

**MALAYSIAN SUSTAINABLE PALM OIL  
MSPO OPMC Public Summary Report**

- Initial Assessment
- Annual Surveillance Assessment (4)
- Recertification Assessment (Choose an item.)
- Extension of Scope

<b>JOHOR PLANTATIONS BERHAD</b>
Client Company (HQ) 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, Siang Estate, Bukit Kelompok Estate and Pasir Logok Estate
Date of Final Report: 17/4/2023

**Report prepared by:**  
**Mohd Nur Amin Bin Mohd Halim** (Lead Auditor)

**Report Number: 3293260**

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

1.1 Organizational Information and Contact Person			
<b>Company Name</b>	Johor Plantations Berhad formerly known as Mahamurni Plantations Sdn Bhd		
<b>Mill/Estate</b>	<b>Certification Unit</b>	<b>MPOB License No.</b>	<b>Expiry Date</b>
	Pasir Panjang Palm Oil Mill	592302004000	31/12/2023
	Pasir Panjang Estate/ Bukit Payung Division	578736002000	30/11/2023
	Tunjuk Laut Estate	619676002000	30/09/2023
	Siang Estate	575783002000	31/08/2023
	Bukit Kelompok Estate	620166002000	31/03/2023
	Pasir Logok Estate	620145002000	31/03/2023
<b>Address</b>	K.B 705, Ulu Tiram Estate, 81900 Ulu Tiram, Johor Bahru, Johor, Malaysia		
<b>Management Representative</b>	Salasah Elias		
<b>Website</b>	www.kulim.com.my	<b>E-mail</b>	salasah@kulim.com.my
<b>Telephone</b>	07-8611611	<b>Facsimile</b>	07-8631084

1.2 Certification Information			
<b>Certificate Number</b>	Mill: MSPO 696199 Estate: MSPO 696200	<b>Certificate Start Date</b>	08/03/2019
<b>Date of First Certification</b>	08/03/2019	<b>Certificate Expiry Date</b>	07/03/2024
<b>Scope of Certification</b>	<input checked="" type="checkbox"/> Mill: Production of Sustainable Palm Oil and Palm Oil Products <input checked="" type="checkbox"/> Estate: Production of Sustainable Oil Palm Fruits		
<b>Visit Objectives</b>	<p>The objective of the assessment was to conduct a surveillance assessment 4 and look for positive evidence to ensure that elements of the scope of certification and the requirements of the management standard are effectively addressed by the Mahamurni Plantations Sdn Bhd's management system and that the system is demonstrating the ability to support the achievement of statutory, regulatory and contractual requirements and the Mahamurni Plantations Sdn Bhd's specified objectives, as applicable with regard to the scope of the management standard, and to confirm the on-going achievement and applicability of the forward strategic plan and where applicable to identify potential areas for improvement of the management system.</p>		
<b>Standard</b>	<input type="checkbox"/> MSPO MS 2530-2:2013 – General Principles for Independent Smallholders <input checked="" type="checkbox"/> MSPO MS 2530-3:2013 – General Principles for Oil Palm Plantations and Organized Smallholders <input checked="" type="checkbox"/> MSPO MS 2530-4:2013 – General Principles for Palm Oil Mills		
<b>Stage 1 Date</b>	Not applicable since the certification unit is RSPO certified.		

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<b>Stage 2 / Initial Assessment Visit Date (IAV)</b>	03/12/2018 - 06/12/2018
<b>Continuous Assessment Visit Date (CAV) 1</b>	11/11/2019 - 14/11/2019
<b>Continuous Assessment Visit Date (CAV) 2</b>	07/12/2020 - 10/12/2020
<b>Continuous Assessment Visit Date (CAV) 3</b>	Remote Audit: 08/11/2021 - 11/11/2021
<b>Continuous Assessment Visit Date (CAV) 4</b>	04/12/2022 - 08/12/2022

**1.3 Other Certifications**

<b>Certificate Number</b>	<b>Standard(s)</b>	<b>Certificate Issued by</b>	<b>Expiry Date</b>
EU-ISCC-Cert-DE119-60226096	International Sustainable Carbon Certification (ISCC EU)	ASG Cert GmbH	13/06/2023
ISCC-PLUS-Cert-DE119-60226096	International Sustainable Carbon Certification (ISCC PLUS)	ASG Cert GmbH	13/06/2023
RSPO 657192	RSPO Principles & Criteria of Sustainable Palm Oil Production: 2018; Malaysian National Interpretation:2019	BSI Services Malaysia Sdn Bhd	08/03/2027
A148857	MS 1500:2009	JAKIM	15/02/2023
BVC_MSPO/SC_0030	MSPO Supply Chain Certification Standard (MSPO SCCS) 1/10/2018	Bureau Veritas	07/03/2024

**1.4 Location of Certification Unit**

<b>Name of the Certification Unit (Palm Oil Mill/ Estate)</b>	<b>Site Address</b>	<b>GPS Reference of the site office</b>	
		<b>Latitude</b>	<b>Longitude</b>
Pasir Panjang Palm Oil Mill	PTD 558, HSD35107, Mukim Kambau, Daerah Kota Tinggi, Johor, Malaysia	2° 01' 04.80" N	103° 56' 54.60" E
Pasir Panjang Estate	PTD 558, HSD35107, Mukim Kambau, Daerah Kota Tinggi, Johor, Malaysia	2° 00' 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' 09.24" 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, HSD32182, Mukim Kambau, Daerah Kota Tinggi, Johor, Malaysia	2° 00' 24.12" N	103° 59' 54.24" E
Pasir Logok Estate	PTD 402, HSD32183, Mukim Kambau, Daerah Kota Tinggi, Johor, Malaysia	2° 01' 53.04" N	104° 02' 20.04" E

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1.5 Certified Area					
Estate	Total Planted (Mature + Immature) (ha)	HCV (ha)	Infrastructure & Other (ha)	Total Area (ha)	% of Planted
Pasir Panjang Estate & Bukit Payung Division	3,372.08	424.56	216.99	4,013.63	84.01
Tunjuk Laut Estate	2,657.35	29.23	189.78	2,867.36	92.66
Siang Estate	3,204.69	71.11	167.30	3,443.10	93.08
Bukit Kelompok Estate	2,437.75	41.19	134.86	2,613.80	93.26
Pasir Logok Estate	1,992.68	17.40	87.65	2,097.73	94.99
<b>Total (ha)</b>	<b>13,664.55</b>	<b>583.49</b>	<b>796.58</b>	<b>15,044.62</b>	<b>90.88</b>

Note:  
Pasir Panjang Estate & Bukit Payung Estate has combined as one estate.

- Pasir Panjang Estate remain as the main estate.
- Bukit Payung Estate turn as one of Pasir Panjang Estate's division.

1.6 Plantings & Cycle							
Estate	Age (Years)					Mature	Immature
	0 - 3	4 - 10	11 - 20	21 - 25	26 - 30		
Pasir Panjang Estate & Bukit Payung Division	251.13	2,834.71	286.24	0	0	3,120.95	251.13
Tunjuk Laut Estate	0	1,453.72	1,203.63	0	0	2,657.35	0
Siang Estate	0	239.46	2,766.65	198.58	0	3,204.69	0
Bukit Kelompok Estate	0	604.91	1,809.04	23.80	0	2,437.75	0
Pasir Logok Estate	140.91	0	1,851.77	0	0	1,851.77	140.91
<b>Total (ha)</b>	<b>392.04</b>	<b>5,132.8</b>	<b>7,917.33</b>	<b>222.38</b>	<b>0</b>	<b>13,272.51</b>	<b>392.04</b>

1.7 Certified Tonnage of FFB			
Estate	Tonnage / year		
	Estimated (Dec 21 - Nov 22)	Actual (Oct 21 - Nov 22)	Forecast (Mar 23 - Feb 24)
Pasir Panjang Estate	21,461.20	50,552.94	67,156.00
Bukit Payung Division	21,575.23		
Tunjuk Laut Estate	51,764.10	58,064.74	67,651.00
Siang Estate	83,871.00	66,776.74	82,702.00
Bukit Kelompok Estate	62,471.00	49,015.81	61,018.00
Pasir Logok Estate	48,939.00	42,994.47	52,641.00

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Sungai Papan Estate	0	37,713.18	0
<b>Total (mt)</b>	<b>290,081.53</b>	<b>305,117.88</b>	<b>331,168.00</b>

### 1.8 Uncertified Tonnage of FFB

Estate	Tonnage / year		
	Estimated (Dec 21 - Nov 22)	Actual (Oct 21 - Nov 22)	Forecast (Mar 23 - Feb 24)
N/A	N/A	N/A	N/A
<b>Total (mt)</b>	<b>N/A</b>	<b>N/A</b>	<b>N/A</b>

### 1.9 Certified Tonnage

	Estimated (Dec 21 - Nov 22)	Actual (Oct 21 - Nov 22)	Forecast (Mar 23 - Feb 24)
	<b>Mill Capacity: 45 MT/hr</b>	<b>FFB</b>	<b>FFB</b>
	290,081.53	305,117.88	331,168.00
<b>SCC Model: SG</b>	<b>CPO (OER: 24.87%)</b>	<b>CPO (OER: 20.78%)</b>	<b>CPO (OER: 22.80%)</b>
	72,171.00	63,404.67	75,506.00
	<b>PK (KER: 6.00%)</b>	<b>PK (KER: 5.28%)</b>	<b>PK (KER: 5.50%)</b>
	17,337.00	16,107.94	18,214.00

### 1.10 Actual Sold Volume (CPO)

CPO (mt)	MSPO Certified	Other Schemes Certified		Conventional	Total
		ISCC	RSPO		
63,404.67	0	2,770.97	58,653.34	1,143.52	<b>62,567.83</b>

### 1.11 Actual Sold Volume (PK)

PK (mt)	MSPO Certified	Other Schemes Certified		Conventional	Total
		ISCC	RSPO		
16,107.94	0	0	15,814.27	0	<b>15,814.27</b>

## Section 2: Assessment Process

BSI is a leading global provider of management systems assessment and certification, with more than 92,000 certified locations and clients in over 193 countries. BSI Standards is the UK's National Standards Body. BSI provides independent, third-party certification of management systems.

### Assessment Methodology, Programme, Site Visits

This on-site assessment was conducted from 04-08/12/2022. The audit programme is included as Section 2.4. The approach to the audit was to treat the Pasir Panjang Palm Oil Mill, Pasir Panjang Estate, Tunjuk Laut 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 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 Certification Unit not using MSPO certification marks for any type of on- and off-product communication. The Certification Unit are compliance with the use of the MSPO Logo and related claims.

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 B.

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

Structured worker interviews with male and female workers and staff were held in private at the workplace in the mill and the estates. Fieldworkers were interviewed informally in small groups in the field. In addition, the wives of workers and staff were interviewed in informal group meetings at their housing. Separate visits were made to each of the local communities to meet with the village head and residents. Company officials were not present at any of the internal or external stakeholder interviews. A list of Stakeholders contacted is included as Section 3.6.

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.

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

This report was externally reviewed by MSPO approved Peer Reviewer prior to certification and recertification decision by BSI. For Annual surveillance assessment, the report was internally reviewed and approved by BSI qualified certification reviewer.

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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)	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 & Bukit Payung Division	X	-	X	-	X
Tunjuk Laut Estate	X	-	X	X	-
Siang Estate	-	X	-	X	-
Bukit Kelompok Estate	-	X	-	-	X
Pasir Logok Estate	-	X	-	X	X

**Tentative Date of Next Visit: December 3, 2023 - December 7, 2023**

**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 Nur Amin Bin Mohd Halim (MNA)	Team Leader	<p><b>Education:</b> Diploma Office Management &amp; Technology, UiTM.</p> <p><b>Work Experience:</b> He gained his career as sustainability practitioner in Government Link Company related to palm oil plantation for over 6 years and 10 months majorly handling operational excellent, environment, safety and health at the upstream and downstream operations. He then joining an international certification body over the last 3 years and started his auditing career as qualified lead auditor for MSPO (OPMC and SCCS) scheme; and qualified auditor for ISCC Waste and Residue scheme. Concurrent, he was also a document controller and scheme coordinator for MSPO (OPMC and SCCS) prior to DSM accreditation.</p> <p><b>Training attended:</b> He has completed Exemplar IMS (9001, 14001 &amp; 45001) LA Course (2019), SA 8000 Course (2019), Endorse MSPO SCCS Course (2020), Endorse MSPO LA Course (2020), Endorse ISCC Waste and Residue Course (2020), HCV &amp; HCS Course (2020), Endorse ISCC Basic &amp; PLUS Course (2022), CQI &amp; IRCA ISO 14001:2015 LA Course (2022), Endorse RSPO P&amp;C LA Course (2022), Endorse RSPO SCCS LA Course (2022).</p>



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		<p><b>Aspect covered in this audit:</b>  Interview with workers and stakeholders, Transparency &amp; communications, traceability, land used rights, social aspect &amp; aspects, human rights, employees' welfare, trafficking &amp; child labour, stakeholders' consultation. (Principle 2 and Principle 4).</p> <p><b>Language proficiency:</b>  He is fluent in both verbal/ written English and Bahasa Malaysia languages.</p>
Amir Bin Bahari (AB)	Team Member	<p><b>Education:</b>  Bachelor Of Science (Hons) Chemistry, from Universiti Sains Malaysia (USM) in 1985 and Diploma in Palm Oil Milling Technology/Management in 1996 from MPOB, a registered Chemist with Institut Kimia Malaysia as AMIC.</p> <p><b>Work Experience:</b>  34 years' experience in the oil palm industry including in the mill and estates, 350 mandays in RSPO auditing, and 210 mandays in MSPO audit.</p> <p><b>Training attended:</b>  Attended RSPO Lead Assessor Course (Refresher) on May 2022 and MSPO Lead Auditor course in April 2016, as well as courses related to HCV &amp; GHG, social and environmental related program.</p> <p><b>Aspect covered in this audit:</b>  Interview with workers. Company policy &amp; commitment, Continuous Improvement Plan, Legal requirement, safety requirement, safety risk analysis, safety implementation, accident reporting and Training. (Principle 1, Principle 3, and Principle 4).</p> <p><b>Language proficiency:</b>  Fluent in Bahasa Malaysia and English Language.</p>
Hanafi Bin Shufaat @ Mohd (HSM)	Team Member	<p><b>Education:</b>  He holds an Executive Master in Plantation Management from Asean E University and Diploma in Plantation Industry Management from Mara University of Technology.</p> <p><b>Work Experience:</b>  Has 17 years working experience at managerial level of oil palm in plantation industry in Malaysia and aboard. The last position was Senior Manager in Primula Gemilang Sdn Bhd, Sibul, Sarawak and responsible for 12,000 hectare of oil palm plantation.</p> <p><b>Training attended:</b>  Has successfully obtained competency of Quality Management system (ISO 9001:2015) and ISO Integrated Management system (ISO 9001:2015 and ISO 14001:2015) and MSPO SCCS auditor training in 2019 conducted by PSV Sdn Bhd. He has successfully obtained competency of Malaysia Sustainable Palm oil (MSPO) course for Malaysian Sustainable Palm Oil (MSPO).</p> <p><b>Aspect covered in this audit:</b>  Interview with workers. Environmental management &amp; action plan, environmental requirement, biodiversity &amp; HCV, water &amp; waste</p>

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		<p>management, opening burning practices, Mill &amp; Estate best practices, Mill &amp; Estate economy viability and new development (if any), (Principle 5, Principle 6 and Principle 7).</p> <p><b>Language proficiency:</b>          He is fluent in both verbal/ written English and Bahasa Malaysia languages.</p>
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**2.2 Impartiality and conflict of interest**

During this assessment there was no circumstances or pressure that had influenced the independence or confidentiality of the assessment team.

**2.3 Accompanying Persons**

No.	Name	Role
	Nil	

**2.4 Assessment Plan**

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

Date	Time	Subjects	MNA	AB	HSM
Saturday 03/12/2022	09:00 - 15:00	Audit team travel to Holiday Villa Hotel, Johor Bahru	✓	✓	✓
Sunday 04/12/2022	07:30	Travel to Pasir Logok Estate (for Opening Meeting)	✓	✓	✓
	08:30 - 09:00	Opening Meeting <ul style="list-style-type: none"> <li>• Presentation by Mahamurni Plantations Sdn Bhd</li> <li>• Presentation by BSI Lead Auditor – introduction of team member and assessment agenda</li> <li>• Confirmation of assessment scope and finalizing audit scope</li> </ul>			
	09:00 - 12:45	<u>Pasir Logok Estate</u> Field visit, boundary inspection, field operations, staff & workers interview, buffer zone, HCV area, IPM implementation, OSH & ERP, workshop, storage area (agrochemical, fertilizer, lubricant, etc.), agrochemical mixing area, wastes management, workers housing, clinic, landfill, etc.	✓	✓	✓
	10:00 - 12:00	Stakeholder consultation: Government agencies, village representatives, smallholders, Union Leader, contractors etc.	✓	-	-
	12:45 - 13:45	Lunch break	✓	✓	✓

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	13:45 - 16:30	<u>Pasir Logok Estate</u> Document review P1 – P7 (MS 2530 Part 3): General documentation e.g., Legal, Manual and Procedures, production and monitoring records, IPM & HCV records, SEIA documents and records, OSH records, review pay documents, records of communication with stakeholder/workers representatives, new planting, CIP and implementation etc.	✓	✓	✓
	16:30 - 17:00	Interim closing meeting	✓	✓	✓
Monday 05/12/2022	07:30	Travel to Pasir Logok Estate	✓	-	-
	08:30 - 16:30	<u>Pasir Logok Estate</u> Field visit to workers housing and amenities. Document review P1 – P7 (MS 2530 Part 3): General documentation e.g., Legal, Manual and Procedures, production and monitoring records, SIA documents and records, review pay documents, records of communication with stakeholder/workers representatives, CIP and implementation etc.	✓	-	-
	16:30 - 17:00	Interim closing	✓	-	-
	07:30	Travel to Bukit Kelompok Estate	-	✓	✓
	08:30 - 12:45	<u>Bukit Kelompok Estate</u> Field visit, boundary inspection, field operations, staff & workers interview, buffer zone, HCV area, IPM implementation, OSH & ERP, workshop, storage area (agrochemical, fertilizer, lubricant, etc.), agrochemical mixing area, wastes management, workers housing, clinic, landfill, etc.	-	✓	✓
	12:45 - 13:45	Lunch Break	-	✓	✓
	13:45 - 16:30	<u>Bukit Kelompok Estate</u> Document review P1 – P7 (MS 2530 Part 3): General documentation e.g., Legal, Manual and Procedures, production and monitoring records, IPM & HCV records, SEIA documents and records, OSH records, review pay documents, records of communication with stakeholder/workers representatives, new planting, CIP and implementation etc.	-	✓	✓
	16:30 - 17:00	Interim closing meeting	-	✓	✓
Tuesday 06/12/2022	07:30	Travel to Bukit Kelompok Estate	✓	-	-
	08:30 - 16:30	<u>Bukit Kelompok Estate</u>	✓	-	-

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Date	Time	Subjects	MNA	AB	HSM
	16:30 - 17:00	Field visit to workers housing and amenities. Document review P1 – P7 (MS 2530 Part 3): General documentation e.g., Legal, Manual and Procedures, production and monitoring records, SIA documents and records, review pay documents, records of communication with stakeholder/workers representatives, CIP and implementation etc. Interim closing	✓	-	-
	07:30	Travel to Pasir Panjang Estate	-	✓	✓
	08:30 - 12:45	<u>Pasir Panjang Estate (including Bukit Payung Div)</u> Field visit, boundary inspection, field operations, staff & workers interview, buffer zone, HCV area, IPM implementation, OSH & ERP, workshop, storage area (agrochemical, fertilizer, lubricant, etc.), agrochemical mixing area, wastes management, workers housing, clinic, landfill, etc.			
	12:45 - 13:45	Lunch Break	-	✓	✓
	13:45 - 16:30	<u>Pasir Panjang Estate (including Bukit Payung Div)</u> Document review P1 – P7 (MS 2530 Part 3): General documentation e.g., Legal, Manual and Procedures, production and monitoring records, IPM & HCV records, SEIA documents and records, OSH records, review pay documents, records of communication with stakeholder/workers representatives, new planting, CIP and implementation etc.	-	✓	✓
	16:30 - 17:00	Interim closing meeting	-	✓	✓
Wednesday 07/12/2022	07:30	Travel to Pasir Panjang Estate	✓	-	-
	08:30 - 16:30	<u>Pasir Panjang Estate (including Bukit Payung Div)</u> Field visit to workers housing and amenities. Document review P1 – P7 (MS2530 Part 3): General documentation e.g., Legal, Manual and Procedures, production and monitoring records, SIA documents and records, review pay documents, records of communication with stakeholder/workers representatives, CIP and implementation etc.  Stakeholder consultation: Government agencies, village representatives, smallholders, Union Leader, contractors etc.	✓	-	-
	16:30 - 17:00	Interim closing meeting	✓	-	-
	07:30	Travel to Pasir Panjang Palm Oil Mill	-	✓	✓
	08:30 - 12:45	<u>Pasir Panjang Palm Oil Mill</u>			

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		Document review P1 – P6 (MS 2530 Part 4): SOPs, Review on SEIA documents and records, wage records, employee data, training records, legal permits, mill inspection and internal monitoring records, CIP & implementation, etc.			
	12:45 - 13:45	Lunch Break	-	✓	✓
	13:45 - 16:30	<u>Pasir Panjang Palm Oil Mill</u> Document review P1 – P6 (MS 2530 Part 4): SOPs, Review on SEIA documents and records, wage records, employee data, training records, legal permits, mill inspection and internal monitoring records, CIP & implementation, etc.	-	✓	✓
	16:30 - 17:00	Interim closing meeting	-	✓	✓
Thursday 08/12/2022	07:30	Travel to Pasir Panjang Palm Oil Mill	✓	✓	✓
	08:30 - 12:45	<u>Pasir Panjang Palm Oil Mill</u> Continue with pending document review P1 – P6 (MS 2530 Part 4)	-	✓	✓
	08:30 - 12:45	<u>Pasir Panjang Palm Oil Mill</u> Field visit to workers housing and amenities. Document review P1 – P7 (MS 2530 Part 3): General documentation e.g., Legal, Manual and Procedures, production and monitoring records, SIA documents and records, review pay documents, records of communication with stakeholder/workers representatives, CIP and implementation etc.	✓	-	-
	12:45 - 13:45	Lunch Break	✓	✓	✓
	13:45 - 15:30	Continue with pending document review P1 – P6 (MS 2530 Part 4)	✓	✓	✓
	15:30 - 16:00	Assessment team discussion and preparation	✓	✓	✓
	16:00 - 16:30	Team discussion with Kulim HQ Sustainability team	✓	✓	✓
	16:30 - 17:00	Closing meeting at Pasir Panjang Palm Oil Mill	✓	✓	✓
Friday 09/12/2022	08:00 - 15:00	Audit team travel back to Kuala Lumpur	✓	✓	✓

### Section 3: Assessment Findings

#### 3.1 Details of audit results

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

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

#### 3.2 Details of Nonconformities and Opportunity for improvement

The findings summary of the assessment by criteria are listed in Appendix A.

During the assessment there were Zero (0) Major, Zero (0) Minor nonconformities and three OFI (3) raised.

Non-Conformity Report			
<b>NCR Ref #:</b>	N/A	<b>Issue Date:</b>	N/A
<b>Due Date:</b>	N/A	<b>Date of Closure:</b>	N/A
<b>Area/Process:</b>	N/A	<b>Clause &amp; Category: (Major / Minor)</b>	<b>MSPO Part __:</b> N/A
<b>Clause:</b>	N/A		
<b>Requirements:</b>	N/A		
<b>Statement of Nonconformity:</b>	N/A		
<b>Objective Evidence:</b>	N/A		
<b>Corrections:</b>	N/A		
<b>Root cause analysis:</b>	N/A		
<b>Corrective Actions:</b>	N/A		
<b>Assessment Conclusion:</b>	N/A		

Opportunity For Improvement			
<b>Ref:</b>	2285766-202212-I1	<b>Clause:</b>	MSPO 2530 Part 4: 4.1.2.2
<b>Area/Process:</b>	Pasir Panjang Palm Oil Mill		
<b>Objective Evidence:</b>	Internal Audit dated 13/11/2022 Pasir Panjang Palm Oil Mill - The audit team can be further improved in the audit findings and remarks highlighted by authorities visit i.e. DOE.		

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<b>Opportunity For Improvement</b>			
<b>Ref:</b>	2285766-202212-12	<b>Clause:</b>	MSP0 2530 Part 4: 4.4.5.11
<b>Area/Process:</b>	Pasir Panjang Palm Oil Mill		
<b>Objective Evidence:</b>	Pasir Panjang Palm Oil Mill's linesite inspection can be further improved to identify all potential issue which may lead to inconducive conditions.		

<b>Opportunity For Improvement</b>			
<b>Ref:</b>	2285766-202212-13	<b>Clause:</b>	MSP0 2530 Part 3: 4.4.5.11
<b>Area/Process:</b>	Mahamurni Plantations Sdn Bhd		
<b>Objective Evidence:</b>	Pasir Logok, Bukit Kelompok Estate and Pasir Panjang Estate's linesite inspection can be further improved to identify all potential issue which may lead to inconducive conditions.		

<b>Noteworthy Positive Comments</b>	
1	Good commitment from Mahamurni Plantations Sdn Bhd's management (Oil Mill and Plantations).
2	Good filling system and documentation, easy to retrieve the documents and records.
3	Positive feedback from stakeholders whose attended during stakeholder consultations.
4	Good awareness among workers towards the MSP0 requirement and able to demonstrate in fields.

**3.3 Status of Nonconformities Previously Identified and OFI**

<b>Non-Conformity Report</b>			
<b>NCR Ref #:</b>	N/A	<b>Issue Date:</b>	N/A
<b>Due Date:</b>	N/A	<b>Date of Closure:</b>	N/A
<b>Area/Process:</b>	N/A	<b>Clause &amp; Category: (Major / Minor)</b>	<b>MSP0 Part __:</b> N/A
<b>Clause:</b>	N/A		
<b>Requirements:</b>	N/A		
<b>Statement of Nonconformity:</b>	N/A		
<b>Objective Evidence:</b>	N/A		
<b>Corrections:</b>	N/A		
<b>Root cause analysis:</b>	N/A		
<b>Corrective Actions:</b>	N/A		
<b>Assessment Conclusion:</b>	N/A		
<b>Verification Statement:</b>	N/A		

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Opportunity For Improvement			
<b>Ref:</b>	2128369-202111-I1	<b>Clause:</b>	MSPO 2530 Part 4 - 4.6.3.2
<b>Area/Process:</b>	Pasir Panjang Palm Oil Mill		
<b>Objective Evidence:</b>	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.		
<b>Verification Statement:</b>	For the verification on the previous OFI issue, the management of Mahamurni Plantations Sdn Bhd has call the contractor to do the briefing on the misunderstanding on the term and conditions. Verified the contract Kejururteraan Letrik Etara (M) Sdn Bhd has called the contractor to re-brief the contractor on the miss understanding terms. As evidence the contractor has initiated in contract agreement. For long terms starting the new contract, the management Mahamurni Plantations Sdn Bhd has done an initiative to prepare bi-language contract agreement (English and Bahas Melayu) for better understanding for both parties. Verified the evidence contract agreement for Ghulam Qadiraslamen Enterprise, contract number PPM 03/2022 for work calling quotation number PPPOM/2022/QC/03.		

Opportunity For Improvement			
<b>Ref:</b>	2128369-202111-I2	<b>Clause:</b>	MSPO 2530 Part 3 & 4 - 4.4.5.6
<b>Area/Process:</b>	Pasir Panjang Palm Oil Mill and estates		
<b>Objective Evidence:</b>	<p>Verification has been made on employment contract for sample workers and there was 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 have 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>		
<b>Verification Statement:</b>	Document review on 'Kontrak Pekerjaan – Pekerja Asing, stated Mahamurni Plantations Sdn Bhd through Kulim (M) Berhad updated with revision 04 updated by June 2022 includes additional benefit for workers on leave vacation pay, agreed deduction from salary, medical treatment cost and agreed deduction from employee salary with authority approval.		

### 3.4 Summary of the Nonconformities and Status

CAR Ref.	Clause & Category (Major / Minor)	Issued Date	Status & Date (Closure)
1716200-201806-M1	4.3.1.1 Part 3 Major	06/12/2018	Closed on 12/01/2019
1844763-201910-M1	4.3.1.1 Part 3 Major	10/10/2019	Closed on 12/01/2020
1844763-201910-M2	4.4.5.8 Part 4 Major	10/10/2019	Closed on 12/01/2020



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1844763-201910-N1	4.4.1.1 Part 3 Minor	10/10/2019	Closed on 10/12/2020
1844763-201910-N2	4.4.5.4 Part 3 Minor	10/10/2019	Closed on 10/12/2020

**3.5 Issues Raised by Stakeholders**


IS #	Description
1	<p><b>Issues:</b> <u>Contractors, (Representative from Juliyanamurni Bin Samsuddin, Nor Azura Bt Sidak, Nur Umairah Bt. Haziqah, Kejuruteraan Cabaran)</u></p> <p>4 contractors have been contacted and interviewed which are Juliyanamurni, Nor Azura, Nur Umairah (Transporter contractor) and Kejuteraan Cabaran (Mill contractor). Based on interview, the contractors agreed good relationship has been established between management and contractors. The contractor also mentioned that the payment paid within timeline as per terms and conditions. Contractors were being briefed regarding RSPO &amp; MSPO during stakeholders meeting.</p>
	<p><b>Management Responses:</b> Noted on the information.</p>
	<p><b>Audit Team Findings:</b> No other issue.</p>
2	<p><b>Issues:</b> <u>Retailer and Shopper (Representative from Rul &amp; Rel Trading, Berkat Green Enterprise, Kedai Makan Bukit Payung, Kedai Runcit Bukit Payung, Kedai Makan Keyla, Kedai Yoke Lan, Kedai Makanan Parti, Kedai Makan Ladang Siang)</u></p> <p>Management has given a briefing related implementation of MSPO matters. All rules set by management related MSPO need to follow by them. The retailers and shoppers will share the price of goods sold to the estate workers and nearby local communities. No complaint or grievances recorded.</p>
	<p><b>Management Responses:</b> Noted on the information.</p>
	<p><b>Audit Team Findings:</b> No other issue.</p>
3	<p><b>Issues:</b> <u>Government Agencies (SK Tunjuk Laut)</u></p> <p>Interview with teachers from SK Tunjuk Laut, informed they have good relationship with estates management. All matters related to safety and health has regularly discussed between parties. No serious issue involved between schools and estates operations. They often joined both parties' community programme.</p>
	<p><b>Management Responses:</b> Noted on the information.</p>
	<p><b>Audit Team Findings:</b> No other issue.</p>
4	<p><b>Issues:</b> <u>Neighbouring Estate (Ladang Aliran Semangat)</u></p> <p>Interview with managers from Ladang Aliran Semangat, informed they have good relationship with estates management. All matters related to boundary, palm diseases and field operations has regularly discussed between both parties. No serious issue with estate management and operations. They often joined both parties' community programme.</p>

	<p><b>Management Responses:</b> Noted on the information.</p>
	<p><b>Audit Team Findings:</b> No other issue.</p>
<b>5</b>	<p><b>Issues:</b> <u>Estates Employee (Sampled Local and Foreign employee)</u>            Interviewed with sampled employees from estates and mill. Informed that they attended training and briefing which conducted by their employer. Employees informed they are being given with equal wages, equal welfare, and equal benefits as per stated in their employment contract. Employees being paid either with daily rated and piece rated are understandable on how their salary being calculated. Employees who do not understand on their salary calculated, will be communicated with their officers for further clarifications. Any deduction from employee, will be communicate and have mutually agreement. Employees informed they are aware and being brief of any new deduction or new wages during muster call.</p>
	<p><b>Management Responses:</b> Noted on the information.</p>
	<p><b>Audit Team Findings:</b> No other issue.</p>

### 3.6 List of Stakeholders Contacted

<p><b>Government Officer:</b> Headmaster, SK Tunjuk Laut</p>	<p><b>Community/neighbouring village:</b> Ladang Aliran Semangat</p>
<p><b>Suppliers/Contractors/Vendors:</b>            Juliyanamurni Bin Samsuddin            Nor Azura Bt Sidak            Nur Umairah Bt. Haziqah            Kejuruteraan Cabaran            Rul &amp; Rel Trading            Berkat Green Enterprise            Kedai Makan Bukit Payung            Kedai Runcit Bukit Payung            Kedai Makan Keyla            Kedai Yoke Lan            Kedai Makanan Parti            Kedai Makan Ladang Siang</p>	<p><b>Worker’s Representative/Gender Committee:</b>            Local employee            Foreigner employee (Indonesia)            Foreigner employee (Bangladeshi)</p>

**Section 4: Assessment Conclusion and Recommendation**

<b>Acknowledgement of Internal Responsibility and Formal Sign-off of Assessment Findings</b>	
Based on the findings during the assessment <u>Mahamurni Plantations Sdn Bhd – Pasir Panjang POM and Supply Base Certification Unit</u> complies with the <b>MS 2530-3:2013 and MS 2530-4:2013</b> . It is recommended that the certification of <u>Mahamurni Plantations Sdn Bhd – Pasir Panjang POM and Supply Base Certification Unit</u> is continued.	
<b>Acknowledgement of Assessment Findings</b>	<b>Report Prepared by</b>
<b>Name:</b> <u>Salasah Elias</u>	<b>Name:</b> Mohd Nur Amin Bin Mohd Halim
<b>Company name:</b> <u>Kulim Malaysia Berhad</u>	<b>Company name:</b> <u>BSI Services Malaysia Sdn Bhd</u>
<b>Title:</b> Deputy General Manager	<b>Title:</b> Client Manager
<b>Signature:</b>  <b>Date: 08/01/2023</b>	<b>Signature:</b>  <b>Date: 06/01/2023</b>

**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
<b>4.1 Principle 1: Management commitment &amp; responsibility</b>			
<b>Criterion 4.1.1 – Malaysian Sustainable Palm Oil (MSPO) Policy</b>			
<b>4.1.1.1</b>	A policy for the implementation of MSPO shall be established. <b>- Major compliance -</b>	Mahamurni Plantations Sdn Bhd through Kulim (M) Berhad established Malaysian Sustainable Palm Oil Policy signed by Managing Director dated 01/10/2021.  The policy therein described 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.	Complied
<b>4.1.1.2</b>	The policy shall also emphasize commitment to continual improvement. <b>- Major compliance -</b>	Mahamurni Plantations Sdn Bhd through Kulim (M) Berhad established Malaysian Sustainable Palm Oil Policy signed by Managing Director dated 01/10/2021.  The policy therein among others has included commitment 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
<b>Criterion 4.1.2 – Internal Audit</b>			
<b>4.1.2.1</b>	Internal audit shall be planned and conducted regularly to determine the strong and weak points and potential area for further improvement. <b>- Major compliance -</b>	Mahamurni Plantations Sdn Bhd through Kulim (M) Berhad Internal Audit with Doc. No.: SID/SMS/3.2, issued: 01 dated 01/08/2020. Therein describing requirement and procedure in establishing audits exercises. Audits are to be held once a year. The internal audit checklist is available	Complied

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Criterion / Indicator		Assessment Findings	Compliance																				
		<p>to cover all the MSPO requirements.</p> <table border="1"> <thead> <tr> <th>No.</th> <th>Estate</th> <th>Date</th> <th>NCR</th> <th>OFI</th> </tr> </thead> <tbody> <tr> <td>1</td> <td>Pasir Logok</td> <td>26/07/2022</td> <td>0</td> <td>0</td> </tr> <tr> <td>2</td> <td>Pasir Panjang</td> <td>21/08/2022</td> <td>0</td> <td>0</td> </tr> <tr> <td>3</td> <td>Bukit Kelompok</td> <td>25/08/2022</td> <td>0</td> <td>0</td> </tr> </tbody> </table> <p>The root causes where applicable to the audits for the NCR were clearly identified and the proposed corrective action were satisfactorily provided for all the commentaries given by the auditors. All elements in the MSPO MS2530 Part 3 were covered. Commentaries were made as shown in the audit report for the internal improvement.</p>	No.	Estate	Date	NCR	OFI	1	Pasir Logok	26/07/2022	0	0	2	Pasir Panjang	21/08/2022	0	0	3	Bukit Kelompok	25/08/2022	0	0	
No.	Estate	Date	NCR	OFI																			
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2	Pasir Panjang	21/08/2022	0	0																			
3	Bukit Kelompok	25/08/2022	0	0																			
<b>4.1.2.2</b>	<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><b>- Major compliance -</b></p>	<p>Mahamurni Plantations Sdn Bhd through Kulim (M) Berhad Internal Audit with Doc. No.: SID/SMS/3.2, issued: 01 dated 01/08/2020.</p> <p>There is evidence of the internal audit checklist has listed down the 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 titled 'Internal audit, non-conformance report'. The audit results have been signed accepted by the respective Estate Managers.</p> <p>The nonconformity raised at each estate as shown in 4.1.2.1 above during the internal audit for all the estates.</p> <p>The auditor has also complied to the documented procedure through issuance of audit plan to the operating units. This audit notification was sighted and verified.</p>	Complied																				
<b>4.1.2.3</b>	<p>Report shall be made available to the management for their review.</p> <p><b>- Major compliance -</b></p>	<p>Mahamurni Plantations Sdn Bhd through Kulim (M) Berhad Internal Audit with Doc. No.: SID/SMS/3.2, issued: 01 dated 01/08/2020.</p>	Complied																				

