

**RSPO PRINCIPLE AND CRITERIA –
INITIAL CERTIFICATION ASSESSMENT (IC)
Public Summary Report**

Boustead Plantations Berhad
Client company Address: 19th Floor Menara Boustead, 69, Jalan Raja Chulan, 50200 Kuala Lumpur, Malaysia
Certification Unit: Telok Sengat Business Unit Telok Sengat Palm Oil Mill and Plantations (Telok Sengat Estate, Chamek Estate and Kulai Young Estate) Location of Certification Unit: Telok Sengat, 81900 Kota Tinggi, Johor, Malaysia

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Section 1: Scope of the Certification Assessment

1. Company Details			
RSPO Membership Number	1-0012-04-000-00	Membership Approval Date	11/10/2004
Parent Company Name	Boustead Plantations Berhad		
Address	19 th Floor Menara Boustead, 69, Jalan Raja Chulan, 50200 Kuala Lumpur, Malaysia		
Subsidiary (Certification Unit Name)	Telok Sengat Business Unit - Telok Sengat Palm Oil Mill and Plantations		
Address	Telok Sengat, 81900 Kota Tinggi, Johor, Malaysia		
Contact Name	Mr. Anuar Bin Semail		
Website	www.bousteadplantations.com.my	E-mail	anuar@bplant.com.my
Telephone	+603-2145 2121	Facsimile	+603-2144 7917

2. Certification Information			
Certificate Number	RSPO 697033	Date of First Certification	11/9/2020
		Certificate Start Date	11/9/2020
		Certificate Expiry Date	10/9/2025
Scope of Certification	Palm Oil and Palm Kernel Production		
Applicable Standards	RSPO P&C MY-NI 2014; RSPO Supply Chain Certification Standard 2017 (CPO Mill – Module E – Mass Balance)		

3. Other Certifications			
Certificate Number	Standard(s)	Certificate Issued by	Expiry Date
Mill: MSPO 697045	MS2530-4:2013 MSPO Part 4: General Principles for Palm Oil Mills	BSI Services Malaysia Sdn. Bhd.	14/04/2024
Estate: MSPO 697047	MS2530-3:2013 MSPO Part 3: General Principles for Oil Palm Plantations and Organized Smallholders		

4. Location(s) of Mill & Supply Bases			
Name (Mill / Supply Base)	Location [Map Reference #]	GPS Coordinates	
		Latitude	Longitude
Telok Sengat POM	Telok Sengat, 81900 Kota Tinggi, Johor	104° 02' 37.5" E	1° 34' 04.5" N

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Telok Sengat Estate	Telok Sengat, 81900 Kota Tinggi, Johor	104° 02' 13.80" E	1° 34' 03.60" N
Chamek Estate	Jalan Paloh, 86009 Kluang, Johor	103° 14' 59.95" E	2° 08' 58.8" N
Kulai Young Estate	Jalan Sedenak, 81000 Kulai, Johor	103° 31' 48.50" E	1° 37' 31.50" N

5. Description of Supply Base

Estate	Total Planted (Mature + Immature) (ha)	HCV (ha)	Infrastructure & Other (ha)	Total Area (ha)	% of Planted
Telok Sengat Estate	3,503.40	60.70	115.90	3,680.00	95.20
Chamek Estate	795.60	-	21.30	816.90	97.39
Kulai Young Estate	657.50	-	13.00	670.50	98.06
Total	4,956.50	60.70	150.20	5,167.40	95.92

6. Plantings & Cycle

Estate	Age (Years)					Mature**	Immature
	0 - 3	4 - 10	11 - 20	21 - 25	26 - 30		
Telok Sengat Estate	353.70	897.50	1,579.30	570.30	102.60	3,149.70	353.70
Chamek Estate	98.80	60.80	476.90	159.10	-	696.80	98.80
Kulai Young Estate	421.60	36.30	-	199.60	-	235.90	421.60
Total (ha)	874.10	994.60	2,056.20	929.00	102.60	4,082.40	874.10

7. Certified Tonnage of FFB (Own Certified Scope)

Estate	Tonnage / year		
	Estimated	Actual	Forecast (Sep 2020-Aug 2021)
Telok Sengat Estate	N/A	N/A	72,000.00
Chamek Estate			14,500.00
Kulai Young Estate			10,800.00
Total (mt)			97,300.00

8. Certified Tonnage of FFB (from other certified unit(s)) if applicable *

Estate	Tonnage / year		
	Estimated	Actual	Forecast

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			(Sep 2020-Aug 2021)
Nil	N/A	N/A	N/A
Total			

9. Non-Certified Tonnage of FFB (outside supplier – excluded from certificate) if applicable			
Independent FFB Supplier	Tonnage / year		
	Estimated	Actual	Forecast (Sep 2020-Aug 2021)
External FFB supplier	N/A	N/A	N/A
Total			

10. Certified Tonnage			
Mill Capacity: 40 MT/hr SCC Model: MB	Estimated	Actual	Forecast (Sep 2020-Aug 2021)
	FFB	FFB	FFB
	N/A	N/A	97,300.00 mt
	CPO	CPO	CPO (OER: 22.00%)
	N/A	N/A	21,406.00 mt
	PK	PK	PK (KER: 4.50%)
N/A	N/A	4,378.50 mt	

11. Actual Sold Volume (CPO)					
	RSPO Certified	Other Schemes Certified		Conventional	Total
		ISCC	RSB		
CPO (MT)	N/A	N/A	N/A	N/A	N/A

Conventional product = product that is produced using certified FFB but sold without RSPO claim.

12. Actual Sold Volume (PK)					
	RSPO Certified	Other Schemes Certified		Conventional	Total
		ISCC	RSB		
PK (MT)	N/A	N/A	N/A	N/A	N/A

Conventional product = product that is produced using certified FFB but sold without RSPO claim.

13. Actual Group certification Claims		
	Credit	Physical Volume (MT)
IS-CSPO	-	-

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IS-CSPKO	-	-
IS-CSPKE	-	-

Section 2: Assessment Process

Certification Body:

BSI Services Malaysia Sdn Bhd,
(ASI Accreditation Number: ASI-ACC-067)
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Mid Valley City Lingkaran Syed Putra
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BSI is a leading global provider of management systems assessment and certification, with more than 80,000 certified locations and clients in over 180 countries. BSI Standards is the UK's National Standards Body. BSI provides independent, third-party certification of management systems. BSI is ASI Accredited (ASI-ACC-067) to conduct RSPO assessment since 31/10/2014 with accredited office located at Kuala Lumpur, Malaysia and an office at Jakarta and Australia which involve in RSPO Certification Program.

2.1 Assessment Methodology, Programme, Site Visits

The on-site assessment was conducted from 26 - 30/8/2019. The audit programme is included as Appendix D. The approach to the audit was to treat the mill and its supply base as an RSPO Certification Unit. Mill was audited together with the sample estates. A range of environmental and social factors were covered. This includes consideration of topography, palm age, proximity to areas with HCVs, 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. RSPO Principles & Criteria 2013 (MYNI-2014) and RSPO Supply Chain Certification Standard 2017 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 where the stakeholder notification was made on 19/7/2019, through BSI website as per following link: <https://www.bsigroup.com/globalassets/localfiles/en-my/rspo/Public%20Notification/pn-for-initial-assessment-telok-sengat-palm-oil-mill-bm.pdf>

The approach to the audit was to treat the mill and its supply base as an RSPO Certification Unit. The mill was audited together with the estates (or smallholders) of its supply base.

- The minimum sample size is four estates. Sample size for certification unit with more than four (4) estates were determined based on formula $N = (0.8\sqrt{y}) \times (z)$ where y is the number of estates and where z is the multiplier defined by risk assessment
- As for the smallholders, the sample were determined following the RSPO Management System Requirements and Guidance for Group Certification of FFB Production (2016). The sampling of smallholders were based on the formula $(0.8\sqrt{y}) \times (z)$; where y is total number of independent group member and where z is the multiplier defined by the risk assessment. The sampled smallholder listed in Appendix I.

Meetings were held with stakeholders to seek their views on the performance of the company with respect to the RSPO 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

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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 3.5.

The assessment findings for the initial assessment are detailed in Section 3.4.

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

For Initial and Re-certification assessment, the report was externally reviewed by RSPO approved Certification Reviewer prior to certification decision by BSI.

For Annual surveillance assessment, the report was internally reviewed and approved by BSI qualified certification reviewer.

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

Assessment Program					
Name (Mill / Supply Base)	Year 1 (Initial Assessment)	Year 2 (ASA 1)	Year 3 (ASA 2)	Year 4 (ASA 3)	Year 5 (ASA 4)
Telok Sengat Palm Oil Mill	✓	✓	✓	✓	✓
Telok Sengat Estate	✓	✓	✓	✓	✓
Chamek Estate	✓	✓	✓	✓	✓
Kulai Young Estate	✓	✓	✓	✓	✓

Tentative Date of Next Visit: August 2, 2021 – August 6, 2021

Total No. of Mandays: 13.0 mandays including one day SC audit for mill

2.2 BSI Assessment Team:

Team Member Name	Role <i>(Team Leader or Team member)</i>	Qualifications <i>(Short description of the team members)</i>
Hafriazhar Mokhtar	Mohd. Team Leader	Hafriazhar Mohd. Mokhtar is a Chemical Engineer by qualification. He has more than five years of direct work experience in the upstream processes of palm oil within the plantation industry. He is a qualified Lead Auditor for CDM, ISO 9001, ISO 14001, ISO 45001 and ISO 50001 and has accumulated more than 1000 audit days throughout his current career as the auditor for multiple disciplines covering Malaysia, Indonesia and Thailand. He has been trained in the RSPO

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		P&C and SCCS standards since 2011 and completed his RSPO P&C and SCCS Lead Assessor courses successfully. He has been involved in RSPO audits within Malaysia, Papua New Guinea, Solomon Islands, Gabon, Nigeria and Pakistan. During this assessment, he assessed the aspects of Environmental, HCV, GHG and mill best practices as well as the RSPO supply chain requirements. Able to communicate in Bahasa Malaysia and English
Mohd. Hafiz Mat Hussain	Team Member	He holds bachelor’s degree in Plantation Technology and Management, graduated from University Technology Mara (UiTM) on 2009. He has 4 years working experience in oil palm plantation industry. He also has the experiences as an auditor for several standards including ISO 9001, ISO 14001, OHSAS 18001, MSPO and RSPO in his previous certification body. He completed the ISO 9001 Lead Auditor Course, ISO 14001 Lead Auditor Course and OHSAS 18001 Lead Auditor Course in 2013, Endorsed RSPO P&C Lead Auditor Course in 2014, MSPO Awareness Training in 2014 and Endorsed RSPO SCCS Lead Auditor Course in 2016. He had been involved in RSPO auditing since May 2013 within Malaysia, Papua New Guinea, Solomon Islands, Gabon and Liberia. During this assessment, he assessed on the aspects of Occupational, Health & Safety and estate best practice. He is fluent in Bahasa Malaysia and English languages.
Ronnie Tan	Team Member	Ronnie Tan is a Social Compliance and Security Auditor for more than 15 years. He is a qualified Lead Auditor for SMETA 2 & 4 Pillar, Responsibility Business Alliance (RBA), C-TPAT, TAPA FSR & TSR and other code of conduct audits scheme. He is a National Social Compliance Manager during his past employment and manages a pool of social auditors on social and security audits. He has accumulated more than 400 audit days throughout his current career as the auditor for multiple disciplines covering Malaysia, Singapore, Vietnam and Philippines. He has been trained in the RSPO P&C standards, BSCI standard, RBA standards, McDonalds SWA, Disney ILS and has been actively involved in RSPO audits & 2 nd party audits within Malaysia. During assessment, he covered the legal issues, social issues, workers consultation and stakeholder consultation. He is fluent in Bahasa Malaysia and English languages.

Accompanying Persons:

No.	Name	Role
Nil	N/A	N/A

2.3 Assessment Plan

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

Date	Time	Subjects	HMM	MH	RT
Sunday, 25/8/19	PM	Travel to JB (Hotel Holiday Villa)	✓	✓	✓

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Date	Time	Subjects	HMM	MH	RT
Monday, 26/8/19 Kulai Young Estate	08:30-09:00	Opening Meeting at Kulai Young Estate: <ul style="list-style-type: none"> Opening Presentation by Audit team leader. Confirmation of assessment scope and finalize Audit plan (including stakeholder's consultation). 	✓	✓	✓
	0900-12:00	Kulai Young Estate Field visit, boundary inspection, field operations, staff & workers interview, buffer zone, HCV area, IPM implementation, OSH&ERP, workshop, storage area (agrochemical, fertilizer, lubricant etc), agrochemical mixing area, Schedule waste management, worker housing, clinic, Landfill, , etc.	✓	✓	✓
	10:30-12:30	Meeting with stakeholders (Government, village rep, smallholders, Union Leader, contractor etc.)	-	-	✓
	12:00-13:00	LUNCH			
	13:00-16:00	Kulai Young Estate Document review P1 – P8: (General Documentation e.g. Legal, Manual and Procedure, production & monitoring records, IPM & HCV records, SEIA documents & 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 Briefing			
Tuesday, 27/8/19 Telok Sengat POM	09:00-12:00	Inspection: FFB receiving, warehouse, workshop, wastes management & Landfill, Effluent Ponds, OSH & ERP, Environment issues, POME application, water treatment, staff, workers and contractor interview, housing and facility inspection, clinic, meeting stakeholders etc.	✓	✓	✓
	12:00-13:00	BREAK			
	13:00-16:30	Telok Sengat Palm Oil Mill: Visit to laboratory, weighbridge and palm product storage area. Document Review P1 – P8: SOPs, Supply chain for CPO mill, Review on SEIA documents and records, wage records, employee data, training records, legal permits, mill inspection and internal monitoring records, CIP & implementation.	✓	✓	✓
	16:30-17:00	Interim Closing Briefing	✓	✓	✓
Wednesday, 28/8/19 Chamek Estate	08:30-12:00	Chamek Estate Field visit, boundary inspection, field operations, staff & workers interview, buffer zone, HCV area, IPM implementation, OSH&ERP, workshop, storage area (agrochemical, fertilizer, lubricant etc), agrochemical mixing area, Schedule waste management, worker housing, clinic, Landfill, , etc.	✓	✓	✓
	10:30-12:30	Meeting with stakeholders (Government, village rep, smallholders, Union Leader, contractor etc.)	-	-	✓
	12:00-13:00	LUNCH			
	13:00-16:00	Chamek Estate Document review P1 – P8: (General Documentation e.g. Legal, Manual and Procedure, production & monitoring records, IPM & HCV records, SEIA documents & 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 Briefing			
Thursday, 29/8/19 Telok Sengat Estate	08:30-12:00	Telok Sengat Estate Field visit, boundary inspection, field operations, staff & workers interview, buffer zone, HCV area, IPM implementation, OSH&ERP, workshop, storage area (agrochemical, fertilizer, lubricant etc), agrochemical mixing area, Schedule waste management, worker housing, clinic, Landfill, , etc.	✓	✓	✓

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Date	Time	Subjects	HMM	MH	RT
	10:30-12:30	Meeting with stakeholders for Telok Sengat Estate and Telok Sengat POM (Government, village rep, smallholders, Union Leader, contractor etc.)	-	-	✓
	12:00–13:00	LUNCH			
	13:00–16:00	Telok Sengat Estate Document review P1 – P8: (General Documentation e.g. Legal, Manual and Procedure, production & monitoring records, IPM & HCV records, SEIA documents & 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 Briefing			
Friday, 30/8/19 Telok Sengat POM	08:30–09:30	RSPO Supply Chain for Telok Sengat POM General Chain of custody: Element 5.1 – 5.13	✓	✓	-
	09:30-11:00	RSPO Supply Chain for Telok Sengat POM CPO Mill Supply Chain Assessment Report (Module E - CPO Mills: <i>Mass Balance</i>)	✓	✓	-
	11:00-11:30	Verify any outstanding issues & Preparation for closing meeting	✓	✓	-
	11:30-12:30	Closing meeting	✓	✓	-
	PM	Travel back to KL			

