWh per person and stated in the employment contract.</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>Based on the photo that has been provided, there is evidence that it is habitable and have basic amenities and facilities. Electric and water has been provided for free and verified has been maintain in clean and appropriate manner.</p> <p>Further verification has been made through the interview with the workers and records of complaint. There is no complaint from the workers and workers satisfied with the accommodation provided.</p>	Complied
4.4.5.12	<p>The management shall establish a policy to prevent all forms of sexual harassment and violence at the workplace.</p>	<p>Internal policy for sexual harassment has been document in the document title sexual harassment policy which the definition of the policy has been</p>	Complied

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	- Major compliance -	<p>derive from the local regulation Employment act 1955. The policy has been signed by Mr Zulkifly Zakariah as the executive director.</p> <p>Mentioned in the policy that the management is committed to eradicate all forms of sexual harassment in the workplace in whenever possible.</p> <p>The management of each estates has established WOW complaint panel which received any complaint especially sexual harassment from the women workers. While for men workers, sexual harassment complaint can be done through complaint and grievance procedure. Other mechanism is the management has established whistle blowing policy which has established channel for any improper conduct that has been discovered</p>	
4.4.5.13	<p>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.</p> <p>- Major compliance -</p>	<p>The management respected the right of all employees to form and join trade union and allow workers' own representative(s) to facilitate collective bargain in accordance with applicable laws and regulations. This was mentioned in the Core Labour Standard Policy dated 01/05/2018 and signed by the Executive director. The workers have their freedom to join the NUPW.</p> <p>During the interview with workers, there was no evidence to show that the management had restricted its workers and staff from joining a trade union.</p>	Complied
4.4.5.14	<p>Children and young persons shall not be employed or exploited. The minimum age shall comply with local, state and national legislation.</p> <p>- Major compliance -</p>	<p>No workers less than 16 years old will be recruited and less than 18 years old for hazardous work. Verified the document Employee Master List confirmed that all the workers employed were above 18 years old.</p>	Complied
Criterion 4.4.6: Training and competency			

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Criterion / Indicator		Assessment Findings	Compliance																																
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 -	Mill has a comprehensive annual training plan for its staff and workers and this was documented under Doc No: SQD/SMS/3.14 -FI Issue No:1 Revision No;0 dated 1/7/2018. Details as below: - <table border="1"> <thead> <tr> <th></th> <th>Topic</th> <th>Month programme</th> <th>Status</th> </tr> </thead> <tbody> <tr> <td colspan="4">Occupational Safety and Health</td> </tr> <tr> <td>1</td> <td>Chemical Handling</td> <td>September</td> <td>2/2/2021</td> </tr> <tr> <td>2</td> <td>ERP and CPR</td> <td>October</td> <td>1/4/2021</td> </tr> <tr> <td>3</td> <td>Fire Drill</td> <td>February</td> <td>1/4/2021</td> </tr> <tr> <td>4</td> <td>First Aid</td> <td>June</td> <td>8/10/2021</td> </tr> <tr> <td>5</td> <td>Safety at Workshop</td> <td>August</td> <td>3/3/2021</td> </tr> <tr> <td>6</td> <td>PPE Usage</td> <td>March</td> <td>3/3/2021</td> </tr> </tbody> </table>		Topic	Month programme	Status	Occupational Safety and Health				1	Chemical Handling	September	2/2/2021	2	ERP and CPR	October	1/4/2021	3	Fire Drill	February	1/4/2021	4	First Aid	June	8/10/2021	5	Safety at Workshop	August	3/3/2021	6	PPE Usage	March	3/3/2021	Complied
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4.4.6.2	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. - Major compliance -	Training Need Analysis being documented for all employees under Doc No: PPM/SOP/6.8-F1, Issue No: 0, Rev:0 dated 7/2/2018. Seen, all the training need / matrix of all the personnel in the files. Training Need Analysis of all workers are based on their competencies and job description.	Complied																																
4.4.6.3	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. - Minor compliance -	All workers involved in the operations have been adequately trained in safe working practice. The Mill has a comprehensive Training Needs Analysis for staffs and workers and this was sighted in the training records file. Trainings conducted were recorded in the various trainings record and completed with attendance records, training materials and photographs of the training.	Complied																																
4.5 Principle 5: Environment, natural resources, biodiversity and ecosystem services																																			
Criterion 4.5.1: Environmental Management Plan																																			
4.5.1.1	An environmental policy and management plan shall be in line	Kulim (Malaysia) Berhad do established the Environmental Management	Complied																																

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Criterion / Indicator	Assessment Findings	Compliance
<p>with the relevant country and state environmental laws shall be established, effectively communicated and implemented.</p> <p>- Major compliance -</p>	<p>Policy issued on Group level signed by the Executive Director, Tuan Zulkifly Zakariah dated in 1/5/2018. Kulim (Malaysia) Berhad is committed to the creation through team effort of a quality environment as key factor in the continuous success of business. Among others the organization shall;</p> <ul style="list-style-type: none"> a) Adhere to and comply with relevant environmental legislations of the country. b) Strive for continual improvement on our environmental performance. c) Undertake to communicate our Environmental Policy to all stakeholders and educate the employees to practice and uphold the business commitment on caring for the environment. d) Continue to explore and implement cost effective technology in environmental Policy and the achievement of environmental objectives and targets. e) Review, adopt and implement Good Management Practices currently established in the industry. f) Plan, assess and take judicious actions to alleviate any potential negative impacts on the environment and local community with respect to any new development. g) Adopt and implement the principles of Reduction, Reuse and recycle in all matters pertaining to the use of resources and to pollution elimination. h) Continue to enhance the knowledge and skill for employees by briefing, training and exposure to relevant new technology with respect to any new improvement or development of the industry. i) Monitor and report to the Board of Directors on the implementation of this Environmental Policy, and the achievement of environmental objectives and targets. 	