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Criterion / Indicator		Assessment Findings	Compliance																								
		<p>Reports are made available and retained for minimum of 10 years. All reports are circulated and maintained to the estate managements, regional office and SID HQ.</p> <p>There is a monthly SID meeting at HQ level to review the reports' findings and performance raised in both internal and external audit. The outcome was also discussed at Regional Office.</p>																									
<b>Criterion 4.1.3 – Management Review</b>																											
<b>4.1.3.1</b>	<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><b>- Major compliance -</b></p>	<p>Mahamurni Plantations Sdn Bhd through Kulim (M) Berhad established Management Review Procedure with Doc. No.: SID/SMS/3.1 dated 01/08/2020. The procedure therein among others mentioned that management review is to be held once annually.</p> <table border="1"> <thead> <tr> <th>No.</th> <th>Estate</th> <th>Date</th> <th>Attendee</th> <th>Date</th> <th>Attendee</th> </tr> </thead> <tbody> <tr> <td>1</td> <td>Pasir Logok</td> <td>15/08/2022</td> <td>11</td> <td>06/09/2021</td> <td>13</td> </tr> <tr> <td>2</td> <td>Pasir Panjang</td> <td>28/08/2022</td> <td>17</td> <td>06/09/2021</td> <td>21</td> </tr> <tr> <td>3</td> <td>Bukit Kelompok</td> <td>30/08/2022</td> <td>14</td> <td>29/09/2021</td> <td>12</td> </tr> </tbody> </table> <p>Members discussed issues relating to the MSPO preparation among others.</p> <ol style="list-style-type: none"> <li>1. Internal audit findings</li> <li>2. Process Performance</li> <li>3. Customer Feedback</li> <li>4. Audits Results</li> <li>5. Changes That Could Affect Management System</li> <li>6. Complaints and grievance</li> <li>7. Continual Improvement Plan</li> </ol>	No.	Estate	Date	Attendee	Date	Attendee	1	Pasir Logok	15/08/2022	11	06/09/2021	13	2	Pasir Panjang	28/08/2022	17	06/09/2021	21	3	Bukit Kelompok	30/08/2022	14	29/09/2021	12	Complied
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Criterion / Indicator		Assessment Findings	Compliance																											
		The meeting made a conclusive statement on the suitability, effectiveness of the MSPO implementation and present management system.																												
<b>Criterion 4.1.4 – Continual Improvement</b>																														
<b>4.1.4.1</b>	<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><b>- Major compliance -</b></p>	<p>Pasir Logok Estate, Bukit Kelompok Estate and Pasir Panjang Estate established continual improvement plan updated 30/04/2022 upon consideration of the social, operations and environmental impacts. Among other efforts are.</p> <table border="1"> <thead> <tr> <th>No.</th> <th>Program</th> <th>Action /Initiatives</th> </tr> </thead> <tbody> <tr> <td rowspan="5">1</td> <td rowspan="5">Chemical Reduction</td> <td>Manual grass cutting</td> </tr> <tr> <td>Only circle and strip spraying in fields</td> </tr> <tr> <td>Apply low volume spraying equipment</td> </tr> <tr> <td>Follow manufacturer dosage</td> </tr> <tr> <td>Cattle integration - grassing in field.</td> </tr> <tr> <td rowspan="2">2</td> <td rowspan="2">Waste reduction</td> <td>Awareness among employees</td> </tr> <tr> <td>Enhancement of waste segregation.</td> </tr> <tr> <td rowspan="4">3</td> <td rowspan="4">Employment condition</td> <td>Enhancement of workers quarters</td> </tr> <tr> <td>Schedule repair and painting</td> </tr> <tr> <td>Conducive environment</td> </tr> <tr> <td>Housing roofing / ceiling upgrading</td> </tr> <tr> <td rowspan="2">4</td> <td rowspan="2">Labour ratio</td> <td>Expansion of in-field FFB collection-grabber</td> </tr> <tr> <td>Expand mechanization in manuring</td> </tr> <tr> <td>5</td> <td>Environmental</td> <td>Desilting field drain for maintenance</td> </tr> </tbody> </table> <p>Details of expenditure are provided in respective estates under both CAPEX/OPEX. Inclusive are projects for improvement as described below among others.</p>	No.	Program	Action /Initiatives	1	Chemical Reduction	Manual grass cutting	Only circle and strip spraying in fields	Apply low volume spraying equipment	Follow manufacturer dosage	Cattle integration - grassing in field.	2	Waste reduction	Awareness among employees	Enhancement of waste segregation.	3	Employment condition	Enhancement of workers quarters	Schedule repair and painting	Conducive environment	Housing roofing / ceiling upgrading	4	Labour ratio	Expansion of in-field FFB collection-grabber	Expand mechanization in manuring	5	Environmental	Desilting field drain for maintenance	Complied
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5	Operation	Procurement of 2 units grabber Dec 2022 at MYR0.2M																																															
No.	Sections	Description - Pasir Panjang Estate																																															
1	Facilities	Installation 16 units o/h water tank MYR12K Jun 22																																															
2	Facilities	Workers roofing 41 units - MYR1.2M - May 22																																															
3	Facilities	SAJ water pipeline - MYR300K - Sept 22																																															
4	Facilities	Probase Road 3. 9km - MYR460K - Mac 2022																																															
No.	Sections	Description - Bukit Kelompok Estate																																															
1	Facilities	Workers roofing change 9 units 2023 at MYR11K																																															
2	Operation	Procurement of 1-unit rear grader 2022 MYR15K																																															
3	Operation	Procurement 1 unit passenger trailer in 2022 MYR20K																																															
<b>4.1.4.2</b>	<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><b>- Major compliance -</b></p>	<p>This is being made upon confirmation of any new projects. Employees were briefed of any new development in basic understanding during the weekly briefings.</p> <ol style="list-style-type: none"> <li>The management team will be informed of such development during the monthly management meetings.</li> <li>Dissemination of information by the RC and Head Office transacted during the monthly Managers meetings and emails.</li> </ol>	Complied																																														



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		The management continuously reviewed the estates performance and work method for a continual improvement to achieve better results yield and costings.	
<b>4.1.4.3</b>	An action plan to provide the necessary resources including training, to implement the new techniques or new industry standard or technology (where applicable) shall be established. <b>- Major compliance -</b>	Where introduction of new machines and new work method, all level of employees will be trained to handle /implement the new techniques and work changes. Monitoring is made by the Estate Managers and Assistants throughout the on-the-job training and familiarization. The issue being included in the estates monthly meeting.	Complied
<b>4.2 Principle 2: Transparency</b>			
<b>Criterion 4.2.1 – Transparency of information and documents relevant to MSPO requirements</b>			
<b>4.2.1.1</b>	The management shall communicate the information requested by the relevant stakeholders in the appropriate languages and forms, except those limited by commercial confidentiality or disclosure that could result in negative environmental or social outcomes. <b>- Major compliance -</b>	Mahamurni Plantations Sdn Bhd through Kulim (M) Berhad has established Transparency procedure with document number SQD/SMS/1.0 dated 01/08/2020. The procedure described the person responsible for transparency, types of information / documents that can be request, and the mechanism to request any information or document. Example of inquiry from internal and external stakeholders as below: 1. Pasir Logok Estate with 1 enquiry recorded for year 2021 and 2022 for permission to request an assistance for preparing army training based at Lapang Sasar Bumi Ke Udara, Tanjung Logok Camp, Johor from 11/10/2022 until 16/10/2022. The request agreed by acting manager. 2. Bukit Kelompok Estate with 1 enquiry recorded for year 2021 and 2022 for permission to use estate vehicles to ferrying netball players to R.E.M Estate for tournament. The requests the then been	Complied

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		<p>approved by manager.</p> <p>3. Pasir Panjang Estate with no enquiry recorded for year 2021 and 2022.</p>	
<b>4.2.1.2</b>	<p>Management documents shall be publicly available, except where this is prevented by commercial confidentiality or where disclosure of information would result in negative environmental or social outcomes.</p> <p><b>- Major compliance -</b></p>	<p>Mahamurni Plantations Sdn Bhd has established Transparency Procedure with Doc. No.: SQD/SMS/1.0 dated 01/08/2020.</p> <p>The procedure describes that the person responsible for transparency, types of information / documents 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 such as:</p> <ol style="list-style-type: none"> <li>1. Land title/ user rights</li> <li>2. Occupational safety and health plan</li> <li>3. HCV documentation</li> <li>4. Detail of complaint or grievances.</li> </ol>	Complied
<b>Criterion 4.2.2 – Transparent method of communication and consultation</b>			
<b>4.2.2.1</b>	<p>Procedures shall be established for consultation and communication with the relevant stakeholders.</p> <p><b>- Major compliance -</b></p>	<p>Mahamurni Plantations Sdn Bhd through Kulim (M) Berhad established Consultation and Communication procedure with document number SQD/SMS/1.1, issue number 01 and dated 01/08/2020.</p> <p>The procedure describes of 2 categorized in communication and consultation includes internal and external parties.</p> <p>For first category, the internal communication is through muster, meeting, notice board, inspection and others. While for external communication, through meeting, telephone, fax, email and others.</p> <p>Communication internal and external will be done through the person in charge that has been appointed which basically the social person in</p>	Complied

Criterion / Indicator		Assessment Findings	Compliance
		<p>charge. The PIC is responsible to disclose, implement, made available and explain consultation and communication procedure to all relevant stakeholders.</p> <p>Mahamurni Plantations Sdn Bhd through Kulim (M) Berhad has conduct stakeholder consultation meeting which being held virtually for Tunjuk Laut Complex on 14/11/2022 for Southern Region includes Pasir Logok Estate, Bukit Kelompok Estate and Pasir Panjang Estate (includes Bukit Payung division).</p> <p>Agenda includes introduction and awareness on stakeholders' relation, Mahamurni Plantations Sdn Bhd through Kulim (M) Berhad's Policies, Requirement &amp; Regulation applicable, Oil Palm Sustainability certification, complaint and grievance procedure, NDPE and ESG implementation, independent smallholders' certifications (ISH-RSPO), handling RTE (Biology, HCS, HCV, IUCN red list, HEC), contractor responsibilities, Anti-Bribery management system implementation, latest development in Kulim's estates and others matters.</p>	
<b>4.2.2.2</b>	<p>A management official should be nominated to be responsible for issues related to Indicator 1 at each operating unit.</p> <p><b>- Minor compliance -</b></p>	<p>Mahamurni Plantations Sdn Bhd through Kulim (M) Berhad established Consultation and Communication procedure with document number SQD/SMS/1.1, issue number 01 and dated 01/08/2020.</p> <p>The procedure describes social person in- charge at respective operating units as responsible person to disclose, implement, made available and explain consultation and communication to all relevant stakeholders. Based appointment letter reviewed as follow:</p> <ol style="list-style-type: none"> <li>1. Pasir Logok assistant manager has been appointed as social person in-charge with appointment letter dated 20/01/2021 signed the estate manager.</li> </ol>	Complied

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		<p>2. Bukit Kelompok assistant Manager has been appointed as social person in-charge with appointment letter dated 01/07/2022 signed the estate manager.</p> <p>3. Pasir Panjang senior assistant Manager has been appointed as social person in-charge with appointment letter dated 10/01/2022 estate manager.</p>	
<b>4.2.2.3</b>	<p>List of stakeholders, records of all consultation and communication and records of action taken in response to input from stakeholders should be properly maintained.</p> <p><b>- Major compliance -</b></p>	<p>Pasir Logok Estate, Bukit Kelompok Estate and Pasir Panjang Estate has maintained list of stakeholders for 2022 updated 03/10/2022 based on the category.</p> <p>The list includes with external stakeholders such as: - Relevant government agencies (e.g., DOE, DOA, Immigration Department, Department of Safety and Health, Labour Department), Contractors, Suppliers, Consultants, Neighboring estates, Clinics, hospitals, fire brigade, police, etc. Correspondence with stakeholders is properly maintained and records of all consultation and communication during the past one.</p> <p>Mahamurni Plantations Sdn Bhd through Kulim (M) Berhad has conduct stakeholder consultation meeting which being held virtually for Tunjuk Laut Complex on 14/11/2022 for Southern Region includes Pasir Logok Estate, Bukit Kelompok Estate and Pasir Panjang Estate (includes Bukit Payung division).</p> <p>Agenda includes introduction and awareness on sustainability, NDPE and ESG implementation, traceability, new project development and others matters.</p>	Complied
<b>Criterion 4.2.3 – Traceability</b>			
<b>4.2.3.1</b>	The management shall establish, implement and maintain a	Mahamurni Plantations Sdn Bhd through Kulim (M) Berhad established	Complied

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	<p>standard operating procedure to comply with the requirements for traceability of the relevant product(s).</p> <p><b>- Major compliance -</b></p>	<p>SOP Traceability, Doc: No: SQD/SMS/2.1, Issued: 01 Rev: 06 dated 17/02/2022 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 &amp; Analytics Solution (IDEAS). Daily muster attendance, bunch count, productivity based on mill declared weight and yield statistic report could be retrieve from IDEAS.</p>	
4.2.3.2	<p>The management shall conduct regular inspections on compliance with the established traceability system.</p> <p><b>- Major compliance -</b></p>	<p>Pasir Logok Estate, Bukit Kelompok Estate and Pasir Panjang Estate 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.</p>	Complied
4.2.3.3	<p>The management should identify and assign suitable employees to implement and maintain the traceability system.</p> <p><b>- Minor compliance -</b></p>	<p>Mahamurni Plantations Sdn Bhd through Kulim (M) Berhad appoint Senior Manager, Manager, Deputy Manager, Assistant In-charge of each estate and mill as person in charge for traceability system with refer to Memo of Appointment as Person Responsible for Traceability System doc. No.: SQD/ADMIN/019/21 signed by Tuan Mohamad Yami bin Bakar, Head of Plantation Division dated 15/9/2021.</p>	Complied
4.2.3.4	<p>Records of sales, delivery or transportation of FFB shall be maintained.</p> <p><b>- Major compliance -</b></p>	<p>All production of the estate is being recorded on daily basis into In-Field Data Execution &amp; Analytics Solution (IDEAS).</p> <p>FFB being sell to own mill, Pasir Panjang Palm Oil Mill and being</p>	Complied

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Criterion / Indicator	Assessment Findings	Compliance
	<p>monitored by Headquarters. Sighted the records of sales, delivery or transportation of FFB. This record being maintained, and the documents are kept by both site, estate and mill. Sample taken as follows:</p> <ol style="list-style-type: none"> <li>1. Pasir Logok Estate, Raw Material Delivery - Estate FFB Delivery <ul style="list-style-type: none"> <li>• Date: 06/11/2022, 08/11/2022, 15/11/2022, Estate: Pasir Logok</li> <li>• Delivery Note No.: 12244, 11885, 12410 Transaction Type: Delivering</li> <li>• MSPO Certificate No.: 696200, valid till 07/03/2024</li> <li>• Vehicle No: JCK 3358, JUL 8020, JUL 9020</li> <li>• Field No: P05, P10, P04</li> <li>• Mill Ticket No: 139254, 139377, 139841, Transaction Type: Receiving</li> <li>• MPOB License: 592302004000</li> <li>• Gross Wt: 28,250 kg, 23,000 kg, 26,260 kg, Tare Wt: 12,240 kg, 13,550 kg, 13,820kg</li> <li>• Net Wt: 15,820 kg, 9,340 kg, 12,190 kg</li> </ul> </li> <li>2. Bukit Kelompok Estate, Raw Material Delivery - Estate FFB Delivery <ul style="list-style-type: none"> <li>• Date: 08/11/2022, 22/11/2022, 30/11/2022, Estate: Bukit Kelompok</li> <li>• Delivery Note No.: 15929, 16597, 16763 Transaction Type: Delivering</li> <li>• MSPO Certificate No.: 696200, valid till 07/03/2024</li> <li>• Vehicle No: JCK 3358, JUL 8020, JUL 9020</li> <li>• Field No: P12, P10, P14</li> <li>• Mill Ticket No: 139376, 140223, 140722, Transaction Type:</li> </ul> </li> </ol>	

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Criterion / Indicator		Assessment Findings	Compliance
		<ul style="list-style-type: none"> <li>Receiving</li> <li>• MPOB License: 592302004000</li> <li>• Gross Wt: 8,840 kg, 29,760 kg, 10,190 kg, Tare Wt: 3,600 kg, 16,310 kg, 3,560kg</li> <li>• Net Wt: 5,180 kg, 13,450 kg, 6,630 kg</li> </ul> <p>3. Pasir Panjang Estate, Raw Material Delivery - Estate FFB Delivery</p> <ul style="list-style-type: none"> <li>• Date: 26/11/2022, 27/11/2022, 28/11/2022, Estate: Pasir Panjang</li> <li>• Delivery Note No.: 54579, 54583, 54585 Transaction Type: Delivering</li> <li>• MSPO Certificate No.: 696200, valid till 07/03/2024</li> <li>• Vehicle No: JFP 9931, JRB 1963, JFP 9931</li> <li>• Field No: P11, P17, P11</li> <li>• Mill Ticket No: 1405058, 140593, 140616, Transaction Type: Receiving</li> <li>• MPOB License: 592302004000</li> <li>• Gross Wt: 11,030 kg, 26,560 kg, 11,640 kg, Tare Wt: 4,090 kg, 15,530 kg, 4,080 kg</li> <li>• Net Wt: 6,940 kg, 10,810 kg, 7,560 Kg</li> </ul>	
<b>4.3 Principle 3: Compliance to legal requirements</b>			
<b>Criterion 4.3.1 – Regulatory requirements</b>			
<b>4.3.1.1</b>	All operations are in compliance with the applicable local, state, national and ratified international laws and regulations.	Pasir Logok Estate, Bukit Kelompok Estate and Pasir Panjang Estate continued to comply with legal requirements as per indicator.	Complied

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<p><b>- Major compliance -</b></p>	<p>Compliance to each applicable law and regulation is monitored by the operating units and SID sustainability team.</p> <p>Pasir Logok Estate, Bukit Kelompok Estate and Pasir Panjang Estate had obtained and renewed license and permits as required by the law. The licenses and permits maintained by the estates among others include the following.</p> <table border="1" data-bbox="1032 639 1868 975"> <thead> <tr> <th>No.</th> <th>Authority</th> <th>Details - Pasir Logok Estate</th> <th>Validity</th> </tr> </thead> <tbody> <tr> <td>1</td> <td>S/Tenaga</td> <td>Energy Commission License 2022/02569</td> <td>28/08/2023</td> </tr> <tr> <td>2</td> <td>MPOB</td> <td>License 620145002000 valid until 31/3/2022</td> <td>31/03/2023</td> </tr> <tr> <td>3</td> <td>KPDNHEP</td> <td>Diesel Permit - 15000 L ref no J 00215</td> <td>10/04/2023</td> </tr> <tr> <td>4</td> <td>BAKAJ</td> <td>Lesen Mengabstrak Air Sg 1921 07/A/KT/09</td> <td>31/12/2023</td> </tr> <tr> <td>5</td> <td>SPAN</td> <td>SPAN/JKSP/PT/800-4EKS/(PT) /800-4(2)/6/54</td> <td>25/08/2023</td> </tr> <tr> <td>6</td> <td>DOSH</td> <td>Air Compressor - ref no JH PMT 22734</td> <td>25/08/2023</td> </tr> </tbody> </table> <table border="1" data-bbox="1032 991 1868 1294"> <thead> <tr> <th>No.</th> <th>Authority</th> <th>Details - Pasir Panjang Estate</th> <th>Validity</th> </tr> </thead> <tbody> <tr> <td>1</td> <td>S/Tenaga</td> <td>Energy Commission License 2022/03575</td> <td>28/11/2023</td> </tr> <tr> <td>2</td> <td>MPOB</td> <td>License 578773-600-2000</td> <td>30/11/2023</td> </tr> <tr> <td>3</td> <td>KPDNHEP</td> <td>Diesel Permit - 15000 L ref no J 0033PD</td> <td>23/01/2023</td> </tr> <tr> <td>4</td> <td>BAKAJ</td> <td>Lesen Mengabstrak Air Sg 07/A/KT/012</td> <td>31/12/2022</td> </tr> <tr> <td>5</td> <td>SPAN</td> <td>SPAN/JKSP/PT/800/4/1/14/17</td> <td>04/10/2023</td> </tr> <tr> <td>6</td> <td>SPAN</td> <td>SPAN/EKS/PT/800/4/1/5/10</td> <td>05/08/2023</td> </tr> <tr> <td>7</td> <td>DOSH</td> <td>Air Compressors - ref JH PMT22178869/67</td> <td>25/08/23</td> </tr> </tbody> </table> <table border="1" data-bbox="1032 1310 1868 1380"> <thead> <tr> <th>No.</th> <th>Authority</th> <th>Details - Bkt Kelompok Estate</th> <th>Validity</th> </tr> </thead> <tbody> <tr> <td>1</td> <td>S/Tenaga</td> <td>Energy Commission ref 2022/03234/34</td> <td>22/12/2023</td> </tr> </tbody> </table>	No.	Authority	Details - Pasir Logok Estate	Validity	1	S/Tenaga	Energy Commission License 2022/02569	28/08/2023	2	MPOB	License 620145002000 valid until 31/3/2022	31/03/2023	3	KPDNHEP	Diesel Permit - 15000 L ref no J 00215	10/04/2023	4	BAKAJ	Lesen Mengabstrak Air Sg 1921 07/A/KT/09	31/12/2023	5	SPAN	SPAN/JKSP/PT/800-4EKS/(PT) /800-4(2)/6/54	25/08/2023	6	DOSH	Air Compressor - ref no JH PMT 22734	25/08/2023	No.	Authority	Details - Pasir Panjang Estate	Validity	1	S/Tenaga	Energy Commission License 2022/03575	28/11/2023	2	MPOB	License 578773-600-2000	30/11/2023	3	KPDNHEP	Diesel Permit - 15000 L ref no J 0033PD	23/01/2023	4	BAKAJ	Lesen Mengabstrak Air Sg 07/A/KT/012	31/12/2022	5	SPAN	SPAN/JKSP/PT/800/4/1/14/17	04/10/2023	6	SPAN	SPAN/EKS/PT/800/4/1/5/10	05/08/2023	7	DOSH	Air Compressors - ref JH PMT22178869/67	25/08/23	No.	Authority	Details - Bkt Kelompok Estate	Validity	1	S/Tenaga	Energy Commission ref 2022/03234/34	22/12/2023	
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		2	MPOB	License 620166002000	31/03/2023	
		3	DOSH	Air Compressor JH PMT 22733	25/08/2023	
		4	KPDNHEP	Diesel Permit - 20000 L ref no J 005959	31/10/2023	
		5	BAKAJ	Lesen Mengabstrak Air Sg 1921 07/A/KT/013	31/12/2022	
		6	SPAN	SPAN/EKS/(PT) /800- 4(2)/6/54	25/08/2023	
<b>4.3.1.2</b>	<p>The management shall list all laws applicable to their operations in a legal requirements register.</p> <p><b>- Major compliance -</b></p>	<p>Mahamurni Plantations Sdn Bhd through Kulim (M) Berhad established Kulim Group Compliance Framework of Legal &amp; Other Requirements Register (LORR) updated 01/07/2022 - 31/08/2022 covers all the necessary regulatory requirements.</p> <p>The list of applicable legal and other requirements was made available during the assessment and complied. Documented procedure has been established and implemented to the KMB Sustainable Management System Doc no SID/SMS/2.0 dated 31/10/2022.</p> <p>The identified applicable laws and regulations relevant to its operations among others include the following.</p> <ol style="list-style-type: none"> <li>1. Environmental Quality Act 1974 and its Regulations,</li> <li>2. Factories and Machinery Act 1967 and its Regulations,</li> <li>3. Occupational Safety and Health Act 1994 and its Regulations,</li> <li>4. Pesticides Act, 1974,</li> <li>5. Worker’s Minimum Standards of Housing &amp; Amenities Act, 2020.</li> <li>6. Employment Act 1955 Act 265</li> <li>7. Wildlife Conservation Act 2010</li> <li>8. Malaysian Palm Oil Board 1998 - Amendment 2021</li> <li>9. Holiday Act 1951</li> <li>10. Passport Act 1966</li> </ol>				Complied

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		11. BAKAJ - Enakmen Air no 66 Johor 12. Workers Union Act 1959 13. Estate Hospital Assistants (Registration) Act 1965 14. Petroleum (safety Measures) Act 1984 15. Fire Services Act 1984 16. Uniform Building by Laws 1986 17. Weights And Measures Act 1972 (Act 71) (Amendment 1981) 18. National Land Code 1965 Act 56 19. Water Act 1920 Act 418 20. Animal Act 1953 21. Malaysian Anti-Corruption A1567 Act 2018 22. Energy Commission 2001 Act 610 23. Perintah Gaji Minimum 2022 24. Peraturan Kawalan Penyakit - Fasa Peralihan Endemic 01/4/22	
<b>4.3.1.3</b>	<p>The legal requirements register shall be updated as and when there are any new amendments or any new regulations coming into force.</p> <p><b>- Major compliance -</b></p>	<p>Mahamurni Plantations Sdn Bhd through Kulim (M) Berhad HQ's Sustainability and Innovation Department (SID) is responsible to track any changes to the Acts and Regulations and the information was disseminated to all its plantations and mills.</p> <p>Regional Controller of Southern Region also played a role in disseminating new Acts &amp; Regulations to all the mills and estates in the Region.</p> <ol style="list-style-type: none"> <li>1. This was made via communication with the publisher of the documents.</li> <li>2. This mechanism was outlined in its procedure.</li> <li>3. The updating of the legal register is made on a periodical basis.</li> </ol>	Complied

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		<p>4. Changes in the legal register if any are communicated to the respective Region.</p> <p>The estates had entirely adopted the Mahamurni Plantations Sdn Bhd through Kulim (M) Berhad’s documented system for identifying, tracking, accessing and updating the legal requirements. It had ensured that all applicable legal requirements pertaining to MSPO are established, implemented and maintained.</p> <p>The latest revision on the LORR was made dated 31/10/2022 on the following changes to date for the year.</p> <table border="1"> <thead> <tr> <th>No.</th> <th>Date</th> <th>Title</th> </tr> </thead> <tbody> <tr> <td>1</td> <td>01/04/2022</td> <td>Peraturan Kawalan Penyakit - Fasa Peralihan Endemic</td> </tr> <tr> <td>2</td> <td>01/04/2022</td> <td>Peraturan Kawalan Penyakit - Compounding of offenses</td> </tr> <tr> <td>3</td> <td>30/06/2022</td> <td>Minimum Wages 2022</td> </tr> <tr> <td>4</td> <td>31/08/2022</td> <td>KWSP Amendment of 3<sup>rd</sup> Schedule Order 2022</td> </tr> <tr> <td>5</td> <td>31/08/2022</td> <td>KWSP Amendment of 8<sup>th</sup> Schedule Order 2022</td> </tr> <tr> <td>6</td> <td>31/08/2022</td> <td>COVID-19 - Extension of operations Order 2022</td> </tr> </tbody> </table>	No.	Date	Title	1	01/04/2022	Peraturan Kawalan Penyakit - Fasa Peralihan Endemic	2	01/04/2022	Peraturan Kawalan Penyakit - Compounding of offenses	3	30/06/2022	Minimum Wages 2022	4	31/08/2022	KWSP Amendment of 3 <sup>rd</sup> Schedule Order 2022	5	31/08/2022	KWSP Amendment of 8 <sup>th</sup> Schedule Order 2022	6	31/08/2022	COVID-19 - Extension of operations Order 2022	
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6	31/08/2022	COVID-19 - Extension of operations Order 2022																						
<b>4.3.1.4</b>	<p>The management should assign a person responsible to monitor compliance and to track and update the changes in regulatory requirements.</p> <p><b>- Minor compliance -</b></p>	<p>The PIC is Executive Regional Controller appointed by the Head of Governance Division with appointment letter dated 21/07/2022.</p>	Complied																					
<b>Criterion 4.3.2 – Lands use rights</b>																								
<b>4.3.2.1</b>	<p>The management shall ensure that their oil palm cultivation activities do not diminish the land use rights of other users.</p> <p><b>- Major compliance -</b></p>	<p>Mahamurni Plantations Sdn Bhd through Kulim (M) Berhad kept their document of evidence of legal ownership for oil palm cultivation activities that do not diminish the land use rights of other users for all</p>	Complied																					

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	<p>estates.</p> <p>Document review for sampled estates, verified as follow:</p> <p>Pasir Logok Estate and Bukit Kelompok Estate share with all three (3) land titles.</p> <p>Details as per below:</p> <ol style="list-style-type: none"> <li>1. H.S.(D): 32182 PTD 401 leased for 60 years from 01/04/2010 until 31/03/2070 with total 2,837.998 ha.</li> <li>2. H.S.(D): 32183 PTD 402 leased for 60 years from 01/04/2010 until 31/03/2070 with total 1,055.629 ha.</li> <li>3. H.S.(D): 32184 PTD 403 leased for 60 years from 01/04/2010 until 31/03/2070 with total 144.20 ha.</li> </ol> <p>All land titles are stated with restriction terms of transferred without State Authority concern. And the leased is under Johor Corporation, parent company to Kulim (M) Berhad and Mahamurni Plantations Sdn Bhd. Total area as per land titles are 4,037.827Ha.</p> <p>However, Pasir Logok Estate share land title HSD 32182 PTD 401 with Bukit Kelompok Estate with only 20% or 580.704 ha from the total HSD 32182 land title area of 2,837.998 ha is belong to Pasir Logok Estate. Total area of the estate is 2,097.73 ha.</p> <p>Quit rent was paid by headquarters and not direct from estate's account. Document review, sighted Johor Corporation has made payment of quit rent to Pentadbiran Tanah Johor for the leased land with receipt number below.</p> <ol style="list-style-type: none"> <li>1. HSD 32182, Lot No.: 401 with receipt no.: F0038992-3105229714740153 dated 31/05/2022.</li> <li>2. HSD 32183, Lot No.: 402 with receipt no.: F0038991-3105229714740154 dated 31/05/2022.</li> </ol>	

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	<p>3. HSD 32184, Lot No.: 403 with receipt no.: F0038990-3105229714740155 dated 31/05/2022.</p> <p>Pasir Panjang Estate maintained with all three (3) land titles.</p> <p>Details as per below:</p> <ol style="list-style-type: none"> <li>1. HSD 35107 leased for 99 years from 17/09/2013 with total of 1,609.869 ha</li> <li>2. HSD 35105 leased for 99 years from 13/09/2013 with total of 2,282.60 ha</li> <li>3. HSD 35106 leased for 99 years from 13/09/2013 with total of 25.03 ha</li> </ol> <p>All land titles are stated under the MYR of 'tanah ini hendaklah ditanam dengan tanaman Kelapa Sawit'. And the ownership is under Kulim (M) Berhad. Total area of the estate is 3,763.9462 ha.</p> <p>HSD 35107 who was previously by Johor Corporation was transferred to Mahamurni Plantations Sdn Bhd with letter from lawyer ARSA Abdul Rahmand Saad @ Associates with subject 'Sale and Purchase Agreement All Dated 16/08/2011 Supplement Sale and Purchase Agreement All Dated 08/11/2011', ref. letter: NM/NAS71565-2010/GenCorp/yan dated 18/02/2014.</p> <p>Quit rent was paid by headquarters and not direct from estate's account. Document review, sighted Mahamurni Plantations Sdn Bhd has made payment of quit rent to Pentadbiran Tanah Johor for the leased land with receipt number below.</p> <ol style="list-style-type: none"> <li>1. HSD 35017, Lot No.: PTD 558 with receipt no.: F0174439-310522040200103 dated 31/05/2022.</li> <li>2. HSD 35016, Lot No.: PTD 4144 with receipt no.: F0172948-2605220415380048 dated 28/05/2022.</li> </ol>	

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		3. HSD 35015, Lot No.: PTD 4143 with receipt no.: F0172947-2605220415380047 dated 28/05/2022.	
<b>4.3.2.2</b>	The management shall provide documents showing legal ownership or lease, history of land tenure and the actual use of the land. <b>- Major compliance -</b>	Mahamurni Plantations Sdn Bhd through Kulim (M) Berhad kept their document of evidence of legal ownership for oil palm cultivation activities that do not diminish the land use rights of other users for all estates.  There is evidence of document showing lease on land for estates and has been verified based on the land title that has been provided. Detail as per indicator 4.3.2.1.	Complied
<b>4.3.2.3</b>	Legal perimeter boundary markers should be clearly demarcated and visibly maintained on the ground where practicable. <b>- Major compliance -</b>	Mahamurni Plantations Sdn Bhd through Kulim (M) Berhad established Procedure of Boundary Marker Placement and distribute to estate operation through memo dated 01/11/2007.  Document review, the memo describes those estates need to mark the boundary using concrete pole and painted with red and white stripe.  Legal perimeter boundary markers have been clearly demarcated and visibly maintained for all estates and has been verified based on the sample photo that has been provided the auditor.	Complied
<b>4.3.2.4</b>	Where there are, or have been, disputes, documented proof of legal acquisition of land title and fair compensation that have been or are being made to previous owners and occupants; shall be made available and that these should have been accepted with free prior informed consent (FPIC). <b>- Minor compliance -</b>	Mahamurni Plantations Sdn Bhd through Kulim (M) Berhad established internal procedure for land dispute in the document title Land encroachment: doc. No.: PROP/MP/5 dated 20/10/2014 and revised on 09/06/2020. The procedure has outlined the process if there is any encroachment or land dispute has been identified.  Not applicable for all estate since there is not dispute has been received.	Not applicable
<b>Criterion 4.3.3 – Customary rights</b>			

Criterion / Indicator		Assessment Findings	Compliance
<b>4.3.3.1</b>	Where lands are encumbered by customary rights, the company shall demonstrate that these rights are understood and are not being threatened or reduced. <b>- Major compliance -</b>	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
<b>4.3.3.2</b>	Maps of an appropriate scale showing extent of recognized customary rights land, if any, should be made available. <b>- Minor compliance -</b>	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
<b>4.3.3.3</b>	Negotiation and FPIC shall be recorded and copies of negotiated agreements should be made available. <b>- Major compliance -</b>	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
<b>4.4 Principle 4: Social responsibility, health, safety and employment condition</b>			
<b>Criterion 4.4.1: Social Impact Assessment (SIA)</b>			
<b>4.4.1.1</b>	Social impact should be identified and plans are implemented to mitigate the negative impacts and promote the positive ones. <b>- Minor compliance -</b>	<p>Mahamurni Plantations Sdn Bhd through Kulim (M) Berhad has established SOPs for Social Impact Assessment document number SQD/SMS/3.6 dated 01/08/2020. Mentioned in the SOPs that assessment need to be done with participation of affected parties.</p> <p>Onsite interview with PIC from SQD department informed that assessment has identified positive, negative, and other initiative which been made by providing feedback form to employees, contractor, and stakeholders if there is any respond.</p> <p>Based on SIA action plan, sampled estates have identified as follow issued:</p> <p>While for Pasir Logok Estate, Bukit Kelompok Estate and Pasir Panjang Estate the assessment has been documented and concluded on</p>	Complied

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Criterion / Indicator		Assessment Findings	Compliance						
		<p>30/11/2022 where 3 negative outcomes have been identified which related to save worker passport by their own, 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. Monitoring of grocery price has been done by the management of Pasir Logok Estate, Bukit Kelompok Estate and Pasir Panjang Estate in October 2022 for all the grocery shop.</p> <p>There is evidence that price is reasonable and affordable.</p> <p>Example:</p> <table border="1" style="width: 100%;"> <thead> <tr> <th>Estates</th> <th>Issued</th> <th>Action Taken</th> </tr> </thead> <tbody> <tr> <td>Pasir Logok Estate, Bukit Kelompok Estate, Pasir Panjang Estate</td> <td>3 negative outcomes have been identified which related to save worker passport by their own, late of permit renewal and monitoring of grocery price for grocery store inside the estate.</td> <td>The action taken due to the issues occurred, management had acted by issued the action in Penyerahan Passport – Pekerja Asing with document number ver. 1.0/SID, dated 03/08/2022. Monitor the status of renewal permit of foreign workers digitally with manual established to access into the digital system and monitor monthly list of grocery price against with nearby shop.</td> </tr> </tbody> </table> <p>Pasir Logok Estate conduct briefing on social policy to workers during muster morning on 28/06/2022.</p>	Estates	Issued	Action Taken	Pasir Logok Estate, Bukit Kelompok Estate, Pasir Panjang Estate	3 negative outcomes have been identified which related to save worker passport by their own, late of permit renewal and monitoring of grocery price for grocery store inside the estate.	The action taken due to the issues occurred, management had acted by issued the action in Penyerahan Passport – Pekerja Asing with document number ver. 1.0/SID, dated 03/08/2022. Monitor the status of renewal permit of foreign workers digitally with manual established to access into the digital system and monitor monthly list of grocery price against with nearby shop.	
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<b>Criterion 4.4.2: Complaints and grievances</b>									
<b>4.4.2.1</b>	A system for dealing with complaints and grievances shall be established and documented.	Mahamurni Plantations Sdn Bhd through Kulim (M) Berhad established Grievance Procedure, Doc. No. SQD/SMS/4.1 issue: 1 dated 01/08/2020.	Complied						



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	- <b>Major compliance</b> -	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).	
4.4.2.2	The system shall be able to resolve disputes in an effective, timely and appropriate manner that is accepted by all parties. - <b>Major compliance</b> -	Based on the procedure, the company's dispute resolution mechanism needs 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 Mahamurni Plantations Sdn Bhd top management through 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.  For Pasir Logok Estate, Bukit Kelompok Estate and Pasir Panjang Estate, there is no complaint has been received for year 2021 and 2022.	Complied
4.4.2.3	A complaint form should be made available at the premises, where employees and affected stakeholders can make a complaint. - <b>Minor compliance</b> -	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. - <b>Minor compliance</b> -	Mahamurni Plantations Sdn Bhd through Kulim (M) Berhad has conduct stakeholder consultation meeting which being held virtually for Tunjuk Laut Complex on 14/11/2022 for Southern Region includes Pasir Logok Estate, Bukit Kelompok Estate and Pasir Panjang Estate (includes Bukit Payung division).  Each operating units conduct briefing on Complaints and Grievance produce to workers during muster morning as follow: 1. Bukit Kelompok Estate conduct on 22/04/2022.	Complied

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		2. Pasir Panjang Estate conduct on 09/01/2022. 3. Pasir Panjang Estate conduct briefing on whistle-blowing policy during muster morning to workers on 13/01/2022.	
<b>4.4.2.5</b>	Complaints and resolutions for the last 24 months shall be documented and made available to affected stakeholders upon request. <b>- Major compliance -</b>	For Pasir Logok Estate, Bukit Kelompok Estate and Pasir Panjang Estate, there is no complaint has been received for year 2021 and 2022.	Complied
<b>Criterion 4.4.3: Commitment to contribute to local sustainable development</b>			
<b>4.4.3.1</b>	Growers should contribute to local development in consultation with the local communities. <b>- Minor compliance -</b>	Mahamurni Plantations Sdn Bhd through Kulim (M) Berhad reported in Integrated Report 2021, contributing to the well-being of the communities in which operated. Below is the list of contribution program: <ol style="list-style-type: none"> <li>To support the development of football to Kelab Bola Speak Johor Darul Takzim (JDT)</li> <li>To improve the living conditions of underprivileged communities to Yayasan Johor Corporation</li> <li>Collaboration with MyFundAction (NGO) for post-flood relief in Selangor and Johor</li> <li>Post-flood relief contribution of JCorp group employees to Tabung Bantuan Banjir JCorp</li> <li>Donation to the Johor Cerebral Palsy Association</li> <li>To subsidize the school uniforms of employees' children</li> <li>Contribution to hospitals, government initiated COVID-19 fund, frontliners, hemodialysis patients undergoing Home Surveillance Order for COVID-19, NGOs and communities</li> </ol>	Complied

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		<p>Mahamurni Plantations Sdn Bhd through Kulim (M) Berhad has advertised job vacancy to local community surrounding by displayed to Masjid / Surau notice board, website and involve in 'Karnival Kerjaya Negeri Johor 2022 on dated 06/03/2022.</p> <p>In additional to that, the management of each sampled estates has taken their own initiative to provide contribution to nearby stakeholders as per below:</p> <ol style="list-style-type: none"> <li>1. Pasir Logok Estate made donation based on request from external stakeholders nearby. There is evidence that the management provided contribution to the request with latest dated 14/10/2022.</li> <li>2. Bukit Kelompok Estate made donation based on request from external stakeholders nearby. There is evidence that the management provided contribution to the request with latest dated 15/06/2022.</li> <li>3. Pasir Panjang Estate made donation based on request from external stakeholders nearby. There is evidence that the management provided contribution to the request with latest dated 07/06/2022 and 16/08/2022.</li> </ol> <p>Onsite interview with employees during stakeholder consultation, verified Pasir Logok Estate, Pasir Logok Estate and Bukit Kelompok Estate hired locals as their workers and staffs.</p>	
<b>Criterion 4.4.4: Employees safety and health</b>			
<b>4.4.4.1</b>	<p>An occupational safety and health policy and plan shall be documented, effectively communicated and implemented.</p> <p><b>- Major compliance -</b></p>	<p>Mahamurni Plantations Sdn Bhd through Kulim (M) Berhad established Group Occupational Safety &amp; Health Management Policy and implemented for all mill and estates.</p> <ol style="list-style-type: none"> <li>1. The policy was signed by the Managing Director of Kulim (Malaysia)</li> </ol>	Complied

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		<p>Berhad dated 01/10/2021 and displayed prominently on notice boards in English and local language Bahasa Malaysia.</p> <ol style="list-style-type: none"> <li>2. The Policy is implemented through the OSH activities by the on-site Safety Officers and monitored by OSH Manager from Head Office.</li> <li>3. Included in the policy is the commitment of the Company to provide and maintain a safe and healthy working environment of its employees &amp; contractors &amp; visitors.</li> <li>4. Regularly and continuously conduct education, training and awareness program on OSH to all parties concerned.</li> </ol> <p>Onsite interviews with the workers and staff informed that the employees have been briefed and have understood the policy.</p>	
<b>4.4.4.2</b>	<p>The occupational safety and health plan shall cover the following:</p> <ol style="list-style-type: none"> <li>a) A safety and health policy, which is communicated and implemented.</li> <li>b) The risks of all operations shall be assessed and documented.</li> <li>c) An awareness and training programme which includes the following requirements for employees exposed to pesticides:               <ol style="list-style-type: none"> <li>i. all employees involved shall be adequately trained on safe working practices</li> <li>ii. all precautions attached to products shall be properly observed and applied</li> </ol> </li> <li>d) The management shall provide the appropriate PPE at the place of work to cover all potentially hazardous operations as identified in the risk assessment and control</li> </ol>	<ol style="list-style-type: none"> <li>a) Pasir Logok Estate, Bukit Kelompok Estate and Pasir Panjang Estate conduct briefings to employees were through training, circulars and ad hoc briefing. The briefing conducts using method such as dialogue and displayed in slide presentation, include topics of safety policies, road safety, zero harm, accident history, precautionary measures, prioritize safety, execute work safely, adherence to all safety rules &amp; regulations and to target zero accident.</li> <li>b) Pasir Logok Estate, Bukit Kelompok Estate and Pasir Panjang Estate identified, reviewed significant hazards, risks and determined appropriate risk control measures.</li> </ol> <p>HIRARC records and CHRA reports were verified during the assessment. HIRARC is subject for review in event of the following.</p> <ol style="list-style-type: none"> <li>1. Change in work process</li> <li>2. Revision/changes in legislative requirement</li> <li>3. Occurrence of accidents</li> </ol> <p>Document review, HIRARC for sample estates was formalized on in</p>	Complied