Section 3: Assessment Findings

3.1 Normative requirement applied for this assessment:

- Boustead Plantations Berhad Multiple Management Units / Time Bound Plan
- RSPO P&C 2013 Generic
- RSPO Group Certification Standard 2016
- RSPO Supply Chain Certification Standard 2017
- RSPO P&C GA-NIWG 2017
- RSPO P&C INA-NIWG 2016
- RSPO P&C MY-NIWG 2014
- RSPO P&C PNG-NIWG 2017

3.2 Time Bound Plan progress for multiple management units

Time Bound Plan		
Requirement	Remarks	Compliance
Does the plan include all current subsidiaries, estates and mills?	Yes. Please refer to appendix B for details on the mills and estates of Boustead Plantations Berhad.	Yes
Have all the estates and mills certified within five years after obtaining RSPO membership?	Yes. For Telok Sengat certification unit certification delayed to 2020 due to changes in organizational top management and closure of the assessment findings processes. The Major NC has been closed on 14/8/2020.	Yes

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<p>Have there been any new acquisitions? If yes, the new acquisitions shall be certified within three-year from the date of acquisition. Certification plan for the new acquisition shall be available.</p>	<p>Yes, new acquisitions took place in 2018 involving Pertama Business Unit, Sabah from Duta Plantations Berhad and in 2019 involving Tawai Business Unit, Sabah from Sit Seng & Sons Realty Sdn Bhd. Certification plan for the new acquisition planned on 2021 and 2022 respectively.</p>	<p>Yes</p>
<p>Have there been any changes to the time-bound plan since the last audit (both new acquisition and existing)? If yes, justification is required. Is this consistent with the ACOP reporting?</p>	<p>Yes, due to new acquisitions took place in 2018 involving Pertama Business Unit, Sabah from Duta Plantations Berhad and in 2019 involving Tawai Business Unit, Sabah from Sit Seng & Sons Realty Sdn Bhd. Certification plan for the new acquisition planned on 2021 and 2022 respectively. This is consistent with latest reported ACOP 2019.</p>	<p>Yes</p>
<p>Have there been any isolated lapses in implementation of the plan? If yes a Minor non-compliance shall be raised</p>	<p>No, there has not been any isolated lapses except for delayed certification of this Telok Sengat Business Unit due to changes in organizational top management and closure of the assessment findings processes.</p>	<p>Yes</p>
<p>Have there been any fundamental failure (e.g. unable to justify delay in planning the assessments) to proceed with implementation of the plan? If yes a Major non-compliance shall be raised</p>	<p>No, there is no fundamental failure except for delayed certification of this Telok Sengat Business Unit due to changes in organizational top management and closure of the assessment findings processes.</p>	<p>Yes</p>
<p>Have there been any stakeholder comments?</p>	<p>BSI has made public announcement on the BSI and RSPO website regarding the certification of Telok Sengat Business Unit under Boustead Plantations Berhad. There was no comment received. For local stakeholder comments gathered during on-site assessment, please refer to section 3.5 of this report.</p>	<p>Yes</p>
<p>Un-Certified Units or Holdings</p>		
<p>No replacement after dates defined in NIs Criterion 7.3: <ul style="list-style-type: none"> • Primary forest. • Any area required to maintain or enhance HCVs in accordance with RSPO P&C criterion 7.3. </p>	<p>Neither any replacement after dates defined in NIs Criterion 7.3 for primary forest nor any area required to maintain or enhance HCVs in accordance with RSPO P&C criterion 7.3.</p>	<p>Yes</p>
<p>Any new plantings since January 1st 2010 shall comply with the RSPO New Plantings Procedure.</p>	<p>No new development reported since 1st July 2010 within Boustead Plantations Berhad.</p>	<p>Yes</p>
<p>Any Land conflicts are being resolved through a mutually agreed process, such as RSPO Complaints System or Dispute Settlement Facility, in accordance with RSPO P&C criteria 2.2, 6.4, 7.5 and 7.6. The RSPO RaCP tracker shall be checked to</p>	<p>No any land conflicts occurred within Telok Sengat Business Unit that require to be resolved through a mutually agreed process, such as RSPO Complaints System or Dispute Settlement Facility, in accordance with RSPO P&C criteria 2.2, 6.4, 7.5 and 7.6.</p>	<p>Yes</p>

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confirm for any land conflicts/Liabilities https://www.rspo.org/certification/remediation-and-compensation/racp-tracker . The progress on the Liabilities shall be verified and reported.	The RSPO RaCP tracker portal shown zero management units with potential liability for Boustead Plantation Berhad.	
Any Labor disputes are being resolved through a mutually agreed process, in accordance with RSPO P&C criterion 6.3.	No labour dispute reported. During this audit, interview with the workers shows no labour dispute.	Yes
Any Legal non- compliance is being addressed through measures consistent with the requirements of RSPO P&C criteria 2.1	No. Findings raised on legal non-compliance during this audit was resolved prior to certification.	Yes
Did the company conduct internal audit against the uncertified management units requirement? If yes, a positive assurance statement shall be available.	Yes. As part of the RSPO P&C compliance, internal audit has been conducted at Telok Sengat Business Unit prior the audit. Report of improvement was provided for site's further improvement.	Yes

3.3 Progress of scheme smallholders and/or outgrowers (if applicable to this assessment)

Progress of scheme smallholders or outgrowers towards compliance with relevant standards		
Requirement	Remarks	Compliance
Has 100% of scheme smallholders and/or scheme outgrowers comply with the standard within three years of the mill's initial certification? OFI shall be raised if after one year where 100% of the scheme smallholders and scheme outgrowers are not in compliance, a minor NC after two years, and a major NC if this requirement is not met after three years.	Not applicable.	N/A

3.4 Details of findings

The nonconformity is listed below. The summary report of the assessment by criteria is listed in Appendix A.

During the Initial Certification assessment there were seven (7) Major nonconformities (NC) and five (5) Minor NC raised. The Telok Sengat Business Unit submitted Corrective Action Plans for the NCs. Corrective action plans (CAP) with respect to the NCs was reviewed by the BSI audit team and accepted.

On-site verification was conducted for Major NC close-out on 13-14 August 2020. Verification found that the CAP evidence implemented confirmed to be sufficient to address the Major NC hence Major NC was closed on 14/8/2020.

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

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Summary of Total Number of Nonconformity			
Nonconformity			
NCR Ref #	1817083-201908-M1	Clause & Category (Major / Minor)	Indicator 5.2.2 Major
Date Issued	30/8/2019	Due Date	29/8/2020
Closed (Yes / No)	Yes	Date of nonconformity Closure	14/8/2020
Statement of Nonconformity:	The management plan to maintain and/or enhance HCV presence was not adequate		
Requirement Reference:	Where rare, threatened or endangered (RTE) species, or HCVs, are present or are affected by plantation or mill operations, appropriate measures that are expected to maintain and/or enhance them shall be implemented through a management plan.		
Objective Evidence:	<p>Recommendation for actions from information available based on the High Conservation Value (HCV) Assessment Report (Multi-site) for Boustead Plantations Berhad covering Telok Sengat Estate, Kulai Young Estate, Chamek Estate, Eldred Estate and Bekoh Estate; July 2018 were not fully implemented. Based on the HCV report, few recommendations made by HCV assessor on management and monitoring for identified HCV were not evidence as per following samples:</p> <ul style="list-style-type: none"> - HCV 1: Mark and label boundaries of HCV areas (Present in Telok Sengat & Chamek Estate) - HCV 2: Mark and label boundaries of HCV areas (Potentially present in Telok Sengat Estate) - HCV 3: Mark and label boundaries of HCV areas (Present in Telok Sengat Estate) - HCV 4: Mark and label boundaries of HCV areas (Present in all estates) - HCV 6: Mark and install signage for each HCV site (Present in all estates) 		
Corrections:	Installation of HCV signages at designated locations		
Root Cause Analysis:	Implementation was delayed due non-inclusion of cost in annual budget		
Corrective Actions:	Costing of implementation has been included in the annual budget		
Assessment Conclusion:	<p>Major NC Close Out Evidence Verification:</p> <ul style="list-style-type: none"> - Installation of HCV signages at designated locations photos at Telok Sengat Estate and Chamek Estate - Budgeting FY 2020 inclusion for RSPO implementation <p>Evidence shown the CAP was found to be effective thus the major NC was closed on 14/8/2020. Continuous implementation will be further verified in the next audit.</p>		

Summary of Total Number of Nonconformity			
Nonconformity			
NCR Ref #	1817083-201908-M2	Clause & Category (Major / Minor)	Indicator 6.1.3 Major
Date Issued	30/8/2019	Due Date	29/8/2020

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Closed (Yes / No)	Yes	Date of nonconformity Closure	14/8/2020
Statement of Nonconformity:	No management plan established for avoidance or mitigation of negative impacts and promotion of the positive ones and monitoring of impacts identified based on consultation with the affected parties, documented and timetabled, including responsibilities for implementation.		
Requirement Reference:	Plans for avoidance or mitigation of negative impacts and promotion of the positive ones, and monitoring of impacts identified, shall be developed in consultation with the affected parties, documented and timetabled, including responsibilities for implementation.		
Objective Evidence:	No documented Management plan being established by Boustead team as at time of audit.		
Corrections:	Updating of documented management action plan dated on 15/9/2019		
Root Cause Analysis:	Updating of plan was not conducted as per established Sustainability Management Program		
Corrective Actions:	To include actual completed plan upon updating of established annual program		
Assessment Conclusion:	<p>Major NC Close Out Evidence Verification:</p> <ul style="list-style-type: none"> - Updated documented management action plan on 15/9/2019 - Updated documented Sustainability Management Program 2019 plan & actual <p>Evidence shown the CAP was found to be effective thus the major NC was closed on 14/8/2020. Continuous implementation will be further verified in the next audit.</p>		

Summary of Total Number of Nonconformity			
Nonconformity			
NCR Ref #	1817083-201908-M3	Clause & Category (Major / Minor)	Indicator 2.1.1 Major
Date Issued	30/8/2019	Due Date	29/8/2020
Closed (Yes / No)	Yes	Date of nonconformity Closure	14/8/2020
Statement of Nonconformity:	<p>1. Migrant worker without valid work permit and absconded / missing migrant worker not reported to local authority in accordance with "Immigration Department – Recruitment Terms and Condition of Foreign Workers" & Employment (Restriction) Act 1968, (Act 353), Part II – Restriction of Employment of Person Not being Citizens of Malaysia, Section 5 – Restrictions of Employment of Non-Citizens, Subsection (1)(a) and Immigration Act 155, Section 6 – Control of Entry into Malaysia.</p> <p>2. Workers working hours exceeded 12 hours per day violating Employment Act 1955 (Act 625) Part XII Rest day, Hours of Work, Holiday and Other Condition of Service. Section 60A. Hours of Work: (7).</p> <p>3. Overtime hours exceeding 104 hours per month; violating Employment (limitation of Overtime Work) Regulation 1980; (2) Limit of overtime work: The limit of overtime work for the purpose of Section 60A (4) (a) of the Employment Act 1955 (Act 625)</p>		

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	<p>4. Total overtime hours worked per month does not reflected in the pay slip furnished to workers violating the Employment Regulation 1957; Section 9 Employer to furnish particulars under regulation 5 (c).</p> <p>5. Estates migrant workers found not contributing the SOCSO in accordance to 'Akta Keselamatan Social Pekerja 1969 (Akta 4)'.</p> <p>6. No approval letter obtained for deduction such as electricity, water, 'hutang kedai' / sundry shop debt and 'other', violating Employment Act 1955 (Act265); Part IV Deduction from Wages; Section 24 – Lawful Deduction.</p> <p>7. Foreign workers passports are currently kept/hold by the estate management and labour contractor, violating Passport Act 1966 (Act 1950) – Regulation 12 (1) (f)</p>
Requirement Reference:	Evidence of compliance with relevant legal requirements shall be available.
Objective Evidence:	<p>1. Kulai Young Estate 2 selected foreign workers found with details as below. i.e. - expired work permit (Passport B3629153 / Indonesia, Work Permit: PE7149696, Valid up to: 19.07.2019); and, - absconded migrant worker not being made informed to the local authority according to "Immigration Department – Recruitment Terms and Condition of Foreign Workers"; ref: https://www.imi.gov.my/index.php/en/foreign-worker.html - (Passport AS575396 / Indonesia (Passport Expired on 10.03.2019), Work Permit: PD8711809, Valid up to: 04.08.2018)</p> <p>Chamek Estate 3 foreign worker / India nationality found without work permit. VDR (Permohonan Visa Dengan Rujukan) Application letter issued by the Immigration Department evidenced that the 3 affected workers are newly hired and in progress of permit application. Immigration Letter Ref. BPA/FWCMS/JFBE1036151814 & BPA/FWCMS/JFBE1105191702 dated 01.07.2019 clause 2.3 requires the new migrant workers to undergo medical check (FOMEMA) latest 3 days upon arrival. However, the medical check conducted on 24.08.2019 although their arrival is on 09.08.2019.</p> <p>Telok Sengat Estate – 2 selected Bangladesh worker work permit found expired on 21.11.2018; permit renewal initiated on 08.11.2018 through government agency – MyEG Services Bhd; however no permit issued despite several follow up carried out with MyEG. i.e. - Passport BM0790470 / Bangladesh, work permit PE1344608, Valid up to: 15.07.2019, Special Pass obtained: J18K97MBBB1G expired on 19.08.2019. - Pasport BQ0285988 / Bangladesh, work permit PD9644910, Valid up to: 21.11.2018.</p> <p>2. Sighted 3 months selected record (payslip and punch card attendance record) confirmed that Workers in Telok Sengat POM found working more than 12 hours per day June 2019 Emp. No.: 0694A – 01 day, 23 hours per day Emp. No.: 0665I – 05 days, averagely 14~22 hours / day Emp. No.: 1042C – 03 days, averagely 13~16 hours / day Emp. No.: 0294G – 05 days, averagely 13~16 hours / day Emp. No.: 0550J – 02 days, averagely 14~15 hours / day Emp. No. 1042C – 03 days, averagely 13~24 hours / day July 2019 Emp. No. 055J – 04 days; averagely 13~15 hours / day Emp. No. 0665I – 11 days; averagely 16~24 hours / day Emp. No. 1045D – 05 days; averagely 13~15 hours / day</p>