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Criterion / Indicator		Assessment Findings	Compliance
		<p>Communications to the internal and external stakeholders were through training and briefing at muster grounds. The session conducted as sample follows: -</p> <ol style="list-style-type: none"> 1. Sustainability and MSPO Policy briefing was conducted by Assistant Manager to all workers and staffs comprising 91 participants dated 2/5/2021 at Pasir Panjang POM 2. External stakeholder briefing being conducted on 10/10/2021 through Virtual / Remote. The meeting was collaborated within estates and mill. Tuan Muhamad Fakhru Mukminin chaired the meeting which attended by 64 participants. 	
<p>4.5.1.2</p>	<p>The environmental management plan shall cover the following:</p> <ol 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>Apart from Environmental Policy, Kulim (Malaysia) Berhad has established Sustainability Policy signed by the Managing Director, Tuan Mohd Faris Adli Shukery dated in 1/10/2020. The policy stated that Kulim is actively seeking continually improve environmental performance through:</p> <ul style="list-style-type: none"> • Pollution prevention by minimizing emissions to air, land and water. Optimal use of renewable resources, while minimizing the use of non-renewable resource. • Provision of adequate resources for effective implementation of Sustainable Management Programs • Ensuring integration of Sustainable programs with all other company policies. <p>The mill has conducted Environmental Aspect and Impact Analysis and documented in Environmental Impact Assessment. The analysis was reviewed on annually basis and as and when there are changes in the operations. Latest review was conducted on 8/9/2021.</p>	<p>Complied</p>

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Criterion / Indicator		Assessment Findings	Compliance										
		<p>The Environmental Impact Assessment has covered 20 keys activities of the Mill such as:</p> <ol style="list-style-type: none"> 1. Chemical mixing and storage 2. CPO Storage 3. FFB Receiving and Grading 4. Generation Power 5. Lab Operation 6. Machine and Vehicle maintenance 7. Office Work 8. Oil Clarification 9. Oil pressing 10. Etc 											
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>Sighted, Environmental Impact Assessment for the year 2021 at Mill has been developed and the mitigation on the negative impacts and to promote the positive one being recorded under Environmental Improvement Plan. Sample taken at Pasir Panjang POM as follows: -</p> <table border="1"> <thead> <tr> <th>Process/ Area</th> <th>Sub - Activity</th> <th>Aspect</th> <th>Impact</th> <th>Existing Control Measures</th> </tr> </thead> <tbody> <tr> <td>CPO Store</td> <td>Storage Tank</td> <td>Spillage of CPO into Drain During Cleaning Process</td> <td>Water Pollution</td> <td>Use drip tray when if necessary Use sand/saw dust to clean spillage. Refresher training on spill kit</td> </tr> </tbody> </table>	Process/ Area	Sub - Activity	Aspect	Impact	Existing Control Measures	CPO Store	Storage Tank	Spillage of CPO into Drain During Cleaning Process	Water Pollution	Use drip tray when if necessary Use sand/saw dust to clean spillage. Refresher training on spill kit	Complied
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Criterion / Indicator		Assessment Findings					Compliance												
						Installation of pollution control device (PCD)													
		Boiler	Disposal of fibre	Usage of shell for boiler combustion	Air pollution	1. Stack sampling analysis 2. Ambient air monitoring													
4.5.1.4	A programme to promote the positive impacts should be included in the continual improvement plan. - Minor compliance -	Programme to promote positive impacts on environment was verified through Waste Management Plan and Pollution and Emission Management Plan. Sample taken as below: - a. Waste management Plan <table border="1" style="width: 100%; border-collapse: collapse;"> <thead> <tr> <th>Waste Type</th> <th>Source</th> <th>Action Plan</th> <th>Frequency</th> </tr> </thead> <tbody> <tr> <td>Plastics, Bottles (Recyclable material)</td> <td>Line site</td> <td>Where possible, to be recycled.</td> <td>When necessary</td> </tr> <tr> <td>Empty chemical containers (SW409)</td> <td>Process of chemical application at lab and water treatment plant</td> <td>For containers that to be disposed, securely placed in the SW store. When there is adequate quantity 20 MT or due for 180 day, contact the licensed contractor (refer to Procurement & Contract department) for collection and disposal.</td> <td>As required by legal</td> </tr> </tbody> </table>					Waste Type	Source	Action Plan	Frequency	Plastics, Bottles (Recyclable material)	Line site	Where possible, to be recycled.	When necessary	Empty chemical containers (SW409)	Process of chemical application at lab and water treatment plant	For containers that to be disposed, securely placed in the SW store. When there is adequate quantity 20 MT or due for 180 day, contact the licensed contractor (refer to Procurement & Contract department) for collection and disposal.	As required by legal	Complied
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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 -	An Environmental training program is available in Training Plan updated on a yearly basis. Sample taken as below: - <table border="1"> <thead> <tr> <th></th> <th>Topic</th> <th>Month programme</th> <th>Status</th> </tr> </thead> <tbody> <tr> <td>1</td> <td>Schedule waste</td> <td>August</td> <td>23/9/2021</td> </tr> <tr> <td>2</td> <td>Water treatment</td> <td>April</td> <td>2/2/2021</td> </tr> <tr> <td>3</td> <td>Effluent Sampling</td> <td>August</td> <td>2/2/2021</td> </tr> </tbody> </table>					Topic	Month programme	Status	1	Schedule waste	August	23/9/2021	2	Water treatment	April	2/2/2021	3	Effluent Sampling	August	2/2/2021	Complied	
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Criterion / Indicator		Assessment Findings	Compliance																							
4.5.1.6	The management shall organize regular meetings with workers where concerns of workers about the environmental quality are discussed. - Major compliance -	Environmental Performance Monitoring Committee (EPMC) being established in all estates & mill to discuss on environmental aspect. The latest meeting conducted at Pasir Panjang POM was on 25/10/2021 chaired by the Mill Manager, En. Amir Muslimin bin Mohamed and 9 Committee members attended the meeting.	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 -	Monthly record on energy consumption for non-renewable sources were kept and documented. It is monitored to optimise use of renewable energy. Data is being compiled for comparison and control for future improvement. Following is the last 3 years data for diesel usage record at Mill: - <table border="1" style="margin-left: 20px;"> <thead> <tr> <th rowspan="2"></th> <th colspan="3">Pasir Panjang POM</th> </tr> <tr> <th>FFB</th> <th>Diesel</th> <th>Lt/FFB</th> </tr> </thead> <tbody> <tr> <td>2019</td> <td>257,792</td> <td>197,718</td> <td>1.10</td> </tr> <tr> <td>2020</td> <td>283,106</td> <td>106,000</td> <td>0.37</td> </tr> <tr> <td>2021</td> <td>242,165</td> <td>109,792</td> <td>0.45</td> </tr> <tr> <td></td> <td colspan="2">Baseline value</td> <td>1.50</td> </tr> </tbody> </table>		Pasir Panjang POM			FFB	Diesel	Lt/FFB	2019	257,792	197,718	1.10	2020	283,106	106,000	0.37	2021	242,165	109,792	0.45		Baseline value		1.50	Complied
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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 projection consumption of diesel for the Mill has been documented on annual basis based on the Financial Year Budget with the latest available is for FY2021.	Complied																							
4.5.2.3	The use of renewable energy should be applied where possible. - Minor compliance -	Monthly record on energy consumption for renewable energy sources were kept and documented. The details as listed herein: - a. Fibre	Complied																							