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<p>such as Hazard Identification, Risk Assessment and Risk Control (HIRARC).</p> <p>e) The management shall establish Standard Operating Procedure for handling of chemicals to ensure proper and safe handling and storage in accordance to Occupational Safety Health (Classification Packaging and Labeling) Regulation 1997 and Occupational Safety Health (Use and Standard of Exposure of Chemical Hazardous to Health) Regulation 2000.</p> <p>f) The management shall appoint responsible person(s) for workers' safety and health. The appointed person(s) of trust must have knowledge and access to latest national regulations and collective agreements.</p> <p>g) The management shall conduct regular two-way communication with their employees where issues affecting their business such as employee's health, safety and welfare are discussed openly. Records from such meeting are kept and the concerns of the employees and any remedial actions taken are recorded.</p> <p>h) Accident and emergency procedures shall exist and instructions shall be clearly understood by all employees.</p> <p>i) Employees trained in First Aid should be present at all field operations. A First Aid Kit equipped with approved contents should be available at each worksite.</p> <p>j) Records shall be kept of all accidents and be reviewed periodically at quarterly intervals.</p> <p><b>- Major compliance -</b></p>	<p>2008 with review made annually.</p> <table border="1" style="width: 100%; border-collapse: collapse;"> <thead> <tr> <th>No.</th> <th>Estate</th> <th>Date</th> <th>Activities</th> </tr> </thead> <tbody> <tr> <td>1</td> <td>Pasir Logok</td> <td>Apr 2022</td> <td>All with changes to harvesting</td> </tr> <tr> <td>2</td> <td>Pasir Panjang</td> <td>Mac 2022</td> <td>All with changes to harvesting</td> </tr> <tr> <td>3</td> <td>Bkt Kelompok</td> <td>Sept 2022</td> <td>All with NIL changes.</td> </tr> </tbody> </table> <p>Document review, estates has put significant and routine for all activities were adequately covered with details as follows.</p> <table border="1" style="width: 100%; border-collapse: collapse;"> <thead> <tr> <th>No.</th> <th>Areas/Activities</th> <th>No.</th> <th>Areas /Activities</th> </tr> </thead> <tbody> <tr> <td>1</td> <td>Palm /bunch census</td> <td>12</td> <td>Harvesting &amp; collection</td> </tr> <tr> <td>2</td> <td>Circle /selective spraying</td> <td>13</td> <td>Transportation of workers</td> </tr> <tr> <td>3</td> <td>Confined space</td> <td>14</td> <td>Walking form palm to palm</td> </tr> <tr> <td>4</td> <td>Drainage machinery/ manual</td> <td>15</td> <td>Loose fruit collection</td> </tr> <tr> <td>5</td> <td>Grass cutting</td> <td>16</td> <td>In field machine to 3mt bin</td> </tr> <tr> <td>6</td> <td>Compound sanitation</td> <td>17</td> <td>Water catchment -all activities</td> </tr> <tr> <td>7</td> <td>Fertilizer application</td> <td>18</td> <td>Chemical mixing</td> </tr> <tr> <td>8</td> <td>Replanting</td> <td>19</td> <td>Nursery (where applicable)</td> </tr> <tr> <td>9</td> <td>Chemical Store</td> <td>20</td> <td>Engine Room</td> </tr> <tr> <td>10</td> <td>Workshop</td> <td>21</td> <td>Clinic</td> </tr> <tr> <td>11</td> <td>FFB Transportation</td> <td>22</td> <td>Elephant fencing/ trailing</td> </tr> </tbody> </table> <p>Appropriate risk control measures were determined and implemented for the respective activities and operation. Most of the moving part and rotating machinery were installed with machine guarding and properly covered. Appropriate administrative controls such as safety signage were displayed at all workstations in the estates' office and workshop. In general, the control measures were appropriate to the identified risks. A person-in-charge at each site</p>	No.	Estate	Date	Activities	1	Pasir Logok	Apr 2022	All with changes to harvesting	2	Pasir Panjang	Mac 2022	All with changes to harvesting	3	Bkt Kelompok	Sept 2022	All with NIL changes.	No.	Areas/Activities	No.	Areas /Activities	1	Palm /bunch census	12	Harvesting & collection	2	Circle /selective spraying	13	Transportation of workers	3	Confined space	14	Walking form palm to palm	4	Drainage machinery/ manual	15	Loose fruit collection	5	Grass cutting	16	In field machine to 3mt bin	6	Compound sanitation	17	Water catchment -all activities	7	Fertilizer application	18	Chemical mixing	8	Replanting	19	Nursery (where applicable)	9	Chemical Store	20	Engine Room	10	Workshop	21	Clinic	11	FFB Transportation	22	Elephant fencing/ trailing	
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		<p>was appointed to monitor the implementation of the control measures through the 5S initiative.</p> <p>c) i. Pasir Logok Estate, Bukit Kelompok Estate and Pasir Panjang Estate conduct training include topics of pesticides handling with the precautionary measures of products organized by the manufacturer.</p> <table border="1"> <thead> <tr> <th>No.</th> <th>Subject</th> <th>Pasir Logok Estate</th> <th>Bukit Kelompok Estate</th> <th>Pasir Panjang Estate</th> </tr> </thead> <tbody> <tr> <td>1</td> <td>Triple rinsing - guidelines</td> <td>10/10/2022</td> <td>12/09/2022</td> <td>04/12/2022</td> </tr> <tr> <td>2</td> <td>PPE adherence</td> <td>17/01/2022</td> <td>16/11/2022</td> <td>29/03/2022</td> </tr> <tr> <td>3</td> <td>Pesticide's handling - SOP</td> <td>09/01/2022</td> <td>13/01/2022</td> <td>10/05/2022</td> </tr> <tr> <td>4</td> <td>Spraying guidelines</td> <td>12/01/2022</td> <td>20/01/2022</td> <td>27/01/2022</td> </tr> <tr> <td>5</td> <td>Policies briefing - RSPO &amp; MSPO</td> <td>02/12/2022</td> <td>10/01/2022</td> <td>05/01/2022</td> </tr> <tr> <td>6</td> <td>First Aid Management - PPE</td> <td>21/06/2022</td> <td>28/11/2022</td> <td>25/05/2021</td> </tr> <tr> <td>7</td> <td>WTP/ Chemical Management</td> <td>15/11/2022</td> <td>17/03/2022</td> <td>06/02/2022</td> </tr> </tbody> </table> <p>ii. Training and briefing on the operations were provided for workers to educate them on safe working practices. This is also made to ensure that the applicable precautions are adhered. Training for employees is conducted from time to time based on needs through various method such as on the job training, briefings, meetings, etc. The staff and workers such as the storekeepers, harvesters, pruners, field workers, sprayers, fertilizer and rat bait</p>				No.	Subject	Pasir Logok Estate	Bukit Kelompok Estate	Pasir Panjang Estate	1	Triple rinsing - guidelines	10/10/2022	12/09/2022	04/12/2022	2	PPE adherence	17/01/2022	16/11/2022	29/03/2022	3	Pesticide's handling - SOP	09/01/2022	13/01/2022	10/05/2022	4	Spraying guidelines	12/01/2022	20/01/2022	27/01/2022	5	Policies briefing - RSPO & MSPO	02/12/2022	10/01/2022	05/01/2022	6	First Aid Management - PPE	21/06/2022	28/11/2022	25/05/2021	7	WTP/ Chemical Management	15/11/2022	17/03/2022	06/02/2022	
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	<p>workers were trained, and they had understood the hazards involved and how the chemicals should be used in a safe manner.</p> <p>d) Based on the HIRARC carried out at the estates the PPE types for the various activities were identified and recommended.</p> <table border="1" data-bbox="1072 576 1865 842"> <thead> <tr> <th>No.</th> <th>Category</th> <th>PPE issuance</th> </tr> </thead> <tbody> <tr> <td>1</td> <td>Harvester</td> <td>Safety helmet/ sickle cover/ hand glove/ Wellington boots</td> </tr> <tr> <td>2</td> <td>Sprayers</td> <td>Respirator/nitrile glove/ goggles/ wellington boots/ apron.</td> </tr> <tr> <td>3</td> <td>Manurer</td> <td>Apron, wellington boots, dust mask, nitrile glove.</td> </tr> <tr> <td>4</td> <td>WTP operator</td> <td>Safety boots/ earmuff/ safety vest/ helmet/ cotton glove, dust mask.</td> </tr> </tbody> </table> <p>Sighted issuance of PPE record for the following employees in year 2021/2022.</p> <p>e) Pasir Logok Estate, Bukit Kelompok Estate and Pasir Panjang Estate adopt Mahamurni Plantations Sdn Bhd through Kulim (M) Berhad's SOP for chemical handling. This is available in SID – Operational Control Procedure under subject Chemical Safety Management.</p> <p>This includes compliance related as follow:</p> <ol style="list-style-type: none"> <li>1. Conduct/reassess CHRA</li> <li>2. Review of chemical register</li> <li>3. Chemical management assessment review</li> <li>4. Conduct health surveillance.</li> </ol> <p>The document was sighted and currently applicable to the estate's operations.</p>	No.	Category	PPE issuance	1	Harvester	Safety helmet/ sickle cover/ hand glove/ Wellington boots	2	Sprayers	Respirator/nitrile glove/ goggles/ wellington boots/ apron.	3	Manurer	Apron, wellington boots, dust mask, nitrile glove.	4	WTP operator	Safety boots/ earmuff/ safety vest/ helmet/ cotton glove, dust mask.	
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		<p>Pasir Logok Estate, Bukit Kelompok Estate and Pasir Panjang Estate being assessed with CHRA assessor with details as follow:</p> <table border="1"> <thead> <tr> <th>No.</th> <th>Estate</th> <th>Date</th> <th>Assessor</th> <th colspan="2">DOSH no</th> </tr> </thead> <tbody> <tr> <td>1</td> <td>Pasir Logok</td> <td>13/08/2018</td> <td>QMSPRO Sdn Bhd</td> <td colspan="2">HQ/03/ASS/00/154</td> </tr> <tr> <td>2</td> <td>Bukit Kelompok</td> <td>13/08/2018</td> <td>QMSPRO Sdn Bhd</td> <td colspan="2">HQ/03/ASS/00/154</td> </tr> <tr> <td>3</td> <td>Pasir Panjang</td> <td>13/08/2018</td> <td>QMSPRO Sdn Bhd</td> <td colspan="2">HQ/03/ASS/00/154</td> </tr> </tbody> </table> <p>CHRA report was compiled for each estate with details provided therein below. Document review for CHRA report, includes requirement of medical surveillance as per category of employees.</p> <p>The medical surveillance respectively was performed in Dr Rosman Surie with registration no.: HQ/15/DOC/00/437 from KPJ Bandar Dato Onn.</p> <table border="1"> <thead> <tr> <th>No.</th> <th>Estate</th> <th>Date</th> <th>Wshop/WTP</th> <th>S/Keeper</th> <th>Sprayer</th> <th>Manurer</th> </tr> </thead> <tbody> <tr> <td>1</td> <td>Pasir Logok</td> <td>27/7/2022</td> <td>N/A</td> <td>N/A</td> <td>18</td> <td>N/A</td> </tr> <tr> <td>2</td> <td>Bukit Kelompok</td> <td>26/7/2022</td> <td>3</td> <td>1</td> <td>18</td> <td>15</td> </tr> <tr> <td>3</td> <td>Pasir Panjang</td> <td>21/7/2022</td> <td>21</td> <td>2</td> <td>13</td> <td>30</td> </tr> <tr> <td>4</td> <td>Bukit Payung</td> <td>21/7/2022</td> <td>5</td> <td>2</td> <td>11</td> <td>26</td> </tr> </tbody> </table>					No.	Estate	Date	Assessor	DOSH no		1	Pasir Logok	13/08/2018	QMSPRO Sdn Bhd	HQ/03/ASS/00/154		2	Bukit Kelompok	13/08/2018	QMSPRO Sdn Bhd	HQ/03/ASS/00/154		3	Pasir Panjang	13/08/2018	QMSPRO Sdn Bhd	HQ/03/ASS/00/154		No.	Estate	Date	Wshop/WTP	S/Keeper	Sprayer	Manurer	1	Pasir Logok	27/7/2022	N/A	N/A	18	N/A	2	Bukit Kelompok	26/7/2022	3	1	18	15	3	Pasir Panjang	21/7/2022	21	2	13	30	4	Bukit Payung	21/7/2022	5	2	11	26	
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		<p>Document review of medical surveillance sighted resulted with positive and declared as 'FIT' to handle chemicals. However, the exception to the following UNFIT cases reported as follow:</p> <ol style="list-style-type: none"> <li>1. Pasir Logok Estate - 2 cases</li> <li>2. Bkt Kelompok Estate - 2 cases</li> <li>3. Pasir Panjang Estate - 3 cases</li> </ol> <p>All the UNFIT workers underwent re-examination of medical checks upon tow (2) months of lapses in contact with pesticides.</p> <p>Document review of the re-examination verified has resulted thereafter and declared as FIT to handle chemicals.</p> <p>f) Pasir Logok Estate, Bukit Kelompok Estate and Pasir Panjang Estate managers were appointed as the Chairman of the ESH committee. The letter of appointment for all managers signed by the Chairman - ESG Committee based in Head Office. Managers subsequently assigned duties of ESH coordinator to assistant managers for the down line implementation of ESH practices in the estates. All assistant managers were officially given a letter for such an appointment.</p> <p>g) The estates management conduct regular two-way communication with their employees through the quarterly ESH meeting.</p> <p>Document review, Pasir Logok Estate, Bukit Kelompok Estate and Pasir Panjang Estate conduct meeting as follow:</p> <table border="1"> <thead> <tr> <th>Estate</th> <th>1<sup>st</sup> Meeting</th> <th>2<sup>nd</sup> Meeting</th> <th>3<sup>rd</sup> Meeting</th> <th>4<sup>th</sup> Meeting</th> </tr> </thead> <tbody> <tr> <td>Pasir Logok</td> <td>10/12/2021</td> <td>10/03/2022</td> <td>23/06/2022</td> <td>21/09/3022</td> </tr> <tr> <td>Pasir Panjang</td> <td>14/12/2021</td> <td>24/03/2022</td> <td>18/07/2022</td> <td>11/09/2022</td> </tr> </tbody> </table>	Estate	1 <sup>st</sup> Meeting	2 <sup>nd</sup> Meeting	3 <sup>rd</sup> Meeting	4 <sup>th</sup> Meeting	Pasir Logok	10/12/2021	10/03/2022	23/06/2022	21/09/3022	Pasir Panjang	14/12/2021	24/03/2022	18/07/2022	11/09/2022	
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Pasir Logok	10/12/2021	10/03/2022	23/06/2022	21/09/3022														
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		Bukit Kelompok	14//11/2021	17/03/2022	23/06/2022	15/09/2022								
		<p>Document review on minutes of meeting, sighted workers participated in the discussion mainly on housing and safety.</p> <p>Pasir Logok Estate, Bukit Kelompok Estate and Pasir Panjang Estate adopted the agenda as released SID. Document review agenda is adequately discussed salient issues relating safety, environmental and health.</p> <p>Additional agenda of discussion include as follow:</p> <ol style="list-style-type: none"> <li>1. <i>Laporan Pemakaian PPE</i></li> <li>2. <i>Laporan Prestasi ESH/Kesihatan</i></li> <li>3. <i>Laporan Latihan &amp; SOP/HIRARC</i></li> <li>4. <i>Laporan Pematuhan Undang-Undang</i></li> <li>5. <i>Laporan Pematuhan Oleh Kontraktor</i></li> <li>6. <i>Laporan Kemalangan</i></li> <li>7. <i>Laporan Pemeriksaan Tempat Kerja</i></li> <li>8. <i>Laporan Kesihatan &amp; Kawasan Perumahan</i></li> </ol> <p>h) Mahamurni Plantations Sdn Bhd through Kulim (M) Berhad established policy on 'Crisis Management &amp; Emergency Response' plan as per included in OSH manual and 'Accident and Reporting and Investigation Procedure'.</p> <p>Pasir Logok Estate, Bukit Kelompok Estate and Pasir Panjang Estate adopt the emergencies situation procedures as listed below in the table.</p> <table border="1"> <thead> <tr> <th>No.</th> <th>Emergencies Situation</th> <th>Mill</th> <th>Estate</th> </tr> </thead> <tbody> <tr> <td>1</td> <td>Fire Hazard</td> <td>/</td> <td>/</td> </tr> </tbody> </table>				No.	Emergencies Situation	Mill	Estate	1	Fire Hazard	/	/	
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		2	Injury At Site	/	/															
		3	CPO spillage	/	N/A															
		4	Dieseline spillage	/	/															
		5	Explosion	/	N/A															
		6	Poisonous animals attack	N/A	/															
		7	Flood	/	/															
		8	Workers' Strike	/	/															
		9	Electrocution /Electric shock	/	/															
		10	Gas Release/Leaks	/	N/A															
		11	Explosion Incident	/	N/A															
		12	Rescue retrieval Worker - Confined Space	/	N/A															
		<p>There was formation of ERP Team &amp; ERP for all the identified incidences. The organization chart for the ERP team was established and displayed for information of the employees. The important telephone contact numbers were also provided therein. Procedure's guidelines were issued by SID and amended to tailor to the situation differences in the estates.</p> <p>ERT members will receive training and practice in emergency procedures appropriate to their respective workplace and degree of risk. The training are made by an accredited or qualified organization who can demonstrate their suitability to provide training. Among others the training held by the estates in the CU are;</p>																		
		<table border="1" style="width: 100%; border-collapse: collapse;"> <thead> <tr> <th style="width: 5%;">No.</th> <th style="width: 45%;">Subject</th> <th style="width: 15%;">Pasir Logok Estate</th> <th style="width: 15%;">Bukit Kelompok Estate</th> <th style="width: 20%;">Pasir Panjang Estate</th> </tr> </thead> <tbody> <tr> <td>1</td> <td>CPR/ERP procedure</td> <td>08/08/2022</td> <td>08/03/2022</td> <td>30/11/2022</td> </tr> <tr> <td>2</td> <td>Environment - Fire</td> <td>22/06/2022</td> <td>02/11/2022</td> <td>02/11/2022</td> </tr> </tbody> </table>						No.	Subject	Pasir Logok Estate	Bukit Kelompok Estate	Pasir Panjang Estate	1	CPR/ERP procedure	08/08/2022	08/03/2022	30/11/2022	2	Environment - Fire	22/06/2022
No.	Subject	Pasir Logok Estate	Bukit Kelompok Estate	Pasir Panjang Estate																
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		3	RSPO/ MSPO awareness	13/02/2022	21/02/2022	22/04/2022																															
		4	Policies briefing - RSPO & MSPO	02/12/2022	10/01/2022	05/01/2022																															
		5	Fire - ERP	29/11/2022	10/03/2022	21/04/2021																															
		6	Basic Life Support/ First Aid	N/A	10/02/2021	12/05/2022																															
		7	COVID-19 awareness	06/01/2022	05/06/2022	10/02/2022																															
		8	First Aid Management - PPE	21/06/2022	28/11/2022	25/05/2021																															
		<p>i) The trained personnel for the First Aid were among the employees working in the estates as staff/mandores. Each estates distributed first aid box to mandores and brought along to the field during operations. In addition, there are also first aid boxes kept in the office, store and workshops.</p> <p>j) Accident statistics are being maintained and periodically reviewed (quarterly basis) during ESH committee meeting. The following accident incidents were reported during the meeting as follow:</p> <table border="1"> <thead> <tr> <th>No.</th> <th>Estate</th> <th>Cases</th> <th>LTI</th> <th>Non LTI</th> <th>JKKP 8 submission</th> </tr> </thead> <tbody> <tr> <td>1</td> <td>Pasir Logok</td> <td>17</td> <td>97</td> <td>0</td> <td>24/01/2022</td> </tr> <tr> <td>2</td> <td>Bukit Kelompok</td> <td>5</td> <td>7</td> <td>0</td> <td>24/01/2022</td> </tr> <tr> <td>3</td> <td>Pasir Panjang</td> <td>5</td> <td>6</td> <td>0</td> <td>21/01/2022</td> </tr> <tr> <td>4</td> <td>Bukit Payung Division</td> <td>8</td> <td>10</td> <td>0</td> <td>21/01/2022</td> </tr> </tbody> </table> <p>Mainly all estates had incidences related to harvesting and commuting on motorcycle. LTI recorded highest not more than two (2) days.</p>					No.	Estate	Cases	LTI	Non LTI	JKKP 8 submission	1	Pasir Logok	17	97	0	24/01/2022	2	Bukit Kelompok	5	7	0	24/01/2022	3	Pasir Panjang	5	6	0	21/01/2022	4	Bukit Payung Division	8	10	0	21/01/2022	
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		<p>Accident Statistics are being maintained with satisfactory manner. LTI as of December 2022. Where required submissions using JKKP 6 form and JKKP 8 form to DOSH as per requirement. Investigations and revision of HIRARC were appropriate and accordingly.</p> <p>Pasir Logok Estate, Bukit Kelompok Estate and Pasir Panjang Estate submitted the JKKP 8 form by January 2022 as per DOSH statutory requirement.</p>	
<b>Criterion 4.4.5: Employment conditions</b>			
<b>4.4.5.1</b>	<p>The management shall establish policy on good social practices regarding human rights in respect of industrial harmony. The policy shall be signed by the top management and effectively communicated to the employees.</p> <p><b>- Major compliance -</b></p>	<p>Pasir Logok Estate, Bukit Kelompok Estate and Pasir Panjang Estate adopt Mahamurni Plantations Sdn Bhd's through Kulim (M) Berhad Sustainability policy which newly revised and approved by Kulim's Sustainability &amp; 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>Mahamurni Plantations Sdn Bhd through Kulim (M) Berhad established Core Labour Standard Policy 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>Mahamurni Plantations Sdn Bhd through Kulim (M) Berhad has conduct stakeholder consultation meeting which being held virtually for Tunjuk Laut Complex on 14/11/2022 for Southern Region includes Pasir Logok Estate, Bukit Kelompok Estate and Pasir Panjang Estate (includes Bukit Payung division).</p>	Complied

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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><b>- Major compliance -</b></p>	<p>Mahamurni Plantations Sdn Bhd through Kulim (M) Berhad established Sustainability Policy dated 01/10/2020 describes origin, caste, national origin, religion, disability, gender, sexual orientation, gender identity, union membership, political affiliation or age.</p> <p>Mahamurni Plantations Sdn Bhd through Kulim (M) Berhad has conduct stakeholder consultation meeting which being held virtually for Tunjuk Laut Complex on 14/11/2022 for Southern Region includes Pasir Logok Estate, Bukit Kelompok Estate and Pasir Panjang Estate (includes Bukit Payung division).</p> <p>Bukit Kelompok Estate conduct briefing on No Discrimination and Equal Opportunity during muster morning to workers on 29/04/2022.</p>	Complied																																				
4.4.5.3	<p>Management shall ensure that employees' pay and conditions meet legal or industry minimum standards and as per agreed Collective Agreements. The living wage should be sufficient to meet basic needs and provide some discretionary income based on minimum wage.</p> <p><b>- Major compliance -</b></p>	<p>Mahamurni Plantations Sdn Bhd through Kulim (M) Berhad is committed to ensure that workers' wages are in line and meet the minimum wages. Pasir Logok Estate, Bukit Kelompok Estate and Pasir Panjang Estate apply new Minimum Wages Act 2021. The auditor has taken sample for months of February, March, June or September for verification.</p> <p>As per sampled of payslip, verified wages paid accordingly.</p> <p><u>Pasir Logok Estate</u></p> <table border="1"> <thead> <tr> <th>No.</th> <th>Employee ID</th> <th>Job Descriptions</th> <th>Passport / IC No.</th> </tr> </thead> <tbody> <tr> <td>1.</td> <td>E760001254</td> <td>Field Worker</td> <td>C42xxxx</td> </tr> <tr> <td>2.</td> <td>E760001190</td> <td>Harvester</td> <td>AU49xxxx</td> </tr> <tr> <td>3.</td> <td>E760001049</td> <td>Gardener</td> <td>C274xxxx</td> </tr> <tr> <td>4.</td> <td>E760001189</td> <td>Harvester</td> <td>EG045xxxx</td> </tr> <tr> <td>5.</td> <td>E760001384</td> <td>Field Worker</td> <td>B327xxxx</td> </tr> <tr> <td>6.</td> <td>E760001437</td> <td>Field Worker</td> <td>C950xxxx</td> </tr> <tr> <td>7.</td> <td>E760001441</td> <td>Field Worker</td> <td>E059xxxx</td> </tr> <tr> <td>8.</td> <td>E760001364</td> <td>Sprayer</td> <td>021015-xx-xxxx</td> </tr> </tbody> </table>	No.	Employee ID	Job Descriptions	Passport / IC No.	1.	E760001254	Field Worker	C42xxxx	2.	E760001190	Harvester	AU49xxxx	3.	E760001049	Gardener	C274xxxx	4.	E760001189	Harvester	EG045xxxx	5.	E760001384	Field Worker	B327xxxx	6.	E760001437	Field Worker	C950xxxx	7.	E760001441	Field Worker	E059xxxx	8.	E760001364	Sprayer	021015-xx-xxxx	Complied
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6.	E760001437	Field Worker	C950xxxx																																				
7.	E760001441	Field Worker	E059xxxx																																				
8.	E760001364	Sprayer	021015-xx-xxxx																																				

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Criterion / Indicator		Assessment Findings				Compliance
		9.	E760001338	Sprayer	980505-xx-xxxx	
		10.	E760001384	Field Worker	870117-xx-xxxx	
		Payslip Sample for Pasir Logok Estate:				
		Employee ID	E760001190	E760001364	E760001384	
		JD	Harvester	Sprayer	General Worker	
		Originality	Bangladesh	Malaysia	Indonesia	
		Passport/IC	EG045xxxxx	021015-xx-xxxx	B327xxxx	
		Day Rate/ Piece Rate	MYR106.77 (Piece Rate)	MYR60.29 (Piece Rate)	MYR60.29 (Piece Rate)	
		Rate for Bunch (mt)	Normal: 1,836mt Rest day: 310mt Public Holiday: 329mt	Not Applicable	Not Applicable	
		Overtime	0	(Normal 58 hours)	(Normal 83 hours)	
		Working day	28	26	27	
		Deduction	MYR200 (Advance)	MYR391.75 (Advance, EPF, SOCSO, Insurance, Income Tax)	MYR200.00 (Advance)	
		Employer Contribution	MYR45.60 (SOCSO)	MYR264.22 (EPF, SOCSO, SIP, HRDF)	MYR45.60 (SOCSO)	

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Criterion / Indicator	Assessment Findings	Compliance																																																																
	<p>Pasir Logok Estate conduct briefing on new wages, overtime and deduction on salary to workers during muster morning on 06/07/2022.</p> <p><u>Bukit Kelompok Estate</u></p> <table border="1" data-bbox="1032 552 1868 890"> <thead> <tr> <th>No.</th> <th>Employee ID</th> <th>Job Descriptions</th> <th>Passport / IC No.</th> </tr> </thead> <tbody> <tr><td>1.</td><td>E770004596</td><td>General Worker</td><td>A0314xxxx</td></tr> <tr><td>2.</td><td>E770001550</td><td>Harvester</td><td>B997xxxx</td></tr> <tr><td>3.</td><td>E770001515</td><td>General Worker</td><td>010521-xx-xxxx</td></tr> <tr><td>4.</td><td>E770007650</td><td>Harvester</td><td>C732xxxx</td></tr> <tr><td>5.</td><td>E770003595</td><td>General Worker</td><td>AU38xxxx</td></tr> <tr><td>6.</td><td>E770001343</td><td>General Worker</td><td>000124-xx-xxxx</td></tr> <tr><td>7.</td><td>E770007830</td><td>General Worker</td><td>A0320xxxx</td></tr> <tr><td>8.</td><td>E770007638</td><td>Harvester</td><td>E011xxxx</td></tr> <tr><td>9.</td><td>E770001537</td><td>General Worker</td><td>850728-xx-xxxx</td></tr> </tbody> </table> <p>Payslip Sample for Bukit Kelompok Estate:</p> <table border="1" data-bbox="1032 938 1868 1399"> <thead> <tr> <th>Employee ID</th> <th>E770001550</th> <th>E770007638</th> <th>E770001537</th> </tr> </thead> <tbody> <tr> <td>JD</td> <td>Harvester</td> <td>Harvester</td> <td>General Worker</td> </tr> <tr> <td>Passport/IC</td> <td>B997xxxx</td> <td>E011xxxx</td> <td>850728-xx-xxxx</td> </tr> <tr> <td>Originality</td> <td>Indonesia</td> <td>Indonesia</td> <td>Malaysia</td> </tr> <tr> <td>Day Rate/ Piece Rate</td> <td>MYR92.83 (Piece Rate)</td> <td>MYR61.58 (Piece Rate)</td> <td>MYR59.69 (Piece Rate)</td> </tr> <tr> <td>Rate for Bunch (mt)</td> <td>Normal: 1,839mt Rest day: 679mt Public Holiday: 154mt</td> <td>Normal: 1,421mt Rest day: 66mt Public Holiday: 0mt</td> <td>Not Applicable</td> </tr> </tbody> </table>	No.	Employee ID	Job Descriptions	Passport / IC No.	1.	E770004596	General Worker	A0314xxxx	2.	E770001550	Harvester	B997xxxx	3.	E770001515	General Worker	010521-xx-xxxx	4.	E770007650	Harvester	C732xxxx	5.	E770003595	General Worker	AU38xxxx	6.	E770001343	General Worker	000124-xx-xxxx	7.	E770007830	General Worker	A0320xxxx	8.	E770007638	Harvester	E011xxxx	9.	E770001537	General Worker	850728-xx-xxxx	Employee ID	E770001550	E770007638	E770001537	JD	Harvester	Harvester	General Worker	Passport/IC	B997xxxx	E011xxxx	850728-xx-xxxx	Originality	Indonesia	Indonesia	Malaysia	Day Rate/ Piece Rate	MYR92.83 (Piece Rate)	MYR61.58 (Piece Rate)	MYR59.69 (Piece Rate)	Rate for Bunch (mt)	Normal: 1,839mt Rest day: 679mt Public Holiday: 154mt	Normal: 1,421mt Rest day: 66mt Public Holiday: 0mt	Not Applicable	
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Criterion / Indicator		Assessment Findings				Compliance																																												
		Overtime	Not Applicable	Not Applicable	NIL																																													
		Working day	26	23	21																																													
		Deduction	MYR357.45 (Income tax, Advance)	MYR300.00 (Advance)	MYR471.15 (Advance)																																													
		Employer Contribution	MYR46.90 (SOCSO)	MYR25.60 (SOCSO)	MYR230.91 (EPF, SOCSO, SIP Insurance, HRDF)																																													
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		JD	General Worker	General Worker	General Worker																																													

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Criterion / Indicator		Assessment Findings				Compliance
		Passport/IC	C381xxxx	030127-xx-xxxx	EJ040xxxx	
		Originality	Indonesia	Malaysia	Bangladesh	
		Day Rate /Piece Rate	MYR62.69 (Piece Rate)	MYR62.69 (Piece Rate)	MYR63.52 (Piece Rate)	
		Rate for Bunch (mt)	Not Applicable	Not Applicable	Not Applicable	
		Overtime	(Normal 59 hours)	(Normal 36 hours)	(Normal 66 hours)	
		Working day	24	21	24	
		Deduction	MYR200.00 (Advance)	MYR381.65 (Advance, EPF, SOCSO, SIP)	MYR400.00 (Advance)	
		Employer Contribution	MYR31.90 (SOCSO)	MYR248.58 (EPF, SOCSO, SIP, HRDF)	MYR31.90 (SOCSO)	
		Pasir Panjang Estate conduct briefing on new wages rate for salary to workers during muster morning on 09/05/2022.				
<b>4.4.5.4</b>	Management should ensure employees of contractors are paid based on legal or industry minimum standards according to the employment contract agreed between the contractor and his employee. <b>- Minor compliance -</b>	There is evidence that all employees of contractor have been paid based on local regulations and has been verified by the auditor. Employment contract, payslips, SOCSO and EPF has been reviewed.				Complied
<b>4.4.5.5</b>	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	Pasir Logok Estate, Bukit Kelompok Estate and Pasir Panjang Estate 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				Complied

Criterion / Indicator		Assessment Findings	Compliance
	of entry, a job description, wage and the period of employment. <b>- Major compliance -</b>	birth and date entry. The list has categorized the workers base on origin of the workers which are Indonesia, Bangladesh and Malaysia.	
<b>4.4.5.6</b>	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. <b>- Major compliance -</b>	<p>Pasir Logok Estate, Bukit Kelompok Estate and Pasir Panjang Estate, total 28 samples of employment contract have been taken as sample for verification. There is evidence 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"> <li>1. KWSP</li> <li>2. PERKESO</li> <li>3. Skim Khairat Keluarga</li> <li>4. NUPW</li> <li>5. Electricity if exceeds the limit 50kWh per house</li> <li>6. Water if exceeds the limit 35gallon per workers.</li> </ol> <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>Document review on 'Kontrak Pekerjaan – Pekerja Asing, stated Mahamurni Plantations Sdn Bhd through Kulim (M) Berhad updated with revision 04 updated by June 2022 includes additional benefit for workers on leave vacation pay, agreed deduction from salary, medical treatment cost and agreed deduction from employee salary with authority approval.</p>	Complied

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Criterion / Indicator		Assessment Findings	Compliance			
		Bukit Kelompok Estate conduct briefing on paid annual leave to workers during muster morning on 29/04/2022.				
<b>4.4.5.7</b>	The management shall establish a time recording system that makes working hours and overtime transparent for both employees and employer. <b>- Major compliance -</b>	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 logbook 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.	Complied			
<b>4.4.5.8</b>	The working hours and breaks of each individual employee as indicated in the time records shall comply with legal regulations and collective agreements. Overtime shall be mutually agreed and shall always be compensated at the rate applicable and shall meet the applicable legal requirement. <b>- Major compliance -</b>	As per mentioned in the employment contract, stated that working hours is from 6.30 am until 2.30pm. Mentioned also breaking hours is from 11.00am - 11.30am. 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 130 hours/ months. For overtime, each worker has their own logbook 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.	Complied			
<b>4.4.5.9</b>	Wages and overtime payment documented on the pay slips shall be in line with legal regulations and collective agreements. <b>- Major compliance -</b>	Mahamurni Plantations Sdn Bhd through Kulim (M) Berhad is committed to ensure that workers' wages are in line and meet the minimum wages. Pasir Logok Estate, Bukit Kelompok Estate and Pasir Panjang Estate apply new Minimum Wages Act 2021. There is evidence that wages and overtime payment documented on the pay slips in line with legal regulations and collective agreements. Five (5) samples of workers have been taken for each estate for month February, May and October. Details of wages as per below: Payslip Sample for Pasir Logok Estate: <table border="1" data-bbox="1025 1362 1868 1396"> <tr> <td>Employee ID</td> <td>E760001364</td> <td>E760001384</td> </tr> </table>	Employee ID	E760001364	E760001384	Complied
Employee ID	E760001364	E760001384				

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Criterion / Indicator		Assessment Findings				Compliance
		JD	Sprayer	General Worker		
		Originality	Malaysia	Indonesia		
		Passport/IC	021015-xx-xxxx	B327xxxx		
		Overtime	(Normal 58 hours)	(Normal 83 hours)		
		Payslip Sample for Bukit Kelompok Estate:				
		Employee ID	E690001803	E690002170	E690007204	
		JD	General Worker	General Worker	General Worker	
		Passport/IC	C381xxxx	030127-xx-xxxx	EJ040xxxx	
		Originality	Indonesia	Malaysia	Bangladesh	
		Overtime	(Normal 59 hours)	(Normal 36 hours)	(Normal 66 hours)	
<b>4.4.5.10</b>	Other forms of social benefits should be offered by the employer to employees, their families or community such as incentives for good work performance, bonus payment, support of professional development, medical care provisions and improvement of social surroundings. <b>- Minor compliance -</b>	Mahamurni Plantations Sdn Bhd through Kulim (M) Berhad offer social benefit 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
<b>4.4.5.11</b>	In cases where on-site living quarters are provided, these quarters shall be habitable and have basic amenities and facilities in compliance with the Workers' Minimum Standards Housing and Amenities Act 1990 (Act 446) or any other applicable legislation. <b>- Major compliance -</b>	Pasir Logok Estate, Bukit Kelompok Estate and Pasir Panjang Estate employees are provided with benefits such as free housing with amenities such as football field, badminton/ takraw fields, surau/ mosque, free medical treatment (includes their dependents) and creche facilities. Water and electricity were subsidized for 30 gallons and 50kWh per person and stated in the employment contract. <u>Pasir Logok Estate</u>				OFI

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		<p>Visiting Medical Officer (VMO) latest dated 27/11/2022, 07/11/2022, 27/10/2022, 16/10/2022, 19/09/2022, 12/09/2022, 25/08/2022, 14/08/2022, 20/07/2022 and 03/07/2022 was made by doctor from Klinik Moiz Sdn Bhd.</p> <p>Linesite inspection conduct by Pasir Logok Estate management for workers housing dated 05/10/2022, 12/10/2022, 18/10/2022 and 23/10/2022 For inspection dated 26/10/2022.</p> <p><u>Bukit Kelompok Estate</u></p> <p>Visiting Medical Officer (VMO) latest dated 27/11/2022, 07/11/2022, 27/10/2022, 16/10/2022, 19/09/2022, 12/09/2022, 25/08/2022, 14/08/2022, 20/07/2022 and 03/07/2022 was made by doctor from Klinik Moiz Sdn Bhd.</p> <p>Linesite inspection conducted 28/10/2022, 04/11/2022, 11/11/2022, 17/11/2022 and 25/11/2022.</p> <p><u>Pasir Panjang Estate</u></p> <p>Visiting Medical Officer (VMO) latest dated 16/10/2022, 27/10/2022, 07/11/2022, 22/11/2022 and 04/12/2022 was made by doctor from Klinik Moiz Sdn Bhd.</p> <p>Linesite inspection conduct by Pasir Panjang Estate management for workers housing dated 25/10/2022 and 26/10/2022.</p> <p><u>Opportunity for Improvement</u></p> <p>The linesite inspection can be further improved to identify all potential issue which may lead to inconducive conditions.</p>	
<b>4.4.5.12</b>	The management shall establish a policy and provide guidelines to prevent all forms of sexual harassment and violence at the workplace.	Mahamurni Plantations Sdn Bhd through Kulim (M) Berhad has established sexual harassment policy signed by Managing Director dated 01/10/2021. The policy describes of company derive from the local regulation Employment act 1955 and commitment to ensure by providing	Complied

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<p><b>- Major compliance -</b></p>	<p>safe workplace with no abuse and no sexual harassment to direct and indirectly to all workers and stakeholders.</p> <p>Pasir Logok Estate, Bukit Kelompok Estate and Pasir Panjang Estate has established WOW complaint panel which received any complaint especially sexual harassment, complaint and grievance procedure and whistle blowing policy.</p> <p>WOW meeting conduct to discuss agenda includes women empower activities, new committee members lineup, functional of the 'Women on Ward', company polices, sexual harassment abuse among women employee, job equality, complaint procedures, channel of complaints to Panel Aduan WOW Ladang or HQ if any serious cases reported by complainant, domestic violence and status of latest pregnant woman in estate.</p> <p>Each respective estates conduct WOW meeting with dates as follow:</p> <ol style="list-style-type: none"> <li>1. Pasir Logok Estate conduct on 10/03/2022 at Kelab WOW Ladang Pasir Logok.</li> <li>2. Bukit Kelompok Estate conduct on 16/10/2022 at Rumah WOW Ladang Bukit Kelompok.</li> <li>3. Pasir Panjang Estate conduct WOW meeting on 14/10/2022 at Meeting Room, Pasir Panjang Estate's office.</li> </ol> <p>Mahamurni Plantations Sdn Bhd conduct briefing to workers during muster morning with topics and dates as follow:</p> <ol style="list-style-type: none"> <li>1. Pasir Logok Estate conduct briefing with topics and dates as follow:               <ol style="list-style-type: none"> <li>i. Ethic policy to workers during muster morning on 14/07/2022.</li> <li>ii. Sexual harassment policy to workers during muster morning on 18/07/2022.</li> </ol> </li> </ol>	