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	<p>Emp. No. 0694A – 09 days, averagely 14~24 hours / day Dec 2018 Emp. No.1045D – 02 days, averagely 13~15 hours / day Emp. No.0550J – 03 days, averagely 15~23 hours / day Emp. No. 0665I – 12 days, averagely 13~23 hours / day Emp. No. 0363B – 10 days, averagely 13~16 hours / day</p> <p>3. Telok Sengat POM - 3 randomly selected month pay-slip, punch cards and Checkroll Advance & Overtime Underpaid record sighted with detail as below. Dec 2018 - Emp. No. 0665I – 121 overtime hours June 2019 - Emp. No. 0694A – 122 overtime hours July 2019 - Emp. No. 0665I – 134 overtime hours</p> <p>4. Telok Sengat POM – Overtime wages are paid in 2 payment cycle, i.e. (a) on the 7th day of the last day of the wage period including maximum 104 hours of overtime wage & (b) the balance of overtime wage (which exceed 104 hours) paid on 15th day of the last day of the wage period along with Checkroll advance. Pay-slip furnished to workers were found indicating 104 hours of overtime instead of actual overtime hours worked during the month. Sighted the amount of overtime wage paid on 15th appeared in pay-slip as Income - 'overtime underpaid', at the same time in Deduction - 'overtime payment' since the overtime wage is collected on 15th.</p> <p>5. SOCSO Contribution Form 8A sighted; no SOCSO contribution made by the employer for migrant workers. Sampled migrant workers as listed below. Kulai Young Estate; Khairul Wadi, Sulistyowati, Abdul Hamid, Muhd Hudri Chamek Estate; Asippudin, Jum, Tarzan, Mohammad Amin, Bambang Puwanto, Upriadi, Zikri Hakim, Saepul Bahri. Telok Sengat Estate; Anisa Kamal, Amaq Mudahan, Darmaji Bin Amak Badrun; Padil</p> <p>6. Kulai Young Estate & Chamek Estate Foreign workers payslip sighted there are deduction made for electricity charges and sundry shop debt without prior approval obtained from the labour office. E.g. Kulai Young Estate Harvester – Abdul Hakim; June 2019 payslip, deduction made on electricity amounting MYR25.50 and sundry shop debt amounting MYR297.80. Chamek Estate Harvester – PMH contractor - Darmono and 5 other workers (group wages); payslip for month of July 2019, deduction made on electricity amounting MYR139.45 and water bill of MYR140.80 & MYR153.60. (the amount for water bill authorized by labour office is Maximum MYR30 only) LKB contractor's worker – payslip for month of June 2019, deduction made on 'other' amounting MYR237.00.</p> <p>7. Migrant workers passports found kept by Boustead management at Chamek Estate, Kulai Young Estate and Telok Sengat Estate. As at time of audit, passports of the migrant workers found kept at the Chief Clerk's desk drawer at Kulai Young Estate; fire proof safe in the Chamek Estate Manager room and Safe Cabinet at Telok Sengat Estate. Migrant worker interview states that they have no access to their passport. No letter of consent, procedure of passport safe-keeping and effective withdrawal passport mechanism / process is established to evidence that passport retention is meant for safe-keeping purposes.</p>
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<p>Corrections:</p>	<p>Correction: 1. Immediate renewal of expired worker’s permit & report to police for absconded workers 2. Immediate stop of extra overtime work 3. Immediate stop of extra overtime work 4. Immediate stop of extra overtime work 5. Immediate registration of SOCSO to new/expired FWCS foreign workers 6. Immediate stop unauthorized deduction in payslip 7. Prepare and issue documented letter of consent to keep/hold workers’ passport that were verbally agreed by them</p>
<p>Root Cause Analysis:</p>	<p>1. No thorough monitoring of passport/work permit expiry for contractors’ workers by management & newly joined workers’ permit was delayed due to awaiting FOMEMA results 2. No control and monitoring by management of workers overtime and payment 3. No control and monitoring by management of workers overtime and payment 4. No control and monitoring by management of workers overtime and payment 5. SOCSO contribution was not done since FWCS was still valid until December 2019 6. Manual pay-slip used as secondary document to show actual payment 7. No documented letter of consent to keep/hold workers’ passport that were verbally agreed by them</p>
<p>Corrective Actions:</p>	<p>1. Implementation of monitoring through table & pigeon hole of passport & work permit expiry date 2. Reminder and briefing of overtime rule according to Employment Act 1955 3. Reminder and briefing of overtime rule according to Employment Act 1955 4. Reminder and briefing of overtime rule according to Employment Act 1955 5. Immediate registration of SOCSO to new/expired FWCS foreign workers 6. Use and issuance of single computerized system payslip to workers 7 Use of form as following: - Form of consent passport holding - Form of passport taking for use by FW - Form of passport return to office</p>
<p>Assessment Conclusion:</p>	<p>Major NC Close Out Evidence Verification: - Evidence of renewal on July 2019– passport new expiry date: 10/12/2020 and subsequently renewed until 10/12/2020 - Renewal on September 2019– passport new expiry date: 19/7/2020 - Records of work permit applied (MyEG) 3 months before expired date - Records of police report for absconded workers - Monitoring table & pigeon hole of expiry date for workers’ passport & work permit - Payment done within same month for all unpaid overtime - Re-briefing to employee & monitoring of hours to ensure no overtime exceed limit - SOCSO contribution done on monthly basis as per consecutive months’ SOCSO Form 8A - New computerized system payslip issued - Form of consent for FW passport holding - Form of passport taking for use by FW - Form of passport return by FW to office</p> <p>Evidence shown the CAP was found to be effective thus the major NC was closed on 14/8/2020. Continuous implementation will be further verified in the next audit.</p>

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Summary of Total Number of Nonconformity			
Nonconformity			
NCR Ref #	1817083-201908-M4	Clause & Category (Major / Minor)	Indicator SCCS 5.3.2 Major
Date Issued	30/8/2019	Due Date	29/8/2020
Closed (Yes / No)	Yes	Date of nonconformity Closure	14/8/2020
Statement of Nonconformity:	The established procedure for internal audit was not implemented.		
Requirement Reference:	The site shall have a written procedure to conduct annual internal audit to determine whether the organization; i) conforms to the requirements in the RSPO Supply Chain Certification Standard and the RSPO Market Communications and Claims Documents. ii) effectively implements and maintains the standard requirements within its organization		
Objective Evidence:	At Telok Sengat POM, the SC internal audit yet to be conducted.		
Corrections:	Conduct the internal audit immediately by trained internal auditor		
Root Cause Analysis:	RSPO SCCS Internal audit training was not yet conducted to the available internal auditor. Trained internal auditor not available prior to external audit		
Corrective Actions:	To plan for annual RSPO/MSPO internal audit to be conducted by trained internal auditor prior to external audit while awaiting all internal auditors fully trained		
Assessment Conclusion:	Major NC Close Out Evidence Verification: - Records of RSPO SCCS internal audit dated 2/10/2019 - Annual sustainability internal audit plan to be conducted by trained internal auditors Evidence shown the CAP was found to be effective thus the major NC was closed on 14/8/2020. Continuous implementation will be further verified in the next audit.		

Summary of Total Number of Nonconformity			
Nonconformity			
NCR Ref #	1817083-201908-M5	Clause & Category (Major / Minor)	Indicator SCCS 5.5.1 Major
Date Issued	30/8/2019	Due Date	29/8/2020
Closed (Yes / No)	Yes	Date of nonconformity Closure	14/8/2020
Statement of Nonconformity:	The evidence of the mill ensuring the independent third party complies with the requirements of the RSPO Supply Chain Certification Standard was not evident.		
Requirement Reference:	In cases where an operation seeking or holding certification outsources activities to independent third parties (e.g. subcontractors for storage, transport or other outsourced activities), the operation seeking or holding certification shall ensure that the independent third party complies with the requirements of the RSPO		

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	Supply Chain Certification Standard. A CPO mill and independent mill cannot outsource processing activities like refining or crushing.
Objective Evidence:	No communication between the mill and the transporter (Yewtan Enterprise Sdn Bhd) with regards to the mill shall ensure the transporter complies with the requirement of RSPO supply chain certification standard.
Corrections:	Communication to transporter conducted on 2/10/2020 to following transporter: - Aik Heng Hung Sdn. Bhd. - Sing Rubber & Transport Sdn. Bhd. - Yewtan Enterprise Sdn. Bhd.
Root Cause Analysis:	Document of communication to transporter not available during the audit for the sampled transporter
Corrective Actions:	Mill give a copy of supplementary document to transporter as reference. Communication also done in stakeholder consultation meeting.
Assessment Conclusion:	Major NC Close Out Evidence Verification: - Provision of outsourced activities form to contractor (transporter) - Records of briefing dated 2/10/2019 Evidence shown the CAP was found to be effective thus the major NC was closed on 14/8/2020. Continuous implementation will be further verified in the next audit.

Summary of Total Number of Nonconformity			
Nonconformity			
NCR Ref #	1817083-201908-M6	Clause & Category (Major / Minor)	Indicator SCCS 5.8.1 Major
Date Issued	30/8/2019	Due Date	29/8/2020
Closed (Yes / No)	Yes	Date of nonconformity Closure	14/8/2020
Statement of Nonconformity:	No training for RSPO supply chain being conducted.		
Requirement Reference:	The organization shall have a training plan on RSPO Supply Chain Standards requirements, which is subject to on-going review and is supported by records of the training provided to staff.		
Objective Evidence:	There was no training related to RSPO supply chain being conducted at Telok Sengat POM.		
Corrections:	Conduct RSPO SCCS training to mill employee immediately on 2/10/2019		
Root Cause Analysis:	Changes in mill management team cause delay of training		
Corrective Actions:	Establishment of training schedules on annual basis to include RSPO SCCS.		
Assessment Conclusion:	Major NC Close Out Evidence Verification: - Records of RSPO SCCS training conducted on 2/10/2020 to relevant staff and employees - Records of annual training program Evidence shown the CAP was found to be effective thus the major NC was closed on 14/8/2020. Continuous implementation will be further verified in the next audit.		

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Summary of Total Number of Nonconformity			
Nonconformity			
NCR Ref #	1817083-201908-M7	Clause & Category (Major / Minor)	Indicator SCCS 5.13.1 Major
Date Issued	30/8/2019	Due Date	29/8/2020
Closed (Yes / No)	Yes	Date of nonconformity Closure	14/8/2020
Statement of Nonconformity:	Management review meeting to discuss the issues related to the supply chain was not conducted.		
Requirement Reference:	The organization is required to hold management reviews annually at planned intervals, appropriate to the scale and nature of the activities undertaken.		
Objective Evidence:	Management review yet to be conducted by Telok Sengat POM		
Corrections:	Additional management review conducted on 2/10/2019 to cover the missing RSPO SCCS elements.		
Root Cause Analysis:	Previous management review was not included the RSPO SCCS discussion		
Corrective Actions:	Management review to include the RSPO SCCS discussion		
Assessment Conclusion:	Major NC Close Out Evidence Verification: - Minutes of meeting records for additional management review conducted on 2/10/2019 - Notice of management review meeting included with RSPO SCCS agenda Evidence shown the CAP was found to be effective thus the major NC was closed on 14/8/2020. Continuous implementation will be further verified in the next audit.		

Summary of Total Number of Nonconformity			
Nonconformity			
NCR Ref #	1817083-201908-N1	Clause & Category (Major / Minor)	Indicator 5.3.3 Minor
Date Issued	30/8/2019	Due Date	29/8/2021
Closed (Yes / No)	Yes	Date of nonconformity Closure	Open
Statement of Nonconformity:	The waste management and disposal plan to avoid or reduce pollution was not effectively implemented		
Requirement Reference:	A waste management and disposal plan to avoid or reduce pollution shall be documented and implemented.		
Objective Evidence:	Based on specific Boustead Sustainability Guideline – Scheduled Waste Procedure; Ref. # BEA SUS/SW/EQA (SW); Date: 22/12/2014, all identified scheduled wastes generated by mill and estates shall be handled in accordance with legal requirement Environmental Quality (Scheduled Waste) Regulations 2005. However, based on the evidence from site visit and documented information, it was found that the procedure was not implemented effectively in following sites: - Scheduled wastes in Kulai Young Estate were stored more than 180 days period without DOE approval for following wastes: Battery (SW 110) since 9/6/2016; Oil		

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	filters (SW 410) since 2/7/2015, Used lubricants oil ((2/7/2015), empty fertilizer bag (29/5/2015), empty chemical container (1/1/2018) - Scheduled wastes were found being dumped at field PR18A near pocket forest CV in Telok Sengat Estate
Corrections:	Clear and keep the waste to the store and manage according to the scheduled waste handling procedure
Root Cause Analysis:	No training conducted for Person in-charge of management of scheduled waste
Corrective Actions:	To conduct training as per annual training plan
Assessment Conclusion:	The submitted CAP detailing on proposed actions to be taken to address the nonconformity based on the root cause determined were being reviewed by auditors deemed to be appropriate. Thus, the evidence of effectiveness of CAP will be verify during next coming surveillance assessment.

Summary of Total Number of Nonconformity			
Nonconformity			
NCR Ref #	1817083-201908-N2	Clause & Category (Major / Minor)	Indicator 1.3.1 Minor
Date Issued	30/8/2019	Due Date	29/8/2021
Closed (Yes / No)	Yes	Date of nonconformity Closure	Open
Statement of Nonconformity:	Code of ethical conduct and integrity in all operations and transactions not communicated to all level of workforce and operation.		
Requirement Reference:	There shall be a written policy committing to a code of ethical conduct and integrity in all operations and transactions, which shall be documented and communicated to all levels of the workforce and operations.		
Objective Evidence:	Code of Ethics and Conduct handbook that contains the code of ethical elements such as respect for fair conduct of business; prohibition of all forms of corruption, bribery and fraudulent use of funds and resources; and proper disclosure of information in accordance with applicable regulations and accepted industry practices; is only made available to the manager levels. No objective evidence sighted that the code of ethical conduct and integrity communicated to all levels of workforce and operations. Internal and external stakeholder interview confirmed that they are not being communicated and not aware of the policy.		
Corrections:	Communication conducted to all mill employees on 17/11/2019 (POM); Telok Sengat Estate (17 & 24/9/2019) – and by Contract & Compliance Manager (CCM) on 25/11/2019		
Root Cause Analysis:	Changes in mill management team cause delay of training/briefing/communication to all employees.		
Corrective Actions:	To conduct training as per annual training plan		
Assessment Conclusion:	The submitted CAP detailing on proposed actions to be taken to address the nonconformity based on the root cause determined were being reviewed by auditors deemed to be appropriate. Thus, the evidence of effectiveness of CAP will be verify during next coming surveillance assessment.		

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Summary of Total Number of Nonconformity			
Nonconformity			
NCR Ref #	1817083-201908-N3	Clause & Category (Major / Minor)	Indicator 2.1.3 Minor
Date Issued	30/8/2019	Due Date	29/8/2021
Closed (Yes / No)	Yes	Date of nonconformity Closure	Open
Statement of Nonconformity:	<p>1. No mechanism in place to ensure deployment of contract migrant workers by the labour contractor to the estate carries a legal work permit; to prevent violation of Employment (Restriction) Act 1968, (Act 353), Part II – Restriction of Employment of Person Not being Citizens of Malaysia, Section 5 – Restrictions of Employment of Non-Citizens, Subsection (1)(a) and Immigration Act 155, Section 6 – Control of Entry into Malaysia</p> <p>2. No mechanism in place to maintain and monitor accuracy of wages paid to migrant workers by the labour contractor, based on the information furnished by the labour contractors. E.g. payslip; to prevent violation of Employment Regulation 1957, Section 9 Employer to furnish particulars under regulation 5 (c).</p> <p>3. No adequate mechanism in place to monitor and ensuring the migrant worker work permit remain valid at all time by initiating renewal of work permit with sufficient period of time prior to the expiry date of the permit; to prevent violation of Employment (Restriction) Act 1968, (Act 353), Part II – Restriction of Employment of Person Not being Citizens of Malaysia, Section 5 – Restrictions of Employment of Non-Citizens, Subsection (1)(a) and Immigration Act 155, Section 6 – Control of Entry into Malaysia.</p>		
Requirement Reference:	A mechanism for ensuring compliance shall be implemented.		
Objective Evidence:	<p>1. Based on Contractor interview, it is agreed that all task assigned by the Boustead Estate shall be completed with adequate workforce deployed. All migrant workers with Boustead work permit will be prioritized in job scheduling in the estate and should there be any shortage of workforce, the labour contractor will deploy other harvester / workers to complete the task assigned to them by the estate management. However, the estate management does not have a mechanism for ensuring all workers supplied by the workforce contractor are carrying a valid work permit, category of industry, passport validity and only deploying worker that registered with Boustead. Issues found e.g.</p> <ul style="list-style-type: none"> - Sighted, 2 out of 3 randomly selected migrant workers at the Chamek Estate housing tenant found not in the employee list furnished to the auditor as at time of audit. Labour contractor interview states that there are 9 migrant workers under Perusahaan Mewah Hijau (PWH) and 5 migrant workers under Lokman Khalid Baba Resources (LKB). Employee List furnished to auditor has 8 migrant workers under PMH and 5 under LKB. - 1 out of the 3 migrant worker at Chamek Estate is holding work permit, neither belongs to Boustead Estate Agency Sdn Bhd nor labour contractor’s permit (Perusahaan Mewah Hijau). i.e. EPA Management Sdn Bhd, Ulu Tiram. <p>2. Kulai Young Estate management provided with copy of payslip from labour contractor as evidence of monthly wage paid. Sighted copy of the payslip not consistent and accurate against the actual payslip received by the migrant workers. Amount of wages earned based on piece rates and amount of deductions appeared in both payslip found not tallied.</p> <p>Slip presented for review Payslip received by migrant worker</p>		