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Criterion / Indicator		Assessment Findings				Compliance
		Pasir Panjang POM	FFB Processed (Mt)	Fiber Produced (Mt)	% Fiber to FFB	
		2019	257,792	35,592	13.81	
		2020	283,106	36,754	12.98	
		2021	242,165	31,071	12.83	
		B. Shell				
		Pasir Panjang POM	FFB Processed (Mt)	Shell Produced (Mt)	% Shell to FFB	
		2019	257,792	15,595	6.05	
		2020	283,106	16,149	5.70	
		2021	242,165	14,274	5.89	
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 and pollution are identified and documented in the Waste & Pollution Management Plan 2021 updated on 1/8/2021. Details of waste generated from the mill activities among others as shown below; 1. Empty chemical containers 2. Batteries 3. Contaminated rags 4. Spent Oil 5. Pesticide Spillage 6. Contaminated Soil 7. Worn PPE 8. Liquid waste 9. Medical / Clinical				Complied

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Criterion / Indicator		Assessment Findings				Compliance															
		10. Domestic waste 11. Garden waste 12. Office Waste 13. Scraps 14. Mill By-Products 15. Rubber Materials 16. Emissions																			
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>Details of the management plan as described below. This is a continuation of the 4.5.3.1 above.</p> <table border="1"> <thead> <tr> <th></th> <th>Source</th> <th>Waste Produce</th> <th>Action Plan</th> <th>Responsibility</th> </tr> </thead> <tbody> <tr> <td>1</td> <td>Workshop</td> <td>Empty hydrocarbon containers (SW 409)</td> <td>Collect and placed in the Scheduled Waste store. When there is adequate quantity 20 mt or due for 180 days, contact the licensed contractor (refer to Procurement & Contract Department) for collection and disposal.</td> <td>Manager/ Assistant/ staff</td> </tr> <tr> <td>2</td> <td>PPE used by workers</td> <td>Worn PPE (SW 410)</td> <td>Collect and placed in the Scheduled Waste store. When there is adequate quantity 20 mt or due for 180</td> <td>Manager/ Assistant/ staff</td> </tr> </tbody> </table>					Source	Waste Produce	Action Plan	Responsibility	1	Workshop	Empty hydrocarbon containers (SW 409)	Collect and placed in the Scheduled Waste store. When there is adequate quantity 20 mt or due for 180 days, contact the licensed contractor (refer to Procurement & Contract Department) for collection and disposal.	Manager/ Assistant/ staff	2	PPE used by workers	Worn PPE (SW 410)	Collect and placed in the Scheduled Waste store. When there is adequate quantity 20 mt or due for 180	Manager/ Assistant/ staff	Complied
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					<p>days, contact the licensed contractor (refer to Procurement & Contract Department) for collection and disposal.</p> <p>Sighted, Pasir Panjang POM disposed their Schedule Waste to the licensed contractor, Kualiti Alam Sdn Bhd within the Regulation timeframe of 180 days. The details as follows:</p> <table border="1"> <thead> <tr> <th>SW</th> <th>Date Generate</th> <th>Date Disposed</th> </tr> </thead> <tbody> <tr> <td>305</td> <td>1/1/2021</td> <td>15/6/2021</td> </tr> <tr> <td>306</td> <td>1/1/2021</td> <td>15/6/2021</td> </tr> <tr> <td>408</td> <td>1/1/2021</td> <td>15/6/2021</td> </tr> </tbody> </table>	SW	Date Generate	Date Disposed	305	1/1/2021	15/6/2021	306	1/1/2021	15/6/2021	408	1/1/2021	15/6/2021	
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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>Pasir Panjang POM had established the procedures for handling of chemicals classified under Work Instruction; Document Number: PPM/WI/9; Rev No: 0, Doc Date: 01/7/2016 and Scheduled Waste under Work Instruction; Document Number: SPO/WI/06; Issue No: 1, Revision:0 Doc Date: 01/10/2020.</p> <p>The Work Instruction is to ensure proper and safe handling and storage, in accordance to OSH (Classification Packaging and Labelling) Regulation 1997, OSH (Use and Standard of Exposure of Chemical Hazardous to Health) Regulation 2000 and EQ (Scheduled Wastes) Regulations 2005.</p>				Complied												