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		<ul style="list-style-type: none"> <li>iii. No present policy to workers during muster morning on 01/08/2022.</li> <li>iv. Impartiality Conflict Policy to workers during muster morning on 14/10/2022.</li> <li>v. Anti-Bribery policy to workers during muster morning on 17/10/2022.</li> </ul> <p>2. Bukit Kelompok Estate conduct briefing on sexual harassment policy to workers during muster morning on 13/06/2022.</p> <p>3. Pasir Panjang Estate conduct briefing on sexual harassment policy to workers during muster morning on 09/02/2022.</p>	
<b>4.4.5.13</b>	<p>The management shall respect the right of all employees to form or join trade union and allow workers own representative(s) to facilitate collective bargaining in accordance with applicable laws and regulations. Employees shall be given the freedom to join a trade union relevant to the industry or to organize themselves for collective bargaining. Employees shall have the right to organize and negotiate their work conditions. Employees exercising this right should not be discriminated against or suffer repercussions.</p> <p><b>- Major compliance -</b></p>	<p>Mahamurni Plantations Sdn Bhd through Kulim (M) Berhad 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 signed by Managing Director dated 01/10/2021. The workers have their freedom to join the NUPW. This was evident from NUPW membership subscription deductions made in the pay slips.</p> <p>Onsite interview employees informed they have no restriction to join any form of association or union.</p> <p>Trade union management meeting conducted at Pasir Logok Estate dated 13/05/2022, Bukit Kelompok Estate dated 23/05/2022 and Pasir Panjang Estate dated 19/01/2022. The meeting attended by both management, union representative and workers representative. There are no negative issues has been discussed, matter of discussion includes related to on the company policy and procedure, workers to write letter of permission for exist estate's premises and new wages proposal in new circular with MAPA status.</p>	Complied



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Criterion / Indicator		Assessment Findings	Compliance
		<p>Mahamurni Plantations Sdn Bhd conduct briefing to workers during muster morning with topics and dates as follow:</p> <ol style="list-style-type: none"> <li>1. Pasir Logok Estate conduct briefing on Freedom of Association to workers during muster morning on 20/01/2022.</li> <li>2. Pasir Logok Estate conduct briefing on Discrimination to workers during muster morning on 24/06/2022.</li> <li>3. Pasir Logok Estate conduct briefing on Core Labour Standard Policy to workers during muster morning on 02/12/2022.</li> <li>4. Bukit Kelompok Estate conduct briefing on Freedom of Association to workers during muster morning on 05/06/2022.</li> <li>5. Bukit Kelompok Estate conduct briefing on Core Labour Standard Policy to workers during muster morning on 06/01/2022.</li> <li>6. Pasir Panjang Estate conduct briefing on Freedom of Association to workers during muster morning on 06/03/2022.</li> <li>7. Pasir Panjang Estate conduct briefing on Core Labour Standard Policy to workers during muster morning on 11/05/2022.</li> </ol>	
<b>4.4.5.14</b>	<p>Children and young persons shall not be employed or exploited. The minimum age shall comply with local, state and national legislation. Work by children and young persons is acceptable on family farms, under adult supervision, and when not interfering with their education. They shall not be exposed to hazardous working conditions.</p> <p><b>- Major compliance -</b></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. Bukit Kelompok Estate conduct briefing on Child Labour Standard Policy to workers during muster morning on 01/08/2022.</p>	Complied
<b>Criterion 4.4.6: Training and competency</b>			

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Criterion / Indicator		Assessment Findings				Compliance																																																																																																
<p><b>4.4.6.1</b></p> <p>All employees, contractors and relevant smallholders are appropriately trained. A training programme (appropriate to the scale of the organization) that includes regular assessment of training needs and documentation, including records of training shall be kept.</p> <p><b>- Major compliance -</b></p>	<p>Pasir Logok Estate, Bukit Kelompok Estate and Pasir Panjang Estate conduct training during musters and estate’s community hall.</p> <p>Document review of following training made for the employees were recorded as follows. Subjects extracted were mainly related to ESH, company SOP and pesticide handling etc.</p> <table border="1"> <thead> <tr> <th>No.</th> <th>Subject</th> <th>Pasir Logok Estate</th> <th>Bukit Kelompok Estate</th> <th>Pasir Panjang Estate</th> </tr> </thead> <tbody> <tr><td>1</td><td>CPR/ERP procedure</td><td>08/08/2022</td><td>08/03/2022</td><td>30/11/2022</td></tr> <tr><td>2</td><td>Compound hygiene &amp; disease</td><td>18/08/2022</td><td>13/03/2022</td><td>03/10/2022</td></tr> <tr><td>3</td><td>Safety Health Awareness</td><td>03/11/2022</td><td>25/01/2022</td><td>27/04/2022</td></tr> <tr><td>4</td><td>FFB Grading Guidelines</td><td>12/08/2022</td><td>10/01/2022</td><td>10/08/2022</td></tr> <tr><td>5</td><td>Recycling Environment - Fire</td><td>22/06/2022</td><td>02/11/2022</td><td>02/11/2022</td></tr> <tr><td>6</td><td>RSPO/ MSPO awareness</td><td>13/02/2022</td><td>21/02/2022</td><td>22/04/2022</td></tr> <tr><td>7</td><td>Fertilizer application - calibration</td><td>13/03/2022</td><td>17/02/2022</td><td>26/04/2022</td></tr> <tr><td>8</td><td>Buffer zone maintenance</td><td>21/07/2022</td><td>03/10/2022</td><td>29/03/2022</td></tr> <tr><td>9</td><td>Oil trap- procedure/ maintenance</td><td>17/05/2022</td><td>20/03/2022</td><td>13/11/2022</td></tr> <tr><td>10</td><td>Sch Waste inventory/ disposal</td><td>20/09/2022</td><td>24/01/2022</td><td>05/09/2022</td></tr> <tr><td>11</td><td>Triple rinsing – guidelines</td><td>10/10/2022</td><td>12/09/2022</td><td>04/12/2022</td></tr> <tr><td>12</td><td>Pay Slip/ Employment Contract</td><td>06/07/2022</td><td>05/06/2022</td><td>09/05/2022</td></tr> <tr><td>13</td><td>Fertilizer application</td><td>08/03/2022</td><td>22/03/2022</td><td>09/05/2022</td></tr> <tr><td>14</td><td>Rat baiting - SOP</td><td>23/01/2022</td><td>16/01/2022</td><td>15/03/2022</td></tr> <tr><td>15</td><td>Harvesting FFB</td><td>22/02/2022</td><td>15/03/2022</td><td>05/04/2022</td></tr> <tr><td>16</td><td>Fogging Operations</td><td>12/09/2022</td><td>22/03/2022</td><td>11/01/2022</td></tr> <tr><td>17</td><td>PPE adherence</td><td>17/01/2022</td><td>16/11/2022</td><td>29/03/2022</td></tr> <tr><td>18</td><td>Pesticide’s handling - SOP</td><td>09/01/2022</td><td>13/01/2022</td><td>10/05/2022</td></tr> <tr><td>19</td><td>Harvesting SOP</td><td>N/A</td><td>18/10/2021</td><td>N/A</td></tr> </tbody> </table>	No.	Subject	Pasir Logok Estate	Bukit Kelompok Estate	Pasir Panjang Estate	1	CPR/ERP procedure	08/08/2022	08/03/2022	30/11/2022	2	Compound hygiene & disease	18/08/2022	13/03/2022	03/10/2022	3	Safety Health Awareness	03/11/2022	25/01/2022	27/04/2022	4	FFB Grading Guidelines	12/08/2022	10/01/2022	10/08/2022	5	Recycling Environment - Fire	22/06/2022	02/11/2022	02/11/2022	6	RSPO/ MSPO awareness	13/02/2022	21/02/2022	22/04/2022	7	Fertilizer application - calibration	13/03/2022	17/02/2022	26/04/2022	8	Buffer zone maintenance	21/07/2022	03/10/2022	29/03/2022	9	Oil trap- procedure/ maintenance	17/05/2022	20/03/2022	13/11/2022	10	Sch Waste inventory/ disposal	20/09/2022	24/01/2022	05/09/2022	11	Triple rinsing – guidelines	10/10/2022	12/09/2022	04/12/2022	12	Pay Slip/ Employment Contract	06/07/2022	05/06/2022	09/05/2022	13	Fertilizer application	08/03/2022	22/03/2022	09/05/2022	14	Rat baiting - SOP	23/01/2022	16/01/2022	15/03/2022	15	Harvesting FFB	22/02/2022	15/03/2022	05/04/2022	16	Fogging Operations	12/09/2022	22/03/2022	11/01/2022	17	PPE adherence	17/01/2022	16/11/2022	29/03/2022	18	Pesticide’s handling - SOP	09/01/2022	13/01/2022	10/05/2022	19	Harvesting SOP	N/A	18/10/2021	N/A	Complied
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		20	Workplace inspection ESH	07/04/2022	09/03/2022	27/04/2022	
		21	Tractor/ Vehicles safe driving	09/06/2022	04/07/2022	15/07/2021	
		22	Lorry drivers safe driving	28/11/2022	07/10/2022	16/11/2022	
		23	Spraying guidelines	12/01/2022	20/01/2022	27/01/2022	
		24	Policies briefing – RSPO & MSPO	02/12/2022	10/01/2022	05/01/2022	
		25	Fire - ERP	29/11/2022	10/03/2022	21/04/2021	
		26	IPM management	11/10/2022	20/02/2022	12/10/2022	
		27	RTE/ HCV/ Buffer Zone-Guide	08/11/2022	03/10/2022	07/11/2022	
		28	Work ethics & conduct/ Gender	13/10/2022	06/02/2022	16/08/2022	
		29	Basic Life Support/ First Aid	N/A	10/02/2021	12/05/2022	
		30	COVID-19 awareness	06/01/2022	05/06/2022	10/02/2022	
		31	First Aid Management - PPE	21/06/2022	28/11/2022	25/05/2021	
		32	W/bridge Operations - Gen Set	12/04/2022	13/06/2022	07/03/2022	
		33	Complaint Procedure/ Induction	08/07/2022	15/09/2022	09/01/2022	
		34	Sexual Harassment/ Channel	18/07/2022	13/06/2022	09/02/2022	
		35	Landfill Management/ SOP	24/05/2022	10/01/2022	12/05/2022	
		36	WTP/ Chemical Management	15/11/2022	17/03/2022	06/02/2022	
		37	Working at height SOP	27/09/2022	29/09/2022	21/09/2022	
<b>4.4.6.2</b>	<p>Training needs of individual employees shall be identified prior to the planning and implementation of the training programmes in order to provide the specific skill and competency required to all employees based on their job description.</p> <p><b>- Major compliance -</b></p>	<p>Pasir Logok Estate, Bukit Kelompok Estate and Pasir Panjang Estate has identified the training needs with details include categories as follow:</p> <ol style="list-style-type: none"> <li>1. Job descriptions.</li> <li>2. Sections.</li> <li>3. Employees' group.</li> </ol> <p>Topic of the program as follow:</p> <ol style="list-style-type: none"> <li>1. Environment, safety &amp; health policy</li> </ol>				Complied	

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		2. Scheduled waste management 3. Environmental responsibility, HCV & Biodiversity training 4. Field activities and operations procedures 5. Equipment handling, vehicles maintenance, etc.																																																																															
<b>4.4.6.3</b>	<p>A continuous training programme should be planned and implemented to ensure that all employees are well trained in their job function and responsibility, in accordance to the documented training procedure.</p> <p><b>- Minor compliance -</b></p>	<p>Formal training programs for 2022 that covered aspects of the MSPO with regular assessments of training needs were available for all the audited sites. Training Plan was for each operating unit were established. A training need identification matrix has been established with target dates for the training identified. The training program among others includes the following subjects:</p> <table border="1"> <thead> <tr> <th rowspan="2">No.</th> <th rowspan="2">Subjects</th> <th colspan="3">Month</th> </tr> <tr> <th>1-4</th> <th>5-8</th> <th>9-12</th> </tr> </thead> <tbody> <tr> <td>1</td> <td>ESH Legal &amp; Other requirements</td> <td>/</td> <td>-</td> <td>-</td> </tr> <tr> <td>2</td> <td>Use &amp; Standard Exposure of Chemical Hazardous to Health (USECHH) 2000</td> <td>/</td> <td>-</td> <td>-</td> </tr> <tr> <td>3</td> <td>Accident Investigation Techniques</td> <td>/</td> <td>-</td> <td>-</td> </tr> <tr> <td>4</td> <td>ER Plan (Chemical spill/flood /poisoning/Fire)</td> <td>/</td> <td>-</td> <td>/</td> </tr> <tr> <td>5</td> <td>First Aid Training</td> <td>/</td> <td>-</td> <td>/</td> </tr> <tr> <td>6</td> <td>Scheduled waste management</td> <td>/</td> <td>/</td> <td>-</td> </tr> <tr> <td>7</td> <td>Safe Work Procedure for All Stations.</td> <td>/</td> <td>-</td> <td>/</td> </tr> <tr> <td>8</td> <td>Confined Space Training</td> <td>-</td> <td>/</td> <td>-</td> </tr> <tr> <td>9</td> <td>Policy Training</td> <td>/</td> <td>-</td> <td>/</td> </tr> <tr> <td>10</td> <td>Effective workplace inspection</td> <td>-</td> <td>/</td> <td>/</td> </tr> <tr> <td>11</td> <td>GAP training / SW</td> <td>/</td> <td>/</td> <td>/</td> </tr> <tr> <td>12</td> <td>RSPO &amp; Management Training,</td> <td>/</td> <td>-</td> <td>/</td> </tr> <tr> <td>13</td> <td>RSPO Human Right Training,</td> <td>/</td> <td>-</td> <td>/</td> </tr> <tr> <td>14</td> <td>Briefing on KMB Policies</td> <td>/</td> <td>-</td> <td>/</td> </tr> </tbody> </table>	No.	Subjects	Month			1-4	5-8	9-12	1	ESH Legal & Other requirements	/	-	-	2	Use & Standard Exposure of Chemical Hazardous to Health (USECHH) 2000	/	-	-	3	Accident Investigation Techniques	/	-	-	4	ER Plan (Chemical spill/flood /poisoning/Fire)	/	-	/	5	First Aid Training	/	-	/	6	Scheduled waste management	/	/	-	7	Safe Work Procedure for All Stations.	/	-	/	8	Confined Space Training	-	/	-	9	Policy Training	/	-	/	10	Effective workplace inspection	-	/	/	11	GAP training / SW	/	/	/	12	RSPO & Management Training,	/	-	/	13	RSPO Human Right Training,	/	-	/	14	Briefing on KMB Policies	/	-	/	Complied
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Criterion / Indicator		Assessment Findings			Compliance		
		15	Maintenance of spraying equipment	/	/	/	
		16	HCV Training for Region	-	/	/	
		17	Safe handling of Electrical Equipment	/	-	/	
		18	MSDS/CSDS	/	-	/	
		19	5 S Housekeeping	/	/	-	
		20	PPE adherence	/	/	-	
		21	Estate Activities / Mill workstations	/	/	/	
		22	Triple rinsing	/	/		
		23	Effective workplace inspection	-	/	/	
		24	HIRARC	/	-	/	
		25	Safe driving techniques	/	-	/	
<b>4.5 Principle 5: Environment, natural resources, biodiversity and ecosystem services</b>							
<b>Criterion 4.5.1: Environmental Management Plan</b>							
<b>4.5.1.1</b>	An environmental policy and management plan in compliance with the relevant country and state environmental laws shall be developed, effectively communicated and implemented.  <b>- Major compliance -</b>	<p>Mahamurni Plantations Sdn Bhd through Kulim (Malaysia) Berhad established Environmental Management Policy signed by Managing Director updated 01/10/2021.</p> <p>The policy describes company commitment 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> <ol style="list-style-type: none"> <li>1. Adhere to and comply with relevant environmental legislations of the country. Strive for continual improvement on our environmental performance.</li> <li>2. 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.</li> <li>3. Continue to explore and implement cost effective technology in</li> </ol>				Complied	

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	<p>environmental Policy and the achievement of environmental objectives and targets.</p> <ol style="list-style-type: none"> <li>4. Review, adopt and implement Good Management Practices currently established in the industry.</li> <li>5. Plan, assess and take judicious actions to alleviate any potential negative impacts on the environment and local community with respect to any new development.</li> <li>6. Adopt and implement the principles of Reduction, Reuse and recycle in all matters pertaining to the use of resources and to pollution elimination.</li> <li>7. 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.</li> <li>8. Monitor and report to the Board of Directors on the implementation of this Environmental Policy, and the achievement of environmental objectives and targets.</li> </ol> <p>Communications to the internal were through briefing at muster grounds. The session conducted as sample follows: -</p> <table border="1" data-bbox="1032 1070 1870 1206"> <thead> <tr> <th>Estates</th> <th>Date</th> <th>No of Participants</th> </tr> </thead> <tbody> <tr> <td>Pasir Logok</td> <td>12/01/2022</td> <td>109</td> </tr> <tr> <td>Bukit Kelompok</td> <td>06/02/2022</td> <td>102</td> </tr> <tr> <td>Pasir Panjang</td> <td>20/04/2022</td> <td>113</td> </tr> </tbody> </table> <p><u>Pasir Logok Estate.</u> All workers briefing being conducted on 12/01/2022 through muster morning rollcall by Sr. Asst. Manager attended by 102 participants.</p> <p><u>Bukit Kelompok Estate.</u></p>	Estates	Date	No of Participants	Pasir Logok	12/01/2022	109	Bukit Kelompok	06/02/2022	102	Pasir Panjang	20/04/2022	113	
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		<p>All workers briefing being conducted on 06/02/2022 through muster morning rollcall by Assistant Manager attended by 109 participants.  <u>Pasir Panjang Estate.</u></p> <p>All workers briefing being conducted on 20/04/2022 muster morning rollcall by Assistant Manager attended by 113 participants.</p>	
<b>4.5.1.2</b>	<p>The environmental management plan shall cover the following:</p> <p>a) An environmental policy and objectives;</p> <p>b) The aspects and impacts analysis of all operations.</p> <p><b>- Major compliance -</b></p>	<p>Mahamurni Plantations Sdn Bhd through Kulim (Malaysia) Berhad established Sustainability Policy signed by Managing Director updated in 01/10/2021.</p> <p>The policy describes company is actively seeking continually improve environmental performance through:</p> <ol style="list-style-type: none"> <li>1. Pollution prevention by minimizing emissions to air, land and water. Optimal use of renewable resources, while minimizing the use of non-renewable resource.</li> <li>2. Provision of adequate resources for effective implementation of Sustainable Management Programs</li> <li>3. Ensuring integration of Sustainable programs with all other company policies.</li> </ol> <p>Pasir Logok Estate, Bukit Kelompok Estate and Pasir Panjang Estate 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 in estate such as harvesting, office, workshop, manuring and spraying, etc.</p>	Complied
<b>4.5.1.3</b>	<p>An environmental improvement plan to mitigate the negative impacts and to promote the positive ones, shall be developed, effectively implemented and monitored.</p>	<p>Pasir Logok Estate, Bukit Kelompok Estate and Pasir Panjang Estate develop Environmental Risk Assessment for year 2022 mitigation on plan</p>	Complied

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	- Major compliance -	for negative impacts and promote the positive activity been identified in Waste & Pollution Management Plan. Sample taken at Bukit Kelompok Estate as follows on the ERA: <table border="1" style="width: 100%; border-collapse: collapse;"> <thead> <tr> <th>Process/ Area</th> <th>Sub-activity</th> <th>Aspect</th> <th>Impact</th> <th>Control measures</th> </tr> </thead> <tbody> <tr> <td>Workshop</td> <td>Welding</td> <td>Disposal of welding rod and scrap iron</td> <td>Land Pollution</td> <td>Work instruction for maintenance works.</td> </tr> <tr> <td>Harvesting</td> <td>Harvesting</td> <td>Spillage of oil from loose fruit into field drain when expose to rain</td> <td>Water pollution</td> <td>SOP Procedure</td> </tr> <tr> <td>Manuring</td> <td>Transport fertilizer to field</td> <td>Emission of noise</td> <td>Noise pollution</td> <td>Work instruction. Vehicle maintenance.</td> </tr> </tbody> </table>					Process/ Area	Sub-activity	Aspect	Impact	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	Work instruction. Vehicle maintenance.	
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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: 1. 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>Kitchen waste</td> <td>Line site</td> <td>Disposed into landfill</td> <td>Twice or thrice depending on situation</td> </tr> <tr> <td>Broken computer</td> <td>Office</td> <td>Collect and placed in the Scheduled</td> <td>Within 180 days from date of waste generated</td> </tr> </tbody> </table>					Waste Type	Source	Action Plan	Frequency	Kitchen waste	Line site	Disposed into landfill	Twice or thrice depending on situation	Broken computer	Office	Collect and placed in the Scheduled	Within 180 days from date of waste generated	Complied								
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		equipment's (SW 110)		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.		
		Batteries (SW 102)	Works hop	Collect and placed in Scheduled Waste Store.	Disposed to license DOE Contractors within 180 days from date of waste generated.	
2. Emission Management Plan						
		<b>Waste Type</b>	<b>Source</b>	<b>Action Plan</b>	<b>Frequency</b>	
		Dark smoke	All running 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	
		Air pollutant	Running of vehicles	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.																																																																							
<b>4.5.1.5</b>	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.  <b>- Major compliance -</b>	<p>An Environmental training program is available in Training Plan updated on a yearly basis. Sample taken as below:</p> <table border="1"> <thead> <tr> <th>No</th> <th>Subject</th> <th>Pasir Logok Estate</th> <th>Bukit Kelompok Estate</th> <th>Pasir Panjang Estate</th> </tr> </thead> <tbody> <tr><td>1</td><td>Compound hygiene &amp; disease</td><td>18/08/2022</td><td>13/03/2022</td><td>03/10/2022</td></tr> <tr><td>2</td><td>Recycling Environment - Fire</td><td>22/06/2022</td><td>02/11/2022</td><td>02/11/2022</td></tr> <tr><td>3</td><td>RSPO/ MSPO awareness</td><td>13/02/2022</td><td>21/02/2022</td><td>22/04/2022</td></tr> <tr><td>4</td><td>Buffer zone maintenance</td><td>21/07/2022</td><td>03/10/2022</td><td>29/03/2022</td></tr> <tr><td>5</td><td>Oil trap- procedure/ maintenance</td><td>17/05/2022</td><td>20/03/2022</td><td>13/11/2022</td></tr> <tr><td>6</td><td>Sch Waste inventory/ disposal</td><td>20/09/2022</td><td>24/01/2022</td><td>05/09/2022</td></tr> <tr><td>7</td><td>Triple rinsing – guidelines</td><td>10/10/2022</td><td>12/09/2022</td><td>04/12/2022</td></tr> <tr><td>8</td><td>Policies briefing – RSPO &amp; MSPO</td><td>02/12/2022</td><td>10/01/2022</td><td>05/01/2022</td></tr> <tr><td>9</td><td>Fire - ERP</td><td>29/11/2022</td><td>10/03/2022</td><td>21/04/2021</td></tr> <tr><td>10</td><td>RTE /HCV /Buffer Zone- Guide</td><td>08/11/2022</td><td>03/10/2022</td><td>07/11/2022</td></tr> <tr><td>11</td><td>Complaint Procedure/ Induction</td><td>08/07/2022</td><td>15/09/2022</td><td>09/01/2022</td></tr> <tr><td>12</td><td>Landfill Management/ SOP</td><td>24/05/22</td><td>10/01/2022</td><td>12/05/2022</td></tr> <tr><td>13</td><td>WTP / Chemical Management</td><td>15/11/2022</td><td>17/03/2022</td><td>06/02/2022</td></tr> </tbody> </table> <p>Briefing on Zero Burning dated 10/08/2022 to 110 workers by the Assistant Manager.</p>	No	Subject	Pasir Logok Estate	Bukit Kelompok Estate	Pasir Panjang Estate	1	Compound hygiene & disease	18/08/2022	13/03/2022	03/10/2022	2	Recycling Environment - Fire	22/06/2022	02/11/2022	02/11/2022	3	RSPO/ MSPO awareness	13/02/2022	21/02/2022	22/04/2022	4	Buffer zone maintenance	21/07/2022	03/10/2022	29/03/2022	5	Oil trap- procedure/ maintenance	17/05/2022	20/03/2022	13/11/2022	6	Sch Waste inventory/ disposal	20/09/2022	24/01/2022	05/09/2022	7	Triple rinsing – guidelines	10/10/2022	12/09/2022	04/12/2022	8	Policies briefing – RSPO & MSPO	02/12/2022	10/01/2022	05/01/2022	9	Fire - ERP	29/11/2022	10/03/2022	21/04/2021	10	RTE /HCV /Buffer Zone- Guide	08/11/2022	03/10/2022	07/11/2022	11	Complaint Procedure/ Induction	08/07/2022	15/09/2022	09/01/2022	12	Landfill Management/ SOP	24/05/22	10/01/2022	12/05/2022	13	WTP / Chemical Management	15/11/2022	17/03/2022	06/02/2022	Complied
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<b>4.5.1.6</b>	Management shall organize regular meetings with employees where their concerns about environmental quality are discussed.	Environmental Performance Monitoring Committee (EPMC) being established in all Estates & Mill to discuss on environmental aspect. The latest meeting conducted as follows:	Complied																																																																						

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<b>4.5.2.1</b>	<p>Consumption of non-renewable energy shall be optimized and closely monitored by establishing baseline values and trends shall be observed within an appropriate timeframe. There should be a plan to assess the usage of non-renewable energy including fossil fuel, electricity and energy efficiency in the operations over the base period.</p> <p>- 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">Year</th> <th colspan="3">Pasir Logok Estate</th> <th rowspan="2">Average</th> </tr> <tr> <th>FFB</th> <th>Diesel</th> <th>Litre/FFB</th> </tr> </thead> <tbody> <tr> <td>2019</td> <td>47,885.35</td> <td>158,580</td> <td>3.31</td> <td rowspan="4">3.63 L/FFB</td> </tr> <tr> <td>2020</td> <td>53,939.78</td> <td>172,640</td> <td>3.20</td> </tr> <tr> <td>2021</td> <td>40,510.87</td> <td>170,211</td> <td>4.20</td> </tr> <tr> <td>2022</td> <td>40,084.95</td> <td>152,210</td> <td>3.80</td> </tr> </tbody> </table> <table border="1"> <thead> <tr> <th rowspan="2">Year</th> <th colspan="3">Bukit Kelompok Estate</th> <th rowspan="2">Average</th> </tr> <tr> <th>FFB</th> <th>Diesel</th> <th>Litre/FFB</th> </tr> </thead> <tbody> <tr> <td>2019</td> <td>51,372.24</td> <td>209,180</td> <td>4.09</td> <td rowspan="4">4.08 L/FFB</td> </tr> <tr> <td>2020</td> <td>57,154.05</td> <td>226,190</td> <td>3.99</td> </tr> <tr> <td>2021</td> <td>48,966.21</td> <td>192,850</td> <td>4.11</td> </tr> <tr> <td>2022</td> <td>44,423.60</td> <td>182,925</td> <td>4.12</td> </tr> </tbody> </table> <table border="1"> <thead> <tr> <th rowspan="2">Year</th> <th colspan="3">Pasir Panjang Estate</th> <th rowspan="2">Average</th> </tr> <tr> <th>FFB</th> <th>Diesel</th> <th>Litre/FFB</th> </tr> </thead> <tbody> <tr> <td>2019</td> <td>33,836.00</td> <td>419,728</td> <td>12.40</td> <td></td> </tr> </tbody> </table>			Year	Pasir Logok Estate			Average	FFB	Diesel	Litre/FFB	2019	47,885.35	158,580	3.31	3.63 L/FFB	2020	53,939.78	172,640	3.20	2021	40,510.87	170,211	4.20	2022	40,084.95	152,210	3.80	Year	Bukit Kelompok Estate			Average	FFB	Diesel	Litre/FFB	2019	51,372.24	209,180	4.09	4.08 L/FFB	2020	57,154.05	226,190	3.99	2021	48,966.21	192,850	4.11	2022	44,423.60	182,925	4.12	Year	Pasir Panjang Estate			Average	FFB	Diesel	Litre/FFB	2019	33,836.00	419,728	12.40		Complied
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Criterion / Indicator		Assessment Findings					Compliance
		2020	39,008.30	391,931	10.05	10.16 L/FFB	
		2021	42,669.88	433,978	10.17		
		2022	47,196.77	378,886	8.03		
<b>4.5.2.2</b>	The oil palm premises shall estimate the direct usage of non-renewable energy for their operations, including fossil fuel, and electricity to determine energy efficiency of their operations. This shall include fuel use by contractors, including all transport and machinery operations. <b>- Major compliance -</b>	<p>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 FY2022.</p> <ol style="list-style-type: none"> <li>Sample for Bukit Kelompok Estate as below: <ul style="list-style-type: none"> <li>Total number of vehicles: 24</li> <li>Rate diesel price: MYR2.30</li> </ul> </li> <li>Sample for Pasir Panjang Estate as below: <ul style="list-style-type: none"> <li>Total number of vehicles: 29</li> <li>Rate diesel price: MYR2.30</li> </ul> </li> </ol>					Complied
<b>4.5.2.3</b>	The use of renewable energy should be applied where possible. <b>- Minor compliance -</b>	<p><u>Bukit Kelompok Estate</u> The management has an initiative to use 200w Led Solar Street light at 1 unit for main security post. Referring to the invoice of the light No. 1-00019025. Verified and identified the usage of renewable energy at the sampled estate for Bukit Kelompok Estate.</p> <p><u>Pasir Panjang Estate</u> The management has an initiative to use 400w Led Solar Street light at 2 units for main security post. Referring to the invoice of the light No. INV001894. Verified and identified the usage of renewable energy at the sampled estate for Pasir Panjang Estate.</p>					Complied
<b>Criterion 4.5.3: Waste management and disposal</b>							
<b>4.5.3.1</b>	All waste products and sources of pollution shall be identified	All waste and pollution are identified and documented in the Waste & Pollution Management Plan 2022 updated on 22/8/2022. Details of					Complied

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Criterion / Indicator		Assessment Findings	Compliance								
	and documented. <b>- Major compliance -</b>	waste generated from the mill activities among others as shown below: 1. Empty chemical containers 2. Batteries 3. Contaminated rags Spent Oil 4. Pesticide Spillage 5. Contaminated Soil 6. Worn PPE 7. Liquid waste 8. Medical / Clinical 9. Domestic waste 10. Garden waste 11. Office Waste 12. Scraps 13. Mill By-Products 14. Rubber Materials 15. Emissions									
<b>4.5.3.2</b>	A waste management plan to avoid or reduce pollution shall be developed and implemented. The waste management plan should include measures for: a) Identifying and monitoring sources of waste and pollution b) Improving the efficiency of resource utilization and recycling of potential wastes as nutrients or converting them into value-added by-products <b>- Major compliance -</b>	Details of the management plan as described below. This is a continuation of the 4.5.3.1 above. Bukit Kelompok Estate with date review: 01/08/2022 <table border="1"> <thead> <tr> <th>Source</th> <th>Waste Type</th> <th>Action</th> <th>Frequency</th> </tr> </thead> <tbody> <tr> <td>Chemical store/ water treatment plant store</td> <td>Empty pesticide/ chemical containers (SW409)</td> <td>Disposed as scheduled waste through DOE</td> <td>120 days</td> </tr> </tbody> </table>	Source	Waste Type	Action	Frequency	Chemical store/ water treatment plant store	Empty pesticide/ chemical containers (SW409)	Disposed as scheduled waste through DOE	120 days	Complied
Source	Waste Type	Action	Frequency								
Chemical store/ water treatment plant store	Empty pesticide/ chemical containers (SW409)	Disposed as scheduled waste through DOE	120 days								

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Criterion / Indicator		Assessment Findings				Compliance
		Workshop, lubricants store	Empty pesticide/chemical packaging (SW409)	registered contractors		
		Fertilizer store/chemical store	Empty hydrocarbon containers (SW409)			
		Spray equipment	Batteries (SW102)			
		PCD	Spent Oil (SW305)			
		Used PPE	Contaminated rags/ sacks (SW410)	Disposed as scheduled waste through registered contractors DOE	120 days	
			Hydrocarbon/pesticide spillage (SW408)			
			Contaminated soil/ (leakage/ spillage during transfer) (SW408)			
			Broken equipment (SW409)			
			Wastewater (PCD)			

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Criterion / Indicator		Assessment Findings			Compliance
		Wastewater (PCD) (SW307)	Disposed through registered contractors as waste DOE	120 days	
		Worn PPE (SW410)			
		Oil Filter (SW410)			
		Expired chemical (SW430)			
		Wastewater (cleaning-lubricants store, workshop washdown) (SW307)			
		Used dressing materials			
		Broken computer			
		Spent bulbs, electrical & electronic waste. (SW110/SW109)			

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Criterion / Indicator		Assessment Findings				Compliance
		Linesite	Domestic waste	1. Provide adequate garbage bins 2. Provide recyclable bin 3. Burning of waste must be prohibited within estate premises. 4. Broken garbage bins must be replaced.	Regularly	
			Plastic/bottle (recyclable material)	Where possible to be recycled.		
			Garden waste	Segregated at source by individual household and during weekly collection placed at frond stacking row nearby the linesite to degrade.		
			Kitchen waste	Disposed to landfill.		
<b>4.5.3.3</b>	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	Mahamurni Plantations Sdn Bhd through Kulim (Malaysia) Berhad established 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.				Complied



Criterion / Indicator		Assessment Findings	Compliance												
	safe handling, storage and disposal. <b>- Major compliance -</b>	<p>The Work Instruction is to ensure proper and safe handling and storage, in accordance with 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> <ol style="list-style-type: none"> <li>1. Conduct/reassess CHRA</li> <li>2. Review of chemical register</li> <li>3. Chemical management assessment review</li> <li>4. To Conduct health surveillance.</li> </ol>													
<b>4.5.3.4</b>	<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><b>- Major compliance -</b></p>	<p>Mahamurni Plantations Sdn Bhd through Kulim (Malaysia) Berhad adopted Agriculture Department guidelines on empty chemical's containers management. All empty chemical containers were triple rinsed, and disposed through approved licensed contractor G-Planter Sdn Bhd.</p> <p>Sighted record of disposal, Used Plastic Pesticides Container Recycling Collection Form (UPPCR) as follows:</p> <p>Pasir Logok Estate: -</p> <table border="1"> <thead> <tr> <th>No</th> <th>Chemical Container</th> <th>Quantity Sold (unit)</th> </tr> </thead> <tbody> <tr> <td></td> <td>Date disposed</td> <td>30/06/2022</td> </tr> <tr> <td>1</td> <td>Contaminated Soil, debris (spent lubricant oil SW408)</td> <td>0.046mt</td> </tr> <tr> <td>2</td> <td>Rags, Plastics, papers (contaminated schedule waste oil SW307)</td> <td>0.064mt</td> </tr> </tbody> </table>	No	Chemical Container	Quantity Sold (unit)		Date disposed	30/06/2022	1	Contaminated Soil, debris (spent lubricant oil SW408)	0.046mt	2	Rags, Plastics, papers (contaminated schedule waste oil SW307)	0.064mt	Complied
No	Chemical Container	Quantity Sold (unit)													
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Criterion / Indicator		Assessment Findings		Compliance	
		3	Spent mineral oil – water emulsion (contaminated schedule waste oil SW307)	0.1820mt	
		4	Disposed containers (SW409)	0.0900mt	
		5	Container (SW409)	0.1630mt	
		6	Spent Lubricating oil (SW305)	0.3650mt	
		Example Consignment notes:			
		1. 20220706179857CW – status submitted 30/06/2022			
		Bukit Kelompok Estate:			
		No	Chemical Container	Quantity Sold (unit)	
			Date Disposed	15/06/2022	
		1	Spent lubricant oil (SW305)	0.132mt	
		2	Spent hydraulic oil (SW306)	0.0570mt	
		3	Spent oil and water (SW307)	0.0680mt	
		4	Spent oil and water (SW408)	0.0250mt	
		5	Container (SW409)	0.0160mt	
		6	Solid (SW410)	0.0040mt	
		Example Consignment notes:			
		1. 2022061912P4X8YU – status submitted 15/06/2022			
		Pasir Panjang Estate: -			
		No	Chemical Container	Quantity Sold (unit)	
			Date Disposed	05/12/2022	
		1	SW110 - Lamp	0.0002mt	
		2	Solid (SW406)	0.0070mt	
		3	Container (SW409)	0.0320mt	
		4	Solid (SW410)	0.0040mt	
		5	SW305- spent lubricant	0.0460mt	

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Criterion / Indicator		Assessment Findings				Compliance
		6	Liquid (SW306)	0.0070mt		
		7	Liquid (SW307)	0.0380mt		
		Exampled Consignment notes: 1. 202212050515605B8M – status submitted 05/12/2022				
<b>4.5.3.5</b>	Domestic waste should be disposed as such to minimize the risk of contamination of the environment and watercourses. <b>- Minor compliance -</b>	Pasir Logok Estate, Bukit Kelompok Estate and Pasir Panjang Estate dispose all the domestic waste into their dedicated landfill. Onsite visited and concluded maintained clean and tidy with proper signage displayed. The frequency of collection is twice a week at the location as below:				Complied
		<b>No.</b>	<b>Estate</b>	<b>Location</b>		
		1	Pasir Logok	PO2/ Block 3		
		2	Bukit Kelompok	PO5/ Block 1		
		3	Pasir Panjang	P12G/ Block 2		
<b>Criterion 4.5.4: Reduction of pollution and emission</b>						
<b>4.5.4.1</b>	An assessment of all polluting activities shall be conducted, including greenhouse gas emissions, scheduled wastes, solid wastes and effluent. <b>- Major compliance -</b>	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).  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.				Complied
<b>4.5.4.2</b>	An action plan to reduce identified significant pollutants and emissions shall be established and implemented. <b>- Major compliance -</b>	Details of action plan for identified pollutants as shown below and is a continuation from the 4.5.4.1 above.				Complied
		<b>Emission</b>	<b>Source</b>	<b>Action</b>	<b>Frequency</b>	<b>Responsibility</b>

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Criterion / Indicator		Assessment Findings					Compliance										
		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											
<b>Criterion 4.5.5: Natural water resources</b>																	
<b>4.5.5.1</b>	<p>The management shall establish a water management plan to maintain the quality and availability of natural water resources (surface and ground water). The water management plan may include:</p> <ul style="list-style-type: none"> <li>a. Assessment of water usage and sources of supply.</li> <li>b. Monitoring of outgoing water which may have negative impacts into the natural waterways at a frequency that reflects the estate's current activities.</li> <li>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.).</li> </ul>	<p>The Water Management Plan has been established in all estates with the recent review made on 01/8/2022. The plan stated the source from the followings: -</p> <table border="1"> <thead> <tr> <th>No.</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, spraying and manuring are not allowed. Estate to monitor field drain including natural or artificial drain connected to natural waterways on the significant impact (such as erosion, bare land, water pollution) occur at near the drain and waterways.</td> </tr> </tbody> </table>					No.	Source	Activity	Threat	Action Plan	1	Reservoir/ pond/ SAJ/ Rain	Chemical mixing	Water pollution and degradation of water quality	Buffer zone area, spraying and manuring are not allowed. Estate to monitor field drain including natural or artificial drain connected to natural waterways on the significant impact (such as erosion, bare land, water pollution) occur at near the drain and waterways.	Complied
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Criterion / Indicator		Assessment Findings				Compliance
	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. <b>- Major compliance -</b>	2	Line site	Draught	Every house is supplied with containers. To schedule water supply to avoid wastage.	
		3	Drain upkeep	Interruption of water flow at field drainage system because of flood and rain	Upkeep drains by desilting drain periodically plant Guatemala, soft grasses to prevent erosion at affected area	
		4	Line site	Wastage of water.	Monitor use of water. Awareness briefing on water usage efficiently.	
		<p>Mahamurni Plantations Sdn Bhd through 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 riverbank 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.</p> <p>Protection of water courses and wetlands, including maintaining and restoring appropriate riparian buffer zones has been verified at the estates where available. Riparian buffer zones have been identified and demarcated. Generally, no chemicals and fertilizer application observed</p>				