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	<p>Income Deduction Income Deduction 95A 733.95 Advance 150.00 95A 399.15 Advance 0 95C 629.40 95C 602.40 Elec 25.50 96A 201.00 96A 411.60 Shop Debt 297.80 97A 1157.76 97A 1253.76 Unripe 5.00 Allow 100.00 Kong 35.00 SGP 200.00 Allow 100.00 SGP 200.00 Total 3022.11 Total 150 Total 3001.91 Total 323.30 Chamek Estate management received copies of payslip paid to the workers by PMH contractor as evidence of wages paid respectively. 1 randomly selected migrant worker occupied 1 of the housing in Chamek Estate found attached to PMH contractor, work as harvester but not found in the employee list furnished by the Chamek Estate. The payslip furnished by the selected worker found to be in hand-written detailing information of harvested fruit, amount of pay and deduction of water and electricity bill. As estate management has no pay record for the affected worker, verification of the payslip against other harvester payslip available found not consistent. 3. Approx. 47 migrant workers passport found expired (averagely since 15.07.2019). Sighted renewal receipt and invoice issued by government agency – MYEG Services Bhd done several weeks prior expiry date of the permit. E.g. BM0790470 – Sahudullah expired on 15.07.2019 but renewal initiated on 12.07.2019.</p>
Corrections:	<ol style="list-style-type: none"> 1. Immediate renewal of expired worker’s permit & report to police for absconded workers 2. Reimbursement of unpaid wages 3. Immediate renewal of expired worker’s permit & report to police for absconded workers
Root Cause Analysis:	<ol style="list-style-type: none"> 1. No thorough monitoring of passport/work permit expiry for contractors’ workers by management & newly joined workers’ permit was delayed due to awaiting FOMEMA results 2. Manual pay-slip used as secondary document to show actual payment 3. No thorough monitoring of passport/work permit expiry for contractors’ workers by management & newly joined workers’ permit
Corrective Actions:	<ol style="list-style-type: none"> 1. Implementation of monitoring through table & pigeon hole of passport & work permit expiry date 2. Use and issuance of single computerized system payslip to workers 3. Implementation of monitoring through table & pigeon hole of passport & work permit expiry date
Assessment Conclusion:	<p>The submitted CAP detailing on proposed actions to be taken to address the nonconformity based on the root cause determined were being reviewed by auditors deemed to be appropriate. Thus, the evidence of effectiveness of CAP will be verify during next coming surveillance assessment.</p>

Summary of Total Number of Nonconformity			
Nonconformity			
NCR Ref #	1817083-201908-N4	Clause & Category (Major / Minor)	Indicator 6.5.3 Minor
Date Issued	30/8/2019	Due Date	29/8/2021

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Closed (Yes / No)	Yes	Date of nonconformity Closure	Open
Statement of Nonconformity:	<p>1. No approval letter obtained from the local authority (JTK) for the use of alternative source of water (tube well) to the housing area for Kulai Young Estate, in accordance with AKTA STANDARD-STANDARD MINIMUM PERUMAHAN DAN KEUDAHAN PEKERJA, 1990, Akta 446, BAHAGIAN II, PERUMAHAN DAN KEMUDAHAN-KEMUDAHAN LAIN, Seksyen 6. Bekalan air dan elektrik dan penyenggaraan rumah-rumah, Para 1 (a)</p> <p>2. Water supplied to the Kulai Young Estate’s workers housing found not clean as at time of audit; although there is water filter system installed below the reservoir/tank and water pump. Line-site inspection and workers interview onsite states that the water supplied is not clean and only used for cleaning purposes. According to the estate management, the water quality has deteriorated recently.</p> <p>3. Line-site inspection was found inconsistently being carried out at Kulai Young Estate, based on AKTA STANDARD-STANDARD MINIMUM PERUMAHAN DAN KEUDAHAN PEKERJA, 1990, Akta 446, BAHAGIAN III, KESIHATAN, HOSPITAL, RAWATAN PERUBATAN DAN KEBERSIHAN, Seksyen 23. Pemeriksaan mingguan ke atas perumahan pekerja, Para 2 & 3</p>		
Requirement Reference:	<p>Growers and millers shall provide adequate housing, water supplies, medical, educational and welfare amenities to national standards or above, where no such public facilities are available or accessible.</p>		
Objective Evidence:	<p>1. All housing provided to estate workers are supplied with adequate water supply from natural resources – underground / tubed well. However, no written approval from the local authority is obtained for such arrangement.</p> <p>2. Line site visit observed that the underground water extracted thru tubed well are channelled to the filtration system before it is pumped to each houses in the estate. As at time of audit, the filtration system was found not effective as water supplied to the houses are not clean. Worker interview confirmed that the supplied water is not edible except for cleaning purposes.</p> <p>3. Line-site inspection report is documented in “Line Site Inspection Log book”. Sighted last inspection is carried out by Hospital Assistant – Mr. Zayuri Mohd Noor on 18.04.2019.</p>		
Corrections:	<p>1. To submit application to JTK</p> <p>2. To conduct water treatment as per procedure</p> <p>3. To conduct weekly inspection by appointed person in-charge</p>		
Root Cause Analysis:	<p>1. Submission not made since the estate applied for public water supply</p> <p>2. Water sampling analysis was done in-house only</p> <p>3. Estate Hospital Assistant (EHA) was resigned since April 2019</p>		
Corrective Actions:	<p>1.To follow-up with SAJ on application to get public water supply</p> <p>2. To conduct external sampling analysis and Health Department sampling</p> <p>3. To recruit new EHA</p>		
Assessment Conclusion:	<p>The submitted CAP detailing on proposed actions to be taken to address the nonconformity based on the root cause determined were being reviewed by auditors deemed to be appropriate. Thus, the evidence of effectiveness of CAP will be verify during next coming surveillance assessment.</p>		

Summary of Total Number of Nonconformity			
Nonconformity			
NCR Ref #	1817083-201908-N5	Clause & Category	Indicator 6.12.2

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		(Major / Minor)	Minor
Date Issued	30/8/2019	Due Date	29/8/2021
Closed (Yes / No)	Yes	Date of nonconformity Closure	Open
Statement of Nonconformity:	Substitution of contract sighted for sampled migrant workers used at the estates. The labour contractors used by the estate management uses Boustead's migrant workers quota to employ and supply migrant workers in estate works.		
Requirement Reference:	Where applicable, it shall be demonstrated that no contract substitution has occurred.		
Objective Evidence:	<p>Migrant workers holding Boustead work permit is managed by labour contractors; who will be disbursing / paying the migrant workers monthly salary based on the rate as agreed between the labour contractor and migrant workers, manages their day to day works and deployment to the estates.</p> <p>Employment contract sighted at estate; i.e. signed between worker and Boustead. Kulai Young Estate Passport B5782219 / Indonesia Passport B2901610 / Indonesia Passport B3624666 / Indonesia Passport B9251523 / Indonesia Passport B5783196 / Indonesia Passport B5793761 / Indonesia Passport B3629153 / Indonesia Passport B7654594 / Indonesia Chamek Estate Passport C2490376 / Indonesia Passport C0695112 / Indonesia Passport C1960362 / Indonesia Passport AU227579 / Indonesia Passport P3030018 / India Passport M2638018 / India Passport S8021633 / India</p> <p>Generally, there is substitution of contract sighted for all migrant workers used at the estates. Interview with labour contractors states that:- - They are taking charge of the migrant workers task and assigning their daily job deployment, including deployment to other estate if necessary. - Receiving worked payment from Boustead estate management - Paying monthly salary / wage to all migrant workers on every 7th of the month in cash. - Issuing pay-slip to all migrant workers once their salary is paid. - Had an agreement / contract sign with migrant workers; and knows that there is a contract signed between workers and Boustead. - Used Boustead migrant workers quota since they have limited quota on hiring migrant workers.</p> <p>Sighted there is inconsistent pay-slip received by the migrant worker from labour contractor against copy of pay-slip furnished to the Kulai Young estate management. E.g. as below.</p> <p>Slip presented for review Payslip received by migrant worker Income (RM) Deduction (RM) Income (RM) Deduction (RM) 95A 733.95 Advance 150.00 95A 399.15 Advance 0 95C 629.40 95C 602.40 Elec 25.50 96A 201.00 96A 411.60 Shop Debt 297.80 97A 1,157.76 97A 1,253.76 Unripe FFB 5.00 Allow 100.00 Kong 35.00 SGP 200.00 Allow 100.00</p>		

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	SGP 200.00 Total 3,022.11 Total 150.00 Total 3,001.91 Total 323.30
Corrections:	- Include contract workers in checkroll system - Immediate stop unauthorized deduction in payslip
Root Cause Analysis:	- No specific employment contract agreement template forms use before - Manual pay-slip used as secondary document to show actual payment
Corrective Actions:	- Use of single employment contract agreement - Use and issuance of single computerized system payslip to workers
Assessment Conclusion:	The submitted CAP detailing on proposed actions to be taken to address the nonconformity based on the root cause determined were being reviewed by auditors deemed to be appropriate. Thus, the evidence of effectiveness of CAP will be verify during next coming surveillance assessment.

Opportunity for Improvements	
OFI #	Description
OFI 1	Nil

Positive Findings	
PF #	Description
PF 1	Nil

3.4.1 Status of Nonconformities Previously Identified and Observations

Not applicable as this is initial assessment.

Summary of Total Number of Nonconformity			
Nonconformity			
NCR Ref #	N/A	Clause & Category (Major / Minor)	N/A
Closed (Yes / No)	N/A	Date of nonconformity Closure	N/A
Statement of Nonconformity:	N/A		
Requirement Reference:	N/A		
Objective Evidence:	N/A		
Corrective Actions:	N/A		
Assessment Conclusion:	N/A		

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Opportunity for Improvements	
OFI #	Description
OFI 1	N/A

3.4.2 Summary of the Nonconformities and Status

CAR Ref.	Category (Major / Minor)	P&C Indicator	Issued Date	Status & Date (Closure)
1817083-201908-M1	Major	5.2.2	30/8/2019	14/8/2020
1817083-201908-M2	Major	6.1.3	30/8/2019	14/8/2020
1817083-201908-M3	Major	2.1.1	30/8/2019	14/8/2020
1817083-201908-M4	Major	SCCS 5.3.2	30/8/2019	14/8/2020
1817083-201908-M5	Major	SCCS 5.5.1	30/8/2019	14/8/2020
1817083-201908-M6	Major	SCCS 5.8.1	30/8/2019	14/8/2020
1817083-201908-M7	Major	SCCS 5.13.1	30/8/2019	14/8/2020
1817083-201908-N1	Minor	5.3.3	30/8/2019	Open
1817083-201908-N2	Minor	1.3.1	30/8/2019	Open
1817083-201908-N3	Minor	2.1.3	30/8/2019	Open
1817083-201908-N4	Minor	6.5.3	30/8/2019	Open
1817083-201908-N5	Minor	6.12.2	30/8/2019	Open

3.5. Stakeholders Consultation

Stakeholder consultation involved internal and external stakeholders. External stakeholders were contacted via email and telephone to arrange meetings at a location convenient to them to discuss Telok Sengat Business Unit’s environmental and social performance, legal and any known dispute issues.

Meetings were conducted with stakeholders to seek their views on the performance of the company with respect to the RSPO 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 later was verified with the management team. Any comment which is not complying to the RSPO P&C requirements have been incorporated as an assessment finding.

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 below.

List of Stakeholders Contacted	
<p>Internal Stakeholders</p> <p>Mill & Estate managers & asst. managers Supervisors, Staff & Clerks Mill local & foreign workers (process, workshop, etc.) Estate local & foreign workers (harvesters, sprayers, etc.) Local workers representatives Foreign workers representatives Gender committee representative Crèche minder</p>	<p>Union/Contractors/Local Communities</p> <p>Village (Kampung Johor Lama & Kampung Chamek) representatives Grocery Shop/Canteen Operator Smallholders (Independent FFB Supplier) Vendors Transporters Suppliers Contractors</p>
<p>Government Departments</p> <p>SK Telok Sengat representatives SA Telok Sengat representatives SJKC Nan Ya representatives SJKT Telok Sengat Estate representatives Klinik Desa Telok Sengat representatives DOSH/DOE/JTK/Forestry/Wildlife (via stakeholder consultation email dated 24/8/2019 – no feedback)</p>	<p>NGO</p> <p>Tenaganita/Wetlands/WWF/Amnesty/SAM (via stakeholder consultation email dated 24/8/2019 – no feedback)</p>


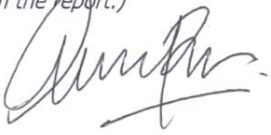
IS #	Description
1	<p>Issues: Schools representatives: Having good relationship with company’s management whom always involved and contributed in school programs</p> <p>Management Responses: Positive comments noted.</p> <p>Audit Team Findings: No further issue.</p>
2	<p>Issues: Village representatives: Boustead offered opportunity of employment among local villagers and being helpful in allowing villagers to access estate area to go to village</p> <p>Managements Responses: Positive comments noted.</p> <p>Audit Team Findings: No further issue.</p>
3	<p>Feedbacks: Small grower – No issue with estates. Boustead estate management responsive to any request made. E.g. seeking permission to use estate route. Access to old Indian temple in the estate is not being restricted. No signs of disagreement between workers, contractors and management as at current. Received invitation for stakeholder meeting regularly but not being able to attend due to tightness in own estate activities.</p> <p>Management Responses: Open to all suggestion and will continue to assist small growers nearby the estate area should there a need.</p> <p>Audit Team Findings: No further issue.</p>
4	<p>Feedbacks: Estate sundry shop owner – Operating the shop since his father’s generation. Aware of how complaint can be made with the estate management and all inquiry made is responded promptly by the estate</p>

	<p>management. Received stakeholder meeting invitation from estate management; and participated the meeting. Observed workers of the estates can move freely without being restricted and may choose to purchase their daily food supplied in the shop or externally.</p>
	<p>Management Responses: The management will continue to support the shop owner and open to any complaint and suggestion if any.</p>
	<p>Audit Team Findings: No further issue.</p>
<p>5</p>	<p>Issues: Mill & estate contractors & vendors – all long-time serving Boustead for more than 10 years. No issue in business dealing.</p>
	<p>Management Responses: Positive comment noted.</p>
	<p>Audit Team Findings: No further issue.</p>

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Formal Signing-off of Assessment Conclusion and Recommendation

The audit objectives have been achieved and the certificate scope remains appropriate. Based on the results of this audit, it is concluded that Telok Sengat Business Unit has complied with the RSPO P&C MY-NI 2014 & RSPO Supply Chain Certification Standard (June 2017) and audit criteria identified within the audit report. It is deemed that the management system continues to achieve its intended outcomes. Therefore, it is recommended that the certification of Telok Sengat Business Unit is approved.

Report prepared by	Acceptance of Assessment Conclusion
Name: Hafriazhar Mohd Mokhtar	Name: AMRUL NIZAM B ABDUL GHANI
Company Name: BSI Services Malaysia Sdn Bhd	Company Name: BOUSTEAD PLANTATIONS BERHAD
Title: Lead Auditor	Title: SUSTAINABILITY /SAFETY
Signature: 	Signature: (I the undersigned, being the most senior relevant management representative of the operation seeking or holding certification, agree with the contents of this report and accept the liability in execution of the procedure in the report.) 
Date: 21/8/2020	Date: 25/8/2020

Appendix A: Summary of Findings

Criterion / Indicator		Assessment Findings	Compliance
Principle 1: Commitment to Transparency			
Criterion 1.1: Growers and millers provide adequate information to relevant stakeholders on environmental, social and legal issues relevant to RSPO Criteria, in appropriate languages and forms to allow for effective participation in decision making.			
1.1.1	There shall be evidence that growers and millers provide adequate information on (environmental, social and/or legal) issues relevant to RSPO Criteria to relevant stakeholders for effective participation in decision making. - Minor compliance -	There was a Sustainability Management Program 2019 established at each site implemented as training and briefing session to all workers by management and HQ sustainability team which also includes the Environmental Responsibility & Biodiversity topics. Records shown latest session was conducted on 18/6/2019 for all mill and estates workers including staff and management by the HQ sustainability team. Another training on RSPO was also conducted on 29/7/2019.	Complied
1.1.2	Records of requests for information and responses shall be maintained. -Major compliance	Records of request made by Department of Environment (DOE) Johor shown TSPOM has been charged and compounded by DOE on the non-compliance towards license requirements (Compound no. K05716 dated 26/6/2019) which was committed on the same date during enforcement officer visit due to issue in handling of scheduled waste. Adequate response made by TSPOM by taking action to comply with the issue and paid the compound accordingly.	Complied
Criterion 1.2: Management documents are publicly available, except where this is prevented by commercial confidentiality or where disclosure of information would result in negative environmental or social outcomes.			