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Criterion / Indicator		Assessment Findings	Compliance																				
4.5.3.4	Domestic waste should be disposed as such to minimize the risk of contamination of the environment and watercourse. - Minor compliance -	Domestic waste is disposed in Landfill at block P15/04 under Pasir Panjang Estate Land. The collection from line site were done 1-2 times a week by Estate.	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, particulate and soot emissions, scheduled wastes, solid wastes and effluent. - Major compliance -	The polluting activities has been assessed during environmental aspect and impact assessment. The EAIA assessment findings including list of polluting sources are recorded in document titled "Environmental Aspect & Impact Assessment (EAIA) & Environmental Management Plan (EMP) & Waste Management plan (WMP). The Pasir Panjang POM has implemented its GHG Calculator to calculate the following emissions parameter/source.	Complied																				
4.5.4.2	An action plan to reduce identified significant pollutants and emissions shall be established and implemented. - Major compliance -	Details of action plan for identified pollutants as shown below and is a continuation from the 4.5.4.1 above. <table border="1" style="width: 100%; border-collapse: collapse;"> <thead> <tr> <th>Emission</th> <th>Source</th> <th>Action Plan</th> <th>Frequency</th> <th>Responsibility</th> </tr> </thead> <tbody> <tr> <td>Dark Smoke</td> <td>All running Vehicles</td> <td>Inspect the vehicle condition</td> <td>Daily</td> <td>Manager/ Assistant/ Staff</td> </tr> <tr> <td>Noise</td> <td>Operation of Diesel Engine</td> <td>Boundary parameter noise mapping data keeping</td> <td>As and when required</td> <td>Manager/ Assistant/ CC</td> </tr> <tr> <td>Dust /ashes particles</td> <td>Shredded EFB Process</td> <td>Routine maintenance</td> <td>As and when required</td> <td>Manager/ Assistant/ Foreman</td> </tr> </tbody> </table>	Emission	Source	Action Plan	Frequency	Responsibility	Dark Smoke	All running Vehicles	Inspect the vehicle condition	Daily	Manager/ Assistant/ Staff	Noise	Operation of Diesel Engine	Boundary parameter noise mapping data keeping	As and when required	Manager/ Assistant/ CC	Dust /ashes particles	Shredded EFB Process	Routine maintenance	As and when required	Manager/ Assistant/ Foreman	Complied
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Criterion / Indicator		Assessment Findings					Compliance																				
		Air Pollutant	Combustion for boiler	Conducting stack monitoring	As and when required	Manager/ Assistant/ Staff																					
4.5.4.3	<p>Palm oil mill effluent (POME) shall be treated to ensure compliance with standards as stipulated in the relevant Environmental Quality (Prescribed Premises) (Crude Palm Oil) Regulations 1977. POME discharge limits and method should be in accordance with the respective state and national policies and regulations.</p> <p>- Major compliance -</p>	<p>The POME is treated with open anaerobic, aerobic and stabilization lagoon. DOE Limits for final discharge on Land Irrigation and Composting is 1000 mg/l The final discharge POME has been analyzed by UTCL Laboratory, and latest report was on 12/10/2021. Thus far, the results from final discharge were compliance within parameter limit.</p>					Complied																				
Criterion 4.5.5: Natural water resources																											
4.5.5.1	<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>The Water Management Plan has been established in the mill with the recent review made on 01/8/2021. Sample of the plan as listed herein:</p> <table border="1" style="width: 100%; border-collapse: collapse;"> <thead> <tr> <th></th> <th>Source</th> <th>Activity</th> <th>Threat</th> <th>Action Plan</th> </tr> </thead> <tbody> <tr> <td style="text-align: center;"><u>1</u></td> <td>Reservoir/ Rain/ River</td> <td>Press</td> <td>Water Pollution, Degradation of water quality</td> <td>Effluent analysis.</td> </tr> <tr> <td></td> <td></td> <td>Oil Room</td> <td>Process of oil recovery in sludge separator</td> <td>Follow Work Instruction and SOP's</td> </tr> <tr> <td></td> <td></td> <td>Line site - House hold activity</td> <td>Wastage of water</td> <td>1. Monitor use of water 2. Awareness briefing on water usage</td> </tr> </tbody> </table>						Source	Activity	Threat	Action Plan	<u>1</u>	Reservoir/ Rain/ River	Press	Water Pollution, Degradation of water quality	Effluent analysis.			Oil Room	Process of oil recovery in sludge separator	Follow Work Instruction and SOP's			Line site - House hold activity	Wastage of water	1. Monitor use of water 2. Awareness briefing on water usage	Complied
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	<p>Water Analysis for Drinking Water were taken on 26/5/2021 for Raw and Treated. The water being analyzed by Decagon Lab & Analytical Testing Sdn Bhd, Reference Number: LW/553/21. The results as follows: -</p> <table border="1" data-bbox="1032 533 1906 970"> <thead> <tr> <th rowspan="2">Parameter</th> <th rowspan="2"></th> <th colspan="2">Results</th> </tr> <tr> <th>Raw</th> <th>Treated</th> </tr> </thead> <tbody> <tr> <td rowspan="2">pH Value</td> <td>5.5 - 9.0</td> <td>6.7</td> <td></td> </tr> <tr> <td>6.5 - 9.0</td> <td></td> <td>8.2</td> </tr> <tr> <td rowspan="2">Turbidity</td> <td>1000</td> <td>0.8</td> <td></td> </tr> <tr> <td>5</td> <td></td> <td>0.31</td> </tr> <tr> <td>Aluminium</td> <td>ND <0.2</td> <td>N/A</td> <td>0.2</td> </tr> <tr> <td>Suspended Solid (mg/l)</td> <td></td> <td>7</td> <td></td> </tr> <tr> <td>Free Residual Chlorine</td> <td>0.2 - 5</td> <td>N/A</td> <td>1.8</td> </tr> <tr> <td>Total Coliform Count (mg/l)</td> <td>5000</td> <td>ND<10</td> <td></td> </tr> <tr> <td></td> <td>Nil</td> <td></td> <td>ND<10</td> </tr> <tr> <td>E-Coli</td> <td>5000</td> <td>ND<10</td> <td></td> </tr> <tr> <td></td> <td>Nil</td> <td></td> <td>ND<10</td> </tr> </tbody> </table> <p>Results: Drinking Water Collected at Inlet (Raw Water)</p> <ul style="list-style-type: none"> All parameters are within the limit as specified under the Regulations Limit follows the Raw Water Quality Standard, Ministry of Health Malaysia; Engineering Services Division; Year 2010 Drinking. <p>Water Collected at Outlet (Treated Water)</p> <ul style="list-style-type: none"> All parameters are within the limit as specified under the Regulations Limit follows the Drinking Water Quality Standard, Ministry of Health Malaysia; Engineering Services Division; Year 2010. The water can be used as a drinking water. 	Parameter		Results		Raw	Treated	pH Value	5.5 - 9.0	6.7		6.5 - 9.0		8.2	Turbidity	1000	0.8		5		0.31	Aluminium	ND <0.2	N/A	0.2	Suspended Solid (mg/l)		7		Free Residual Chlorine	0.2 - 5	N/A	1.8	Total Coliform Count (mg/l)	5000	ND<10			Nil		ND<10	E-Coli	5000	ND<10			Nil		ND<10	
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Suspended Solid (mg/l)		7																																																
Free Residual Chlorine	0.2 - 5	N/A	1.8																																															
Total Coliform Count (mg/l)	5000	ND<10																																																
	Nil		ND<10																																															
E-Coli	5000	ND<10																																																
	Nil		ND<10																																															