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Criterion / Indicator		Assessment Findings						Compliance																																					
		<p>been used in their maintenance. The buffer zones established are as following:</p> <table border="1"> <thead> <tr> <th>No</th> <th>River width</th> <th>Buffer zone</th> </tr> </thead> <tbody> <tr> <td>1</td> <td>&gt;40 meters</td> <td>50 meters</td> </tr> <tr> <td>2</td> <td>20 - 40 meters</td> <td>40 meters</td> </tr> <tr> <td>3</td> <td>10 - 20 meters</td> <td>20 meters</td> </tr> <tr> <td>4</td> <td>5 - 10 meters</td> <td>10 meters</td> </tr> </tbody> </table> <p>1. Water from pond and reservoir.                      2. Pasir Logok Estate, Bukit Kelompok Estate and Pasir Panjang Estate have documented record and monitoring water from pond and reservoir from January to November 2022.</p> <table border="1"> <thead> <tr> <th>Estate</th> <th>Source</th> </tr> </thead> <tbody> <tr> <td>Pasir Logok</td> <td>Pond and Reservoir</td> </tr> <tr> <td>Bukit Kelompok</td> <td>Pond and Reservoir</td> </tr> <tr> <td>Pasir Panjang</td> <td>Pond and Reservoir</td> </tr> </tbody> </table> <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 Mahamurni Plantations Sdn Bhd, UTCL Laboratory. Extracted record of the estates with details below.</p> <p>Monitoring water quality and water testing result:  <u>Pasir Logok Estate:</u></p> <table border="1"> <thead> <tr> <th>Parameter</th> <th>Unit</th> <th>Method</th> <th>Results</th> <th>Regulation Limit for raw water</th> <th>Results</th> <th>Regulation Limit for Drinking water</th> </tr> </thead> <tbody> <tr> <td></td> <td></td> <td></td> <td></td> <td></td> <td></td> <td></td> </tr> </tbody> </table>						No	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	Estate	Source	Pasir Logok	Pond and Reservoir	Bukit Kelompok	Pond and Reservoir	Pasir Panjang	Pond and Reservoir	Parameter	Unit	Method	Results	Regulation Limit for raw water	Results	Regulation Limit for Drinking water								
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		Data Collected	-	-	12/10/2022	-	12/10/2022	-	
		pH	-	APHA 4500-H*B	5.9	5.5-9.0	7	6.5-9.0	
		*Total Coliform count	MPN/ml	APHA 9221 B	ND (<10)	5000	ND (<10)	Nil	
		*E-coli	MPN/ml	APHA 9221 F	ND (<10)	5000	ND (<10)	Nil	
		<b>Bukit Kelompok Estate:</b>							
		Parameter	Unit	Method	Results	Regulation Limit for raw water	Results	Regulation Limit for Drinking water	
		Data Collected	-	-	26/10/2022	-	26/10/2022	-	
		pH	-	APHA 4500-H*B	5.9	5.5-9.0	7	6.5-9.0	
		*Total Coliform count	MPN/ml	APHA 9221 B	ND (<10)	5000	ND (<10)	Nil	
		*E-coli	MPN/ml	APHA 9221 F	ND (<10)	5000	ND (<10)	Nil	
		<b>Pasir Panjang Estate:</b>							
		Parameter	Unit	Method	Results	Regulation Limit for raw water	Results	Regulation Limit for	

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						Drinking water		
		Data Collected	-	-	04/06/2022	-	04/06/2022	-
		pH	-	APHA 4500-H*B	5.9	5.5-9.0	7	6.5-9.0
		*Total Coliform count	MPN/ml	APHA 9221 B	ND (<10)	5000	ND (<10)	Nil
		*E-coli	MPN/ml	APHA 9221 F	ND (<10)	5000	ND (<10)	Nil
<p><u>Inference &amp; Discussion. (Summary for three estates)</u></p> <ol style="list-style-type: none"> <li>All parameters are within the limits as specified under the Regulation Limit follows the Raw Water Quality Standard, Ministry of Health Malaysia: Engineering Service Division, Year 2010.</li> <li>All parameters are tested were within limits as specified under the Regulation Limit follows the Raw Water Quality Standard, Ministry of Health Malaysia: Engineering Service Division, Year 2010. The water can be used as a drinking water.</li> </ol> <p>Drinking water samples on own water treatment are taken twice a year. Sampled the following analysis at Decagon Lab &amp; Analytical Testing Sdn Bhd. All results conform to the specification. Pasir Logok Estate, Bukit Kelompok and Pasir Panjang Estate tested on 25/5/2022, 20/06/2022 and 20/06/2022 all the parameters tested within the limits as specified under the Regulation Limit follows Drinking Water Quality Standard, Ministry of Health Malaysia: Engineering Division, Year 2010. The water can be used as a drinking water.</p>								



Criterion / Indicator		Assessment Findings	Compliance
		<ol style="list-style-type: none"> <li>1. During site visit to Pasir Logok, Bukit Kelompok and Pasir Panjang Estate, verified that there were no leakages. All unit that provides water are fix well with piping system.</li> <li>2. During site visit to Pasir Logok, Bukit Kelompok and Pasir Panjang Estate, verified that 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 are in order and properly manner.</li> </ol>	
<b>4.5.5.2</b>	No construction of bunds, weirs and dams across main rivers or waterways passing through an estate. <b>- Minor compliance -</b>	From the site visit to three estates verified there was no bund weirs and dam constructions across main rivers or waterways passing through an estate.	Complied
<b>4.5.5.3</b>	Water harvesting practices should be implemented (e.g. water from road-side drains can be directed and stored in conservation terraces and various natural receptacles). <b>- Minor compliance -</b>	From the site visit to three estates verified and noted that that many silt pits were prepared by the roadsides to capture rainwater in order to maintain the moisture content in the field. At estate offices and workshop sighted the practice of rainwater harvesting.	Complied
<b>Criterion 4.5.6: Status of rare, threatened, or endangered species and high biodiversity value</b>			
<b>4.5.6.1</b>	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: <ol style="list-style-type: none"> <li>a) Identification of high biodiversity value habitats, such as rare and threatened ecosystems, that could be significantly affected by the grower(s) activities.</li> <li>b) Conservation status (e.g. The International Union on Conservation of Nature and Natural Resources (IUCN) status on legal protection, population status and habitat requirements of rare, threatened, or endangered species),</li> </ol>	<p>Pasir Logok Estate, Rapid Biodiversity Assessment by A.J.F.M Dekker was conducted on 09/07/2008. 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 (seaside, 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>	Complied

Criterion / Indicator		Assessment Findings	Compliance																																																																		
	<p>that could be significantly affected by the grower(s) activities.</p> <p><b>- Major compliance -</b></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>																																																																			
<b>4.5.6.2</b>	<p>If rare, threatened or endangered species, or high biodiversity value, are present, appropriate measures for management planning and operations should include:</p> <p>a) Ensuring that any legal requirements relating to the protection of the species are met.</p> <p>b) Discouraging any illegal or inappropriate hunting, fishing or collecting activities; and developing responsible measures to resolve human-wildlife conflicts.</p> <p><b>- Major compliance -</b></p>	<p><u>Bukit Kelompok Estate.</u></p> <p>There were 10 of RTE been recorded. Evidence to continuously prevent and discourage illegal or hunting, fishing or collecting activities were maintained and implemented.</p> <table border="1"> <thead> <tr> <th>Date</th> <th>Time</th> <th>Area</th> <th>Type</th> <th>No</th> <th>Name of sighted</th> </tr> </thead> <tbody> <tr> <td>02/10/2022</td> <td>07:45</td> <td>P11/2</td> <td>Ayam Hutan</td> <td>3</td> <td>Worker</td> </tr> <tr> <td>03/10/2022</td> <td>13:30</td> <td>P07/5</td> <td>Biawak</td> <td>2</td> <td>Worker</td> </tr> <tr> <td>07/10/2022</td> <td>10:15</td> <td>P14/1</td> <td>Wild Boar</td> <td>2</td> <td>Worker</td> </tr> <tr> <td>10/10/2022</td> <td>09:15</td> <td>P12/2</td> <td>Biawak</td> <td>2</td> <td>Mandore</td> </tr> <tr> <td>13/10/2022</td> <td>12:30</td> <td>P05/2</td> <td>Enggang</td> <td>2</td> <td>Supervisor</td> </tr> <tr> <td>17/10/2022</td> <td>08:45</td> <td>P08/2</td> <td>Bangau</td> <td>8</td> <td>Worker</td> </tr> <tr> <td>19/10/2022</td> <td>10:45</td> <td>P13/1</td> <td>Gagak</td> <td>1</td> <td>Mandore</td> </tr> <tr> <td>23/10/2022</td> <td>11:50</td> <td>P10/4</td> <td>Biawak</td> <td>1</td> <td>Mandore</td> </tr> <tr> <td>26/10/2022</td> <td>14:05</td> <td>P06/3</td> <td>Wild Boar</td> <td>2</td> <td>Worker</td> </tr> <tr> <td>31/10/2022</td> <td>09:45</td> <td>P09/1</td> <td>Ayam</td> <td>3</td> <td>Staff</td> </tr> </tbody> </table>	Date	Time	Area	Type	No	Name of sighted	02/10/2022	07:45	P11/2	Ayam Hutan	3	Worker	03/10/2022	13:30	P07/5	Biawak	2	Worker	07/10/2022	10:15	P14/1	Wild Boar	2	Worker	10/10/2022	09:15	P12/2	Biawak	2	Mandore	13/10/2022	12:30	P05/2	Enggang	2	Supervisor	17/10/2022	08:45	P08/2	Bangau	8	Worker	19/10/2022	10:45	P13/1	Gagak	1	Mandore	23/10/2022	11:50	P10/4	Biawak	1	Mandore	26/10/2022	14:05	P06/3	Wild Boar	2	Worker	31/10/2022	09:45	P09/1	Ayam	3	Staff	Complied
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<b>4.5.6.3</b>	<p>A management plan to comply with Indicator 1 shall be established and effectively implemented, if required.</p> <p><b>- Major compliance -</b></p>	<p><u>Bukit Kelompok Estate</u>            The Biodiversity Improvement Plan 2022 being established at all Estates and subsequently implement it effectively. The Plan were divided into two stages, Immediate and Long Term.</p> <p>1. Immediate (1,2 Reservoir HC4)</p>						Complied																																																																		

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		<ul style="list-style-type: none"> <li>• Migratory bird survey</li> <li>• Check water quality</li> </ul> 2. Immediate (Unplantable area, stream HC4) <ul style="list-style-type: none"> <li>• Erosion control</li> <li>• RTE species – Entire estate.</li> </ul> 3. Long Term Strategies (Reservoir HCV4) <ul style="list-style-type: none"> <li>• Check and eliminate source of eutrophication</li> <li>• Reduce eliminate the use of mucuna.</li> </ul> 4. Abandon plantation, steep area. <ul style="list-style-type: none"> <li>• Maintain the place control erosion.</li> </ul> 5. Stream <ul style="list-style-type: none"> <li>• Reshape stream bed</li> </ul> 6. Entire estate <ul style="list-style-type: none"> <li>• Wildlife &amp; habitats protection.</li> </ul>	
<b>Criterion 4.5.7: Zero burning practices</b>			
<b>4.5.7.1</b>	Use of fire for waste disposal and for preparing land for oil palm cultivation or replanting shall be avoided except in specific situations, as identified in regional best practice. <b>- Major compliance -</b>	Mahamurni Plantations Sdn Bhd group estates adhered to the policy of “Zero open burning” for any replanting. Onsite interviews with the workers there are 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
<b>4.5.7.2</b>	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.	No areas where the previous crop is highly diseased and where there is a significant risk of disease spread or continuation into the next crop. Therefore, not required treatment by burning method.	Not Applicable

Criterion / Indicator		Assessment Findings	Compliance
	- <b>Major compliance</b> -		
4.5.7.3	Where controlled burning is allowed, it shall be carried out as prescribed by the Environmental Quality (Declared Activities) (Open Burning) Order 2003 or other applicable laws. - <b>Major compliance</b> -	There is no controlled burning carried out in preparation of replanting in Pasir Logok Estate, Bukit Kelompok Estate and Pasir Panjang Estate. There are no infected oil palms observed at field operations that required treatment by burning method. There is no application for approval of controlled burning.	Not Applicable
4.5.7.4	Previous crops should be felled or mowed down, chipped and shredded, windrowed or pulverized or ploughed and mulched. - <b>Minor compliance</b> -	Noted based on the records on the land clearing for the replanting at Pasir Logok Estate, Bukit Kelompok Estate and Pasir Panjang Estate, were felled, shredded, and left to decompose. There was no evidence that fire had been used to prepare land for replanting in the estate. No fire was used for waste disposal.	Complied
<b>4.6 Principle 6: Best Practices</b>			
<b>Criterion 4.6.1: Site Management</b>			
4.6.1.1	Standard operating procedures shall be appropriately documented and consistently implemented and monitored. - <b>Major compliance</b> -	Standard Operating Procedures were available for Pasir Panjang Palm Oil Mill & its Supply Bases. Among the SOPs' established by Mahamurni Plantations Sdn Bhd through Kulim (M) Berhad that were sampled as follow: 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 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	Complied

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		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											
<b>4.6.1.2</b>	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. <b>- Major compliance -</b>	Where planting is on slope, construction of terraces was in accordance with guidance in the Agricultural Manual. The guidance for planting on slope is as follows: <table border="1" style="margin-left: 20px;"> <thead> <tr> <th>Slope (°)</th> <th>Terrace width (m)</th> </tr> </thead> <tbody> <tr> <td>&lt;2°</td> <td>Straight Planting</td> </tr> <tr> <td>2 – 5°</td> <td>Straight planting. Water Conservation terraces at 32m interval</td> </tr> <tr> <td>6 – 15°</td> <td>5.00</td> </tr> <tr> <td>16 – 25°</td> <td>3.60</td> </tr> </tbody> </table> 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.	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)												
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2 – 5°	Straight planting. Water Conservation terraces at 32m interval												
6 – 15°	5.00												
16 – 25°	3.60												
<b>4.6.1.3</b>	A visual identification or reference system shall be established for each field. <b>- Major compliance -</b>	Onsite assessment was done and conducted; assessment audit was conducted instead. Therefore, the fields were able to be physically visited. The summary of the visual identification as below tables: <u>Pasir Logok Estate</u> <table border="1" style="margin-left: 20px;"> <thead> <tr> <th>Slope (°)</th> <th>Terrace width (m)</th> <th>Percentage (%)</th> </tr> </thead> <tbody> <tr> <td>&lt;2°</td> <td>Straight Planting</td> <td>7.1</td> </tr> </tbody> </table>	Slope (°)	Terrace width (m)	Percentage (%)	<2°	Straight Planting	7.1	Complied				
Slope (°)	Terrace width (m)	Percentage (%)											
<2°	Straight Planting	7.1											

Criterion / Indicator		Assessment Findings			Compliance		
		2 – 5°	Straight planting. Water Conservation terraces at 32m interval	22.99			
		6 – 15°	5.00	46.8			
		16 – 25°	3.60	23.11			
		<u>Bukit Kelompok Estate</u>					
		Slope (°)	Terrace width (m)	Percentage (%)			
		<2°	Straight Planting	3.72			
		2 – 5°	Straight planting. Water Conservation terraces at 32m interval	14.76			
		6 – 15°	5.00	52.23			
		16 – 25°	3.60	29.29			
		<u>Pasir Panjang Estate</u>					
		Slope (°)	Terrace width (m)	Percentage (%)			
		<2°	Straight Planting	0.99			
		2 – 5°	Straight planting. Water Conservation terraces at 32m interval	3.63			
		6 – 15°	5.00	34.77			
		16 – 25°	3.60	54.29			
		25° above		1.52			
		Hilly		4.8			
		<u>Bukit Payung Division</u>					
		Slope (°)	Terrace width (m)	Percentage (%)			
		<2°	Straight Planting	8.9			
		2 – 5°	Straight planting. Water Conservation terraces at 32m interval	1.97			
		6 – 15°	5.00	21.44			
		16 – 25°	3.60	53.8			

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Criterion / Indicator		Assessment Findings			Compliance																																																
		25° above		3.07																																																	
		Hilly		10.82																																																	
Therefore, the fields were able to be physically visited.																																																					
<b>Criterion 4.6.2: Economic and financial viability plan</b>																																																					
<b>4.6.2.1</b>	A documented business or management plan shall be established to demonstrate attention to economic and financial viability through long-term management planning. <b>- Major compliance -</b>	Annual business plan in the form of annual budget and the projection for 5 years being prepared as guidance for future planning. The business plan for FY2022 contains FFB yield, CPO, OER, and KER, costs of production, FFB pricing etc. It also includes budgeting on environment and social. <u>Pasir Logok Estate</u> <table border="1"> <thead> <tr> <th>Item / Year</th> <th>2022</th> <th>2023</th> <th>2024</th> </tr> </thead> <tbody> <tr> <td>Ha</td> <td>1,851.77</td> <td>1,992.68</td> <td>1,992.68</td> </tr> <tr> <td>Yield</td> <td>27.06mt/ha</td> <td>25.00mt/ha</td> <td>25.00mt/ha</td> </tr> <tr> <td>CPO Price</td> <td>MYR3,000.00/mt</td> <td>MYR3,000.00/mt</td> <td>MYR3,000.00/mt</td> </tr> <tr> <td>Operation Cost</td> <td>MYR273.44/mt</td> <td>MYR303.34/mt</td> <td>MYR286.93/mt</td> </tr> <tr> <td>Profit</td> <td>MYR318.58/mt</td> <td>MYR323.27/mt</td> <td>MYR329.60/mt</td> </tr> </tbody> </table> <u>Bukit Kelompok Estate</u> <table border="1"> <thead> <tr> <th>Item / Year</th> <th>2022</th> <th>2023</th> <th>2024</th> </tr> </thead> <tbody> <tr> <td>Ha</td> <td>2,437.75</td> <td>2,437.75</td> <td>2,437.75</td> </tr> <tr> <td>Yield</td> <td>26.00mt/ha</td> <td>28.00mt/ha</td> <td>28.00mt/ha</td> </tr> <tr> <td>FFB Price</td> <td>MYR677.45</td> <td>MYR677.45</td> <td>MYR677.45</td> </tr> <tr> <td>CPO Price</td> <td>MYR3,000.00/mt</td> <td>MYR3,000.00/mt</td> <td>MYR3,000.00/mt</td> </tr> <tr> <td>Operation Cost</td> <td>MYR276.60 /mt</td> <td>MYR299.47/mt</td> <td>MYR258.52/mt</td> </tr> </tbody> </table>			Item / Year	2022	2023	2024	Ha	1,851.77	1,992.68	1,992.68	Yield	27.06mt/ha	25.00mt/ha	25.00mt/ha	CPO Price	MYR3,000.00/mt	MYR3,000.00/mt	MYR3,000.00/mt	Operation Cost	MYR273.44/mt	MYR303.34/mt	MYR286.93/mt	Profit	MYR318.58/mt	MYR323.27/mt	MYR329.60/mt	Item / Year	2022	2023	2024	Ha	2,437.75	2,437.75	2,437.75	Yield	26.00mt/ha	28.00mt/ha	28.00mt/ha	FFB Price	MYR677.45	MYR677.45	MYR677.45	CPO Price	MYR3,000.00/mt	MYR3,000.00/mt	MYR3,000.00/mt	Operation Cost	MYR276.60 /mt	MYR299.47/mt	MYR258.52/mt	Complied
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		Profit	MYR359.02/mt	MYR359.53/mt	MYR465.52/mt	
		<u>Pasir Panjang Estate</u>				
		Item / Year	2022	2023	2024	
		Ha	3,372.91	3,372.91	3,372.91	
		Yield	18.42mt/ha	21.00mt/ha	24.00mt/ha	
		FFB Price	MYR677.45	MYR677.45	MYR677.45	
		CPO Price	MYR3,000.00/mt	MYR3,000.00/mt	MYR3,000.00/mt	
		Operation Cost	MYR380.05/mt	MYR350.21/mt	MYR313.21/mt	
		Profit	MYR220.19/mt	MYR277.40/mt	MYR272.57/mt	
<b>4.6.2.2</b>	Where applicable, an annual replanting programme shall be established. Long term replanting programme should be established and review annually, where applicable every 3-5 years. <b>- Major compliance -</b>	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; - <u>Pasir Logok Estate, Bukit Kelompok &amp; Pasir Panjang</u> All Estate does not have replanting program for the next 5 years onwards.				Complied
<b>4.6.2.3</b>	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 <b>- Major compliance -</b>	Pasir Logok Estate, Bukit Kelompok Estate and Pasir Panjang Estate monitor their business plan with details as follow. 1. Planting material for DXP Kulim Dummy and Kulim Clonal 2. Crop projection annually 3. Site yield potential annually Age profile: 1. FFB yield trends annually: To compared last year trends on the increasing or decreasing performance. 2. Cost pf production annually				Complied

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Criterion / Indicator		Assessment Findings	Compliance																																																
		<p>3. Price zone budgeted annually</p> <ul style="list-style-type: none"> <li>Harvesting Cost annually includes operation cost year and depreciation cost.</li> </ul> <p><u>Pasir Logok Estate</u></p> <table border="1"> <thead> <tr> <th>Category of Years</th> <th>Area (Ha)</th> <th>Percentage (%)</th> </tr> </thead> <tbody> <tr> <td>0-3 years</td> <td>140.91</td> <td>7.1</td> </tr> <tr> <td>9-18 years</td> <td>1,520.81</td> <td>76.32</td> </tr> <tr> <td>19-22 years</td> <td>330.96</td> <td>16.6</td> </tr> <tr> <td>23 &amp; above</td> <td>23.80</td> <td>1</td> </tr> </tbody> </table> <p><u>Bukit Kelompok Estate</u></p> <table border="1"> <thead> <tr> <th>Category of Years</th> <th>Area (Ha)</th> <th>Percentage (%)</th> </tr> </thead> <tbody> <tr> <td>0-3 years</td> <td>0</td> <td>0</td> </tr> <tr> <td>9-18 years</td> <td>2,413.77</td> <td>99</td> </tr> <tr> <td>19-22 years</td> <td>0</td> <td>0</td> </tr> <tr> <td>23 &amp; above</td> <td>23.80</td> <td>1</td> </tr> </tbody> </table> <p><u>Pasir Panjang Estate</u></p> <table border="1"> <thead> <tr> <th>Category of Years</th> <th>Area (Ha)</th> <th>Percentage (%)</th> </tr> </thead> <tbody> <tr> <td>0-3 years</td> <td>251.13</td> <td>7.45</td> </tr> <tr> <td>4-8 years</td> <td>2,149.48</td> <td>63.73</td> </tr> <tr> <td>9-18 years</td> <td>972.30</td> <td>23.83</td> </tr> <tr> <td>19-22 years</td> <td>0</td> <td>0</td> </tr> <tr> <td>23 &amp; above</td> <td>0</td> <td>0</td> </tr> </tbody> </table>	Category of Years	Area (Ha)	Percentage (%)	0-3 years	140.91	7.1	9-18 years	1,520.81	76.32	19-22 years	330.96	16.6	23 & above	23.80	1	Category of Years	Area (Ha)	Percentage (%)	0-3 years	0	0	9-18 years	2,413.77	99	19-22 years	0	0	23 & above	23.80	1	Category of Years	Area (Ha)	Percentage (%)	0-3 years	251.13	7.45	4-8 years	2,149.48	63.73	9-18 years	972.30	23.83	19-22 years	0	0	23 & above	0	0	
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<b>4.6.2.4</b>	<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><b>- Major compliance -</b></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</p>	Complied																																																

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Criterion / Indicator		Assessment Findings	Compliance
		<p>and procedures in the estate’s operations.</p> <ol style="list-style-type: none"> <li>1. Plantation Inspectorate Visit</li> <li>2. Internal audit by Sustainability Unit</li> <li>3. Task Force visits</li> <li>4. Monthly and weekly ad hoc meeting</li> <li>5. Daily /monthly production &amp; financial report</li> <li>6. Daily supervision by the field staff / executives</li> </ol>	
<b>Criterion 4.6.3: Transparent and fair price dealing</b>			
<b>4.6.3.1</b>	<p>Pricing mechanisms for the products and other services shall be documented and effectively implemented.</p> <p><b>- Major compliance -</b></p>	<p>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>Three (3) contractors hired by Pasir Logok Estate been samples as follow:</p> <ol style="list-style-type: none"> <li>1. RKP Enterprise for Harvesting Fresh Fruit Bunch (FFB) in field P10 (292.37ha &amp; P11 (217.41ha), contract number MPSB/LPL1/57/2020 dated 01/06/2020.</li> <li>2. Sungai Rezeki Sdn Bhd, for loading and transporting of FFB using Bin System from Fields, contract number MPSB/C1/12/07 (2021) dated 24/03/2021.</li> <li>3. Jeevendran Enterprise for harvesting of FFB in field P09 (249.39ha) works, contract number MPSB/LPL 7/213/2020 dated 06/08/2021.</li> </ol> <p>Three (3) contractors hired by Bukit Kelompok Estate been samples as follow:</p> <ol style="list-style-type: none"> <li>1. Sri Mathai for Harvesting Fresh Fruit Bunch (FFB) in field P11 (190.96ha &amp; P12 (274.05ha), contract number MPSB/LBK</li> </ol>	Complied

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Criterion / Indicator		Assessment Findings	Compliance
		<p>2/114/2021 dated 31/05/2022.</p> <p>2. M &amp; w Service, for school children transport from Bukit Kelompok Estate to Sek. Keb. Tunjuk Laut and Sekolah Menengah Felda Tenggaraoh 2, Kota Tinggi, Johor. Contract number MPSB/C1/11/5(2020) dated 27/07/2021.</p> <p>3. Perniagaan Sri Mathai for loading and transporting of FFB from field Bukit Kelompok Estate to Pasir Panjang Palm Oil Mill, contract number MPSB/LBK/C1/11/4/20219 dated 29/01/2019.</p> <p>Three (3) contractors hired by Pasir Panjang Estate been samples as follow:</p> <p>1. Jeevandran Enterprise for Harvesting Fresh Fruit Bunch (FFB) in field P14 (310.33ha) at Bukit Payung Division, contract number MPSB/LBP 5/85/2019 dated 14/07/2019.</p> <p>2. Yahya Haji Ahmad for Application of Bio Compost at Pasir Panjang Estate. Contract number MPSB/LPP (LBP DIV)) dated 29/04/2021.</p> <p>3. Seng Yan Maju Enterprise for transporting of EFB and Bio Compost from composting plant, Pasir Panjang Palm Oil Mill to field at Bukit Payung Division, contract number MPSB/LBP 1/3/1/2020 dated 20/04/2020.</p>	
<b>4.6.3.2</b>	<p>All contracts shall be fair, legal and transparent and agreed payments shall be made in timely manner.</p> <p><b>- Major compliance -</b></p>	<p>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>Payment made to two (2) contractors hired by Pasir Logok Estate been samples as follow:</p> <p>1. RKP Enterprise for Harvesting Fresh Fruit Bunch (FFB) in field P10 (292.37ha &amp; P11 (217.41ha). Evidence of payment has been taken for October 2022 invoice number RKPENT/702 dated 31/10/2022</p>	Complied

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	<p>and payment on 09/11/2022 based on payment voucher number 220009190.</p> <p>2. Jeevendran Enterprise harvesting of FFB in filed P09 and P09J at Pasir Logok Estate. Evidence of payment has been taken for October 2022 invoice number JEVAENT/421 dated 31/10/2022 and payment on 06/11/2022 based on payment voucher number 22000920.</p> <p>Payment made to two (2) contractors hired by Bukit Kelompok Estate been samples as follow:</p> <ol style="list-style-type: none"> <li>1. Perniagaan Sri Mathai for loading and transporting FFB from field Bukit Kelompok Estate to Pasir Panjang Palm Oil Mill, Evidence of payment has been taken for October 2022 invoice number I-202210C0014 dated 31/10/2022 and payment on 09/11/2022 based on payment voucher number 22000920.</li> <li>2. M &amp; W Service for sending school children to Sek. Keb. Tunjuk Laut and Sekolah Menengah Tenggara 2, Kota Tinggi, Johor. Evidence of payment has been taken for October 2022 invoice number D 11192 dated 31/10/2022 and payment on 09/11/2022 based on payment voucher number 22000909.</li> </ol> <p>Payment made to two (2) contractors hired by Pasir Panjang Estate been samples as follow:</p> <ol style="list-style-type: none"> <li>1. Seng Yan Maju enterprise for and transporting EFB and Bio Compost Panjang Palm Oil Mill to fields at Bukit Payung Estate. Evidence of payment has been taken for October 2022 invoice number IV2210-01 dated 31/10/2022 and payment on 09/11/2022 based on payment voucher number PK 22000854.</li> <li>2. Jeevendran Enterprise for Harvesting in field P14 (310.33ha) at Bukit Payung Division. Evidence of payment has been taken for October 2022 invoice number JEEVAENT/414 dated 31/10/2022 and</li> </ol>	

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Criterion / Indicator		Assessment Findings	Compliance
		payment on 09/11/2022 based on payment voucher number PK 22000860.	
<b>Criterion 4.6.4: Contractor</b>			
<b>4.6.4.1</b>	Where contractors are engaged, they shall understand the MSPO requirements and shall provide the required documentation and information. <b>- Major compliance -</b>	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
<b>4.6.4.2</b>	The management shall provide evidence of agreed contracts with the contractor. <b>- Major compliance -</b>	There is evidence that all sample contracts have been made fair, legal and transparent and has been agreed by both parties. Three (3) contractors hired by Pasir Logok Estate been samples as follow: 1. RKP Enterprise for Harvesting Fresh Fruit Bunch (FFB) in field P10 (292.37ha & P11 (217.41ha), contract number MPSB/LPL1/57/2020 dated 01/06/2020. 2. Sungai Rezeki Sdn Bhd, for loading and transporting of FFB using Bin System from Fields, contract number MPSB/C1/12/07 (2021) dated 24/03/2021. 3. Jeevendran Enterprise for harvesting of FFB in field P09 (249.39ha) works, contract number MPSB/LPL 7/213/2020 dated 06/08/2021. Three (3) contractors hired by Bukit Kelompok Estate been samples as follow: 1. Sri Mathai for Harvesting Fresh Fruit Bunch (FFB) in field P11 (190.96ha & P12 (274.05ha), contract number MPSB/LBK 2/114/2021 dated 31/05/2022.	Complied

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		<p>2. M &amp; w Service, for school children transport from Bukit Kelompok Estate to Sek. Keb. Tunjuk Laut and Sekolah Menengah Felda Tenggara 2, Kota Tinggi, Johor. Contract number MPSB/C1/11/5(2020) dated 27/07/2021.</p> <p>3. Perniagaan Sri Mathai for loading and transporting of FFB from field Bukit Kelompok Estate to Pasir Panjang Palm Oil Mill, contract number MPSB/LBK/C1/11/4/20219 dated 29/01/2019.</p> <p>Three (3) contractors hired by Pasir Panjang Estate been samples as follow:</p> <ol style="list-style-type: none"> <li>1. Jeevandran Enterprise for Harvesting Fresh Fruit Bunch (FFB) in field P14 (310.33ha) at Bukit Payung Division, contract number MPSB/LBP 5/85/2019 dated 14/07/2019.</li> <li>2. Yahya Haji Ahmad for Application of Bio Compost at Pasir Panjang Estate. Contract number MPSB/LPP (LBP DIV)) dated 29/04/2021.</li> <li>3. Seng Yan Maju Enterprise for transporting of EFB and Bio Compost from composting plant, Pasir Panjang Palm Oil Mill to field at Bukit Payung Division, contract number MPSB/LBP 1/3/1/2020 dated 20/04/2020.</li> </ol>	
<b>4.6.4.3</b>	<p>The management shall accept MSPO approved auditors to verify assessments through a physical inspection if required.</p> <p><b>- Minor compliance -</b></p>	<p>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
<b>4.6.4.4</b>	<p>The management shall be responsible for the observance of the control points applicable to the tasks performed by the contractor, by checking and signing the assessment of the contractor for each task and season contracted.</p> <p><b>- Major compliance -</b></p>	<p>Harvesting works observe at the control point applicable for the contractor through the bunch counter that has been appointed. The responsibilities of the bunch counter are 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>	Complied

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		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.	
<b>4.7 Principle 7: Development of new planting</b>			
<b>Criterion 4.7.1: High biodiversity value</b>			
<b>4.7.1.1</b>	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. <b>- Major compliance -</b>	Mahamurni Plantations Sdn Bhd 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
<b>4.7.1.2</b>	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. <b>- Major compliance -</b>	Mahamurni Plantations Sdn Bhd 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
<b>Criterion 4.7.2: Peat Land</b>			
<b>4.7.2.1</b>	New planting and replanting may be developed and implemented on peat land as per MPOB guidelines on peat land development or industry best practice. <b>- Major compliance -</b>	Mahamurni Plantations Sdn Bhd 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
<b>Criterion 4.7.3: Social and Environmental Impact Assessment (SEIA)</b>			
<b>4.7.3.1</b>	A comprehensive and participatory social and environmental impact assessment shall be conducted prior to establishing new plantings or operations. <b>- Major compliance -</b>	Mahamurni Plantations Sdn Bhd 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
<b>4.7.3.2</b>	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. <b>- Major compliance -</b>	Mahamurni Plantations Sdn Bhd 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
<b>4.7.3.3</b>	The results of the SEIA shall be incorporated into an appropriate management plan and operational procedures developed, implemented, monitored and reviewed. <b>- Major compliance -</b>	Mahamurni Plantations Sdn Bhd 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
<b>4.7.3.4</b>	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. <b>- Minor compliance -</b>	Mahamurni Plantations Sdn Bhd 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
<b>Criterion 4.7.4: Soil and topographic information</b>			
<b>4.7.4.1</b>	Information on soil types shall be adequate to establish the long-term suitability of the land for oil palm cultivation.	Mahamurni Plantations Sdn Bhd 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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	- Major compliance -		
4.7.4.2	Topographic information shall be adequate to guide the planning of planting programmes, drainage and irrigation systems, roads and other infrastructure. - Major compliance -	Mahamurni Plantations Sdn Bhd 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
<b>Criterion 4.7.5:</b> Planting on steep terrain, marginal and fragile soils			
4.7.5.1	Extensive planting on steep terrain, marginal and fragile soils shall be avoided unless permitted by local, state and national laws. - Major compliance -	Mahamurni Plantations Sdn Bhd 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 -	Mahamurni Plantations Sdn Bhd 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 -	Mahamurni Plantations Sdn Bhd 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
<b>Criterion 4.7.6:</b> 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	Mahamurni Plantations Sdn Bhd 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 / Indicator		Assessment Findings	Compliance
	institutions. <b>- Major compliance -</b>		
4.7.6.2	Where new plantings on recognised customary lands are acceptable, management plans and operations should maintain sacred sites. <b>- Minor compliance -</b>	Mahamurni Plantations Sdn Bhd 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
4.7.6.3	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. <b>- Major compliance -</b>	Mahamurni Plantations Sdn Bhd 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. <b>- Major compliance -</b>	Mahamurni Plantations Sdn Bhd 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. <b>- Major compliance -</b>	Mahamurni Plantations Sdn Bhd 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. <b>- Major compliance -</b>	Mahamurni Plantations Sdn Bhd 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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<b>4.7.6.7</b>	The process and outcome of any compensation claims shall be documented and made publicly available. <b>- Major compliance -</b>	Mahamurni Plantations Sdn Bhd 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
<b>4.7.6.8</b>	Communities that have lost access and rights to land for plantation expansion should be given opportunities to benefit from the plantation development. <b>- Minor compliance -</b>	Mahamurni Plantations Sdn Bhd 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															
<b>4.1 Principle 1: Management commitment &amp; responsibility</b>																		
<b>Criterion 4.1.1 – Malaysian Sustainable Palm Oil (MSPO) Policy</b>																		
<b>4.1.1.1</b>	Policy for the implementation of MSPO shall be established. <b>- Major compliance -</b>	Mahamurni Plantations Sdn Bhd through Kulim (M) Berhad established Malaysian Sustainable Palm Oil Policy signed by Managing Director dated 01/10/2021.  The policy therein described 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.	Complied															
<b>4.1.1.2</b>	The policy shall also emphasize on the commitment to continual improvement with the objective of improving the milling operation. <b>- Major compliance -</b>	The policy therein among others has included commitment 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															
<b>Criterion 4.1.2 – Internal Audit</b>																		
<b>4.1.2.1</b>	Internal audit shall be planned and conducted regularly to determine the strong and weak points and potential area for further improvement. <b>- Major compliance -</b>	Mahamurni Plantations Sdn Bhd through Kulim (M) Berhad established Internal audit procedure with ref no SID/SMS/3.2 issued no.: 01 dated 01/08/2020.  Therein describing requirement and procedure in establishing audits exercises. Audits are to be held once a year. The internal audit checklist is available to cover all the MSPO requirements.	Complied															
		<table border="1"> <thead> <tr> <th>No.</th> <th>Operating Unit</th> <th>Date</th> <th>NCR</th> <th>OFI</th> </tr> </thead> <tbody> <tr> <td>1</td> <td>Pasir Panjang Palm Oil Mill</td> <td>13/11/2022</td> <td>0</td> <td>0</td> </tr> <tr> <td>2</td> <td>Pasir Panjang Palm Oil Mill</td> <td>12/08/2021</td> <td>0</td> <td>0</td> </tr> </tbody> </table>	No.	Operating Unit	Date	NCR	OFI	1	Pasir Panjang Palm Oil Mill	13/11/2022	0	0	2	Pasir Panjang Palm Oil Mill	12/08/2021	0	0	
No.	Operating Unit	Date	NCR	OFI														
1	Pasir Panjang Palm Oil Mill	13/11/2022	0	0														
2	Pasir Panjang Palm Oil Mill	12/08/2021	0	0														

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		The root causes where applicable to the audits for the NCR were clearly identified and the proposed corrective action were satisfactorily provided. All elements in the MSPO MS2530 Part 4 were covered. Commentaries were made as shown in the audit report for the internal improvement.	
<b>4.1.2.2</b>	The internal audit procedures and audit results shall be documented and evaluated, followed by the identification of strengths and root causes of nonconformities, in order to implement the necessary corrective action. <b>- Major compliance -</b>	<p>Mahamurni Plantations Sdn Bhd through Kulim (M) Berhad established Internal audit procedure with ref no SID/SMS/3.2 issued no.: 01 dated 01/08/2020.</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. The outcome of the audits has been compiled in the document titled 'Internal audit, non-conformance report'. The audit results have been signed accepted by the respective Estate Managers.</p> <p>The nonconformity raised at mill has been shown in 4.1.2.1 above during the internal audit. The auditor has also complied to the documented procedure through issuance of audit plan to the operating units. This audit notification was sighted and verified.</p> <p><u>Opportunity for Improvement</u> The audit team to elaborate in the audit report on findings and remarks highlighted by authorities visit i.e. DOE.</p>	OFI
<b>4.1.2.3</b>	Reports shall be made available to the management for their review. <b>- Major compliance -</b>	Reports are made available and retained for min 10 years. All reports are circulated and maintained to the Mill Management, Regional Office and KMB Head Office SID. There is a monthly SID meeting at HQ level to review the reports' findings and performance raised in both internal and external audit. The outcome was also discussed at Regional Office.	Complied