Criterion / Indicator	Assessment Findings	Compliance
<p>1.2.1 Publicly available documents shall include, but are not necessary limited to:</p> <ul style="list-style-type: none"> • Land titles/user rights (Criterion 2.2); • Occupational health and safety plans (Criterion 4.7); • Plans and impact assessments relating to environmental and social impacts (Criteria 5.1, 6.1, 7.1 and 7.8); • HCV documentation (Criteria 5.2 and 7.3); • Pollution prevention and reduction plans (Criterion 5.6); • Details of complaints and grievances (Criterion 6.3); • Negotiation procedures (Criterion 6.4); • Continual improvement plans (Criterion 8.1); • Public summary of certification assessment report; • Human Rights Policy (Criterion 6.13). <p>- Major compliance –</p>	<p>Boustead Plantations Berhad ensured that the public documents that will not impinge on confidentiality and will not cause detrimental sustainability or social outcomes. Sample of the documents that were made available for viewing were as following:</p> <ul style="list-style-type: none"> • Land title (held as hard copy by the property department) • Health and safety plan • Plans and impact assessment- environmental & social • Pollution prevention plans • Details of complaints and grievances • Negotiation procedures • Continuous improvement plan • Biodiversity plans • Policy documents <p>In addition to the website, the policies were also displayed at various locations at the operating units including the main notice boards of the estates, mill offices and muster ground notice boards for employees and visitors to view.</p> <p>Documents sighted amongst all as per sample as following:</p> <ul style="list-style-type: none"> - Kulai Young Estate: MPOB license # 616050002000; Date: 14/11/2018; Validity: 1/1/2019 – 31/12/2019 licensed for premise # Lot 3564, PTD 109021, 109026, 109033, 109034 Mukim Kulai Johor - Telok Sengat Mill: DOE license # 002340; Validity period: 1/7/2019 – 30/6/2020; Process capacity: 40mt; Final discharge: Water Course; BOD limit 20mg/l & MPOB license # 500089304000; Date: 24/6/2019; Validity: 1/9/2019 – 31/8/2020 	<p>Complied</p>
<p>Criteria 1.3: Growers and millers commit to ethical conduct in all business operations and transactions.</p>		

Criterion / Indicator	Assessment Findings	Compliance
<p>1.3.1</p> <p>There shall be a written policy committing to a code of ethical conduct and integrity in all operations and transactions, which shall be documented and communicated to all levels of the workforce and operations.</p> <p>-Minor compliance</p>	<p>Policies were communicated frequently through direct meeting such as conducted on 2/1/2019 by the Manager of Telok Sengat POM and on 8/11/2018 in Telok Sengat Estate. Seen the training attendance list where all the workers from different stations were participated in the training, photo evident and training materials. Besides, the policy was publicly displayed at the notice board outside the office.</p> <p>Code of Ethics & Conduct handbook (Section 4.9 – General Conduct) where the company was committed to maintain the highest standards of integrity and professionalism in its business dealings. The company will ensure they do business in a transparent, appropriate and fair manner. There were 6 principles that all the employees must observe in the Code of Conduct as below:</p> <ol style="list-style-type: none"> 1) To avoid conflict of interest. 2) To avoid misuse of position. 3) To prevent misuse of information gained through the Group’s operation, either for personal gain or for any purpose other than that intended by the Group. 4) To ensure confidentiality of information, communication and transactions conducted by the Group. 5) To ensure transparency and justice. 6) To create a respectful workplace environment and culture. <p>However, the Code of Ethics and Conduct handbook is only made available to the manager levels. No objective evidence sighted that the code of ethical conduct and integrity is communicated to all levels of workforce and operations. Hence, a Minor NC has been raised on the matter.</p>	<p>Minor NC</p>
<p>Principle 2: Compliance with applicable laws and regulations</p>		
<p>Criterion 2.1: There is compliance with all applicable local, national and ratified international laws and regulations.</p>		

<p>2.1.1</p>	<p>Evidence of compliance with relevant legal requirements shall be available. - Major compliance -</p>	<p>The list of permit and license required for the operations of the mill and estate were sighted. The sample of permit and license:</p> <p>Kulai Young Estate</p> <ol style="list-style-type: none"> 1. MPOB License: 616050002000 valid until 31/12/2019 2. Permit for "Barang Kawalan Berjadual" for diesel was submitted for renewal process and the permit yet to be received by the management. 3. CF for air receiver, #JH PMT 15121 expired 17/12/19 <p>Telok Sengat POM</p> <ol style="list-style-type: none"> 1. MPOB License: 500089304000 valid until 31/8/2020 2. Diesel permit #J/KTG000079 for 18,500Ltr, valid until 15/6/2020 3. Permit to purchase, store and use of sodium hydroxide #004477 valid until 31/12/2019 4. Permit for energy commission #29449 valid until 19/5/2019. The renewal was submitted and accepted by the authority, however the license yet to be received. 5. All CF for machineries found valid eg: JH PMA 6811, JH PMD 382, JH PMT 11494 valid until 4/7/2020. 6. CePPOME #CePPOME/197400 valid until 28/4/2020 7. CePSWaM #CePSWaM/196232 valid until 4/2/2020 8. Authorized Gas Tester #NW-NJHR-AGT-R-0276-Q 9. Electrical chageman #PJ-T-3-H-2332-2000 (Grade A4-1) 10. Engine Driver #J266/06 (Grade 1) 11. Engine Driver #JH/14/EIS/02/18 (Grade 2) 12. Grader #MPOB-RE-TRAINING-SE-02-2016 <p>Chamek Estate</p> <ol style="list-style-type: none"> 1. MPOB License: 613906002000 valid until 31/7/2020 2. Permit Barang Kawalan Berjadual: P:J/KLU000029 for diesel (7,280 Ltr) valid until 23/2/2020 	<p>Major NC</p>
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		<p>Telok Sengat Estate</p> <ol style="list-style-type: none"> 1. MPOB License:615231002000 valid until 30/9/2010 2. Permit Barang Kawalan Berjadual: P:J/KTG 000073 for diesel (10,000 Ltr) valid until 19/5/2020 3. CF for air receiver, #JH PMT 17734 expired 8/8/2020 <p>However, there were evidence of noncompliance with relevant legal requirements as following:</p> <ol style="list-style-type: none"> 1. Kulai Young Estate <p>2 selected foreign workers found with details as below. i.e.</p> <ul style="list-style-type: none"> - expired work permit (Passport B3629153 / Indonesia, Work Permit: PE7149696, Valid up to: 19.07.2019); and, - absconded migrant worker not being made informed to the local authority according to "Immigration Department – Recruitment Terms and Condition of Foreign Workers"; ref: https://www.imi.gov.my/index.php/en/foreign-worker.html - (Passport AS575396 / Indonesia (Passport Expired on 10.03.2019), Work Permit: PD8711809, Valid up to: 04.08.2018) <p>Chamek Estate</p> <p>3 foreign worker / India nationality found without work permit. VDR (Permohonan Visa Dengan Rujukan) Application letter issued by the Immigration Department evidenced that the 3 affected workers are newly hired and in progress of permit application. Immigration Letter Ref. BPA/FWCMS/JFBE1036151814 & BPA/FWCMS/JFBE1105191702 dated 01.07.2019 clause 2.3 requires the new migrant workers to undergo medical check (FOMEMA) latest 3 days upon arrival. However, the medical check conducted on 24.08.2019 although their arrival is on 09.08.2019.</p> <p>Telok Sengat Estate – 2 selected Bangladesh worker work permit found expired on 21.11.2018; permit renewal initiated on 08.11.2018 through government agency – MyEG Services Bhd; however no permit issued despite several follow up carried out with MyEG. i.e.</p>	
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		<p>- Passport BM0790470 / Bangladesh, work permit PE1344608, Valid up to: 15.07.2019, Special Pass obtained: J18K97MBBB1G expired on 19.08.2019. - Pasport BQ0285988 / Bangladesh, work permit PD9644910, Valid up to: 21.11.2018.</p> <p>2. Sighted 3 months selected record (payslip and punch card attendance record) confirmed that Workers in Telok Sengat POM found working more than 12 hours per day June 2019 Emp. No.: 0694A – 01 day, 23 hours per day Emp. No.: 0665I – 05 days, averagely 14~22 hours / day Emp. No.: 1042C – 03 days, averagely 13~16 hours / day Emp. No.: 0294G – 05 days, averagely 13~16 hours / day Emp. No.: 0550J – 02 days, averagely 14~15 hours / day Emp. No. 1042C – 03 days, averagely 13~24 hours / day July 2019 Emp. No. 055J – 04 days; averagely 13~15 hours / day Emp. No. 0665I – 11 days; averagely 16~24 hours / day Emp. No. 1045D – 05 days; averagely 13~15 hours / day Emp. No. 0694A – 09 days, averagely 14~24 hours / day Dec 2018 Emp. No.1045D – 02 days, averagely 13~15 hours / day Emp. No.0550J – 03 days, averagely 15~23 hours / day Emp. No. 0665I – 12 days, averagely 13~23 hours / day Emp. No. 0363B – 10 days, averagely 13~16 hours / day</p> <p>3. Telok Sengat POM - 3 randomly selected month pay-slip, punch cards and Checkroll Advance & Overtime Underpaid record sighted with detail as below. Dec 2018 - Emp. No. 0665I – 121 overtime hours June 2019 - Emp. No. 0694A – 122 overtime hours July 2019 - Emp. No. 0665I – 134 overtime hours</p> <p>4. Telok Sengat POM – Overtime wages are paid in 2 payment cycle, i.e. (a) on the 7th day of the last day of the wage period including maximum 104</p>	
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		<p>hours of overtime wage & (b) the balance of overtime wage (which exceed 104 hours) paid on 15th day of the last day of the wage period along with Checkroll advance. Pay-slip furnished to workers were found indicating 104 hours of overtime instead of actual overtime hours worked during the month. Sighted the amount of overtime wage paid on 15th appeared in pay-slip as Income - 'overtime underpaid', at the same time in Deduction - 'overtime payment' since the overtime wage is collected on 15th.</p> <p>5. SOCSO Contribution Form 8A sighted; no SOCSO contribution made by the employer for migrant workers. Sampled migrant workers as listed below. Kulai Young Estate; Khairul Wadi, Sulistyowati, Abdul Hamid, Muhd Hudri Chamek Estate; Asippudin, Jum, Tarzan, Mohammad Amin, Bambang Puwanto, Upriadi, Zikri Hakim, Saepul Bahri. Telok Sengat Estate; Anisa Kamal, Amaq Mudahan, Darmaji Bin Amak Badrun; Padil</p> <p>6. Kulai Young Estate & Chamek Estate Foreign workers payslip sighted there are deduction made for electricity charges and sundry shop debt without prior approval obtained from the labour office. E.g. Kulai Young Estate Harvester – Abdul Hakim; June 2019 payslip, deduction made on electricity amounting MYR25.50 and sundry shop debt amounting MYR297.80. Chamek Estate Harvester – PMH contractor - Darmono and 5 other workers (group wages); payslip for month of July 2019, deduction made on electricity amounting MYR139.45 and water bill of MYR140.80 & MYR153.60. (the amount for water bill authorized by labour office is Maximum MYR30 only) LKB contractor's worker – payslip for month of June 2019, deduction made on 'other' amounting MYR237.00.</p> <p>7. Migrant workers passports found kept by Boustead management at Chamek Estate, Kulai Young Estate and Telok Sengat Estate. As at time of</p>	
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Criterion / Indicator		Assessment Findings	Compliance
		<p>audit, passports of the migrant workers found kept at the Chief Clerk’s desk drawer at Kulai Young Estate; fire proof safe in the Chamek Estate Manager room and Safe Cabinet at Telok Sengat Estate. Migrant worker interview states that they have no access to their passport. No letter of consent, procedure of passport safe-keeping and effective withdrawal passport mechanism / process is established to evidence that passport retention is meant for safe-keeping purposes.</p> <p>Hence, a Major NC has been raised on the matter.</p>	
2.1.2	<p>A documented system, which includes written information on legal requirements, shall be maintained.</p> <p>- Minor compliance -</p>	<p>LORR was established to cover all legal acts, regulations and other requirement related to POM and supply base. The sample of Act and Legal:</p> <ol style="list-style-type: none"> 1. Minimum Wages Order 2018 2. Sabah Labour Ordinance 1950 3. OSHA 1994 4. FMA 1967 5. Uniform Building By Law 1984 6. Pesticide Act 1974 7. Electrical Supply (Amendment) Act 2015 8. Fire Services Act 9. Environmental Quality Act 10. Local Government Act 11. Code of Practise For Safe Working In a Confined Space, 2010 <p>Last evaluation was conducted on 15/7/2019</p>	Complied

<p>2.1.3</p>	<p>A mechanism for ensuring compliance shall be implemented. - Minor compliance -</p>	<p>The mechanism for ensuring compliance was done through evaluation of compliance. The last evaluation of compliance was done on 15/7/2019.</p> <p>However, based on Contractor interview, it is agreed that all task assigned by the Boustead Estate shall be completed with adequate workforce deployed. All migrant workers with Boustead work permit will be prioritized in job scheduling in the estate and should there be any shortage of workforce, the labour contractor will deploy other harvester / workers to complete the task assigned to them by the estate management. However, the estate management does not have a mechanism for ensuring all workers supplied by the workforce contractor are carrying a valid work permit, category of industry, passport validity and only deploying worker that registered with Boustead. Issues found e.g.</p> <ul style="list-style-type: none"> - Sighted, 2 out of 3 randomly selected migrant workers at the Chamek Estate housing tenant found not in the employee list furnished to the auditor as at time of audit. Labour contractor interview states that there are 9 migrant workers under Perusahaan Mewah Hijau (PWH) and 5 migrant workers under Lokman Khalid Baba Resources (LKB). Employee List furnished to auditor has 8 migrant workers under PMH and 5 under LKB. - 1 out of the 3 migrant worker at Chamek Estate is holding work permit, neither belongs to Boustead Estate Agency Sdn Bhd nor labour contractor's permit (Perusahaan Mewah Hijau). i.e. EPA Management Sdn Bhd, Ulu Tiram. <p>2. Kulai Young Estate management provided with copy of payslip from labour contractor as evidence of monthly wage paid. Sighted copy of the payslip not consistent and accurate against the actual payslip received by the migrant workers. Amount of wages earned based on piece rates and amount of deductions appeared in both payslip found not tallied.</p> <p>Slip presented for review Payslip received by migrant worker</p> <table border="0"> <tr> <td>Income</td> <td>Deduction</td> <td>Income</td> <td>Deduction</td> </tr> <tr> <td>95A 733.95</td> <td>Advance 150.00</td> <td>95A 399.15</td> <td>Advance 0</td> </tr> <tr> <td>95C 629.40</td> <td>95C 602.40</td> <td>Elec 25.50</td> <td></td> </tr> <tr> <td>96A 201.00</td> <td>96A 411.60</td> <td>Shop Debt 297.80</td> <td></td> </tr> </table>	Income	Deduction	Income	Deduction	95A 733.95	Advance 150.00	95A 399.15	Advance 0	95C 629.40	95C 602.40	Elec 25.50		96A 201.00	96A 411.60	Shop Debt 297.80		<p>Minor NC</p>
Income	Deduction	Income	Deduction																
95A 733.95	Advance 150.00	95A 399.15	Advance 0																
95C 629.40	95C 602.40	Elec 25.50																	
96A 201.00	96A 411.60	Shop Debt 297.80																	