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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 -	<p>Pasir Panjang POM discharges its POME to land application and composting plant as stipulated in its DOE's Compliance Scheduled, License No. 004649. The mill monitors the discharge to ensure it does not exceed the approved limit 1,560m²/day.</p> <p>Sampling is done to monitor the POME parameters with the results available for verification. Samples were taken from Cooling Pond 1, Cooling Pond 2, Anaerobic Pond 1, Anaerobic Pond 2, Anaerobic Pond 3, Bio Compost, Aerobic 1, Aerobic 2, Clarifier, Ultra Filter, PCD 1, PCD 3 and Biogas Reactor Outlet. The latest lab test results were dated 12/10/2021; Report Number: E1/2021/10/184; Conducted by: UTCL Laboratory.</p>	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 -	<p>The Mill operations are guided with the following documents:</p> <ul style="list-style-type: none"> • Quality Manual (SM/QM) dated 1/9/14 • Standards Operating Procedure (SM/SOP) dated 10/12/12 covering the following stations/operations among others; <ul style="list-style-type: none"> - loading ramp /sterilization station - threshing / press station - clarification station - kernel station/ depericarper station - effluent and water treatment plant - boiler house / power house • Work Instructions derived from SOPs and displayed the work stations/notice boards. Among others as sighted; 	Complied

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Criterion / Indicator		Assessment Findings	Compliance
		<ul style="list-style-type: none"> - WI: Boiler Station / WI: Power House - WI: Laboratory Manual /Waste Management - WI: Handling chemicals - WI: Usage of hearing protection device - WI: Emergency Response Procedure - WI: Maintenance and servicing of oil trap - WI: Confined Space Management - WI: Workshop/Working at Height/Oxy-Acetylene 	
4.6.1.2	All palm oil mills shall implement best practices. - Major compliance -	<p>The following mechanism is available and adopted as standard practices and procedures in the mill operations among others.</p> <ul style="list-style-type: none"> a) Mill inspectorate Visit program 2x /year b) Internal audit by Sustainability Unit 2x /year c) Task Force visits d) Monthly and weekly ad hoc meeting e) Daily /monthly production & financial report f) Daily and monthly lab analysis report g) Daily supervision by the mill supervisors/Executives 	Complied
Criterion 4.6.2: Economic and financial viability plan			
4.6.2.1	A documented business or management plan shall be established to demonstrate attention to economic and financial viability through long-term management planning. - Major compliance -	Annual business plan in the form of annual budget and the projection for 3 years being prepared as guidance for future planning. The business plan for FY2021 contains FFB yield, CPO, OER, and KER, costs of production, milling utilization, FFB pricing etc. It also includes budgeting on environment and social.	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 documentation of price mechanism for services received from contractors are contained in the respective contracts. Sighted during the audit were crude Palm Oil Transport Agreement dated 05/10/2020 between Mahamurni Plantations Sdn Bhd and Semai Setia Transport valid from 01/06/2020 until 31/05/2023 for transportation services. The pricing mechanism and the rates for transportation of crude palm oil are detailed out in the contract under schedule 1. Other than that, sample of contract agreement has been taken for Unibest Engineering and trading for renting wheel loader for mill operation.	Complied
4.6.3.2	All contracts shall be fair, legal and transparent and agreed payments shall be made in timely manner. - Major compliance -	Contracts entered into between Pasir Panjang POM and third parties are fair as it contains provisions relating to Mill's and contractors' obligations, payment calculation, mutual termination clause, and mutually agreed between Kulim (M) Berhad and contractors. There is an evidence for 2 contract agreement that has been sample which are Semai Setia Transport and Unibest Engineering and trading, the contract agreement has been signed and agreed by both parties. Payment record sighted and has been verified by the auditor and there is evidence that As per mentioned in the contract agreement, payment term in the contract under para 5.3 "payment fees shall be made within thirty (30) days from the date of certification of the submitted invoice" Sample has been taken for invoices number SS03062021 dated 30/06/2021 for Semai Setia Transport. Payment has been verified base on payment voucher dated 23/07/2021, PV number 21000431. While for Unibest Engineering and trading, sample has been taken for invoices number INV11480 dated 12/08/2021 and received on 13/08/2021.	OFI

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Criterion / Indicator		Assessment Findings	Compliance
		<p>Payment has been made on 23/09/2021 and has been verified base on payment voucher number 21000541</p> <p><u>OFI statement</u></p> <p>Contract agreement has been verified and signed by both parties for all contractors in each operation. The wording of the contract can be further improved for the contractor to be more understand on the terms and conditions stated.</p>	
Criterion 4.6.4: Contractor			
4.6.4.1	<p>In case of the engagement of contractors, they shall be made to understand the MSPO requirements and shall provide the required documentation and information.</p> <p>- Major compliance -</p>	<p>Sighted during the audit was the inclusion of MSPO requirements into contracts. This insertion of this Policy is to ensure contractors are aware and comply with local, national laws such as payment of minimum wage, ratified international laws, and also with MSPO standards. This was also acknowledged by the contractors, and reiterated during the stakeholder meeting.</p>	Complied
4.6.4.2	<p>The management shall provide evidence of agreed contracts with the contractor.</p> <p>- Major compliance -</p>	<p>Contracts entered into between Pasir Panjang POM and third parties are fair as it contains provisions relating to Mill's and contractors' obligations, payment calculation, mutual termination clause, and mutually agreed between Kulim (M) Berhad and contractors. There is evidence for 2 contract agreement that has been sample which are Semai Setia Transport and Unibest Engineering and trading, the contract agreement has been signed and agreed by both parties.</p> <p>Contracts entered into between Pasir Panjang POM and third parties are fair as it contains provisions relating to Mill's and contractors' obligations, payment calculation, mutual termination clause, and mutually agreed between Kulim (M) Berhad and contractors. There is evidence for 2 contract agreement that has been sample which are Semai Setia Transport and</p>	Complied