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Criterion / Indicator		Assessment Findings	Compliance												
<b>Criterion 4.1.3 – Management Review</b>															
<b>4.1.3.1</b>	<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><b>- Major compliance -</b></p>	<p>Mahamurni Plantations Sdn Bhd through Kulim (M) Berhad established Management Review with Doc. No.: SID/SMS/3.1 dated 01/08/2020. The procedure therein among others mentioned that management review is to be held once annually.</p> <table border="1" style="width: 100%; border-collapse: collapse;"> <thead> <tr> <th>No.</th> <th>Operating Units</th> <th>Date</th> <th>Attendee</th> <th>Date</th> <th>Attendee</th> </tr> </thead> <tbody> <tr> <td style="text-align: center;">1</td> <td>Pasir Panjang Palm Oil Mill</td> <td style="text-align: center;">14/11/2022</td> <td style="text-align: center;">14</td> <td style="text-align: center;">20/01/2022</td> <td style="text-align: center;">13</td> </tr> </tbody> </table> <p>Members discussed issues relating to the MSPO certification among others.</p> <ol style="list-style-type: none"> <li>1. Internal audit findings</li> <li>2. Process Performance</li> <li>3. Customer Feedback</li> <li>4. Audits Results</li> <li>5. Changes That Could Affect Management System</li> <li>6. Complaints and grievance</li> <li>7. Continual Improvement Plan</li> </ol> <p>The meeting made a conclusive statement on the suitability, effectiveness of the MSPO implementation.</p>	No.	Operating Units	Date	Attendee	Date	Attendee	1	Pasir Panjang Palm Oil Mill	14/11/2022	14	20/01/2022	13	Complied
No.	Operating Units	Date	Attendee	Date	Attendee										
1	Pasir Panjang Palm Oil Mill	14/11/2022	14	20/01/2022	13										
<b>Criterion 4.1.4 – Continual Improvement</b>															
<b>4.1.4.1</b>	<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><b>- Major compliance -</b></p>	<p>The mill has established continual improvement plan revised dated 30/04/2022 upon consideration of the social, operations and environmental impacts. Among other efforts are.</p> <table border="1" style="width: 100%; border-collapse: collapse;"> <thead> <tr> <th>No.</th> <th>Program</th> <th>Action/ Initiatives</th> </tr> </thead> <tbody> <tr> <td> </td> <td> </td> <td> </td> </tr> </tbody> </table>	No.	Program	Action/ Initiatives				Complied						
No.	Program	Action/ Initiatives													

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Criterion / Indicator		Assessment Findings		Compliance																		
		1	Waste reduction Awareness among employees Enhancement of waste segregation																			
		2	Employment condition Enhancement of workers quarters Schedule repair and painting Conducive environment Housing roofing/ ceiling upgrading																			
		Details of expenditure are provided under both CAPEX/OPEX. Inclusive are projects for improvement as described below among others.																				
		<table border="1"> <thead> <tr> <th>No.</th> <th>Sections</th> <th>Description</th> </tr> </thead> <tbody> <tr> <td>1</td> <td>Operation</td> <td>ESP installation Jan 2022 - RM3.5M to replace HCS</td> </tr> <tr> <td>2</td> <td>Operation</td> <td>1 unit Bio Scrubber Dec 2022 - RM600K.</td> </tr> <tr> <td>3</td> <td>Operation</td> <td>CPO washing system June 2022 - RM1.5M</td> </tr> <tr> <td>4</td> <td>Facilities</td> <td>EFB roofing area - Mac 2023 - RM200K</td> </tr> <tr> <td>5</td> <td>Facilities</td> <td>Roofing Boiler/ Clarification Sect Dec 2022 RM110K</td> </tr> </tbody> </table>			No.	Sections	Description	1	Operation	ESP installation Jan 2022 - RM3.5M to replace HCS	2	Operation	1 unit Bio Scrubber Dec 2022 - RM600K.	3	Operation	CPO washing system June 2022 - RM1.5M	4	Facilities	EFB roofing area - Mac 2023 - RM200K	5	Facilities	Roofing Boiler/ Clarification Sect Dec 2022 RM110K
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5	Facilities	Roofing Boiler/ Clarification Sect Dec 2022 RM110K																				
<b>4.1.4.2</b>	The company should establish a system to improve practices in line with new information and techniques; and for disseminating this information throughout the workforce.  <b>- Major compliance -</b>	<p>This is being made upon confirmation of any new projects. Employees were briefed of any new development in basic understanding during the weekly briefings.</p> <ol style="list-style-type: none"> <li>The management team will be informed of such development during the monthly management meetings.</li> <li>Dissemination of information by the RC and Head Office transacted during the monthly Managers meetings and emails.</li> <li>The management continuously reviewed the estates performance and work method for a continual improvement to achieve better results yield and costings.</li> </ol>		Complied																		



Criterion / Indicator	Assessment Findings	Compliance	
<b>4.2 Principle 2: Transparency</b>			
<b>Criterion 4.2.1 – Transparency of information and documents relevant to MSPO requirements</b>			
<b>4.2.1.1</b>	<p>The management shall communicate adequate information to other stakeholder on environmental, social and legal issues relevant to sustainable practices in the relevant languages and forms.</p> <p><b>- Major compliance -</b></p>	<p>Mahamurni Plantations Sdn Bhd through Kulim (M) Berhad has established Transparency procedure with document number SQD/SMS/1.0 dated 01/08/2020.</p> <p>The procedure described the person responsible for transparency, types of information / documents that can be request, and the mechanism to request any information or document.</p> <p>Example of inquiry from internal and external stakeholders as below: -</p> <ol style="list-style-type: none"> <li>1. Pasir Panjang Palm Oil Mill has no enquiry recorded for year 2021 and 2022.</li> </ol>	<p>Complied</p>
<b>4.2.1.2</b>	<p>Management documents shall be publicly available, except where this is prevented by commercial confidentiality or where disclosure of information would result in negative environmental or social outcomes.</p> <p><b>- Major compliance -</b></p>	<p>Mahamurni Plantations Sdn Bhd through Kulim (M) Berhad has established Transparency procedure with document number; SQD/SMS/1.0 dated 01/08/2020.</p> <p>The procedure describes that the person responsible for transparency, types of information / documents 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 such as:</p> <ol style="list-style-type: none"> <li>1. Land title/ user rights</li> <li>2. Occupational safety and health plan</li> <li>3. HCV documentation</li> <li>4. Detail of complaint or grievances.</li> </ol>	<p>Complied</p>

Criterion / Indicator	Assessment Findings	Compliance	
<b>Criterion 4.2.2 – Transparent method of communication and consultation</b>			
<p><b>4.2.2.1</b></p>	<p>Procedures shall be established for consultation and communication with the relevant stakeholders.</p> <p><b>- Major compliance -</b></p>	<p>Mahamurni Plantations Sdn Bhd through Kulim (M) Berhad established Consultation and Communication procedure with document number SQD/SMS/1.1, issue number 01 and dated 01/08/2020.</p> <p>The procedure describes of 2 categorized in communication and consultation includes internal and external parties.</p> <p>For first category, the internal communication is through muster, meeting, notice board, inspection and others. While for external communication, through meeting, telephone, fax, email and others.</p> <p>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.</p> <p>Mahamurni Plantations Sdn Bhd through Kulim (M) Berhad has conduct stakeholder consultation meeting which being held virtually for Tunjuk Laut Complex on 14/11/2022 for Southern Region includes Pasir Panjang Palm Oil Mill, Pasir Logok Estate, Bukit Kelompok Estate and Pasir Panjang Estate (includes Bukit Payung division).</p> <p>Agenda includes introduction and awareness on stakeholders’ relation, Mahamurni Plantations Sdn Bhd through Kulim (M) Berhad’s Policies, Requirement &amp; Regulation applicable, Oil Palm Sustainability certification, complaint and grievance procedure, NDPE and ESG implementation, independent smallholders’ certifications (ISH-RSPO), handling RTE (Biology, HCS, HCV, IUCN redlist, HEC), contractor responsibilities, Anti-Bribery management system implementation, latest development in Mahamurni Plantations Sdn Bhd and others matters.</p>	<p>Complied</p>

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Criterion / Indicator		Assessment Findings	Compliance
4.2.2.2	<p>The management shall nominate management officials at the operating unit responsible for issues related to <i>indicator 1</i>.</p> <p><b>- Minor compliance -</b></p>	<p>Mahamurni Plantations Sdn Bhd through Kulim (M) Berhad established Consultation and Communication procedure with document number SQD/SMS/1.1, issue number 01 and dated 01/08/2020.</p> <p>The procedure describes social person in- charge at respective operating units as responsible person to disclose, implement, made available and explain consultation and communication to all relevant stakeholders.</p> <p>Based appointment letter reviewed as follow:</p> <ol style="list-style-type: none"> <li>1. Pasir Panjang Palm Oil Mill Senior Assistant Mill Engineer has been appointed as social person in-charge with appointment letter dated 08/05/2022 signed mill manager.</li> </ol>	Complied
4.2.2.3	<p>A list of stakeholders, records of all consultation and communication and records of action taken in response to input from stakeholders shall be properly maintained.</p> <p><b>- Major compliance -</b></p>	<p>Pasir Panjang Palm Oil Mill has maintained list of stakeholders for 2022 updated 03/10/2022 based on the category.</p> <p>The list includes with external stakeholders such as: - Relevant government agencies (e.g., DOE, DOA, Immigration Department, Department of Safety and Health, Labour Department) - Contractors - Suppliers - Consultants - Neighbouring estates - Clinics, hospitals, fire brigade, police, etc. Correspondence with stakeholders is properly maintained and records of all consultation and communication during the past one.</p> <p>Mahamurni Plantations Sdn Bhd through Kulim (M) Berhad has conduct stakeholder consultation meeting which being held virtually for Tunjuk Laut Complex on 14/11/2022 for Southern Region includes Pasir Panjang Palm Oil Mill, Pasir Logok Estate, Bukit Kelompok Estate and Pasir Panjang Estate (includes Bukit Payung division).</p> <p>Agenda includes introduction and awareness on sustainability, NDPE and ESG implementation, traceability, new project development and others matters.</p>	Complied

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<b>Criterion 4.2.3 – Traceability</b>			
<b>4.2.3.1</b>	The management shall commit itself to implement and maintain the requirements for the traceability and shall establish a standard operation procedure for traceability. <b>- Major compliance -</b>	<p>Mahamurni Plantations Sdn Bhd through Kulim (M) Berhad established SOP Traceability, Doc: No: SQD/SMS/2.1, Issued: 01 Rev: 06 dated 17/02/2022 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>To weigh and record in-take of raw material (FFB), dispatch of products (CPO &amp; Kernel), other by products like sludge oil, empty bunch and miscellaneous items like diesel, scrap iron, etc.</p> <p>The system being used in harvesting for FFB Tracking is In-Field Data Execution &amp; Analytics Solution (IDEAS). Daily muster attendance, bunch count, productivity based on mill declared weight and yield statistic report could be retrieve from IDEAS.</p>	Complied
<b>4.2.3.2</b>	The management shall conduct regular inspections on compliance with the established traceability system. <b>- Major compliance -</b>	<p>Pasir Panjang Palm Oil Mill 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.</p>	Complied
<b>4.2.3.3</b>	The management shall identify and assign suitable employees to implement and maintain the traceability system. <b>- Minor compliance -</b>	<p>Person in charge for traceability system is Senior Manager, Manager, Deputy Manager, Assistant In-charge of each estate and mill as refer to Memo of Appointment as Person Responsible for Traceability System</p>	Complied

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		doc. No.: SQD/ADMIN/019/21 signed by Tuan Mohamad Yami bin Bakar, Head of Plantation Division dated 15/9/2021.	
<b>4.2.3.4</b>	Records of storage, sales, delivery or transportation of crude palm oil and palm kernel shall be maintained. <b>- Major compliance -</b>	<p>All production of the estate is being recorded on daily basis into In-Field Data Execution &amp; Analytics Solution (IDEAS).</p> <p>FFB being sell to own mill, Pasir Panjang Palm Oil Mill 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 both site, estate and mill. Sample taken as follows: -</p> <ol style="list-style-type: none"> <li>1. Pasir Logok Estate, Raw Material Delivery - Estate FFB Delivery <ul style="list-style-type: none"> <li>• Date: 31/10/2022, Estate: Pasir Logok</li> <li>• Delivery Note No.: 11988 Transaction Type: Delivering</li> <li>• MSPO Certificate No.: 696200, valid till 07/03/2024</li> <li>• Vehicle No: JUL 9020</li> <li>• Field No: P04</li> <li>• Grading form: 21.60 kg (average bunch), backlog, bunch wet 5 unripe return.</li> <li>• Mill Ticket No: 138905, Transaction Type: Receiving</li> <li>• MPOB License: 592302004000</li> <li>• Gross Wt: 27,470, Tare Wt: 13,980kg</li> <li>• Net Wt: 13,220 kg</li> </ul> </li> <li>2. Intercontinental Specialty Fats Sdn Bhd, Raw Material Delivery – Crude Palm Oil (RSPO Identity Preserved Crude Palm Oil in Bulk) <ul style="list-style-type: none"> <li>• Contract Agreement: CPOIP-M21086</li> <li>• Date: 25/11/2021</li> <li>• Quantity of the contract: 9,500 mt</li> </ul> </li> </ol>	Complied

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Criterion / Indicator	Assessment Findings	Compliance
	<ul style="list-style-type: none"> <li>• Specification: FFA 5%, M&amp;I 0.25% and DOBI: 2.31 basis</li> <li>Delivery documents:               <ul style="list-style-type: none"> <li>• Delivery Note No.: 65434, Pengangkutan Olimpik Sdn Bhd, Dated: 31/10/2022</li> <li>• Transport No.: JTJ8238, T/JA4114</li> <li>• Loading Note: C10769, Date: 31/10/2022</li> <li>• Contract No.: CPOIP-M21086</li> <li>• Invoice No.:1289</li> <li>• Lab Analysis: FFA 4.4%, Moisture: 0.16%, Impurities: 0.029%, DOBI: 2.92%</li> <li>• Tank No.: S1</li> <li>• MPOB L3 Form: F967862</li> <li>• Net weight: 41.54mt</li> <li>• Mill Weighbridge ticket No.: C10769, Date: 31/10/2022</li> <li>• RSPO Cert No.: RSPO 657192 CSPO (Identity Preserved)</li> <li>• MPOB License: 592302004000</li> <li>• PL3: F967862</li> <li>• Vehicle No: JTJ8238</li> <li>• Gross Wt: 61,890kg, Tare Wt: 20,350kg</li> <li>• Nett Wt: 41,540kg</li> </ul> </li> <li>3. Palmaju Edible Oils Sdn Bhd, Raw Material Delivery – Palm Kernel In Bulk/ RSPO IP               <ul style="list-style-type: none"> <li>• Contract Agreement: MPOK 2118 IP</li> <li>• Date: 19/11/2021</li> </ul> </li> </ul>	

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Criterion / Indicator	Assessment Findings	Compliance
	<ul style="list-style-type: none"> <li>• Quantity of the contract: 3,500 mt</li> <li>• Specification: M&amp;I 7% and Dirt &amp; Shell: 6%</li> <li>Delivery documents:               <ul style="list-style-type: none"> <li>• Delivery Order No.: 21037, XTE Transport (M) Sdn Bhd</li> <li>• Permission: To allow vehicle no.: JUT8936 to take collection of the PK with 40 mt.</li> <li>• Transport No.: JRY7836</li> <li>• Collection Order: 398469, Jin Le (Oil Mills) Sdn Bhd, Dated: 31/10/2022</li> <li>• Loading Note: K02550, Dated: 31/10/2022</li> <li>• Contract No.: MPOK 2118 IP</li> <li>• Trip: 2</li> <li>• Lab Analysis: Moisture: 5.39%, Impurities: 5.24%</li> <li>• Tank No.: B2</li> <li>• Mill Weighbridge ticket No.: K02550, Dated: 31/10/2022</li> <li>• RSPO Cert No.: RSPO 657192 CSPO (Identity Preserved)</li> <li>• MPOB License: 592302004000</li> <li>• Vehicle No: JUT8936</li> <li>• Gross Wt: 59,940 kg, Tare Wt: 18,560 kg</li> <li>• Nett Wt: 41,538 kg</li> <li>• Collection Order: 398475, Jin Le (Oil Mills) Sdn Bhd, Date: 31/10/2022</li> <li>• Collection Order: PGR-PK 55192, Penggaram Logistic &amp; Trading Sdn Bhd, Date: 31/10/2022</li> <li>• Permission: To allow vehicle no.: VVBL3222 to take collection to</li> </ul> </li> </ul>	

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Criterion / Indicator		Assessment Findings	Compliance									
		<p>Jin Le (Oil Mills) Sdn Bhd with 40 mt PK.</p> <ul style="list-style-type: none"> <li>• Transport No.: JRY7836</li> <li>• Loading Note: K02551, Dated: 31/10/2022</li> <li>• Contract No.: MPOK 2118 IP</li> <li>• Trip: 2</li> <li>• Lab Analysis: Moisture: 5.13%, Impurities: 5.78%</li> <li>• Tank No.: B1</li> <li>• Mill Weighbridge ticket No.: K02551, Dated: 31/10/2022</li> <li>• RSPO Cert No.: RSPO 657192 CSPO (Identity Preserved)</li> <li>• MPOB License: 592302004000</li> <li>• Vehicle No: VBL3222</li> <li>• Gross Wt: 62,130, Tare Wt: 20,530kg</li> <li>• Net Wt: 41,600 kg</li> </ul>										
<b>4.3 Principle 3: Compliance to legal requirements</b>												
<b>Criterion 4.3.1 – Regulatory requirements</b>												
<b>4.3.1.1</b>	<p>All operations shall be in compliance with applicable local, state, national and ratified international laws and regulations.</p> <p><b>- Major compliance -</b></p>	<p>Pasir Panjang Palm Oil Mill continued to comply with legal requirements as per indicator. Compliance to each applicable law and regulation is monitored by the operating units and GSQM sustainability team. The Mill had obtained and renewed license and permits as required by the law. The licenses/permit viewed among others were:</p> <table border="1"> <thead> <tr> <th>No.</th> <th>License / Permit / Regulatory Requirement</th> <th>Validity</th> </tr> </thead> <tbody> <tr> <td>1</td> <td>MPOB License no 59230-200-4000</td> <td>31/12/2023</td> </tr> <tr> <td>2</td> <td>DOE – Jadual Pematuhan Ref 004649</td> <td>30/06/2023</td> </tr> </tbody> </table>	No.	License / Permit / Regulatory Requirement	Validity	1	MPOB License no 59230-200-4000	31/12/2023	2	DOE – Jadual Pematuhan Ref 004649	30/06/2023	Complied
No.	License / Permit / Regulatory Requirement	Validity										
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Criterion / Indicator		Assessment Findings		Compliance						
		3	LHDN - Tax Registration 9134635802	Eff 12/01/2016						
		4	KPDNHEP - ref J 005906 - 20000L diesel	25/05/2023						
		5	Persijilan HALAL JAIJ - ref no A148857	15/02/2023						
		6	JTK - Wages deduction ref TK/NJ/U-21	Eff 02/05/2019						
		7	JTK - O/T working hours	Eff 02/12/2020						
		8	Sterilizer no 1 JH PMT 25364	18/08/2023						
		9	Sterilizer no 2 JH PMT 25365	18/08/2023						
		10	Sterilizer no 3 JH PMT 25366	18/08/2023						
		11	Boiler no 1 JH PMD 1712	18/08/2023						
		12	Back Pressure Receiver JH PMT 83952	18/08/2023						
		13	Air Receiver Tank JH PMT 80950	20/02/2023						
		14	Air Receiver Tank JH PMT 80951	20/02/2023						
		15	Air Receiver Tank JH PMT 25368	18/08/2023						
		16	Air Receiver Tank JH PMT 24785	18/08/2023						
		17	Air receiver Tank JH PMT 24786	18/08/2023						
		18	SPAN ref no LK/3/22/01510	13/07/2023						
		19	BAKAJ ref no 07/A/KT/117 - water abstraction	31/12/2023						
		20	Metrology Corp. w/bridge 1 ref B 1742325	28/03/2023						
		21	Metrology Corp. w/bridge 2 ref D 051096	03/08/2023						
		22	Suruhanjaya Tenaga no 9/2642 - 1600.55 kW	05/07/2023						
		<p>Pasir Panjang Palm Oil Mill operated under MPOB license issued on 17/10/2022 the approved FFB processed/year is maximum 300000 mt and the actual FFB processed in 2021 was 298275 mt compliance to the regulations. The mill was designed at 60 mt/hr.</p> <p>Factory and Machinery Act 1967: –</p> <p>The following competency requirements were verified:</p> <table border="1"> <thead> <tr> <th>No.</th> <th>Competent person</th> <th>No of personnel</th> </tr> </thead> <tbody> <tr> <td>1</td> <td>Steam engineer</td> <td>2<sup>nd</sup> grade – 2</td> </tr> </tbody> </table>			No.	Competent person	No of personnel	1	Steam engineer	2 <sup>nd</sup> grade – 2
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Criterion / Indicator		Assessment Findings				Compliance									
		2	Engine Driver (BHC)	3 - Ist Grade											
		3	Boiler men	3-2 <sup>nd</sup> grade											
		4	AESP (Authorised Entrant and Standby Person Confined Space)	2 competent persons											
		5	AGTES (Authorised Gas Tester Entry Supervisor Confined Space)	2 competent persons											
		6	Electrical Chargemen	1 - A4 1 AO Chargemen											
		EQ (Prescribed Premise) Crude Palm Oil Regulations 1977													
		1. Requirement in 'Jadual Pematuhan'													
		2. License no / validity period: 004649 till 30/06/23 at 60mt/hr													
		3. Discharge method: Land application													
		4. Scheduled waste (CePSWaM): 2 Mill Manager/Engineer - May 2018													
5. Effluent treatment (CePPOME): 3 persons Mill Manager/Engineers - Nov 2018.															
Air Monitoring															
1. Particulate – Stack sampling was carried out on quarterly basis.															
2. Noted that monitoring was conducted on (at 12.0%) CO2.															
		<table border="1"> <thead> <tr> <th>Boiler ref</th> <th>Date</th> <th>Dust concentration</th> <th>EQA std</th> </tr> </thead> <tbody> <tr> <td>JH PMD 1712</td> <td>27/06/2022</td> <td>237 mg/m3</td> <td>150 mg/m3</td> </tr> </tbody> </table>				Boiler ref	Date	Dust concentration	EQA std	JH PMD 1712	27/06/2022	237 mg/m3	150 mg/m3		
Boiler ref	Date	Dust concentration	EQA std												
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The stack sampling was carried out by Mareff Management Sdn Bhd. The mill has programmed ESP installation in January 2023 and commissioned in June 2023. The report concluded that EPOM boiler no 2 has not fulfilled the 2 <sup>nd</sup> schedule regulation 13 of the Environmental Quality (Clean Air) Regulation 2014. This however has obtained violation of compliance (lesen langgar) via DOE letter dated 02/08/2022.															
<b>4.3.1.2</b>	The management shall list all relevant laws related to their	Mahamurni Plantations Sdn Bhd through Kulim (M) Berhad established				Complied									

Criterion / Indicator	Assessment Findings	Compliance
<p>operations in a legal requirements register. - <b>Major compliance</b> -</p>	<p>Legal &amp; Other Requirements Register (LORR) with title as 'Kulim Group Compliance Framework with KMB Sustainable Management System Doc. No.: SID/SMS/2.0 dated 31/10/2022.</p> <p>The LORR covers all the necessary regulatory requirements with list of applicable legal and other requirements was made available during the assessment and complied.</p> <p>The identified applicable laws and regulations relevant to its operations among others include the following:</p> <ol style="list-style-type: none"> <li>1. Environmental Quality Act 1974 and its Regulations</li> <li>2. Factories and Machinery Act 1967 and its Regulations</li> <li>3. Occupational Safety and Health Act 1994 and its Regulations</li> <li>4. Pesticides Act, 1974</li> <li>5. Worker's Minimum Standards of Housing &amp; Amenities Act, 2020</li> <li>6. Employment Act 1955 Act 265</li> <li>7. Wildlife Conservation Act 2010</li> <li>8. Malaysian Palm Oil Board 1998 - Amendment 2021</li> <li>9. Holiday Act 1951</li> <li>10. Passport Act 1966</li> <li>11. BAKAJ - Enakmen Air no 66 Johor</li> <li>12. Workers Union Act 1959</li> <li>13. Estate Hospital Assistants (Registration) Act 1965</li> <li>14. Petroleum (safety Measures) Act 1984</li> <li>15. Fire Services Act 1984</li> <li>16. Uniform Building by Laws 1986</li> <li>17. Weights And Measures Act 1972 (Act 71) (Amendment 1981)</li> </ol>	

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Criterion / Indicator		Assessment Findings	Compliance
		18. National Land Code 1965 Act 56 19. Water Act 1920 Act 418 20. Animal Act 1953 21. Malaysian Anti-Corruption A1567 Act 2018 22. Energy Commission 2001 Act 610 23. Perintah Gaji Minimum 2022 24. Peraturan Kawalan Penyakit - Fasa Peralihan Endermik 01/4/22	
<b>4.3.1.3</b>	<p>The legal requirements register shall be updated as and when there are any new amendments or any new regulations coming into force.</p> <p><b>- Major compliance -</b></p>	<p>The compliance will be guided by visits to Federal Legislation Web site sighted monthly. Thereafter information and updates will be made through Risk Management and Compliance Department Flow Chart will be applied.</p> <p>The Sustainability and Innovation Department SID, based at Head Office is responsible to track changes in the law and the information was disseminated to all its plantations and mills. SID which is based in Ulu Tiram Estate is responsible for tracking any changes to the Acts and Regulations. In addition, the Regional Controller of Northern Region also played a role in disseminating new Acts &amp; Regulations to all the mills and estates in the Region.</p> <ol style="list-style-type: none"> <li>1. This was made via communication with the publisher of the documents.</li> <li>2. This mechanism was outlined in its procedure.</li> <li>3. The updating of the legal register is made on a periodical basis.</li> <li>4. Changes in the legal register if any are communicated to the respective Region.</li> </ol> <p>The mill had entirely adopted the KMB established documented system for identifying, tracking, accessing, and updating the legal requirements.</p>	Complied

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Criterion / Indicator		Assessment Findings	Compliance																					
		<p>It had ensured that all applicable legal requirements pertaining to MSPO are established, implemented, and maintained. The latest revision on the LORR was made dated 31/10/2022 on the following changes to date for the year.</p> <table border="1"> <thead> <tr> <th>No.</th> <th>Date</th> <th>Title</th> </tr> </thead> <tbody> <tr> <td>1</td> <td>01/04/2022</td> <td>Peraturan Kawalan Penyakit - Fasa Peralihan Endermik</td> </tr> <tr> <td>2</td> <td>01/04/2022</td> <td>Peraturan Kawalan Penyakit - Compounding of offenses</td> </tr> <tr> <td>3</td> <td>30/06/2022</td> <td>Minimum Wages 2022</td> </tr> <tr> <td>4</td> <td>31/08/2022</td> <td>KWSP Amendment of 3<sup>rd</sup> Schedule Order 2022</td> </tr> <tr> <td>5</td> <td>31/08/2022</td> <td>KWSP Amendment of 8<sup>th</sup> Schedule Order 2022</td> </tr> <tr> <td>6</td> <td>31/08/2022</td> <td>COVID 19 - Extension of operations Order 2022</td> </tr> </tbody> </table>	No.	Date	Title	1	01/04/2022	Peraturan Kawalan Penyakit - Fasa Peralihan Endermik	2	01/04/2022	Peraturan Kawalan Penyakit - Compounding of offenses	3	30/06/2022	Minimum Wages 2022	4	31/08/2022	KWSP Amendment of 3 <sup>rd</sup> Schedule Order 2022	5	31/08/2022	KWSP Amendment of 8 <sup>th</sup> Schedule Order 2022	6	31/08/2022	COVID 19 - Extension of operations Order 2022	
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<b>4.3.1.4</b>	<p>The management should assign a person responsible to monitor compliance and to track update the changes in regulatory requirements.</p> <p><b>- Minor compliance -</b></p>	<p>Mahamurni Plantations Sdn Bhd through Kulim (M) Berhad assigned Pn. Norazimah Abas, Executive Regional Controller as Person Incharge responsible to monitor compliance by Head of Governance Division with appointment letter dated 21/07/2022.</p>	Complied																					
<b>Criterion 4.3.2 – Lands use rights</b>																								
<b>4.3.2.1</b>	<p>The management shall ensure that their oil palm milling activities do not diminish the land use rights of other users.</p> <p><b>- Major compliance -</b></p>	<p>Mahamurni Plantations Sdn Bhd through Kulim (M) Berhad kept their document of evidence of legal ownership for oil palm cultivation activities that do not diminish the land use rights of other users for all estates.</p> <p>Document review for sampled estates, verified as follow:  Pasir Panjang Estate, there are 3 land titles.  Details as per below:  1. HSD 35107 leased for 99 years from 17/09/2013 with total of 1,609.869 ha</p>	Complied																					

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Criterion / Indicator		Assessment Findings	Compliance
		<p>2. HSD 35105 leased for 99 years from 13/09/2013 with total of 2,282.60 ha</p> <p>3. HSD 35106 leased for 99 years from 13/09/2013 with total of 25.03 ha</p> <p>All land titles are stated under the term of 'tanah ini hendaklah ditanam dengan tanaman Kelapa Sawit'. And the ownership is under Kulim (M) Berhad. Total area of the estate is 3,763.9462 ha.</p> <p>HSD 35,107 who was previously by Johor Corporation was transferred to Mahamurni Plantations Sdn Bhd with letter from lawyer ARSA Abdul Rahmand Saad @ Associates with subject 'Sale and Purchase Agreement All Dated 16/08/2011 Supplement Sale and Purchase Agreement All Dated 08/11/2011', ref. letter: NM/NAS71565-2010/GenCorp/yan dated 18/02/2014.</p> <p>Quit rent was paid by headquarters and not direct from estate's account. Document review, sighted Mahamurni Plantations Sdn Bhd has made payment of quit rent to Pentadbiran Tanah Johor for the leased land with receipt number below:</p> <ol style="list-style-type: none"> <li>1. HSD 35017, Lot No.: PTD 558 with receipt no.: F0174439-310522040200103 dated 31/05/2022.</li> <li>2. HSD 35016, Lot No.: PTD 4144 with receipt no.: F0172948-2605220415380048 dated 28/05/2022.</li> <li>3. HSD 35015, Lot No.: PTD 4143 with receipt no.: F0172947-2605220415380047 dated 28/05/2022.</li> </ol>	
<b>4.3.2.2</b>	<p>The management shall provide documents showing legal ownership or lease, history of land tenure and the actual legal use of the land.</p> <p><b>- Major compliance -</b></p>	<p>Mahamurni Plantations Sdn Bhd through Kulim (M) Berhad kept their document of evidence of legal ownership for oil palm cultivation activities that do not diminish the land use rights of other users for all estates.</p>	Complied

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Criterion / Indicator		Assessment Findings	Compliance
		There is evidence of document showing lease on land for Pasir Panjang Palm Oil Mill and has been verified based on the land title that has been provided. Detail as per indicator 4.3.2.1.	
<b>4.3.2.3</b>	Legal parameter boundary markers should be clearly demarcated and visibly maintained on the ground where practicable. <b>- Major compliance -</b>	Mahamurni Plantations Sdn Bhd through Kulim (M) Berhad established Procedure of Boundary Marker Placement and distribute to estate operation through memo dated 01/11/2007. Document review, the memo describes those estates need to mark the boundary using concrete pole and painted with red and white stripe. Onsite visit sighted the parameter of the factory compound clearly demarcated using bulb wire.	Complied
<b>4.3.2.4</b>	Where there are, or haven been disputes, documented proof of legal acquisition of land and fair compensation that have been or are being made to previous owners and occupants; shall made available and that these should have been accepted with free prior informed consent (FPIC). <b>- Minor compliance -</b>	Mahamurni Plantations Sdn Bhd through Kulim (M) Berhad 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 outlined 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 based on the land title number PTD 558 HS(D) 35107 with total hectarage 1,609.87 Ha.	Not applicable
<b>Criterion 4.3.3 – Customary rights</b>			
<b>4.3.3.1</b>	Where lands are encumbered by customary rights, the company shall demonstrate that these rights are understood and are not being threatened or reduced. <b>- Major compliance -</b>	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

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Criterion / Indicator		Assessment Findings	Compliance						
4.3.3.2	Maps of an appropriate scale showing extent of recognized customary rights shall be made available. - <b>Minor compliance</b> -	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 the relevant agreements should be made available. - <b>Major compliance</b> -	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						
<b>4.4 Principle 4: Social responsibility, health, safety and employment condition</b>									
<b>Criterion 4.4.1: Social Impact Assessment (SIA)</b>									
4.4.1.1	Social impacts should be identified and plans should be implemented to mitigate the negative impacts and promote the positive ones. - <b>Minor compliance</b> -	<p>Mahamurni Plantations Sdn Bhd through Kulim (M) Berhad has established SOPs for Social Impact Assessment document number SQD/SMS/3.6 dated 01/08/2020. Mentioned in the SOPs that assessment need to be done with participation of affected parties.</p> <p>Onsite interview with PIC from SQD department informed that assessment has identified positive, negative, and other initiative which been made by providing feedback form to employees, contractor, and stakeholders if there is any respond.</p> <p>Based on SIA action plan, sampled estates have identified as follow issued:</p> <p>While for Pasir Panjang Palm Oil Mill, the assessment has been documented and concluded on 30/11/2022 where 1 negative outcome has been identified which related to save worker passport by their own.</p> <table border="1"> <thead> <tr> <th>Mill</th> <th>Issued</th> <th>Action Taken</th> </tr> </thead> <tbody> <tr> <td>Pasir Panjang</td> <td>1 issue has been highlighted which</td> <td>The action taken due to the issues occurred, management had acted</td> </tr> </tbody> </table>	Mill	Issued	Action Taken	Pasir Panjang	1 issue has been highlighted which	The action taken due to the issues occurred, management had acted	Complied
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Pasir Panjang	1 issue has been highlighted which	The action taken due to the issues occurred, management had acted							



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Criterion / Indicator		Assessment Findings		Compliance	
		Palm Oil Mill	is related to worker to save worker passport by their own.	by issued the action in 'Penyerahan Passport – Pekerja Asing' with document number ver. 1.0/SID, dated 03/08/2022.	
Pasir Panjang Palm Oil Mill conduct briefing on sustainability policy to workers during muster morning on 01/08/2022.					
<b>Criterion 4.4.2: Complaints and grievances</b>					
<b>4.4.2.1</b>	A system for dealing with complaints and grievances shall be established and documented. - <b>Major compliance</b> -	Mahamurni Plantations Sdn Bhd through Kulim (M) Berhad established 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.		Complied	
<b>4.4.2.2</b>	The system shall be able to resolve dispute in an effective, timely and appropriate manner, which is accepted by all parties. - <b>Major compliance</b> -	Mahamurni Plantations Sdn Bhd through Kulim (M) Berhad Whistle Blowing Policy approved by 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. Document review the company's dispute resolution mechanism needs 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 Pasir Panjang Palm Oil Mill received with no complaint from year 2021 and 2022.		Complied	

Criterion / Indicator		Assessment Findings	Compliance
4.4.2.3	A complaint form should be made available at the premises, where employees and affected stakeholders can make complaints. <b>- Minor compliance -</b>	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 surrounding communities should be made aware of its existence and that complaints or suggestions may be made at any time. <b>- Minor compliance -</b>	Pasir Panjang Palm Oil Mill, 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, Palm Oil Mill 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.  Mahamurni Plantations Sdn Bhd through Kulim (M) Berhad has conduct stakeholder consultation meeting which being held virtually for Tunjuk Laut Complex on 14/11/2022 for Southern Region includes Pasir Panjang Palm Oil Mill, Pasir Logok Estate, Bukit Kelompok Estate and Pasir Panjang Estate (includes Bukit Payung division).  Pasir Panjang Palm Oil Mill conduct briefing on Complaints and Grievance procedure during muster morning to workers on 01/06/2022 and 13/02/2022.	Complied
4.4.2.5	Complaints and solutions within the past 24 months shall be documented and be made available to affected stakeholders upon request. <b>- Major compliance -</b>	Pasir Panjang Palm Oil Mill 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 Panjang Palm Oil Mill there is no complaint has been received since 2019.	Complied
<b>Criterion 4.4.3:</b> Commitment to contribute to local sustainable development			

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Criterion / Indicator	Assessment Findings	Compliance
<p><b>4.4.3.1</b></p> <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><b>- Minor compliance -</b></p>	<p>Mahamurni Plantations Sdn Bhd through Kulim (M) Berhad reported in Integrated Report 2021, contributing to the well-being of the communities in which operated.</p> <p>Below is the list of contribution program:</p> <ol style="list-style-type: none"> <li>1. To support the development of football to Kelab Bola Speak Johor Darul Takzim (JDT)</li> <li>2. To improve the living conditions of underprivileged communities to Yayasan Johor Corporation</li> <li>3. Collaboration with MyFundAction (NGO) for post-flood relief in Selangor and Johor</li> <li>4. Post-flood relief contribution of JCorp group employees to Tabung Bantuan Banjir JCorp</li> <li>5. Donation to the Johor Cerebral Palsy Association</li> <li>6. To subsidise the school uniforms of employees' children</li> <li>7. Contribution to hospitals, government initiated COVID-19 fund, frontliners, hemodialysis patients undergoing Home Surveillance Order for COVID-19, NGOs and communities</li> </ol> <p>Mahamurni Plantations Sdn Bhd through Kulim (M) Berhad has advertised job vacancy to local community surrounding by displayed to Masjid / Surau notice board, website and involve in Karnival Kerjaya Negeri Johor 2022 on dated 06/03/2022.</p> <p>In additional to that, the management of mill has taken their own initiative to provide contribution to nearby stakeholders as per below:</p> <p>Pasir Panjang Palm Oil Mill made donation based on request from external stakeholders nearby. There is evidence that the management provided contribution to the request with latest dated 18/07/2022.</p>	<p>Complied</p>

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Criterion / Indicator		Assessment Findings	Compliance
		Onsite interview with employees during stakeholder consultation, verified Pasir Panjang Palm Oil Mill hired locals as their workers and staffs.	
<b>Criterion 4.4.4: Employees safety and health</b>			
<b>4.4.4.1</b>	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. <b>- Major compliance -</b>	<p>Mahamurni Plantations Sdn Bhd through Kulim (M) Berhad established Group Occupational Safety &amp; Health Management Policy and implemented for all mill and estates.</p> <ol style="list-style-type: none"> <li>1. The policy was signed by the Managing Director of Kulim (Malaysia) Berhad dated 01/10/2021 and displayed prominently on notice boards in English and local language Bahasa Malaysia.</li> <li>2. The Policy is implemented through the OSH activities by the on-site Safety Officers and monitored by OSH Manager from Head Office.</li> <li>3. Included in the policy is the commitment of the Company to provide and maintain a safe and healthy working environment of its employees &amp; contractors &amp; visitors.</li> <li>4. Regularly and continuously conduct education, training and awareness program on OSH to all parties concerned.</li> </ol> <p>Onsite interviews with the workers and staff revealed that the employees have been briefed and have understood the policy.</p>	Complied
<b>4.4.4.2</b>	The occupational safety and health plan should cover the following: a) A safety and health policy, which is communicated and implemented. b) The risk of all operations shall be assessed and documented.	<ol style="list-style-type: none"> <li>a) The OSH policy is communicated through training session and during muster. Ad-hoc training is also being carried in a smaller group of employees. Reference training 4.4.6.1</li> <li>b) The mill had identified and reviewed significant hazards and risks and determined appropriate risk control measures. The hazard identification, risk assessment and risk control (HIRARC) records, as well as CHRA reports were verified during the assessment. Among others the HIRARC covered activities are.</li> </ol>	Complied

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Criterion / Indicator		Assessment Findings				Compliance
<p>c) An awareness and training programme which includes the following requirements for employees exposed to chemicals used at the palm oil mill:</p> <ul style="list-style-type: none"> <li>i. All employees involved are adequately trained on safe working practices;</li> <li>ii. All precautions attached to products should be properly observed and applied;</li> </ul> <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 ant the concerns of</p>		No.	Activity	No.	Activity	
		1	Chemical mixing	11	Scheduled Waste storage	
		2	CPO storage	12	Use of vehicle	
		3	FFB Reception	13	Water treatment	
		4	Generating power	14	Waste handling	
		5	Lab operations	15	Diesel engine	
		6	Machine/maintenance	16	Storage tank	
		7	Office work	17	Effluent T Plant	
		8	Oil clarification	18	Covid 19	
		9	Oil pressing	19	Biogas plant	
	10	EFB shredding	20	Boiler Station		
		<p>Full review dated 15/05/2022 for the HIRARC was conducted by the OSH committee. They are made on annual basis or whenever a situation deemed necessary in event of accident or new machinery / work process. All HIRARC prepared were adequate to address any situation of the risk management. All HIRARC were verified and approved accordingly.</p> <p>c) The training are conducted by an accredited or qualified organization who can demonstrate their suitability to provide training. This was sighted in the training session in 4.4.6.1.</p> <p>Among others the training held are as follows:</p>				
		No.	Subjects	Date	Date	
		1	PPE adherence	22/05/2022	-	
		2	Spill containment	22/05/2022	-	
		3	Chemical Handling. /Lab	23/06/2022	-	
		4	Emergency Respond Plan	08/05/2022	-	
		5	Fire drill training	08/05/2022	17/01/2022	
		6	Medical facilities	21/11/2022	-	