		<p>97A 1157.76 97A 1253.76 Unripe 5.00 Allow 100.00 Kong 35.00 SGP 200.00 Allow 100.00 SGP 200.00 Total 3022.11 Total 150 Total 3001.91 Total 323.30</p> <p>Chamek Estate management received copies of payslip paid to the workers by PMH contractor as evidence of wages paid respectively. 1 randomly selected migrant worker occupied 1 of the housing in Chamek Estate found attached to PMH contractor, work as harvester but not found in the employee list furnished by the Chamek Estate. The payslip furnished by the selected worker found to be in hand-written detailing information of harvested fruit, amount of pay and deduction of water and electricity bill. As estate management has no pay record for the affected worker, verification of the payslip against other harvester payslip available found not consistent.</p> <p>3. Approx. 47 migrant workers passport found expired (averagely since 15.07.2019). Sighted renewal receipt and invoice issued by government agency – MYEG Services Bhd done several weeks prior expiry date of the permit. E.g. BM0790470 – Sahudullah expired on 15.07.2019 but renewal initiated on 12.07.2019.</p> <p>Therefore, no mechanism in place to ensure deployment of contract migrant workers by the labour contractor to the estate carries a legal work permit; to prevent violation of Employment (Restriction) Act 1968, (Act 353), Part II – Restriction of Employment of Person Not being Citizens of Malaysia, Section 5 – Restrictions of Employment of Non-Citizens, Subsection (1)(a) and Immigration Act 155, Section 6 – Control of Entry into Malaysia</p> <p>2. No mechanism in place to maintain and monitor accuracy of wages paid to migrant workers by the labour contractor, based on the information furnished by the labour contractors. E.g. payslip; to prevent violation of Employment Regulation 1957, Section 9 Employer to furnish particulars under regulation 5 (c).</p>	
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Criterion / Indicator		Assessment Findings	Compliance
		<p>3. No adequate mechanism in place to monitor and ensuring the migrant worker work permit remain valid at all time by initiating renewal of work permit with sufficient period of time prior to the expiry date of the permit; to prevent violation of Employment (Restriction) Act 1968, (Act 353), Part II – Restriction of Employment of Person Not being Citizens of Malaysia, Section 5 – Restrictions of Employment of Non-Citizens, Subsection (1)(a) and Immigration Act 155, Section 6 – Control of Entry into Malaysia.</p> <p>Hence, a Minor NC has been raised on the matter.</p>	
2.1.4	<p>A system for tracking any changes in the law shall be implemented.</p> <p>- Minor compliance -</p>	<p>Tracking system available to identify changes in the relevant regulations through head office, sustainability team, website information and the information are communicated from the Head Office (Sustainability Section). Boustead Plantations Berhad have centralised system for tracking any changes in the law and subscribe into Lawnet. The latest communication was done on 15/7/2019 regarding OSH (Noise Exposure) Regulations 2019.</p>	Complied
<p>Criterion 2.2: The right to use the land is demonstrated, and is not legitimately contested by local people who can demonstrate that they have legal, customary or user rights.</p>			

<p>2.2.1</p>	<p>Documents showing legal ownership or lease, history of land tenure and the actual legal use of the land shall be available. - Major compliance -</p>	<p>Documents showing legal ownership available as per sample sighted at respective estate.</p> <p>Kulai Young Estate hold 5 land titles as following:</p> <ol style="list-style-type: none"> 1. Provisional Ownership (Form 11AK) # HSD 64797; Lot # PTD 109034; Area: 0.05ha; Registered date: 15/3/2016 (Freehold) 2. Provisional Ownership (Form 11AK) # HSD 64784; Lot # PTD 109021; Area: 0.19ha; Registered date: 15/3/2016 (Freehold) 3. Grant (Form 5BK) # 229629; Lot # 3564; Area: 103.3465ha; Registered date: 2/1/2016 (Freehold) 4. Provisional Ownership (Form 11AK) # HSD 64789; Lot # PTD 109026; Area: 0.28ha; Registered date: 15/3/2016 (Freehold) 5. Provisional Ownership (Form 11AK) # HSD 64796; Lot # PTD 109033; Area: 562.33ha; Registered date: 15/3/2016 (Freehold) <p>Chamek Estate hold 5 land titles as following:</p> <ol style="list-style-type: none"> 1. Grant (Form 5BK) # GRN 96683; Lot # 72; Area: 601.9689ha; Registered date: 11/5/2006 (Freehold) 2. Grant (Form 5BK) # GRN 89011; Lot # 266; Area: 66.1155ha; Registered date: 12/7/2002 (Freehold) 3. Grant (Form 5BK) # GRN 89006; Lot # 132; Area: 53.292ha; Registered date: 18/1/2006 (Freehold) 4. Grant (Form 5BK) # GRN 90629; Lot # 181; Area: 84.731ha; Registered date: 11/5/2006 (Freehold) 5. Grant (Form 5BK) # GRN 90630; Lot # 183; Area: 26.431ha; Registered date: 11/5/2006 (Freehold) <p>Telok Sengat Estate hold 66 land titles as per following samples:</p> <ol style="list-style-type: none"> 1. Grant (Form 5BK) # 83578; Lot # 1357; Area: 499.9891ha; Registered date: 16/7/2002 (Freehold) 2. Grant (Form 5BK) # 83681; Lot # 337; Area: 2.6608ha; Registered date: 21/11/2002 (Freehold) 	<p>Complied</p>
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Criterion / Indicator	Assessment Findings	Compliance
	<p>3. Grant (Form 5BK) # 84186; Lot # 63; Area: 33.9683ha; Registered date: 27/11/2002 (Freehold)</p> <p>4. Grant (Form 5BK) # 86131; Lot # 62; Area: 32.0207ha; Registered date: 24/11/2002 (Freehold)</p> <p>5. Grant (Form 5BK) # 86866; Lot # 230; Area: 5.1876ha; Registered date: 13/9/2006 (Freehold)</p> <p>Supplemental Agreement (Chamek, Kulai Young & Bekoh Estate) between CIMB Trustee Berhad (Landlord) and Boustead Sungai Manar Sdn. Bhd. (Tenant); Date: 5/3/2010 whereby the Landlord has entered into an Ijarah Agreement dated 14/12/2006 with Tenant takes a tenancy of property (as defined in the Ijarah Agreement commencing from 1/1/2007 – 31/12/2009</p>	
<p>2.2.2</p> <p>Legal boundaries shall be clearly demarcated and visibly maintained. - Minor compliance -</p>	<p>Legal boundaries were clearly demarcated and visibly maintained as per sighted as following:</p> <ol style="list-style-type: none"> 1. Site visit to boundary at field PM95A, Kulai Young Estate with Sime Darby Plantations Berhad, Seri Pulai Estate, found that the boundary stone was maintained and peg accordingly. 2. Site visit to boundary at field 05B, Telok Sengat Estate with smallholder, found that the boundary was maintained accordingly. The management constructed the boundary road as the boundary with smallholders. 3. Site visit to boundary at Chamek Estate with smallholders, found that the boundary stone (2° 9' 8" N, 103° 16' 10" E) was maintained and peg accordingly. 	<p>Complied</p>
<p>2.2.3</p> <p>Where there are or have been disputes, additional proof of legal acquisition of title and evidence that fair compensation has been made to previous owners and occupants shall be available, and that these have been accepted with free, prior and informed consent (FPIC). - Minor compliance -</p>	<p>There was no land dispute in the Telok Sengat Certification Unit at the time of audit. The land belongs Boustead Plantation Berhad (except Kulai Young where title of the land carries the bank trustee CIMB) and land ownership documents verified. The surrounding were owned by smallholders and other plantation's companies. There was no encroachment of land by the Telok Sengat Certification Unit.</p>	<p>Complied</p>

Criterion / Indicator		Assessment Findings	Compliance
2.2.4	There shall be an absence of significant land conflict, unless requirements for acceptable conflict resolution processes (see Criteria 6.3 and 6.4) are implemented and accepted by the parties involved. -Major compliance	There was no land dispute in the Telok Sengat Certification Unit at the time of audit. The land belongs Boustead Plantation Berhad (except Kulai Young where title of the land carries the bank trustee CIMB) and land ownership documents verified. The surrounding were owned by smallholders and other plantation’s companies. There was no encroachment of land by the Telok Sengat Certification Unit.	Complied
2.2.5	For any conflict or dispute over the land, the extent of the disputed area shall be mapped out in a participatory way with involvement of affected parties (including neighbouring communities where applicable). -Minor compliance	There was no land dispute in the Telok Sengat Certification Unit at the time of audit. The land belongs Boustead Plantation Berhad (except Kulai Young where title of the land carries the bank trustee CIMB) and land ownership documents verified. The surrounding were owned by smallholders and other plantation’s companies. There was no encroachment of land by the Telok Sengat Certification Unit.	Complied
2.2.6	To avoid escalation of conflict, there shall be no evidence that palm oil operations have instigated violence in maintaining peace and order in their current and planned operations. -Major compliance	There was no land dispute in the Telok Sengat Certification Unit at the time of audit. The land belongs Boustead Plantation Berhad (except Kulai Young where title of the land carries the bank trustee CIMB) and land ownership documents verified. The surrounding were owned by smallholders and other plantation’s companies. There was no encroachment of land by the Telok Sengat Certification Unit.	Complied
Criterion 2.3:			
Use of the land for oil palm does not diminish the legal rights, customary or user right of other users without their free, prior and informed consent.			
2.3.1	Maps of an appropriate scale showing the extent of recognized legal, customary or user rights (Criteria 2.2, 7.5 and 7.6) shall be developed through participatory mapping involving affected parties (including neighbouring communities where applicable, and relevant authorities). - Major compliance -	There was no land dispute in the Telok Sengat Certification Unit at the time of audit. The land belongs Boustead Plantation Berhad (except Kulai Young where title of the land carries the bank trustee CIMB) and land ownership documents verified. The surroundings were owned by smallholders and other plantation’s companies. There was no encroachment of land by the Telok Sengat Certification Unit.	Complied

Criterion / Indicator	Assessment Findings	Compliance
<p>2.3.2 Copies of negotiated agreements detailing the process of free, prior and informed consent (FPIC) (Criteria 2.2, 7.5 and 7.6) shall be available and shall include:</p> <ul style="list-style-type: none"> a) Evidence that a plan has been developed through consultation and discussion with all affected groups in the communities, and that information has been provided to all affected groups, including information on the steps that shall be taken to involve them in decision making; b) Evidence that the company has respected communities' decisions to give or withhold their consent to the operation at the time that this decision was taken; c) Evidence that the legal, economic, environmental and social implications for permitting operations on their land have been understood and accepted by affected communities, including the implications for the legal status of their land at the expiry of the company's title, concession or lease on the land. <p>- Minor compliance -</p>	<p>There was no land dispute in the Telok Sengat Certification Unit at the time of audit. The land belongs Boustead Plantation Berhad (except Kulai Young where title of the land carries the bank trustee CIMB) and land ownership documents verified. The surroundings were owned by smallholders and other plantation's companies. There was no encroachment of land by the Telok Sengat Certification Unit.</p>	<p>Complied</p>
<p>2.3.3 All relevant information shall be available in appropriate forms and languages, including assessments of impacts, proposed benefit sharing, and legal arrangements.</p> <p>-Minor compliance</p>	<p>There was no land dispute in the Telok Sengat Certification Unit at the time of audit. The land belongs Boustead Plantation Berhad (except Kulai Young where title of the land carries the bank trustee CIMB) and land ownership documents verified. The surroundings were owned by smallholders and other plantation's companies. There was no encroachment of land by the Telok Sengat Certification Unit.</p>	<p>Complied</p>

Criterion / Indicator		Assessment Findings	Compliance
2.3.4	Evidence shall be available to show that communities are represented through institutions or representatives of their own choosing, including legal counsel. -Major compliance	There was no land dispute in the Telok Sengat Certification Unit at the time of audit. The land belongs Boustead Plantation Berhad (except Kulai Young where title of the land carries the bank trustee CIMB) and land ownership documents verified. The surroundings were owned by smallholders and other plantation’s companies. There was no encroachment of land by the Telok Sengat Certification Unit.	Complied
Principle 3: Commitment to long-term economic and financial viability			
Criterion 3.1: There is an implemented management plan that aims to achieve long-term economic and financial viability.			
3.1.1	A business or management plan (minimum three years) shall be documented that includes, where appropriate, a business case for scheme smallholders. - Major compliance -	Telok Sengat Business Unit have established and implemented its commitment to long term sustainability and improvements through a capital expenditure program e.g.: Consist of area statement, capital expenditures, vehicle and heavy plan running schedule, upkeep and cultivation, harvesting, nursery, production cost etc. Budget 2019 and Boustead Group of Estate Five (5) Years Planning Horizon (projections 2020- 2024) was verified during the audit. Telok Sengat Business Unit have made progress towards achieving their performance production targets for the current financial year. Major highlights on the budget are the plan to construct new boiler and dust collection system to comply with EQ (Clean Air) Reg. 2014 by the mill and construction of new house by the estate.	Complied

Criterion / Indicator		Assessment Findings			Compliance																																	
3.1.2	An annual replanting programme projected for a minimum of five years (but longer where necessary to reflect the management of fragile soils, see Criterion 4.3), with yearly review, shall be available. - Minor compliance -	<p>The revised replanting program was established which was updated on Nov 18. The replanting programme sighted as follow:</p> <table border="1"> <thead> <tr> <th>Year</th> <th>Ha</th> <th>Remark</th> </tr> </thead> <tbody> <tr> <td>2021</td> <td>128.90</td> <td rowspan="3">Kulai Young Estate</td> </tr> <tr> <td>2022</td> <td>21.50</td> </tr> <tr> <td>2023</td> <td>49.20</td> </tr> <tr> <td>2020</td> <td>42.90</td> <td rowspan="4">Chamek Estate</td> </tr> <tr> <td>2021</td> <td>41.50</td> </tr> <tr> <td>2022</td> <td>74.70</td> </tr> <tr> <td>2023</td> <td>58.00</td> </tr> <tr> <td>2024</td> <td>98.30</td> <td rowspan="5">Telok Sengat Estate</td> </tr> <tr> <td>2019</td> <td>182.70</td> </tr> <tr> <td>2020</td> <td>154.90</td> </tr> <tr> <td>2021</td> <td>190.40</td> </tr> <tr> <td>2022</td> <td>144.90</td> </tr> <tr> <td>2023</td> <td>208.40</td> <td></td> </tr> </tbody> </table>			Year	Ha	Remark	2021	128.90	Kulai Young Estate	2022	21.50	2023	49.20	2020	42.90	Chamek Estate	2021	41.50	2022	74.70	2023	58.00	2024	98.30	Telok Sengat Estate	2019	182.70	2020	154.90	2021	190.40	2022	144.90	2023	208.40		Complied
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Principle 4: Use of appropriate best practices by growers and millers																																						
Criterion 4.1: Operating procedures are appropriately documented, consistently implemented and monitored.																																						

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Criterion / Indicator	Assessment Findings	Compliance
<p>4.1.1 Standard Operating Procedures (SOPs) for estates and mills are documented - Major compliance -</p>	<p>Quality Assurance Manual (QAM, Rev:01, Date:2/11/09), Mill operation Manual (MOM, Issue 2, Date: June 2002) and Standard Operating Procedure for SPOM was established to cover all the station. Sighted some of the procedure related to loading ramp, sterilization station, threshing and press station, clarification station, kernel station, depericarper station, kernel station, effluent treatment plant, boiler house, power house, water treatment plant and etc.</p> <p>Work Instructions have been derived from SOPs and it were displayed at work stations at the mill and at certain locations at the estates, such as the Muster Notice Boards. Eg: WI Sterilizer, WI Boiler, WI Engine room and WI store.</p> <p>Boustead Plantations Bhd has established the agriculture manual (Oil Palm Circular) covers felling and clearing, planting material, weeding, lallang, manuring, pest & disease, census & thinning out, drains, road & bridges, soil/water conservation, boundaries, fences & survey, supplying, pruning, collection (harvesting), external transport and etc.</p> <p>SWP - Safe work procedure including SOP for Reception & dispatch, Fruit Handling, Sterilisation, Threshing, Pressing, Boiuler House, RWT, Workshop, Laboratory, Mill Store, Working at height and Confined Space.</p>	<p>Complied</p>

Criterion / Indicator		Assessment Findings	Compliance
4.1.2	A mechanism to check consistent implementation of procedures shall be in place. - Minor compliance -	Planting Advisory Visit was conducted on 24 – 25 July 2019 (Kulai Young Estate), 19-21/3/2019 (Telok Sengat Estate) and 26-27/7/2019 (Chamek Estate). The PA report was sighted. Group Internal Audit was conducted once a year which was conducted on 8-18/10/2018 to cover the entire sustainability elements and estate operation.	Complied
4.1.3	Records of monitoring and any actions taken shall be maintained and available, as appropriate. - Minor compliance -	All records related to Internal Audit, Visiting Engineering Visit and Estate Plantation Advisory Visit was maintained and available at Mill and Estate Office.	Complied
4.1.4	The mill shall record the origins of all third-party sourced Fresh Fruit Bunches (FFB). - Major compliance -	There was third party sourced supply to Telok Sengat BU. All the records origins of all third party sourced FFB were clearly stated on the weighbridge ticket.	Complied
Criterion 4.2: Practices maintain soil fertility at, or where possible improve soil fertility to, a level that ensures optimal and sustained yield.			