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Criterion / Indicator		Assessment Findings	Compliance
		Unibest Engineering and trading, the contract agreement has been signed and agreed by both parties.	
4.6.4.3	The management shall accept MSPO approved auditors to verify the assessments through a physical inspection, if required. - Minor compliance -	The auditors have been able to have access to the contractors' workers, documentations such as contracts and workers' pay slips for verification during this audit.	Complied

Appendix B: List of Stakeholders Contacted

<p>Government Officer: Nil</p>	<p>Community/neighbouring village: Masjid Primary school</p>
<p>Suppliers/Contractors/Vendors: Alias Congo Enterprise Mahar bin Yusoff Pengangkutan Sempurna</p>	<p>Worker’s Representative/Gender Committee: Estate and mill social representative Estate and mill workers/stakeholder representative EHA Mill workers Estate/field workers Gender representative</p>

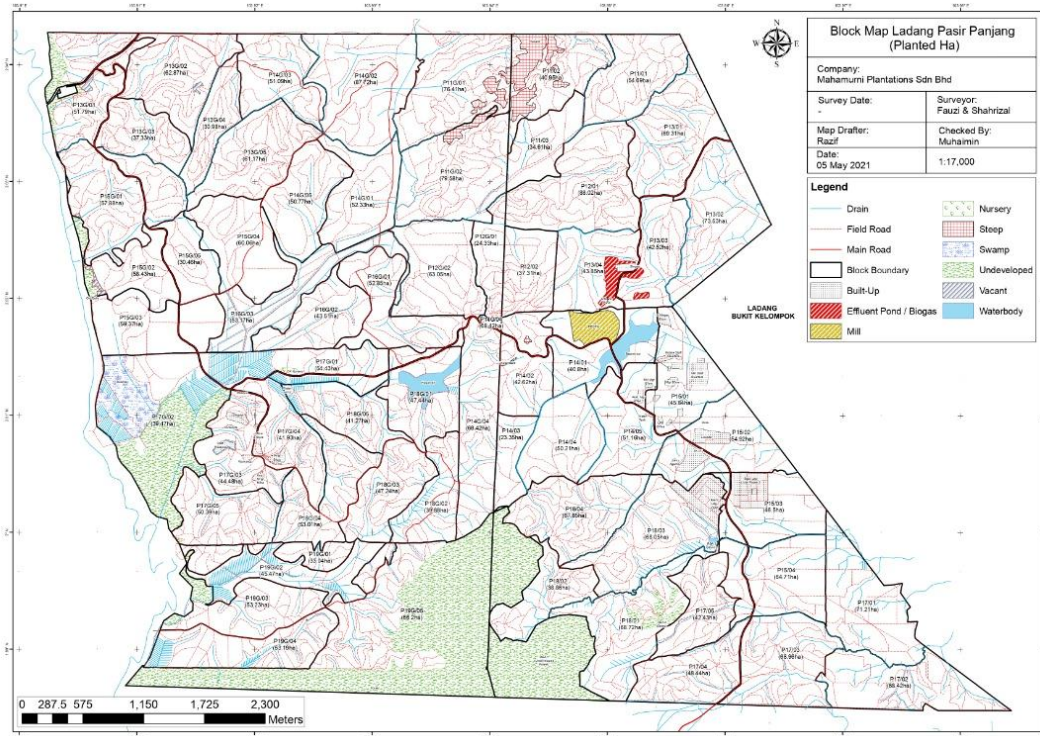
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Appendix C: Smallholder Member Details

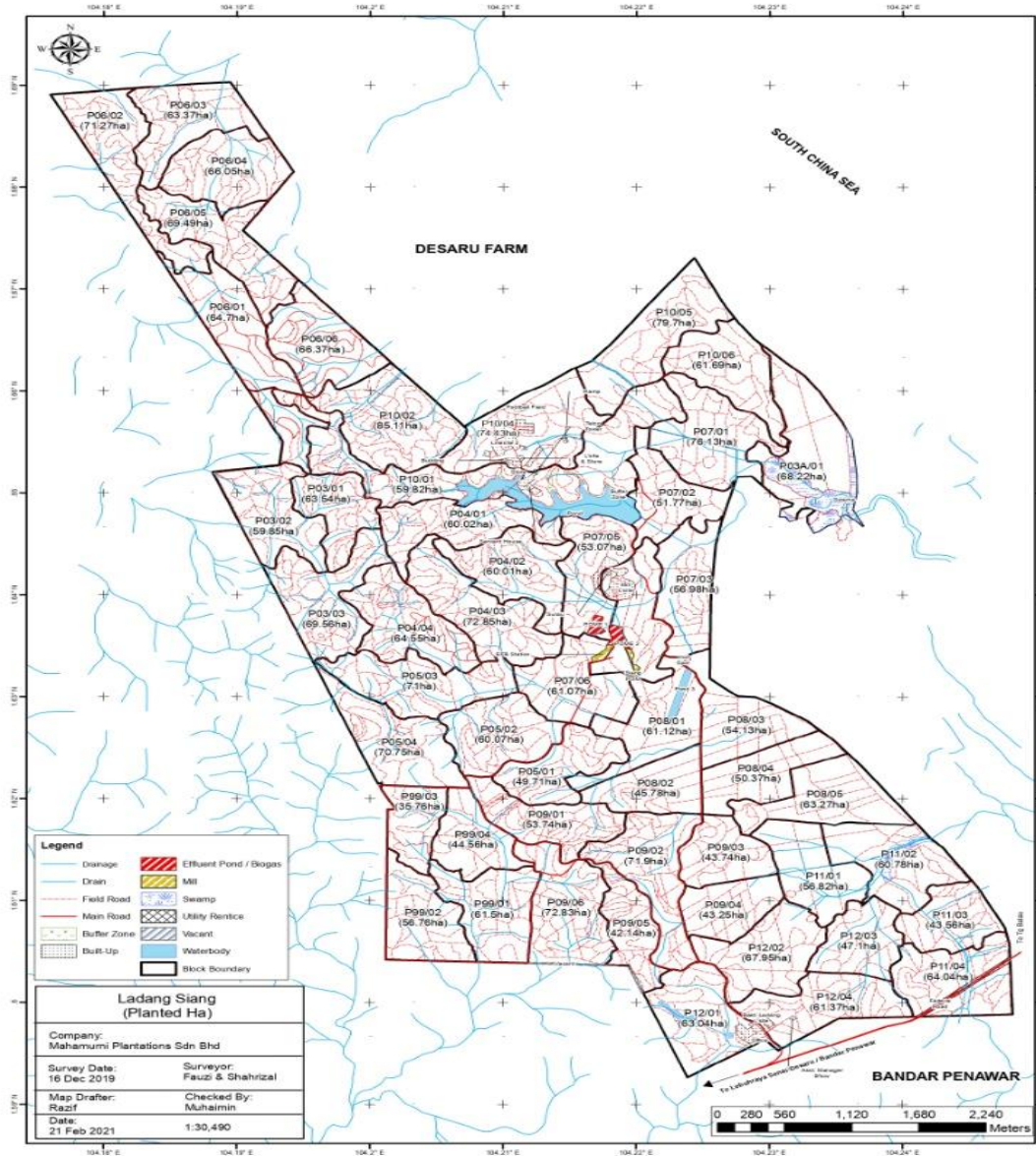
No.	Smallholder		Location of Planted Area (District)	GPS Coordinates	Certified Area (ha)	Planted Area (ha)
	Name	MPOB License Number				
	Not applicable					