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	<p>employees and any remedial actions taken shall be recorded.</p> <p>h) Accident and emergency procedures shall exist and instructions shall be clearly understood by all employees.</p> <p>i) Employees trained in First Aid shall be present at all mill operations. First Aid equipment should be available at each worksite.</p> <p>j) Records shall be kept of all accidents and be reviewed periodically at quarterly intervals.</p> <p><b>- Major compliance -</b></p>	7	First aid /CPR	25/05/2022	08/10/2021	
		8	Confined Space Guidelines	01/02/2022	-	
		d) The mill provides PPE to the employees relevant to the work handled by the workers. The list of PPE that were provided by the mill are as below:				
		No.	Category	Type of PPE		
		1	Gen workers	Safety Helmet, cotton/leather gloves. Safety shoes		
		2	Workshop	Safety Helmet, cotton/leather gloves. Safety shoes		
		3	Workshop	Safety harness, face mask.		
		Records of PPE issuance in 2021/22 were sighted verified. During the site visit workers were observed to be in their respective PPE including the tankers drivers.				
		e) The mill established SOP for chemical handling. This is available in Integrated Management Manual and SOP provided in the Company's documents - Operational Control Procedure under subject Chemical Safety Management.				
		This includes compliance related to.				
		<ol style="list-style-type: none"> <li>1. Conduct/reassess CHRA -</li> <li>2. Review of chemical register</li> <li>3. Chemical management assessment review</li> <li>4. Conduct health surveillance.</li> </ol>				
		The document was sighted and verified. CHRA was made on 15/09/2021 by Kulim Safety Training and Safety Sdn Bhd reg no HQ/14/ASS/00/350 report ref no HQ/14/ASS/00/350-2021/099				

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		<p>The CHRA report among others described requirement of medical surveillance to be made for the listed category of employees.</p> <p>The medical surveillance respectively was performed in Occupational Health Doctor, from KPJ Bandar Dato Onn for 2022.</p> <table border="1"> <thead> <tr> <th>No.</th> <th>Date</th> <th>Workshop</th> <th>Boiler</th> <th>Laboratory</th> <th>WTP</th> <th>Total</th> </tr> </thead> <tbody> <tr> <td>1</td> <td>15/08/2022</td> <td>0</td> <td>0</td> <td>6</td> <td>0</td> <td>6</td> </tr> <tr> <td>2</td> <td>14/07/2021</td> <td>12</td> <td>7</td> <td>4</td> <td>4</td> <td>27</td> </tr> </tbody> </table> <p>The results for the entire workers were positive and all being declared FIT to handle chemicals in the laboratory</p> <p>f) The Mill Manager is appointed as the Chairman of the ESH committee via letter dated 15/09/21. The letter of appointment for the Managers is signed by the Chairman ESG based at Head Office. The Manager subsequently assigned duties of ESH coordinator to the Assistants for the down line implementation of ESH practices in the mill. All identified Executives were officially given a letter for such an appointment.</p> <p>g) The mill management conducts regular two-way communication with their employees through the quarterly OSH meeting. The dates of meeting held are recorded below.</p> <table border="1"> <thead> <tr> <th>No.</th> <th>Date</th> <th>No.</th> <th>Date</th> </tr> </thead> <tbody> <tr> <td>1</td> <td>25/11/2021</td> <td>3</td> <td>25/07/2022</td> </tr> <tr> <td>2</td> <td>28/03/2022</td> <td>4</td> <td>29/09/2022</td> </tr> </tbody> </table> <p>The minutes of meeting dated 28/03/2022 and 29/09/2022 were sighted and verified. Workers during the meeting participated in the discussion mainly on housing and safety.</p> <p>The agenda discussed during the meeting among others includes the following.</p>	No.	Date	Workshop	Boiler	Laboratory	WTP	Total	1	15/08/2022	0	0	6	0	6	2	14/07/2021	12	7	4	4	27	No.	Date	No.	Date	1	25/11/2021	3	25/07/2022	2	28/03/2022	4	29/09/2022	
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		<p>1. Introduction 2. Matters arising 3. Presentation from Head Section 4. Feedback from Chairman 5. Accident Statistics 6. Other matters.</p> <p>h) Accident and emergency procedures are available in the SOP. The Mill had procedures emergencies situation as listed below in the table. There was formation of ERP Team &amp; ERP for all the identified incidences. The organization chart for the ERP team was established and displayed for information of the employees. The important telephone contact numbers were also provided therein. Procedure's guidelines were issued by SID and amended to tailor to the situation differences in the mill.</p> <table border="1"> <thead> <tr> <th>No.</th> <th>Emergencies Situation</th> <th>Mill</th> <th>Estate</th> </tr> </thead> <tbody> <tr> <td>1</td> <td>Fire Hazard</td> <td>/</td> <td>/</td> </tr> <tr> <td>2</td> <td>Injury At Site</td> <td>/</td> <td>/</td> </tr> <tr> <td>3</td> <td>Diesoline /chemical spillage</td> <td>/</td> <td>/</td> </tr> </tbody> </table> <p>ERT members received training and practice in emergency procedures appropriate to their respective workplace and degree of risk. The mill trained their nominated employees for First Aid mainly those involved in the field operations. A training program Basic Occupational First Aider &amp; CPR was organized by KSTS at Head Office level attended by employees nominated by the Estates/Mill.</p> <p>i) A First Aid Kit equipped with approved 16 items were available and replenished on a weekly basis. Distribution of the 1<sup>st</sup> Aid Kit for the</p>	No.	Emergencies Situation	Mill	Estate	1	Fire Hazard	/	/	2	Injury At Site	/	/	3	Diesoline /chemical spillage	/	/	
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		<p>mill are made at the following places/personnel among others located at Office / AP Post / Chemical Store / Laboratory/ Workshop.</p> <p>The boxes kept by the supervisors were sighted during the field visit. The mill had regular briefing to the 1<sup>st</sup> Aid Kit holders on the management of the content and usage. The sessions were briefed by the Medical Assistant and during the weekly briefings.</p> <p>j) Records of all accidents are kept in the mill for a min of seven (7) years. Accident incidences are reviewed during safety meetings. Records in 2021 as extracted from the JKPP 8 form and submitted to DOSH on 24/01/2022 as details below.</p> <table border="1"> <tr> <td>No of cases</td> <td>1</td> </tr> <tr> <td>LTI</td> <td>9</td> </tr> </table> <ol style="list-style-type: none"> <li>1. Management reported with one (1) incidence dated 24/09/2021 revised 15/05/2022 involving a workshop personnel injured at RHS fore finger and been given with nine (9) days of MC.</li> <li>2. HIRARC was revised 01/10/2021 to increase the severity level at press station with training made to remind employees for a better communication prior to work commissioning.</li> <li>3. Submission of JKPP 6 &amp; JKPP 8 form to DOSH as per legislative requirement.</li> </ol>	No of cases	1	LTI	9	
No of cases	1						
LTI	9						
<b>Criterion 4.4.5: Employment conditions</b>							
<b>4.4.5.1</b>	<p>The management shall establish a policy on good social practice regarding human rights in respect of industrial harmony. The policy shall be signed by the top management and communicated to the employees.</p> <p><b>- Major compliance -</b></p>	<p>Pasir Panjang Palm Oil Mill adopt Mahamurni Plantations Sdn Bhd's through Kulim (M) Berhad's Sustainability policy which newly revised and approved by Kulim's Sustainability &amp; 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</p>	Complied				

Criterion / Indicator		Assessment Findings	Compliance
		<p>protect and advance human rights, including prohibiting retaliation, intimidation, and harassment against Human Rights Defenders, whistle blowers, complainants, and community spokespersons.</p> <p>Mahamurni Plantations Sdn Bhd through Kulim (M) Berhad established Core Labour Standard Policy 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>Mahamurni Plantations Sdn Bhd through Kulim (M) Berhad has conduct stakeholder consultation meeting which being held virtually for Tunjuk Laut Complex on 14/11/2022 for Southern Region includes Pasir Panjang Palm Oil Mill, Pasir Logok Estate, Bukit Kelompok Estate and Pasir Panjang Estate (includes Bukit Payung division).</p>	
<b>4.4.5.2</b>	<p>The management shall not engage in or support discriminatory practices and shall provide equal opportunity and treatment regardless of race, colour, sex, religion, political opinion, nationality, social origin or any other distinguishing characteristics.</p> <p><b>- Major compliance -</b></p>	<p>Mahamurni Plantations Sdn Bhd through Kulim (M) Berhad established Sustainability Policy dated 01/10/2020 describes origin, caste, national origin, religion, disability, gender, sexual orientation, gender identity, union membership, political affiliation or age.</p> <p>Mahamurni Plantations Sdn Bhd through Kulim (M) Berhad has conduct stakeholder consultation meeting which being held virtually for Tunjuk Laut Complex on 14/11/2022 for Southern Region includes Pasir Panjang Palm Oil Mill, Pasir Logok Estate, Bukit Kelompok Estate and Pasir Panjang Estate (includes Bukit Payung division).</p> <p>Pasir Panjang Palm Oil Mill conduct briefing on No Discrimination and during morning briefing to workers on 01/06/2022.</p>	Complied
<b>4.4.5.3</b>	<p>Management shall ensure that employees' pay and conditions meet legal or industry minimum standards as per Collective Agreements. The living wage should be sufficient to meet basic</p>	<p>Mahamurni Plantations Sdn Bhd is committed to ensure that workers' wages are in line and meet the minimum wages. Pasir Panjang Palm Oil Mill apply new Minimum Wages Act 2021. The auditor has taken sample</p>	Complied

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	<p>needs and provide some discretionary income based on minimum wage.</p> <p><b>- Major compliance -</b></p>	<p>for months of February, June and October for verification.                      As per sampled of payslip, verified wages paid accordingly.                      Pasir Panjang Palm Oil Mill</p> <table border="1"> <thead> <tr> <th>No.</th> <th>Employee ID</th> <th>Job Descriptions</th> <th>Originality</th> <th>Passport/IC Number</th> </tr> </thead> <tbody> <tr> <td>1.</td> <td>E440000170</td> <td>Laboratory Assistant</td> <td>Malaysia</td> <td>940227-xx-xxxx</td> </tr> <tr> <td>2.</td> <td>E440000044</td> <td>Driver</td> <td>Malaysia</td> <td>630823-xx-xxxx</td> </tr> <tr> <td>3.</td> <td>E440000025</td> <td>Gardener</td> <td>Malaysia</td> <td>680521-xx-xxxx</td> </tr> <tr> <td>4.</td> <td>E440000198</td> <td>Kernel Plant Operator</td> <td>Indonesia</td> <td>AU15xxxx</td> </tr> <tr> <td>5.</td> <td>E440000213</td> <td>Sterilizer Operator</td> <td>Indonesia</td> <td>AU31xxxx</td> </tr> <tr> <td>6.</td> <td>E440000264</td> <td>General Worker</td> <td>Indonesia</td> <td>C527xxxx</td> </tr> </tbody> </table> <p>Payslip Sample for Pasir Panjang Palm Oil Mill:</p> <table border="1"> <thead> <tr> <th>Employee ID</th> <th>E440000170</th> <th>E440000198</th> <th>E440000294</th> </tr> </thead> <tbody> <tr> <td>JD</td> <td>Laboratory Assistant</td> <td>Kernel Plant Operator</td> <td>General Worker</td> </tr> <tr> <td>Passport/ IC</td> <td>940227-xx-xxxx</td> <td>AU15xxxx</td> <td>C527xxxx</td> </tr> <tr> <td>Day Rate/ Piece Rate</td> <td>MYR57.69 (Daily Rated) MYR59.69 (Piece Rate)</td> <td>MYR57.69 (Daily Rated) MYR63.20 (Piece Rate)</td> <td>MYR57.69 (Daily Rated) MYR61.67 (Piece Rate)</td> </tr> <tr> <td>Shift Rate</td> <td>NIL</td> <td>MYR40.50 (12 days)</td> <td>MYR47.50 (7 days)</td> </tr> </tbody> </table>				No.	Employee ID	Job Descriptions	Originality	Passport/IC Number	1.	E440000170	Laboratory Assistant	Malaysia	940227-xx-xxxx	2.	E440000044	Driver	Malaysia	630823-xx-xxxx	3.	E440000025	Gardener	Malaysia	680521-xx-xxxx	4.	E440000198	Kernel Plant Operator	Indonesia	AU15xxxx	5.	E440000213	Sterilizer Operator	Indonesia	AU31xxxx	6.	E440000264	General Worker	Indonesia	C527xxxx	Employee ID	E440000170	E440000198	E440000294	JD	Laboratory Assistant	Kernel Plant Operator	General Worker	Passport/ IC	940227-xx-xxxx	AU15xxxx	C527xxxx	Day Rate/ Piece Rate	MYR57.69 (Daily Rated) MYR59.69 (Piece Rate)	MYR57.69 (Daily Rated) MYR63.20 (Piece Rate)	MYR57.69 (Daily Rated) MYR61.67 (Piece Rate)	Shift Rate	NIL	MYR40.50 (12 days)	MYR47.50 (7 days)	
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		Overtime Allowance	(Normal = 123 hours) (Restday = 4.50 hours)	(Normal = 75.50 hours) (Restday = 7 hours) (Public Holiday = 3.50 hours)	(Normal = 95.50 hours) (Restday = 30 hours) (Public Holiday = 5.50 hours)	
		Working day	25	28	28	
		Deduction	MYR448.45 (Advance, EPF, SOCSO, Income Tax, NUPW, Sport Club)	MYR418.00 (Advance, NUPW, Sport Club)	MYR218.00 (Advance, NUPW, Sport Club)	
		Employer Contribution	MYR34.40 (EPF, SOCSO, SIP Insurance, HRDF, NUPW)	MYR49.10 (SOCSO)	MYR50.60 (SOCSO)	
		Pasir Panjang Palm Oil Mill conduct briefing on new wages, overtime and deduction on salary to workers during muster morning on 01/06/2022.				
<b>4.4.5.4</b>	Management should ensure employees of contractors are paid based on legal or industry minimum standards according to the employment contract agreed between the contractor and his employee. <b>- Minor compliance -</b>	There is no contractor work permanently at Pasir Panjang Palm Oil Mill except for ad-hoc work for equipment repair and engineering project.				Complied
<b>4.4.5.5</b>	The management shall establish records that provide an accurate overview of all employees (including seasonal workers and subcontracted workers on the premises). The records	Pasir Panjang Palm Oil Mill 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.				Complied

Criterion / Indicator		Assessment Findings	Compliance
	<p>should contain full names, gender, date of birth, date of entry, a job description, wage and the period of employment.</p> <p><b>- Major compliance -</b></p>		
4.4.5.6	<p>All employees shall be provided with fair contracts that have been signed by both employee and employer. A copy of employment contract shall be made available for each and every employee indicated in the employment records.</p> <p><b>- Major compliance -</b></p>	<p>Pasir Panjang Palm Oil Mill's employment contract have been taken six (6) samples for verification. There is evidence 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"> <li>1. KWSP</li> <li>2. PERKESO</li> <li>3. Skim Khairat Keluarga</li> <li>4. NUPW</li> <li>5. Electricity if exceeds the limit 50kWh per house</li> <li>6. Water if exceeds the limit 35gallon per workers.</li> </ol> <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>Document review on 'Kontrak Pekerjaan – Pekerja Asing, stated Mahamurni Plantations Sdn Bhd estates updated with revision 04 updated by June 2022 includes additional benefit for workers on leave vacation pay, agreed deduction from salary, medical treatment cost and agreed deduction from employee salary with authority approval.</p> <p>Pasir Panjang Palm Oil Mill conduct briefing on paid annual leave to workers during muster morning on 06/03/2022.</p>	Complied

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4.4.5.7	The management shall establish a time recording system that makes working hours and overtime transparent for both the employees and employers. <b>- Major compliance -</b>	Working hours and overtime has been made transparent for both parties. Time recording system through punch card for all the workers verified by factory supervisor, assistant engineer and mill manager.	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. <b>- Major compliance -</b>	The working hours and breaks of each individual employee are recorded in their respective employment contracts which clearly stipulate that working hour is 8 hours from 8.00 am to 4.30 pm inclusive of 1 hour for lunch break and 30 minutes of tea break time. Any overtime work is paid in accordance with the provisions of the Employment Act 1955. Based on sample payslips provided, there were evidence 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. <b>- Major compliance -</b>	Mahamurni Plantations Sdn Bhd is committed to ensure that workers' wages are in line and meet the minimum wages. Pasir Panjang Palm Oil Mill apply new Minimum Wages Act 2021. There is evidence that wages and overtime payment documented on the pay slips in line with legal regulations and collective agreements. Three (3) sampled of workers have been taken for Pasir Panjang Palm Oil Mill for month February, May and October 2022. Details of wages as per below: <table border="1" data-bbox="1025 1214 1877 1382"> <thead> <tr> <th>Employee ID</th> <th>E440000170</th> <th>E440000198</th> <th>E440000294</th> </tr> </thead> <tbody> <tr> <td>JD</td> <td>Laboratory Assistant</td> <td>Kernel Plant Operator</td> <td>General Worker</td> </tr> <tr> <td>Passport/IC</td> <td>940227-xx-xxxx</td> <td>AU15xxxx</td> <td>C527xxxx</td> </tr> </tbody> </table>	Employee ID	E440000170	E440000198	E440000294	JD	Laboratory Assistant	Kernel Plant Operator	General Worker	Passport/IC	940227-xx-xxxx	AU15xxxx	C527xxxx	Complied
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<b>4.4.5.10</b>	Other forms of social benefits should be offered by the employer to employees, their families or community such as incentives for good work performance, bonus payment, support of professional development, medical care provisions and improvement of social surroundings. <b>- Minor compliance -</b>	Mahamurni Plantations Sdn Bhd through Kulim (M) Berhad offer 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
<b>4.4.5.11</b>	In cases where on-site living quarters are provided, these quarters shall be habitable and have basic amenities and facilities. <b>- Major compliance -</b>	<p>Pasir Panjang Palm Oil Mill employees are provided with benefits such as free housing with amenities such as football field, badminton / takraw fields, surau / mosque, free medical treatment (includes their dependents) and creche facilities. Water and electricity were subsidized for 30 gallons and 50kWh per person and stated in the employment contract.</p> <p><u>Pasir Panjang Palm Oil Mill</u></p> <p>Pasir Panjang Estate manage the Visiting Medical Officer (VMO) with latest dated 27/11/2022, 07/11/2022 and 27/10/2022, 16/10/2022 by doctor from Klinik Moiz Sdn Bhd.</p> <p>Linesite inspection conducted 05/09/2022, 12/09/2022, 19/09/2022, 26/09/2022, 03/10/2022, 11/10/2022, 17/10/2022, 25/10/2022, 07/11/2022, 14/11/2022, 21/11/2022 and 29/11/2022.</p> <p><u>Opportunity for Improvement</u></p>				OFI

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Criterion / Indicator		Assessment Findings	Compliance
		The linesite inspection can be further improved to identify all potential issue which may lead to inconducive conditions.	
<b>4.4.5.12</b>	The management shall establish a policy to prevent all forms of sexual harassment and violence at the workplace. <b>- Major compliance -</b>	<p>Mahamurni Plantations Sdn Bhd through Kulim (M) Berhad has established sexual harassment policy signed by Managing Director dated 01/10/2021. The policy describes of company derive from the local regulation Employment act 1955.</p> <p>Mahamurni Plantations Sdn Bhd through 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.</p> <p>Pasir Panjang Palm Oil Mill has established WOW complaint panel which received any complaint especially sexual harassment from the women workers, complaint and grievance procedure and whistle blowing policy.</p> <p>Pasir Panjang Palm Oil Mill conduct WOW meeting for 02/2022 dated 18/08/2022 at Rumah Kelab Wanita Pasir Panjang Palm Oil Mill. Based on minutes of meeting, WOW committee brief includes with women empower activities, functional of the 'Women on Ward', company polices, sexual harassment abuse among women employee, complaint procedures, channel of complaints to Panel Aduan WOW Ladang or HQ if any serious cases reported by complainant, domestic violence and status of latest pregnant woman in palm oil mill.</p> <p>Pasir Panjang Palm Oil Mill conduct briefing to workers during muster morning with topics as below:</p> <ol style="list-style-type: none"> <li>1. Ethic policy dated 01/08/2022.</li> <li>2. Sexual harassment policy dated 01/08/2022.</li> <li>3. No present policy dated on 0108/2022.</li> <li>4. Impartiality Conflict Policy dated 01/08/2022.</li> <li>5. Anti-Bribery policy dated 01/08/2022.</li> </ol>	Complied



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Criterion / Indicator	Assessment Findings	Compliance
<p><b>4.4.5.13</b> The management shall respect the right of all employees to form and join trade union and allow workers' own representative(s) to facilitate collective bargain in accordance with applicable laws and regulations. Employees shall be given freedom to join trade unions relevant to the industry or organize themselves for collective bargaining. Employees shall have the right to organize and negotiate their work conditions. Employees exercising this right should not be discriminated against or suffer repercussions.</p> <p><b>- Major compliance -</b></p>	<p>Mahamurni Plantations Sdn Bhd through Kulim (M) Berhad 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 signed by Managing Director dated 01/10/2021. The workers have their freedom to join the NUPW. This was evident from NUPW membership subscription deductions made in the pay slips.</p> <p>Onsite interview employees informed they have no restriction to join any form of association or union.</p> <p>Trade union management meeting conducted at Pasir Panjang Palm Oil Mill dated 17/10/2022. The meeting attended by both management, union representative and workers representative. There are no negative issues has been discussed, matter of discussion includes new member join Union, motorcyclist make noise at the housing, dogs &amp; wild boar in the housing, domestic waste was not collected accordingly, malfunction of road light and road maintenance program not included with the road from housing to staff housing.</p> <p>Pasir Panjang Palm Oil Mill conduct briefing to workers during muster morning with topics as below:</p> <ol style="list-style-type: none"> <li>1. Freedom of Association dated 01/06/2022.</li> <li>2. No Discrimination dated 01/06/2022.</li> <li>3. Core Labour Standard Policy dated 16/01/2022.</li> </ol>	<p>Complied</p>
<p><b>4.4.5.14</b> Children and young persons shall not be employed or exploited. The minimum age shall comply with local, state and national legislation.</p> <p><b>- Major compliance -</b></p>	<p>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> <p>Pasir Panjang Palm Oil Mill conduct briefing on Child Labour Standard Policy to workers during muster morning on 01/06/2022.</p>	<p>Complied</p>

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<b>Criterion 4.4.6:</b> Training and competency																																																																							
<b>4.4.6.1</b>	<p>All employees and contractors shall be appropriately trained. A training programme shall include regular assessment of training needs and documentation, including records of training.</p> <p><b>- Major compliance -</b></p>	<p>Formal training programs for 2022 that covered aspects of the MSPO indicators as well as other salient requirement of the mill operations. Regular assessments of training needs were available for all the audited sites. Training Plan was for each operating unit were established. A training need identification matrix has been established with target dates for the training identified. The training program among others includes the following subjects.</p> <p>Training was provided during musters and in session held in the community hall/mill compound.</p> <table border="1"> <thead> <tr> <th>No.</th> <th>Subjects</th> <th>Date</th> <th>Date</th> </tr> </thead> <tbody> <tr><td>1</td><td>PPE adherence</td><td>22/05/2022</td><td>-</td></tr> <tr><td>2</td><td>FFB Grading/ Ramp</td><td>31/01/2022</td><td>-</td></tr> <tr><td>3</td><td>Spill containment</td><td>22/05/2022</td><td>-</td></tr> <tr><td>4</td><td>Chemical Handling./ Lab</td><td>23/06/2022</td><td>-</td></tr> <tr><td>5</td><td>Scheduled waste Mgmt</td><td>32/05/2022</td><td>23/09/2021</td></tr> <tr><td>6</td><td>Water treatment/ sampling</td><td>24/07/2022</td><td>-</td></tr> <tr><td>7</td><td>Process Station SOP</td><td>01/02/2022</td><td>24/10/2021</td></tr> <tr><td>8</td><td>Emergency Respond Plan</td><td>08/05/2022</td><td>-</td></tr> <tr><td>9</td><td>Fire drill training</td><td>08/05/2022</td><td>17/01/2022</td></tr> <tr><td>10</td><td>Medical facilities</td><td>21/11/2022</td><td>-</td></tr> <tr><td>11</td><td>First aid/ CPR</td><td>25/05/2022</td><td>08/10/2021</td></tr> <tr><td>12</td><td>Tractor/ lorry/ safe driving</td><td>03/02/2022</td><td>17/11/2021</td></tr> <tr><td>13</td><td>PolIn Cleaning Device PCD</td><td>30/10/2022</td><td>-</td></tr> <tr><td>14</td><td>Halal Management/ ABS</td><td>03/07/2022</td><td>02/11/2022</td></tr> <tr><td>15</td><td>Confined Space Guidelines</td><td>01/02/2022</td><td>-</td></tr> <tr><td>16</td><td>MSPO/ RSPO/ ISCC/ SCCS</td><td>22/08/2022</td><td>10/10/2021</td></tr> </tbody> </table>	No.	Subjects	Date	Date	1	PPE adherence	22/05/2022	-	2	FFB Grading/ Ramp	31/01/2022	-	3	Spill containment	22/05/2022	-	4	Chemical Handling./ Lab	23/06/2022	-	5	Scheduled waste Mgmt	32/05/2022	23/09/2021	6	Water treatment/ sampling	24/07/2022	-	7	Process Station SOP	01/02/2022	24/10/2021	8	Emergency Respond Plan	08/05/2022	-	9	Fire drill training	08/05/2022	17/01/2022	10	Medical facilities	21/11/2022	-	11	First aid/ CPR	25/05/2022	08/10/2021	12	Tractor/ lorry/ safe driving	03/02/2022	17/11/2021	13	PolIn Cleaning Device PCD	30/10/2022	-	14	Halal Management/ ABS	03/07/2022	02/11/2022	15	Confined Space Guidelines	01/02/2022	-	16	MSPO/ RSPO/ ISCC/ SCCS	22/08/2022	10/10/2021	Complied
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		17	GHG calculations	16/12/2021	-	
		18	Housing Facilities/ Upkeep	20/02/2022	11/09/2022	
		19	Supply chain RSPO/ MSPO	29/08/2022	-	
		20	Working At Height/ LOTO	01/02/2022	03/03/2021	
		21	Engine room/ diesel SOP	01/02/2022	-	
		22	Audiometry Test Guideline	21/11/2022	-	
		23	Induction program New W	29/06/2022	10/12/2021	
		24	Biogas Plant Operations	01/10/2022	-	
		25	Payslip/ Working hours	08/03/2022	10/01/2021	
		26	Gender/ Sexual Harassment	01/08/2022	02/05/2021	
		27	Workshop operations	01/02/2022	-	
		28	Chemical Store SOP	01/02/2022	-	
<b>4.4.6.2</b>	<p>Training needs of individual employees shall be identified prior to the planning and implementation of the training programmes in order to provide the specific skill and competency required to all employees based on their job description.</p> <p><b>- Major compliance -</b></p>	<p>Similar methods for identifying the training needs are used in all the mill. The details of the training needs include categories of.</p> <ol style="list-style-type: none"> <li>1. Job descriptions</li> <li>2. Sections</li> <li>3. Employees' group</li> </ol> <p>Included in this program are subjects related to.</p> <ol style="list-style-type: none"> <li>1. Environment e.g. environmental, safety &amp; health policy</li> <li>2. Scheduled waste management</li> <li>3. Environmental responsibility, HCV &amp; Biodiversity training</li> <li>4. Feld activities/operations</li> <li>5. Equipment handling, vehicles maintenance etc.</li> </ol>				Complied
<b>4.4.6.3</b>	<p>A continuous training programme shall be planned and implemented to ensure that all employees are well trained in</p>	<p>Formal training program for 2022 that covered aspects of the MSPO indicators as well as other salient requirement of the mill operations. Regular assessments of training needs were available for all the audited</p>				Complied

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<p>their job function and responsibility in accordance to the documented training procedure.</p> <p><b>- Minor compliance -</b></p>	<p>sites.</p> <p>The training program among others includes the following subjects.</p> <table border="1" data-bbox="1032 512 1877 1348"> <thead> <tr> <th>No.</th> <th>Subjects</th> <th>J-M</th> <th>A-J</th> <th>J-S</th> <th>O-D</th> </tr> </thead> <tbody> <tr><td>1</td><td>PPE adherence</td><td>/</td><td>/</td><td>/</td><td>/</td></tr> <tr><td>2</td><td>Documentation</td><td>-</td><td>/</td><td>-</td><td>-</td></tr> <tr><td>3</td><td>FFB Grading /Ramp</td><td>-</td><td>/</td><td>/</td><td>-</td></tr> <tr><td>4</td><td>Spill containment</td><td>-</td><td>-</td><td>/</td><td>-</td></tr> <tr><td>5</td><td>Chemical Handling. /Lab</td><td>-</td><td>/</td><td>-</td><td>/</td></tr> <tr><td>6</td><td>Scheduled waste</td><td>-</td><td>-</td><td>/</td><td>-</td></tr> <tr><td>7</td><td>Water treatment / sampling</td><td>/</td><td>-</td><td>-</td><td>/</td></tr> <tr><td>8</td><td>Process Station SOP</td><td>/</td><td>/</td><td>/</td><td>/</td></tr> <tr><td>9</td><td>Sampling &amp; handling</td><td>-</td><td>-</td><td>-</td><td>-</td></tr> <tr><td>10</td><td>Chemical handling</td><td>-</td><td>-</td><td>/</td><td>-</td></tr> <tr><td>11</td><td>Emergency Respond Plan</td><td>/</td><td>/</td><td>-</td><td>-</td></tr> <tr><td>12</td><td>Fire drill training</td><td>-</td><td>-</td><td>-</td><td>/</td></tr> <tr><td>13</td><td>First aid /CPR</td><td>-</td><td>-</td><td>-</td><td>/</td></tr> <tr><td>14</td><td>Tractor /lorry /safe driving</td><td>-</td><td>-</td><td>/</td><td>-</td></tr> <tr><td>15</td><td>Polln Cleaning Device PCD</td><td>-</td><td>/</td><td>-</td><td>-</td></tr> <tr><td>16</td><td>Halal Management</td><td>-</td><td>-</td><td>/</td><td>-</td></tr> <tr><td>17</td><td>Confined Space Guidelines</td><td>-</td><td>-</td><td>/</td><td>-</td></tr> <tr><td>18</td><td>PPE adherence/ Safety</td><td>/</td><td>-</td><td>/</td><td>-</td></tr> <tr><td>20</td><td>MSPO/RSPO/ISCC/SCCS</td><td>-</td><td>/</td><td>/</td><td>-</td></tr> <tr><td>21</td><td>GHG calculations</td><td>-</td><td>/</td><td>-</td><td>/</td></tr> <tr><td>22</td><td>Internal Audit Refresher</td><td>/</td><td>-</td><td>-</td><td>-</td></tr> <tr><td>23</td><td>Working At Height /LOTO</td><td>-</td><td>/</td><td>/</td><td>-</td></tr> <tr><td>24</td><td>Audiometry Test Guideline</td><td>-</td><td>-</td><td>-</td><td>/</td></tr> <tr><td>25</td><td>Induction program New W</td><td>/</td><td>/</td><td>/</td><td>/</td></tr> </tbody> </table>	No.	Subjects	J-M	A-J	J-S	O-D	1	PPE adherence	/	/	/	/	2	Documentation	-	/	-	-	3	FFB Grading /Ramp	-	/	/	-	4	Spill containment	-	-	/	-	5	Chemical Handling. /Lab	-	/	-	/	6	Scheduled waste	-	-	/	-	7	Water treatment / sampling	/	-	-	/	8	Process Station SOP	/	/	/	/	9	Sampling & handling	-	-	-	-	10	Chemical handling	-	-	/	-	11	Emergency Respond Plan	/	/	-	-	12	Fire drill training	-	-	-	/	13	First aid /CPR	-	-	-	/	14	Tractor /lorry /safe driving	-	-	/	-	15	Polln Cleaning Device PCD	-	/	-	-	16	Halal Management	-	-	/	-	17	Confined Space Guidelines	-	-	/	-	18	PPE adherence/ Safety	/	-	/	-	20	MSPO/RSPO/ISCC/SCCS	-	/	/	-	21	GHG calculations	-	/	-	/	22	Internal Audit Refresher	/	-	-	-	23	Working At Height /LOTO	-	/	/	-	24	Audiometry Test Guideline	-	-	-	/	25	Induction program New W	/	/	/	/	
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Criterion / Indicator	Assessment Findings	Compliance	
<b>4.5 Principle 5: Environment, natural resources, biodiversity and ecosystem services</b>			
<b>Criterion 4.5.1: Environmental Management Plan</b>			
<b>4.5.1.1</b>	<p>An environmental policy and management plan shall be in line with the relevant country and state environmental laws shall be established, effectively communicated and implemented.</p> <p><b>- Major compliance -</b></p>	<p>Mahamurni Plantations Sdn Bhd through Kulim (Malaysia) Berhad established the Environmental Management Policy signed by the Executive Director dated in 1/5/2018.</p> <p>Mahamurni Plantations Sdn Bhd 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> <ol style="list-style-type: none"> <li>1. Adhere to and comply with relevant environmental legislations of the country.</li> <li>2. Strive for continual improvement on our environmental performance.</li> <li>3. 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.</li> <li>4. Continue to explore and implement cost effective technology in environmental Policy and the achievement of environmental objectives and targets.</li> <li>5. Review, adopt and implement Good Management Practices currently established in the industry.</li> <li>6. Plan, assess and take judicious actions to alleviate any potential negative impacts on the environment and local community with respect to any new development.</li> <li>7. Adopt and implement the principles of Reduction, Reuse and recycle in all matters pertaining to the use of resources and to pollution elimination.</li> </ol>	<p>Complied</p>

Criterion / Indicator		Assessment Findings	Compliance
		<p>8. 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>Monitor and report to the Board of Directors on the implementation of this Environmental Policy, and the achievement of environmental objectives and targets. 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"> <li>1. Sustainability and MSPO Policy briefing was conducted by Assistant Manager to all workers and staffs comprising 91 participants dated 12/5/2022 at Pasir Panjang Palm Oil Mill</li> <li>2. External stakeholder briefing being conducted on 10/10/2021 through Virtual / Remote. The meeting was collaborated within estates and mill attended by 68 participants.</li> </ol>	
<b>4.5.1.2</b>	<p>The environmental management plan shall cover the following:</p> <ol style="list-style-type: none"> <li>a) An environmental policy and objectives;</li> <li>b) The aspects and impacts analysis of all operations</li> </ol> <p><b>- Major compliance -</b></p>	<p>Mahamurni Plantations Sdn Bhd through Kulim (Malaysia) Berhad established Sustainability Policy signed by the Managing Director dated in 01/10/2020.</p> <p>The policy stated that Kulim is actively seeking continually improve environmental performance through:</p> <ol style="list-style-type: none"> <li>1. Pollution prevention by minimizing emissions to air, land and water. Optimal use of renewable resources, while minimizing the use of non-renewable resource.</li> <li>2. Provision of adequate resources for effective implementation of Sustainable Management Programs</li> <li>3. Ensuring integration of Sustainable programs with all other company policies.</li> </ol> <p>The mill has conducted Environmental Aspect and Impact Analysis and</p>	Complied

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		<p>documented in Environmental Impact Assessment with latest review was conducted on 8/9/2022.</p> <p>The analysis was reviewed on annually basis and as and when there are changes in The Environmental Impact Assessment has covered 20 keys activities of the Mill such as:</p> <ol style="list-style-type: none"> <li>1. Chemical mixing and storage</li> <li>2. CPO Storage</li> <li>3. FFB Receiving and Grading</li> <li>4. Generation Power</li> <li>5. Lab Operation</li> <li>6. Machine and Vehicle maintenance</li> <li>7. Office Work</li> <li>8. Oil Clarification</li> <li>9. Oil pressing, etc.</li> </ol>											
<b>4.5.1.3</b>	<p>An environmental improvement plan to mitigate the negative impacts and to promote the positive ones, shall be developed, implemented and monitored.</p> <p><b>- Major compliance -</b></p>	<p>Sighted, Environmental Impact Assessment for the year 2022 at Mill has been developed and the mitigation on the negative impacts and to promote the positive one being recorded under Environmental Improvement Plan.</p> <p>Sample taken at Pasir Panjang Palm Oil Mill 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</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	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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				Cleaning Process		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																				
<b>4.5.1.4</b>	A programme to promote the positive impacts should be included in the continual improvement plan. <b>- Minor compliance -</b>	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 style="background-color: #d3d3d3;">Waste Type</th> <th style="background-color: #d3d3d3;">Source</th> <th style="background-color: #d3d3d3;">Action Plan</th> <th style="background-color: #d3d3d3;">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 days, contact the licensed contractor (refer to Procurement &amp; Contract department) for collection and disposal.</td> <td>As required by legal</td> </tr> </tbody> </table> b. Emission Management Plan <table border="1" style="width: 100%; border-collapse: collapse;"> <thead> <tr> <th style="background-color: #d3d3d3;">No</th> <th style="background-color: #d3d3d3;">Emission</th> <th style="background-color: #d3d3d3;">Action Plan</th> <th style="background-color: #d3d3d3;">PIC</th> </tr> </thead> <tbody> <tr> <td>1</td> <td>Greenhouse gas (GHG)</td> <td>1. Inspection of the vehicle and machine condition</td> <td>Execs/Boilerman</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 days, contact the licensed contractor (refer to Procurement & Contract department) for collection and disposal.	As required by legal	No	Emission	Action Plan	PIC	1	Greenhouse gas (GHG)	1. Inspection of the vehicle and machine condition	Execs/Boilerman	Complied
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				2. Maintenance of vehicle and machine to ensure efficiency		
		2	Noise	Boundary Parameter noise mapping data Routine maintenance on Running vehicles	Exec/ supervisors	
		3	Air pollutant	1. Follow strictly procedures highlighted in the Mill Manual to ensure emission is within the allowable legal limit 2. Installation of continuous emission system (CEMS) and air pollution control device.	Exec/ supervisors	
<b>4.5.1.5</b>	An awareness and training programme shall be established and implemented to ensure that employees understand the policy, objectives and management plans and are working towards achieving objectives. <b>- Major compliance -</b>	An Environmental training program is available in Training Plan updated on a yearly basis. Sample taken as below: -				Complied
		<b>No</b>	<b>Topic</b>	<b>Month programme</b>	<b>Status</b>	
		1	Schedule waste	May	22/05/2022	
		2	Water treatment	January and November	01/02/2022, 10/11/2021	
		3	Effluent Sampling	July	24/07/2022	
		4	Spill contaminant	May	22/05/2022	
		5	Water sampling	July	24/07/2022	
		6	PCD cleaning	October	30/10/2022	