Criterion / Indicator		Assessment Findings	Compliance
4.2.1	<p>There shall be evidence that good agriculture practices, as contained in Standard Operating Procedures (SOPs), are followed to manage soil fertility to a level that ensures optimal and sustained yield, where possible.</p> <p>- Minor compliance -</p>	<p>Boustead Plantations Bhd has established the agriculture manual (Oil Palm Circular) covers felling and clearing, planting material, weeding, manuring, pest & disease, census & thinning out, drains, road & bridges, soil/water conservation, boundaries, fences & survey, supplying, pruning, collection (harvesting), external transport and etc. The related SOP, namely Soil Conservation/Water Management was sighted.</p> <p>All estate operated in accordance with the OPC and standard operating procedures. The practices consistently monitored by estate operation management and PA visit. The recommendations for improvements are given to maintain the sustainable practices.</p>	Complied

<p>4.2.2</p>	<p>Records of fertiliser inputs shall be maintained. - Minor compliance -</p>	<p>Fertilizers were applied as per agronomist recommendation 2019. Record shows application date, filed number, dosage applied per palm, type of fertilizer and number of applicators.</p> <p><u>Kulai Young Estate</u> Fertilizer recommendation dated 15/2/2018 was done by AAR agronomist :</p> <ol style="list-style-type: none"> 1. gAC : 8.71 mt 2. MOP : 8.71 mt 3. NKC1 : 129.38 mt 4. NPK45 : 33.57 mt 5. OPCom32B : 32.38 mt 6. OPCom65B : 95.89 mt <p>The application was completed for application of fertilizer type NPK Com32B, OPCom65B and NPK45.</p> <p><u>Chamek Estate</u> Fertilizer recommendation dated 7/8/2019 (revised) was done by AAR agronomist:</p> <ol style="list-style-type: none"> 1. AABN20 : 57.63 mt 2. BRP : 12.05 mt 3. Fertibor : 0.16 mt 4. gAC : 61.43 mt 5. GML : 10.54 mt 6. KS : 5.77 mt 7. MOP : 57.25 mt 8. NKC1 : 19.38 mt 9. NPK45 : 9.08 mt 10. OPCom65B : 22.59 mt <p>The application was completed for application of fertilizer type AABN20, BRP, Fertibor, Gac,gml, KS and MOP until July 2019.</p>	<p>Complied</p>
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Criterion / Indicator		Assessment Findings	Compliance								
		<p><u>Telok Sengat Estate</u> Fertilizer recommendation dated 19/7/2019 was done by AAR agronomist:</p> <ol style="list-style-type: none"> 1. gAC : 304.66 mt 2. MOP : 135.77 mt 3. AABN20 : 204.41 mt 4. AABNSp : 17.51 mt 5. BRP : 59.82 mt 6. NKA1 : 369.14 mt 7. RP : 172.78 mt 8. UREA : 0.59 mt <p>The application was completed for application of fertilizer type NPK Com32B, OPCom65B and NPK45.</p>									
4.2.3	There shall be evidence of periodic tissue and soil sampling to monitor changes in nutrient status. - Minor compliance -	External Agronomist from Advanced Agriecological Research Sdn Bhd visited estate on 1/2/2018 (Kulai Young Estate), 26/6/2018 (Chamek Estate) and 2-4/8/2018 (Telok Sengat Estate) to carry out foliar sampling prior to the fertilizer recommendation for 2019, Leaf and soil nutrient analysis. It was commonly used in the diagnosis of fertilizer requirements in oil palms. Foliar, soil and fertilizer recommendation report by AAR Sdn Bhd was sighted. Foliar and Soil analysis report were conducted annually by AAR Sdn Bhd.	Complied								
4.2.4	A nutrient recycling strategy shall be in place, and may include use of Empty Fruit Bunches (EFB), Palm Oil Mill Effluent (POME), and palm residues after replanting. - Minor compliance -	<p>EFB application was applied at 40mt/ha. However, no application of EFB at Kulai Young Estate and Chamek Estate.</p> <table border="1"> <thead> <tr> <th>Year</th> <th>Amount</th> <th>Type</th> <th>Remark</th> </tr> </thead> <tbody> <tr> <td>Jan – Aug 19</td> <td>12,271.76</td> <td>EFB</td> <td>Telok Sengat Estate</td> </tr> </tbody> </table>	Year	Amount	Type	Remark	Jan – Aug 19	12,271.76	EFB	Telok Sengat Estate	Complied
Year	Amount	Type	Remark								
Jan – Aug 19	12,271.76	EFB	Telok Sengat Estate								
<p>Criterion 4.3: Practices minimise and control erosion and degradation of soils.</p>											

Criterion / Indicator		Assessment Findings	Compliance																								
4.3.1	Maps of any fragile soils shall be available. - Major compliance -	Soil series map available for all estates visited. No other soil categorised as problematic or fragile soil. Sighted the type of soil available at Telok Sengat BU: <table border="1" data-bbox="969 491 1603 895"> <thead> <tr> <th>No.</th> <th>Type of Soil</th> </tr> </thead> <tbody> <tr><td>1</td><td>Benta</td></tr> <tr><td>2</td><td>Colluvium</td></tr> <tr><td>3</td><td>Gajah Mati</td></tr> <tr><td>4</td><td>Rengam</td></tr> <tr><td>5</td><td>Soil A</td></tr> <tr><td>6</td><td>Holyrood</td></tr> <tr><td>7</td><td>Masai</td></tr> <tr><td>8</td><td>Rasau</td></tr> <tr><td>9</td><td>Rengam</td></tr> <tr><td>10</td><td>Rengam Coarse</td></tr> <tr><td>11</td><td>Tawar</td></tr> </tbody> </table>	No.	Type of Soil	1	Benta	2	Colluvium	3	Gajah Mati	4	Rengam	5	Soil A	6	Holyrood	7	Masai	8	Rasau	9	Rengam	10	Rengam Coarse	11	Tawar	Complied
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4.3.2	A management strategy shall be in place for plantings on slopes above a certain limit (this needs to be soil and climate specific). - Minor compliance -	Boustead Plantations Bhd has established SOP related to planting on slope namely Soil Conservation/Water Management was sighted. All the strategy including soil conservation practices, type of vegetation, ground cover establishment were found implemented accordingly in the field.	Complied																								
4.3.3	A road maintenance programme shall be in place. - Minor compliance -	Estate has implemented annual road and bridges programme. Example of programme checked at all estate shows the file road programme indicating road repairs and maintenance for the whole estate roads includes grading, compacting and to strengthen the road surface. During site visit, found that the road condition was in good condition.	Complied																								
4.3.4	Subsidence of peat soils shall be minimised and monitored. A documented water and ground cover management programme shall be in place. - Minor compliance -	No fragile soil identified in all estates visited.	Complied																								

Criterion / Indicator		Assessment Findings	Compliance
4.3.5	Drainability assessments shall be required prior to replanting on peat to determine the long-term viability of the necessary drainage for oil palm growing. - Minor compliance -	No fragile soil identified in all estates visited.	Complied
4.3.6	A management strategy shall be in place for other fragile and problem soils (e.g. sandy, low organic matter, acid sulphate soils). - Minor compliance -	No fragile soil identified in all estates visited.	Complied
Criterion 4.4: Practices maintain the quality and availability of surface and ground water.			

<p>4.4.1</p>	<p>An implemented water management plan shall be in place. - Minor compliance -</p>	<p>Water Mangement Plan was established to address the following issue: - Riparian buffer zone - Areas where buffer zone not established - Water quality monitoring</p> <p>Action implemented including the following:</p> <table border="1" data-bbox="972 555 1863 1241"> <thead> <tr> <th data-bbox="972 555 1218 587">Issue</th> <th data-bbox="1218 555 1863 587">Action/strategy</th> </tr> </thead> <tbody> <tr> <td data-bbox="972 587 1218 946">Riparian buffer zone</td> <td data-bbox="1218 587 1863 946"> <ul style="list-style-type: none"> - Identify natural waterways in the estates & comply to the JPS guideline on minimum width for river reserve - To mark on the map - To mark all palms around 5m from the river and stream - No chemical interventions and manuring shall be carried out in the riparian reserved except manual weeding or slashing - To place signage awareness - To plant timber tree along buffer zone area </td> </tr> <tr> <td data-bbox="972 946 1218 1074">Areas where buffer zone not established</td> <td data-bbox="1218 946 1863 1074"> <ul style="list-style-type: none"> - To maintain soft grasses - To stack properly cut fronds - To construct terraces and silt-pits where necessary </td> </tr> <tr> <td data-bbox="972 1074 1218 1241">Water quality monitoring</td> <td data-bbox="1218 1074 1863 1241"> <ul style="list-style-type: none"> - To identify river water sampling point for incoming and outgoing - To mark point on the map - To conduct sampling on annual basis and analyze as per WQI requirements </td> </tr> </tbody> </table> <p>Sampled implementation in place including the following monitoring were sighted:</p>	Issue	Action/strategy	Riparian buffer zone	<ul style="list-style-type: none"> - Identify natural waterways in the estates & comply to the JPS guideline on minimum width for river reserve - To mark on the map - To mark all palms around 5m from the river and stream - No chemical interventions and manuring shall be carried out in the riparian reserved except manual weeding or slashing - To place signage awareness - To plant timber tree along buffer zone area 	Areas where buffer zone not established	<ul style="list-style-type: none"> - To maintain soft grasses - To stack properly cut fronds - To construct terraces and silt-pits where necessary 	Water quality monitoring	<ul style="list-style-type: none"> - To identify river water sampling point for incoming and outgoing - To mark point on the map - To conduct sampling on annual basis and analyze as per WQI requirements 	<p>Complied</p>
Issue	Action/strategy										
Riparian buffer zone	<ul style="list-style-type: none"> - Identify natural waterways in the estates & comply to the JPS guideline on minimum width for river reserve - To mark on the map - To mark all palms around 5m from the river and stream - No chemical interventions and manuring shall be carried out in the riparian reserved except manual weeding or slashing - To place signage awareness - To plant timber tree along buffer zone area 										
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Criterion / Indicator	Assessment Findings	Compliance
	POME final discharge sampling analysis results: - Analysis report # MABB 59/19; Sample type: Effluent; Date: 19/01/2019; BOD: 62 mg/L; by FGV Palm Industries Sdn. Bhd. Lab - Analysis report # MABB 57/19; Sample type: River Upstream and Downstream; Date: 19/01/2019; BOD: 4 mg/L (upstream); 4mg/L (downstream); by FGV Palm Industries Sdn. Bhd. Lab	
4.4.2	Protection of water courses and wetlands, including maintaining and restoring appropriate riparian and other buffer zones (refer to national best practice and national guidelines) shall be demonstrated. - Major compliance -	Complied
4.4.3	Appropriate treatment of mill effluent to required levels and regular monitoring of discharge quality, especially Biochemical Oxygen Demand (BOD), shall be in compliance with national regulations (Criteria 2.1 and 5.6). - Minor compliance -	Complied
4.4.4	Mill water use per tonne of Fresh Fruit Bunches (FFB) (see Criterion 5.6) shall be monitored. - Minor compliance -	Complied

Criterion / Indicator		Assessment Findings	Compliance																		
Criterion 4.5: Pests, diseases, weeds and invasive introduced species are effectively managed using appropriate Integrated Pest Management techniques.																					
4.5.1	Implementation of Integrated Pest Management (IPM) plans shall be monitored. - Major compliance -	<p>OPC Related to Pest & Diseases (OPC 04.a, 04.c, 04.f, 04.g) and Integrated Pest Management Action Plan for Telok Sengat Estate, dated 17/8/17 were established to includes the planting of beneficial plants, leaf-eating caterpillars, rhinonoceros beetle and natural enemies. Beneficial plants such as Turnera subulata, Antigonon Leptopus and Cassia Cobanensis are grown in the estates.</p> <p>Records of planting of new areas and maintenance of existing areas of beneficial plants, location maps and barn owl census are available.</p> <table border="1"> <thead> <tr> <th></th> <th>Total</th> <th>Estate</th> </tr> </thead> <tbody> <tr> <td>Beneficial Plant</td> <td>269 plants</td> <td>Kulai Young Estate</td> </tr> <tr> <td>Beneficial Plant</td> <td>120 plants</td> <td>Chamek Estate</td> </tr> </tbody> </table> <p>The occupancy rate for Barn owl box on July 2019.</p> <table border="1"> <thead> <tr> <th></th> <th>Occupancy rate</th> <th>Estate</th> </tr> </thead> <tbody> <tr> <td>Barn owl</td> <td>62%</td> <td>Kulai Young Estate Estate</td> </tr> <tr> <td>Barn owl</td> <td>64%</td> <td>Chamek Estate</td> </tr> </tbody> </table> <p>At Telok Sengat Estate, the census will be conducted accordingly by October 2019 due to the barn owl box newly installed and replaced.</p>		Total	Estate	Beneficial Plant	269 plants	Kulai Young Estate	Beneficial Plant	120 plants	Chamek Estate		Occupancy rate	Estate	Barn owl	62%	Kulai Young Estate Estate	Barn owl	64%	Chamek Estate	Complied
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4.5.2	Training of those involved in IPM implementation shall be demonstrated. - Minor compliance -	<p>Training for those involve with IPM implementation was conducted accordingly. Training records for staff and workers on IPM implementation were available and verified to be satisfactory during on-site assessment.</p> <p># cross refer with indicator 4.8.2</p>	Complied																		
Criterion 4.6: Pesticides are used in ways that do not endanger health or the environment																					