Appendix D: Location and Field Map

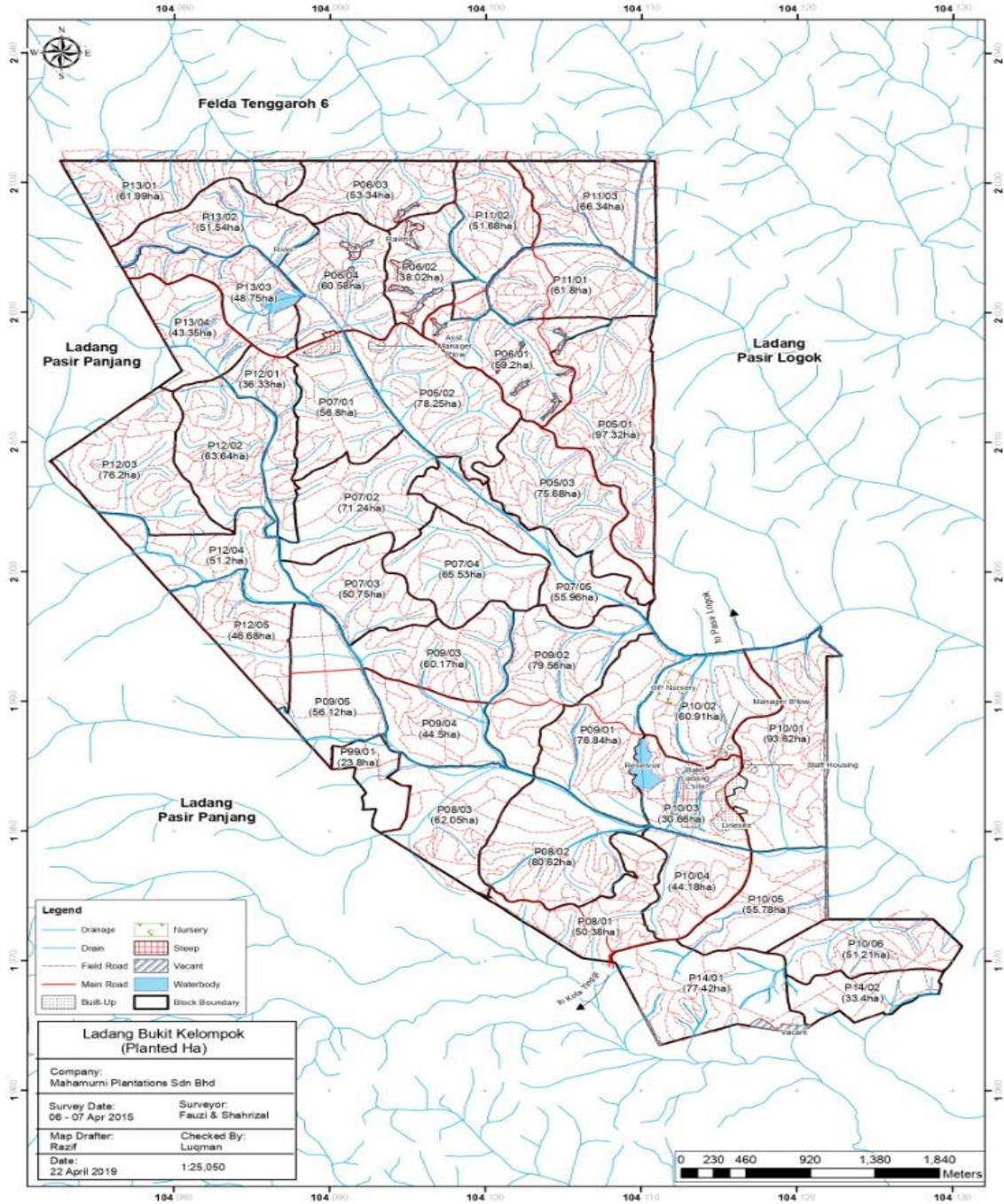
Pasir Panjang POM and Pasir Panjang Estate