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<b>4.5.1.6</b>	The management shall organize regular meetings with workers where concerns of workers about the environmental quality are discussed. <b>- Major compliance -</b>	Environmental Performance Monitoring Committee (EPMC) being established in all estates & mill to discuss on environmental aspect. The latest meeting conducted at Pasir Panjang Palm Oil Mill was on 18/10/2022 chaired by the Mill Manager and 10 Committee members attended the meeting.	Complied																							
<b>Criterion 4.5.2: Efficiency of energy use and use of renewable energy</b>																										
<b>4.5.2.1</b>	Consumption of non-renewable energy shall be optimized and closely monitored by establishing baseline values and trends shall be observed within appropriate timeframe. There should be a plan to assess the usage of non-renewable energy including fossil fuel, electricity in the operations over the base period <b>- Major compliance -</b>	<p>Monthly record on energy consumption for non-renewable sources were kept and documented. It is monitored to optimize use of renewable energy. Data is being compiled for comparison and control for future improvement. Following is the last 3 years data for diesel usage record at Mill: -</p> <table border="1"> <thead> <tr> <th rowspan="2">Year</th> <th colspan="3">Pasir Panjang Palm Oil Mill</th> </tr> <tr> <th>FFB</th> <th>Diesel</th> <th>Lt/FFB</th> </tr> </thead> <tbody> <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>2022</td> <td>277,63</td> <td>*332.790</td> <td>1.20</td> </tr> <tr> <td colspan="3">Baseline value</td> <td>2.30</td> </tr> </tbody> </table> <p>* - High consumption of diesel due to Biogas Plant breakdown from April 2021 until present.                      Baseline value is 2.30</p>	Year	Pasir Panjang Palm Oil Mill			FFB	Diesel	Lt/FFB	2020	283,106	106,000	0.37	2021	242,165	109,792	0.45	2022	277,63	*332.790	1.20	Baseline value			2.30	Complied
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<b>4.5.2.2</b>	Palm oil millers shall estimate the direct usage of non-renewable energy for their operations, including fossil fuel, and electricity to determine energy efficiency of their operations. <b>- Major compliance -</b>	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 FY2022.	Complied																							

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4.5.2.3	<p>The use of renewable energy should be applied where possible.</p> <p><b>- Minor compliance -</b></p>	<p>Monthly record on energy consumption for renewable energy sources were kept and documented. The details as listed herein:</p> <p>a) Fiber</p> <table border="1"> <thead> <tr> <th>Year</th> <th>FFB Processed (Mt)</th> <th>Fiber Produced (Mt)</th> <th>Fiber to FFB (%)</th> </tr> </thead> <tbody> <tr> <td>2020</td> <td>283,106</td> <td>36,754</td> <td>12.98</td> </tr> <tr> <td>2021</td> <td>242,165</td> <td>31,071</td> <td>12.83</td> </tr> <tr> <td>2022</td> <td>277,636</td> <td>34.480</td> <td>12.42</td> </tr> </tbody> </table> <p>b) Shell</p> <table border="1"> <thead> <tr> <th>Year</th> <th>FFB Processed (Mt)</th> <th>Shell Produced (Mt)</th> <th>Fiber to FFB (%)</th> </tr> </thead> <tbody> <tr> <td>2020</td> <td>283,106</td> <td>16,149</td> <td>5.70</td> </tr> <tr> <td>2021</td> <td>242,165</td> <td>14,274</td> <td>5.89</td> </tr> <tr> <td>2022</td> <td>277,636</td> <td>13,330</td> <td>6.24</td> </tr> </tbody> </table> <p>The EFB from was shredded to form compost fertilizer together with other waste from the mill. At the outside from the mill there was a processing plant for decomposition and the organic compost that mixed were sent/sold to outsider and sister estate.</p>	Year	FFB Processed (Mt)	Fiber Produced (Mt)	Fiber to FFB (%)	2020	283,106	36,754	12.98	2021	242,165	31,071	12.83	2022	277,636	34.480	12.42	Year	FFB Processed (Mt)	Shell Produced (Mt)	Fiber to FFB (%)	2020	283,106	16,149	5.70	2021	242,165	14,274	5.89	2022	277,636	13,330	6.24	Complied
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<b>Criterion 4.5.3: Waste management and disposal</b>																																			
4.5.3.1	<p>All waste products and sources of pollution shall be identified and documented.</p> <p><b>- Major compliance -</b></p>	<p>All waste and pollution are identified and documented in the Waste &amp; Pollution Management Plan 2022 updated on 15/08/2022.</p> <p>Details of waste generated from the mill activities among others as shown below.</p> <ol style="list-style-type: none"> <li>1. Empty chemical containers</li> <li>2. Batteries</li> </ol>	Complied																																

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		3. Contaminated rags 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														
<b>4.5.3.2</b>	<p>A waste management plan shall be developed and implemented, to avoid or reduce pollution. The waste management plan should include measure for:</p> <p>a) Identifying and monitoring sources of waste and pollution.</p> <p>b) Improving the efficiency and recycling potential of mill by-products by converting them into value-added products.</p> <p><b>- Major compliance -</b></p>	<p>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>No.</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</td> <td>Manager/ Assistant/ staff</td> </tr> </tbody> </table>				No.	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	Manager/ Assistant/ staff	Complied
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					the licensed contractor (refer to Procurement & Contract Department) for collection and disposal.																					
		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 days, contact the licensed contractor (refer to Procurement & Contract Department) for collection and disposal.	Manager/ Assistant/ staff																				
<p>Sighted, Pasir Panjang Palm Oil Mill 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>Date</th> <th>Generate</th> <th>Waste</th> <th>Weight mt</th> </tr> </thead> <tbody> <tr> <td>31/10/22</td> <td>SW102</td> <td>Electrical and electronic waste</td> <td>0.006</td> </tr> <tr> <td>31/10/22</td> <td>SW305</td> <td>Spent lubricant oil</td> <td>0.238</td> </tr> <tr> <td>31/10/22</td> <td>SW408</td> <td>Contaminated soil</td> <td>0.007</td> </tr> <tr> <td>31/10/22</td> <td>SW410</td> <td>Cotton rags</td> <td>0.017</td> </tr> </tbody> </table>							Date	Generate	Waste	Weight mt	31/10/22	SW102	Electrical and electronic waste	0.006	31/10/22	SW305	Spent lubricant oil	0.238	31/10/22	SW408	Contaminated soil	0.007	31/10/22	SW410	Cotton rags	0.017
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		31/10/22	SW410	Filter oil	0.03	
		31/10/22	SW429	Discarded Chemical	0.036	
		29/11/22	SW305	Spent Lubricating Oil	0.82	
		29/11/22	SW305	Hydraulic oil	0.22	
		29/11/22	SW409	Empty Container	0.024	
<b>4.5.3.3</b>	<p>The palm oil mill management shall establish Standard Operating Procedure for handling of used chemicals that are classified under Environmental Quality Regulations (Scheduled Waste) 2005, Environmental Quality Act, 1974 to ensure proper and safe handling, storage and disposal. Scheduled waste shall be disposed as per Environmental Quality Act 1974 (Scheduled Waste) Regulations, 2005</p> <p><b>- Major compliance -</b></p>	<p>Pasir Panjang Palm Oil Mill had established the procedures for handling of chemicals classified under Work Instruction; Doc. No.: PPM/WI/9; Rev No: 0, dated: 01/07/2016 and Scheduled Waste under Work Instruction; Doc. No.: SPO/WI/06; Issue No: 1, Rev No.: 0 dated: 01/10/2020.</p> <p>The Work Instruction is to ensure proper and safe handling and storage, in accordance with 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
<b>4.5.3.4</b>	<p>Domestic waste should be disposed as such to minimize the risk of contamination of the environment and watercourse.</p> <p><b>- Minor compliance -</b></p>	<p>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.</p>				Complied
<b>Criterion 4.5.4: Reduction of pollution and emission including greenhouse gas</b>						
<b>4.5.4.1</b>	<p>An assessment of all polluting activities shall be conducted, including greenhouse gas emissions, particulate and soot emissions, scheduled wastes, solid wastes and effluent.</p> <p><b>- Major compliance -</b></p>	<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 &amp; Impact Assessment (EAIA) &amp; Environmental Management Plan (EMP) &amp; Waste Management plan (WMP).</p> <p>The Pasir Panjang Palm Oil Mill has implemented its GHG Calculator to calculate the following emissions parameter/source.</p>				Complied

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4.5.4.2	<p>An action plan to reduce identified significant pollutants and emissions shall be established and implemented.</p> <p><b>- Major compliance -</b></p>	<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"> <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> <tr> <td>Air Pollutant</td> <td>Combustion for boiler</td> <td>Conducting stack monitoring</td> <td>As and when required</td> <td>Manager/ Assistant/ Staff</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	Air Pollutant	Combustion for boiler	Conducting stack monitoring	As and when required	Manager/ Assistant/ Staff	Complied
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4.5.4.3	<p>Palm oil mill effluent (PALM OIL MILLE) shall be treated to ensure compliance with standards as stipulated in the relevant Environmental Quality (Prescribed Premises) (Crude Palm Oil) Regulations 1977. PALM OIL MILLE discharge limits and method should be in accordance with the respective state and national policies and regulations.</p> <p><b>- Major compliance -</b></p>	<p>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 analysed 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																									
<p><b>Criterion 4.5.5:</b> Natural water resources</p>																																

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<b>4.5.5.1</b>	<p>The management shall establish water management plans to maintain the quality and availability of natural water resources (surface and ground water). The water management plan may include:</p> <ul style="list-style-type: none"> <li>a) Assessment of water usage and sources.</li> <li>b) Monitoring of outgoing water which may have negative impacts into the natural waterways at a frequency that reflects the mill's current activities.</li> <li>c) Ways to optimize water and nutrient usage and reduce wastage (e.g. having in place systems for re-use, night application, maintenance of equipment to reduce leakage, collection of rainwater, etc.).</li> </ul> <p><b>- Major compliance -</b></p>	<p>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>No.</th> <th>Source</th> <th>Activity</th> <th>Threat</th> <th>Action Plan</th> </tr> </thead> <tbody> <tr> <td>1</td> <td>Reservoir/ rain/ river</td> <td>Press</td> <td>Water pollution/degradation water quality.</td> <td>Effluent analysis</td> </tr> <tr> <td>2</td> <td></td> <td>Oil room</td> <td>Process of oil recovery in sludge oil respirator.</td> <td>Follow work instruction and SOP's.</td> </tr> <tr> <td>3</td> <td></td> <td>Line site – household activities</td> <td>Wastage of water</td> <td>MO</td> </tr> </tbody> </table> <p>Water usage for Pasir Panjang Palm Oil Mill</p> <table border="1" style="width: 100%; border-collapse: collapse;"> <thead> <tr> <th>Month</th> <th>Process (m³)</th> <th>Boiler (m³)</th> <th>Total Processing</th> <th>Domestic</th> <th>Grand Total</th> </tr> </thead> <tbody> <tr><td>January</td><td>17,268</td><td>15,203</td><td>32,471</td><td>9,266</td><td>41,737</td></tr> <tr><td>February</td><td>13,192</td><td>14,122</td><td>27,314</td><td>6,319</td><td>33,633</td></tr> <tr><td>March</td><td>13,612</td><td>17,493</td><td>31,105</td><td>5,691</td><td>36,796</td></tr> <tr><td>April</td><td>14,969</td><td>17,465</td><td>32,434</td><td>7,700</td><td>40,134</td></tr> <tr><td>May</td><td>16,751</td><td>10,277</td><td>27,028</td><td>7,296</td><td>34,324</td></tr> <tr><td>June</td><td>11,282</td><td>16,272</td><td>27,554</td><td>9,533</td><td>37,087</td></tr> <tr><td>July</td><td>15,349</td><td>15,518</td><td>30,507</td><td>9,563</td><td>40,070</td></tr> <tr><td>August</td><td>13,213</td><td>17,709</td><td>30,922</td><td>5,787</td><td>36,709</td></tr> <tr><td>September</td><td>13,975</td><td>17,200</td><td>31,175</td><td>6,303</td><td>37,478</td></tr> <tr><td>October</td><td>18,597</td><td>17,467</td><td>36,964</td><td>7,295</td><td>43,359</td></tr> <tr><td>November</td><td>22,645</td><td>14,475</td><td>37,120</td><td>5,581</td><td>42,701</td></tr> </tbody> </table>					No.	Source	Activity	Threat	Action Plan	1	Reservoir/ rain/ river	Press	Water pollution/degradation water quality.	Effluent analysis	2		Oil room	Process of oil recovery in sludge oil respirator.	Follow work instruction and SOP's.	3		Line site – household activities	Wastage of water	MO	Month	Process (m³)	Boiler (m³)	Total Processing	Domestic	Grand Total	January	17,268	15,203	32,471	9,266	41,737	February	13,192	14,122	27,314	6,319	33,633	March	13,612	17,493	31,105	5,691	36,796	April	14,969	17,465	32,434	7,700	40,134	May	16,751	10,277	27,028	7,296	34,324	June	11,282	16,272	27,554	9,533	37,087	July	15,349	15,518	30,507	9,563	40,070	August	13,213	17,709	30,922	5,787	36,709	September	13,975	17,200	31,175	6,303	37,478	October	18,597	17,467	36,964	7,295	43,359	November	22,645	14,475	37,120	5,581	42,701	Complied
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		Month	Process (m <sup>3</sup> )	Boiler (m <sup>3</sup> )	Total Processing	Domestic	Grand Total	
		January	0.74	0.65	1.39	0.40	1.79	
		February	0,74	0.79	1.53	0.39	1.89	
		March	0.55	0,70	1.25	0.23	1.47	
		April	0.61	0.41	1.31	0.31	1.62	
		May	0.67	0.66	1.08	0.29	1.50	
		June	0.46	0.57	1.11	0.38	1.52	
		July	0.58	0.69	1.15	0.23	1.43	
		August	0.51	0.61	1.20	0.23	1.34	
		September	0.50	0.61	1.11	0.26	1.52	
		October	0.65	0.61	1.26	0.20	1.51	
		November	0.80	0.51	1.31	0.20	1.51	
		Water Analysis for Drinking Water were taken on 20/6/2022 for Raw and Treated. The water being analyzed by Decagon Lab & Analytical Testing Sdn Bhd, Reference Number: LW/513(1-2)/22. The results as follows: -						
		Parameter	Unit	Method	Results	Regulation Limit for raw water		
		Data Collected	-	-	04/06/2022	-		
		pH	-	APHA 4500-H*B	5.9	5.5-9.0		
		*Total Coliform count	MPN/ml	APHA 9221 B	ND (<10)	5000		
		*E-coli	MPN/ml	APHA 9221 F	ND (<10)	5000		
		Parameter	Unit	Method	Results	Regulations Limit for		

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					Drinking water	
		Data Collected	-	-	04/06/2022	-
		pH	-	APHA 4500-H*B	7	6.5-9.0
		*Total Coliform count	MPN/ml	APHA 9221 B	ND (<10)	Nil
		*E-coli	MPN/ml	APHA 9221 F	ND (<10)	Nil
		<p><u>Inference &amp; Discussion.</u></p> <ol style="list-style-type: none"> <li>All parameters are within the limits as specified under the Regulation Limit follows the Raw Water Quality Standard, Ministry of Health Malaysia: Engineering Service Division, Year 2010.</li> <li>All parameters are tested were within limits as specified under the Regulation Limit follows the Raw Water Quality Standard, Ministry of Health Malaysia: Engineering Service Division, Year 2010. The water can be used as a drinking water.</li> </ol>				
<b>4.5.5.2</b>	Where open discharge of PALM OIL MILLE into water course is practiced, mills should undertake to gradually phase it out in accordance to the applicable state or national regulations.  - <b>Major compliance</b> -	<p>Pasir Panjang Palm Oil Mill 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 1,560m<sup>2</sup>/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

Criterion / Indicator	Assessment Findings	Compliance
<b>4.6 Principle 6: Best Practices</b>		
<b>Criterion 4.6.1: Mill Management</b>		
<b>4.6.1.1</b>	<p>Standard operating procedures shall be appropriately documented and consistently implemented and monitored.</p> <p><b>- Major compliance -</b></p> <p>Pasir Panjang Palm Oil Mill operations are guided with the following documents:</p> <ol style="list-style-type: none"> <li>1. Quality Manual (SM/QM) dated 01/09/2014</li> <li>2. Standards Operating Procedure (SM/SOP) dated 10/12/2012 covering the following stations/operations among others.               <ul style="list-style-type: none"> <li>• Loading ramp /sterilization station</li> <li>• Threshing / press station</li> <li>• Clarification station</li> <li>• Kernel station/ depericarper station</li> <li>• Effluent and water treatment plant</li> <li>• Boiler house / powerhouse</li> </ul> </li> </ol> <p>Work Instructions derived from SOPs and displayed the workstations/ notice boards. Among others as sighted.</p> <ol style="list-style-type: none"> <li>1. WI: Boiler Station / WI: Powerhouse</li> <li>2. WI: Laboratory Manual /Waste Management</li> <li>3. WI: Handling chemicals</li> <li>4. WI: Usage of hearing protection device</li> <li>5. WI: Emergency Response Procedure</li> <li>6. WI: Maintenance and servicing of oil trap</li> <li>7. WI: Confined Space Management</li> <li>8. WI: Workshop/Working at Height/Oxy-Acetylene</li> </ol>	<p>Complied</p>

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4.6.1.2	All palm oil mills shall implement best practices. <b>- Major compliance -</b>	The following mechanism is available and adopted as standard practices and procedures in the mill operations among others. 1. Mill inspectorate Visit program 2 times per year 2. Internal audit by Sustainability Unit 2 time per year 3. Task Force visits 4. Monthly and weekly ad hoc meeting 5. Daily /monthly production & financial report 6. Daily and monthly lab analysis report 7. Daily supervision by the mill supervisors/Executives	Complied
<b>Criterion 4.6.2: Economic and financial viability plan</b>			
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. <b>- Major compliance -</b>	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 FY2022 contains FFB yield, CPO, OER, and KER, costs of production, milling utilization, FFB pricing etc. It also includes budgeting on environment and social. Pasir Panjang Palm Oil Mill Budget 2022 includes as follow: 1. FFB Processed and purchase cost 2. OER and PK 3. CPO Price and PK Price 4. Shell and Fibre 5. General Charges and expenditure 6. Production 7. Maintenance	Complied

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		8. Depreciation 9. Gross and Nett Profit 10. Projected cash flow 11. Capital Budget	
<b>Criterion 4.6.3: Transparent and fair price dealing</b>			
<b>4.6.3.1</b>	Pricing mechanisms for the products and other services shall be documented and effectively implemented. <b>- Major compliance -</b>	The documentation of price mechanism for services received from contractors are contained in the respective contracts. 1. Janadunia Sdn Bhd for supply Materials, Skilled Labour, Tools and Consumable tools to replace Bottom Plate for Vertical Sterilizer No. 1, quotation number: PPOM/2022/QC/06 dated 12/07/2022. 2. Ghulam Qadiraslamen Enterprise for supply Labour, Tools and Consumable tools to Fabricate and Install 1 Unit 9mm THK X 27" DIA X 72FT Ribbon for Cake Breaker Conveyor, quotation number: PPOM/2022/QC/03 dated 10/03/2022. 3. 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. 4. Unibest Engineering and trading for renting wheel loader for mill operation.	Compiled
<b>4.6.3.2</b>	All contracts shall be fair, legal and transparent and agreed payments shall be made in timely manner. <b>- Major compliance -</b>	Pasir Panjang Palm Oil Mill hired two (2) contractors and been sampled as per details below: 1. Janadunia Sdn Bhd for supply Materials, Skilled Labour, Tools and Consumable tools to replace Bottom Plate for Vertical Sterilizer No. 1, quotation number: PPOM/2022/QC/06 dated 12/07/2022. Evidence of payment has been taken for October 2022 invoice	Complied

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Criterion / Indicator		Assessment Findings	Compliance
		<p>number 00000018 dated 13/08/2022 and payment on 10/08/2022 based on payment voucher number Order Number 22000148.</p> <p>2. Ghulam Qadiraslamen Enterprise for supply Labour, Tools and Consumable tools to Fabricate and Install 1 Unit 9mm THK X 27" DIA X 72FT Ribbon for Cake Breaker Conveyor, quotation number: PPOM/2022/QC/03 dated 10/03/2022. Evidence of payment has been taken for October 2022 invoice number GQE/SM/2022/481 dated 01/03/2022 and payment on 10/05/2022 based on payment voucher number Order Number 2200088.</p> <p>For the verification on the previous OFI issue, the management of Mahamurni Plantations Sdn Bhd has call the contractor to do the briefing on the misunderstanding on the term and conditions. Verified the contract Kejururteraan Letrik Etara (M) Sdn Bhd has called the contractor to re-brief the contractor on the miss understanding terms. As evidence the contractor has initiated in contract agreement. For long terms starting the new contract, the management Mahamurni Plantations Sdn Bhd has done an initiative to prepare bi-language contract agreement (English and Bahas Melayu) for better understanding for both parties. Verified the evidence contract agreement for Ghulam Qadiraslamen Enterprise, contract number PPM 03/2022 for work calling quotation number PPOM/2022/QC/03.</p>	
<b>Criterion 4.6.4: Contractor</b>			
<b>4.6.4.1</b>	<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><b>- Major compliance -</b></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 with MSPO standards. This was also</p>	Complied

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		acknowledged by the contractors and reiterated during the stakeholder meeting.	
<b>4.6.4.2</b>	The management shall provide evidence of agreed contracts with the contractor. <b>- Major compliance -</b>	Contracts entered between Pasir Panjang Palm Oil Mill 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 Mahamurni Plantations Sdn Bhd 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.  Contracts entered between Pasir Panjang Palm Oil Mill 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 Mahamurni Plantations Sdn Bhd and contractors. There is evidence for 2 contract agreement that has been sample which are Kejurureaan Letrik Etara (M) Sdn Bhd and Janadunia Sdn Bhd, the contract agreement has been signed and agreed by both parties.	Complied
<b>4.6.4.3</b>	The management shall accept MSPO approved auditors to verify the assessments through a physical inspection, if required. <b>- Minor compliance -</b>	The 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

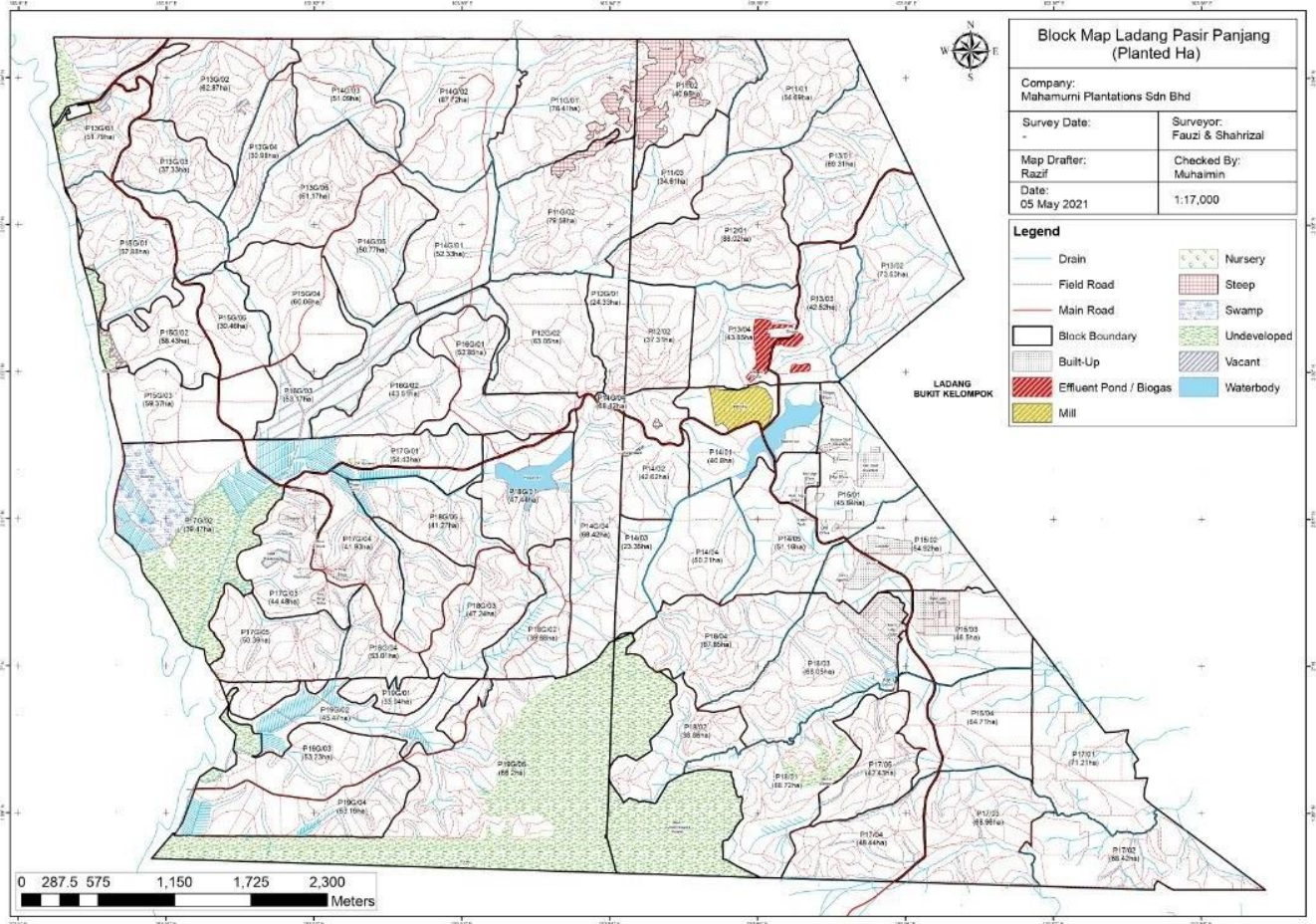
**Appendix B: Smallholder Member Details**

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

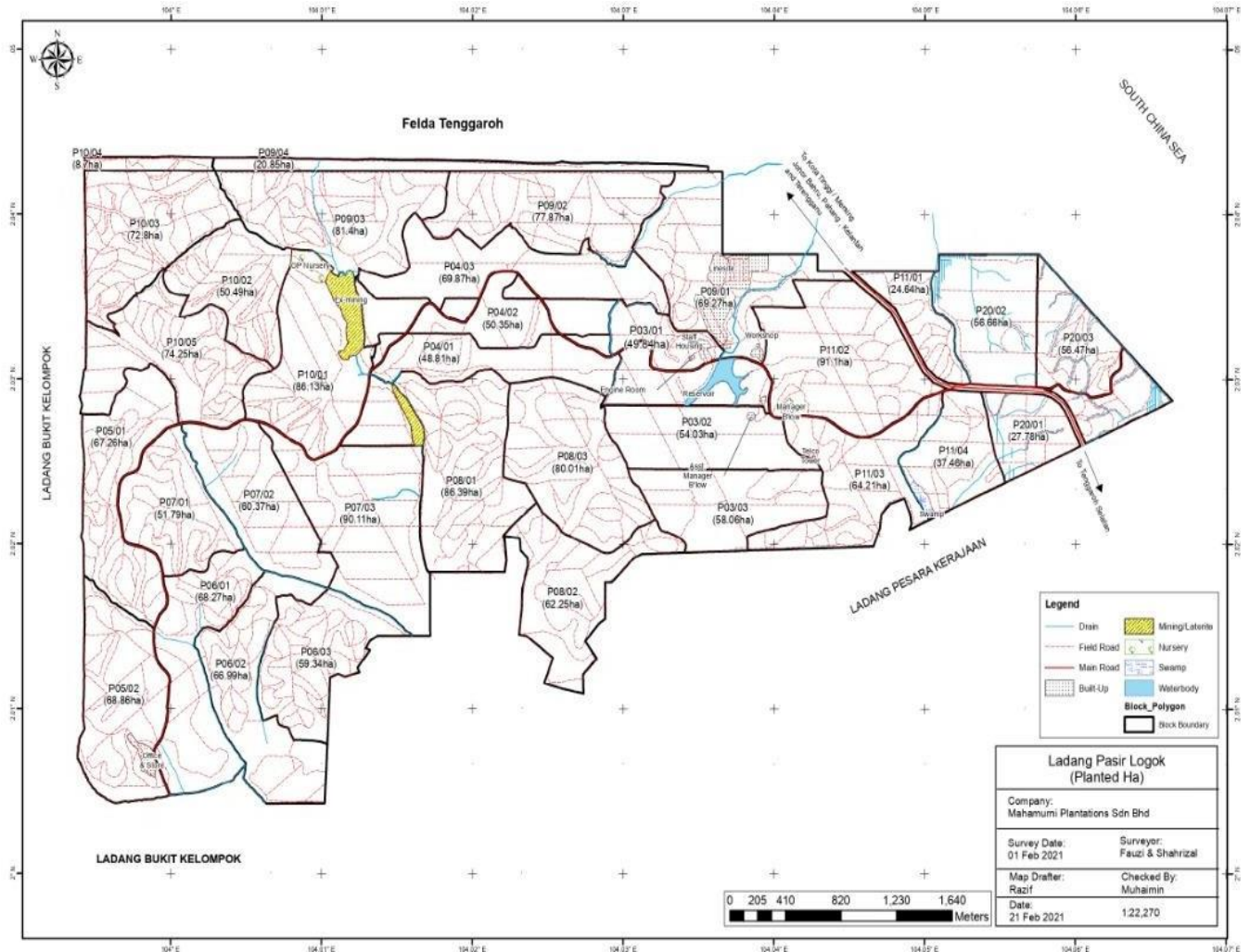


**Appendix C: Location and Field Map**

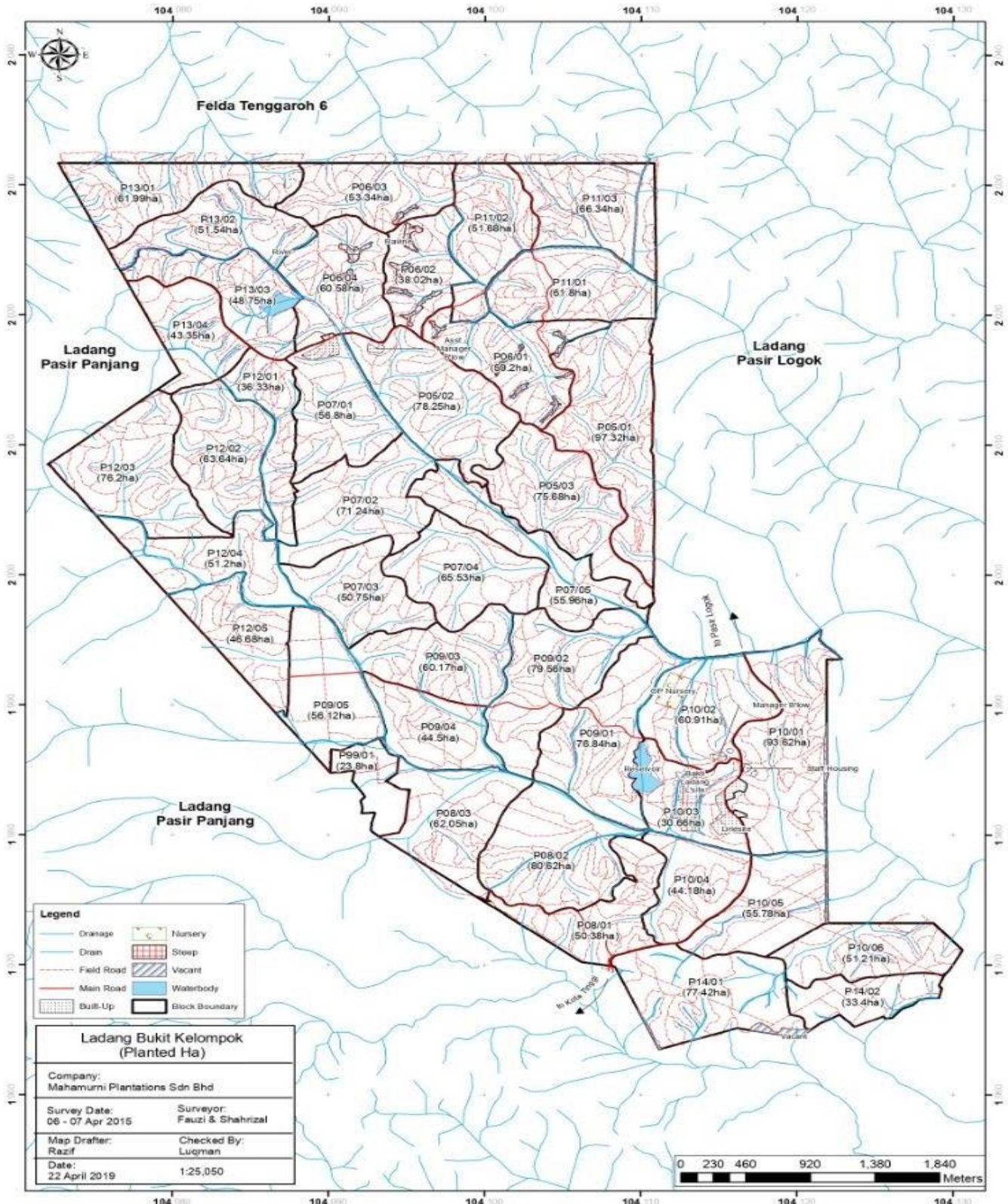
**Pasir Panjang Palm Oil Mill and Pasir Panjang Estate Map**



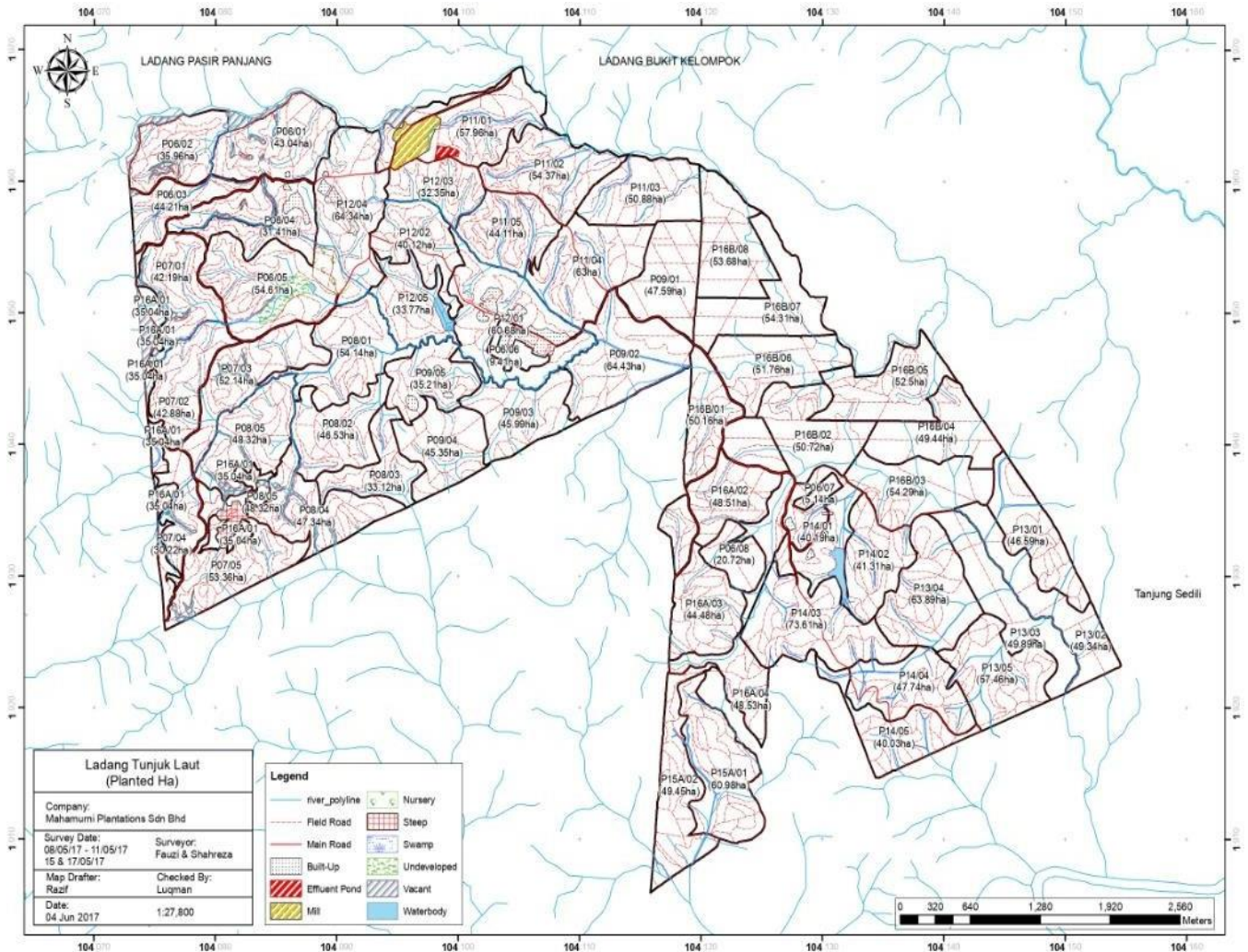
**Pasir Logok Estate Map**



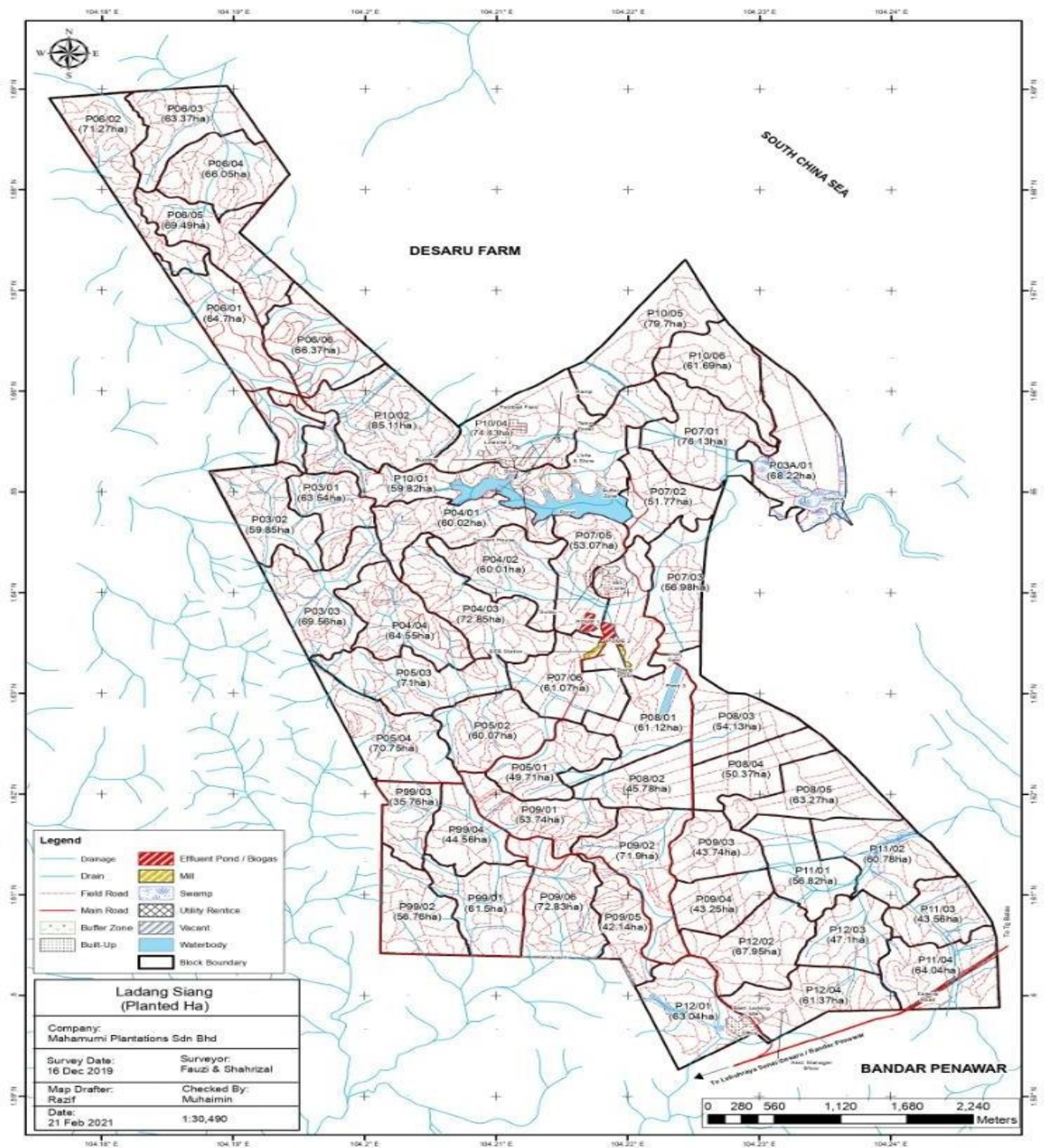
**Bukit Kelompok Estate Map**



**Tunjuk Laut Estate Map**



**Siang Estate Map**



**Appendix D: 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