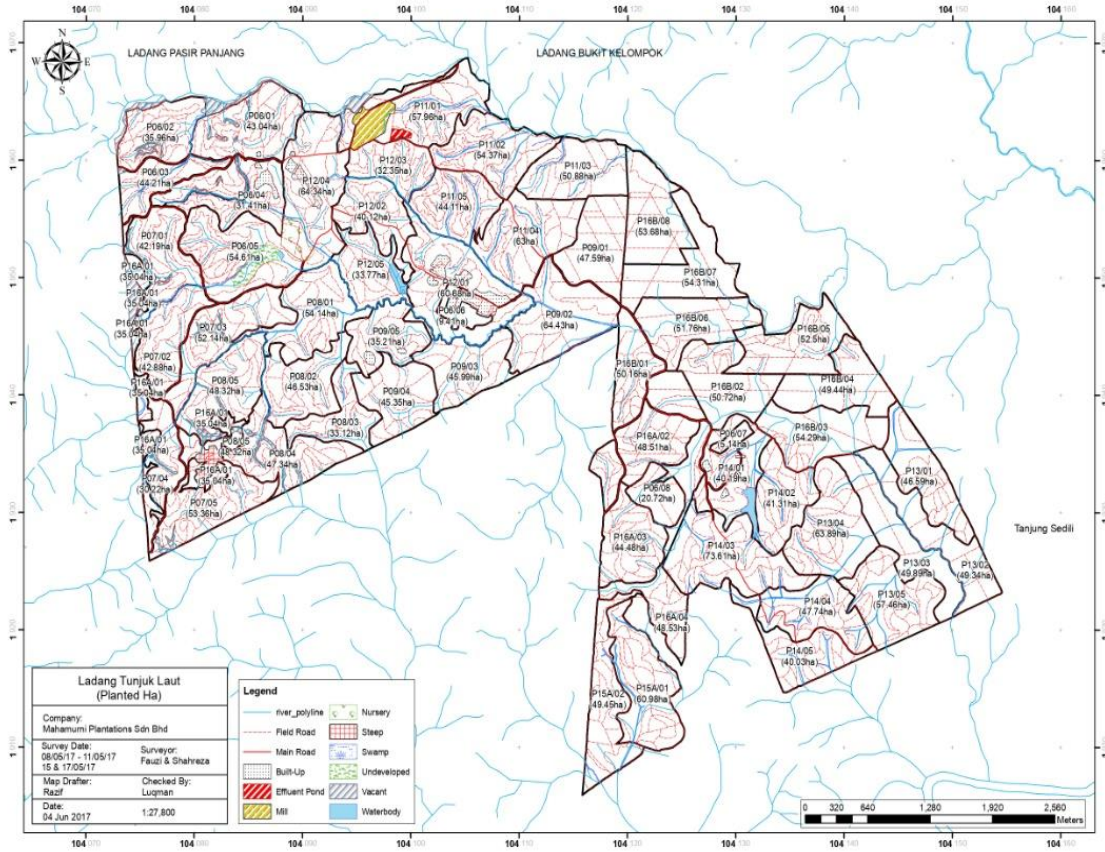
Siang Estate



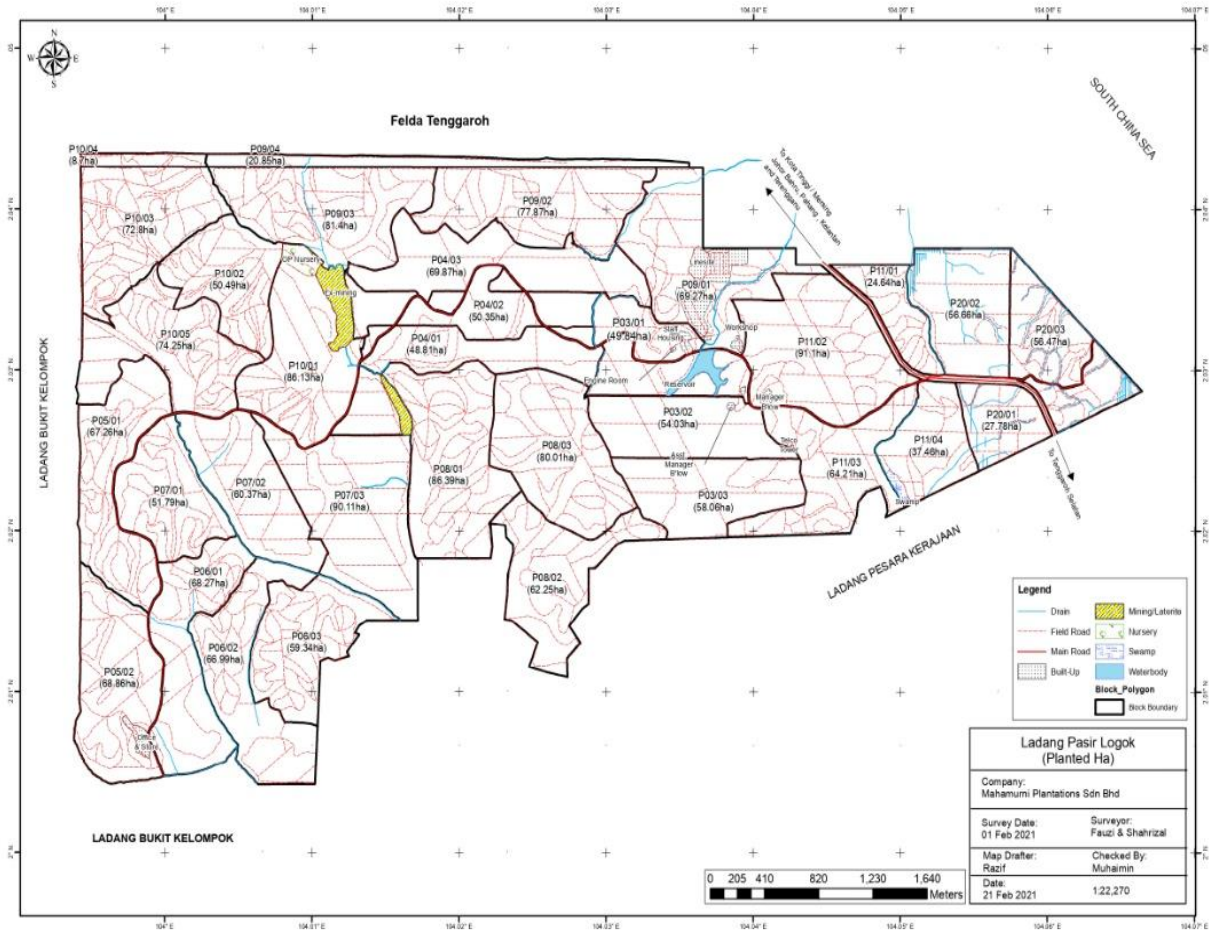
Bukit Kelompok Estate



Tunjuk Laut Estate



Pasir Logok Estate



Appendix E: List of Abbreviations

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