Criterion / Indicator		Assessment Findings	Compliance										
4.6.1	Justification of all pesticides used shall be demonstrated. The use of selective products that are specific to the target pest, weed or disease and which have minimal effect on non-target species shall be used where available. - Major compliance -	Justification of pesticides applied is available in the Oil Palm Circular (Manual). Refer to OPC Weeding (01.c) and Lallang (02.a). The use of pesticide is specific to the target pest, weed and disease. Justification takes consideration to minimize effect on non-target species.	Complied										
4.6.2	Records of pesticides use (including active ingredients used and their LD50, area treated, amount of active ingredients applied per ha and number of applications) shall be provided. - Major compliance -	Records of pesticides and their active ingredients used, LD50, area treated, amount of a.i. applied per ha, and number of applications was maintained as per chemical usage monitoring for 2019. Sampled as follow: <table border="1" data-bbox="969 730 1406 967"> <thead> <tr> <th>Type of chemical</th> <th>a.i/ha</th> </tr> </thead> <tbody> <tr> <td>Amine</td> <td>0.74</td> </tr> <tr> <td>Basta</td> <td>0.83</td> </tr> <tr> <td>Ammo Supre</td> <td>1.38</td> </tr> <tr> <td>BM Glyphosate</td> <td>3.47</td> </tr> </tbody> </table>	Type of chemical	a.i/ha	Amine	0.74	Basta	0.83	Ammo Supre	1.38	BM Glyphosate	3.47	Complied
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4.6.3	Any use of pesticides shall be minimised as part of a plan, and in accordance with Integrated Pest Management (IPM) plans. There shall be no prophylactic use of pesticides, except in specific situations identified in national Best Practice guidelines. - Major compliance -	The quantity of agrochemicals required for various field conditions are documented and justified in Oil Palm Circular (OPC). The implementation in the field is consistent with the manual. There is no prophylactic use of pesticides.	Complied										

Criterion / Indicator		Assessment Findings	Compliance
4.6.4	Pesticides that are categorised as World Health Organisation Class 1A or 1B, or that are listed by the Stockholm or Rotterdam Conventions, and paraquat, are not used, except in specific situations identified in national Best Practice guidelines. The use of such pesticides shall be minimised and eliminated as part of a plan, and shall only be used in exceptional circumstances. - Minor compliance -	Boustead Plantations Bhd has stopped using paraquat for weeding activities. Alternatives such as Glyphosate were used. The implementation in the field is consistent with the OPC.	Complied
4.6.5	Pesticides shall only be handled, used or applied by persons who have completed the necessary training and shall always be applied in accordance with the product label. Appropriate safety and application equipment shall be provided and used. All precautions attached to the products shall be properly observed, applied, and understood by workers (see Criterion 4.7). - Major compliance -	Pesticide operators given training on the safe handling and application of the pesticides. Suitable personal protective equipment's and application equipment provided to the operators. All precautions attached to the products explained to operators and understood by them. The training record can refer to indicator 4.8.2	Complied
4.6.6	Storage of all pesticides shall be according to recognised best practices. All pesticide containers shall be properly disposed of and not used for other purposes (see Criterion 5.3). - Major compliance -	The operating units comply with Regulation 9 of the Pesticides Act 1974 requiring balance of remaining solution to be kept under lock and key. During visit it was noted that all the remaining pesticides are kept in the store and securely locked and comply with regulation.	Complied
4.6.7	Application of pesticides shall be by proven methods that minimise risk and impacts. - Minor compliance -	The quantity of agrochemicals required for various field conditions are documented and justified in the Oil Palm Circular (Manual). Refer to OPC Weeding (01.c) and Lallang (02.a). The implementation in the field is consistent with the Agriculture Manual.	Complied

Criterion / Indicator		Assessment Findings	Compliance
4.6.8	Pesticides shall be applied aerially only where there is documented justification. Communities shall be informed of impending aerial pesticide applications with all relevant information within reasonable time prior to application. - Major compliance -	No aerial spraying at Telok Sengat BU.	Complied
4.6.9	Maintenance of employee and associated smallholder knowledge and skills on pesticide handling shall be demonstrated, including provision of appropriate information materials (see Criterion 4.8). - Minor compliance -	There was no associated smallholder at Telok Sengat BU. Employees handling pesticide given knowledge and skill required to cover safe handling practices and standard operating procedures. #cross refer with indicator 4.8.2	Complied
4.6.10	Proper disposal of waste material, according to procedures that are fully understood by workers and managers shall be demonstrated (see Criterion 5.3). - Minor compliance -	The management disposed the empty containers as per scheduled waste regulations. Some of the empty containers were used back for premixing activity. Proper disposal of waste material was carried out as per the company procedures. The procedures are fully understood by workers and managers. Workers interview reveal that they are aware of the zero burning policy including domestic waste are not allowed to be burned. Management disposes waste material as per regulation for schedule waste and domestic waste. As sample, for Kulai Young Estate, the domestic waste disposed in its own landfill located in field PJ14.	Complied

Criterion / Indicator	Assessment Findings	Compliance
<p>4.6.11 Specific annual medical surveillance for pesticide operators, and documented action to treat related health conditions, shall be demonstrated. - Major compliance -</p>	<p>Medical Surveillance for estate operation was done on 28/3/2018 (HQ/15/DOC/00/408) for Kulai Yound Estate. Total 9 persons have been attended the medical surveillance and found all fit to work. For 2019, the management of Kulai Young Estate has planned to conduct the medical surveillance in Oct 2019.</p> <p>At Chamek Estate, medical surveillance was done on 12/11/2018 by Dr Helem Tan Kwai (HQ/08/DOC/00/597) for 9 workers. From the report, found that all workers were fit to work.</p> <p>At Telok Sengat Estate, medical surveillance was done on 26/7/2018 by Klinik Kota (HQ/08/DOC/00/518) for 8 workers. From the report, found that all workers were fit to work.</p>	<p>Complied</p>

Criterion / Indicator		Assessment Findings	Compliance
4.6.12	No work with pesticides shall be undertaken by pregnant or breast-feeding women. - Major compliance -	At Telok Sengat Estate, there were female sprayers carried out spraying activity, however, at Chamek Estate and Kulai Young Estate, no pregnant or breast-feeding women undertaking the work with pesticide. It was confirmed during interview the female workers and they aware. During interview with female workers also confirmed knowledge of transfer to alternative duties if they wished to continue working when pregnancy was confirmed or breast-feeding.	Complied
Criterion 4.7: An occupational health and safety plan is documented, effectively communicated and implemented. The health and safety plan shall cover the following:			

<p>4.7.1</p>	<p>A health and safety policy shall be in place. A health and safety plan covering all activities shall be documented and implemented, and its effectiveness monitored. - Major compliance -</p>	<p>Telok Sengat BU have established Safety and Health Policy, dated 1/6/2012 signed by Managing Director.</p> <p>OHS plan for 20179dated 1/1/2019 has been established. The OHS plan comprises of OSH legal compliance, emergency response plan (ERP), OSH management system, risk management, safety committee activities and being communicated to workers and staff accordingly. Sample of OSH management system activities as follows :</p> <ol style="list-style-type: none"> 1. CHRA was conducted 10/10/2018 (Kulai Young Estate) by Env Consultancy & Monitoring Services Sdn Bhd (HQ/04/ASS/00/193). 2. CHRA was conducted on 20/8/2015 (Chamek Estate) by Env Consultancy & Monitoring Services Sdn Bhd (HQ/04/ASS/00/193). 3. CHRA was conducted on 6/2/2017 (Telok Sengat Estate) by Env Consultancy & Monitoring Services Sdn Bhd (JKKP IH 127/171-2(193). 4. CHRA was conducted 7/5/2018 (Telok Sengat POM) by Safety Solutions Plt (HQ/04/ASS/00/203) which include laboratory, boiler, water treatment plant, store and spraying (compound). 5. LEV was done on 4/4/2019 by IHT2,CIH Laboratory Sdn Bhd (HQ/18/JHII/00/00019-2019/003). Based on the report, the LEV systems met the required guidelines. 6. Noise Monitoring was done by OSH Safety and Health Services on 28/1/2019. Noise mapping/zoning was identify, established and displayed accordingly at site. 7. Annual Audiometric Testing was conducted on 10/12/2018 by OSH Safety & Health Services. From the report, 21 workers need to be tested every year,50 workers need to be tested once in two years and 9 workers no test required. 	<p>Complied</p>
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Criterion / Indicator		Assessment Findings	Compliance
		<p>8. Medical Surveillance was carried out on 20/8/2018 for 22 workers by Klinik Rafeeq & Nurul (JKKP/HQ/16/DOC/00/546). Sighted the report and found that all the workers were fit to work.</p> <p>9. Chemical exposure monitoring was conducted on 6/8/2019. The result was yet to be received. It will be verified during next assessment.</p>	
4.7.2	All operations where health and safety is an issue shall be risk assessed, and procedures and actions shall be documented and implemented to address the identified issues. All precautions attached to products shall be properly observed and applied to the workers. - Major compliance -	SOP for HIRARC has been established. Last reviewed was done on 17/10/2017 (Telok Sengat POM) and 11/10/2018 (Kulai Young Estate) to include EFB Hopper, workshop, chemical store, WTP station, Kernel Plant, Confined Space, Boiler Station, Ramp, Pressing Station, Clarification Station, Sterilizer Station, Harvesting, Manuring, Spraying, Nursery, Replanting, to name a few.	Complied
4.7.3	All workers involved in the operation shall be adequately trained in safe working practices (see Criterion 4.8). Adequate and appropriate protective equipment shall be available to all workers at the place of work to cover all potentially hazardous operations, such as pesticide application, machine operations, and land preparation, harvesting and, if it is used, burning. - Minor compliance -	<p>Observed at Sterilizer station, press station, oil room, boiler station, spraying activity and harvesting activity, adequate and appropriate protective equipment was provided.</p> <p>The training was conducted accordingly at mill and estates.</p> <p>#Cross refer with indicator 4.8.2</p>	Complied

Criterion / Indicator	Assessment Findings	Compliance
<p>4.7.4 The responsible person/persons shall be identified. There shall be records of regular meetings between the responsible person/s and workers. Concerns of all parties about health, safety and welfare shall be discussed at these meetings, and any issues raised shall be recorded. - Major compliance -</p>	<p>The responsible persons are the Manager and Assistant Manager of the respective operating units. JKKP meeting members consist of employer & employee representatives. Records of regular meetings between the responsible person and workers were maintained. There was no major issue. Refer OHS meeting minutes :</p> <ol style="list-style-type: none"> 1. OHS meeting at TSPOM – dated 20/6/2019. All the agenda was discussed accordingly during OHS meeting, eg: accident review, workplace inspection, safety improvement plan, issues from workers, has been discussed and action to be taken. 2. OHS meeting at Chamek Estate – sampled dated 24/6/2019. All the agenda was discussed accordingly during OHS meeting, eg: accident review, workplace inspection, safety improvement plan, issues from workers, training, complaints has been discussed and action to be taken. 3. OHS meeting at Kulai Young Estate – sampled dated 22/7/2019. All the agenda was discussed accordingly during OHS meeting, eg: accident review, workplace inspection, safety improvement plan, issues from workers, training, complaints has been discussed and action to be taken. 4. OHS meeting at Telok Sengat Estate – sampled dated 25/3/2019. All the agenda was discussed accordingly during OHS meeting, eg: accident review, workplace inspection, safety improvement plan, issues from workers, training, complaints has been discussed and action to be taken. 	<p>Complied</p>

Criterion / Indicator		Assessment Findings	Compliance								
4.7.5	<p>Accident and emergency procedures shall exist and instructions shall be clearly understood by all workers. Accident procedures shall be available in the appropriate language of the workforce. Assigned operatives trained in First Aid should be present in both field and other operations, and first aid equipment shall be available at worksites. Records of all accidents shall be kept and periodically reviewed.</p> <p>- Minor compliance -</p>	<p>Accident and emergency procedure was established to include emergency evacuation, fire situation, chemical spillage, accident at work place. ERP organization chart, assembly area and location of fire extinguishers and contact numbers available and displayed at relevant locations. First aid equipment available at worksites. Training for fire drill and first aid, cross refer with indicator 4.8.2.</p> <table border="1"> <tr> <td>Estate/Mill</td> <td>First Aid Box Station (Site Visit)</td> </tr> <tr> <td>TSPOM</td> <td>Boiler, Office, Workshop</td> </tr> <tr> <td>Kulai Young Estate</td> <td>Harvesting, Office</td> </tr> <tr> <td>Chamek Estate</td> <td>Harvesting, office</td> </tr> </table> <p>At TSPOM, there was 2 accidents happened. Sampled the accident happened on 17/3/2019 at Loading Ramp with 7 days medical leave. The records of accident (including JKPP 6, JKPP 9, SOCSO FORM 34) was available and verified accordingly during the audit.</p> <p>JKPP 8 was sent to DOSH on 21/1/2019 (KYE), 4/1/2019 (TSPOM), 8/1/2019 (CE)</p>	Estate/Mill	First Aid Box Station (Site Visit)	TSPOM	Boiler, Office, Workshop	Kulai Young Estate	Harvesting, Office	Chamek Estate	Harvesting, office	Complied
Estate/Mill	First Aid Box Station (Site Visit)										
TSPOM	Boiler, Office, Workshop										
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Chamek Estate	Harvesting, office										
4.7.6	<p>All workers shall be provided with medical care, and covered by accident insurance.</p> <p>- Minor compliance -</p>	<p>All workers provided with medical care and covered by SOCSO. However, sampled workers found that no SOCSO contribution done by the management.</p> <p>Thus, the NC was raised, cross refer with clause 6.5.1</p>	Complied								

Criterion / Indicator		Assessment Findings	Compliance										
4.7.7	Occupational injuries shall be recorded using Lost Time Accident (LTA) metrics - Minor compliance -	Records of incident and accident were available, using internal reporting system. Records on Lost Time Incident (LTI) metrics had been verified to be satisfactory. Sample of accident statistic as shown below: <table border="1"> <thead> <tr> <th>Year</th> <th>KYE</th> <th>TSPOM</th> <th>CE</th> <th>TSE</th> </tr> </thead> <tbody> <tr> <td>2018</td> <td>0</td> <td>6</td> <td>0</td> <td>0</td> </tr> </tbody> </table> *LTA is equivalent to lost man days	Year	KYE	TSPOM	CE	TSE	2018	0	6	0	0	Complied
Year	KYE	TSPOM	CE	TSE									
2018	0	6	0	0									
Criterion 4.8: All staff, workers, smallholders and contract workers are appropriately trained.													
4.8.1	A formal training programme shall be in place that covers all aspects of the RSPO Principles and Criteria, and that includes regular assessments of training needs and documentation of the programme. - Major compliance -	A formal training programme on all aspects of RSPO Principles and Criteria has been established and implemented. Training for various categories of operators, including all field and office staff, with regards to individual duties and training needs had been reviewed and found to be complied. Training programme planned for year 2019 was consistently implemented. The programme includes training for all categories of workers. Evidence of adequate and appropriate training on safe working practices provided to: - workers exposed to machinery and high noise levels, - workers working in confined space, - harvesters - pesticides operators - manurers	Complied										

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4.8.2	<p>Records of training for each employee shall be maintained. - Minor compliance -</p>	<p>The records of training were available at mill and estate office. Sample training checked:</p> <table border="1"> <thead> <tr> <th>Date</th> <th>Training</th> <th>Remark</th> </tr> </thead> <tbody> <tr> <td>29/7/19</td> <td>RSPO briefing</td> <td rowspan="10">KYE</td> </tr> <tr> <td>11/7/19</td> <td>Harvesting</td> </tr> <tr> <td>8/7/19</td> <td>PPE for workers</td> </tr> <tr> <td>4/4/19</td> <td>Spraying</td> </tr> <tr> <td>4/3/19</td> <td>Manuring</td> </tr> <tr> <td>22-24/10/18</td> <td>ERT</td> </tr> <tr> <td>25/10/18</td> <td>Scheduled waste</td> </tr> <tr> <td>24/5/18</td> <td>Fire drill</td> </tr> <tr> <td>7-8/5/18</td> <td>First aid trainer</td> </tr> <tr> <td>3/4/2019</td> <td>Operation (PPE and SOP)</td> <td rowspan="7">TSPOM</td> </tr> <tr> <td>3/4/2019</td> <td>Noise exposure training</td> </tr> <tr> <td>7-8/5/2018</td> <td>First aid & cardio pulmonary resuscitation</td> </tr> <tr> <td>22-24/10/2018</td> <td>ERT training</td> </tr> <tr> <td>19/6/18</td> <td>SWP for operation and non-operation</td> </tr> <tr> <td>6/8/2019</td> <td>Fire drill</td> </tr> <tr> <td>16/8/2019</td> <td>Tractor's driver training</td> <td rowspan="4">Chamek Estate</td> </tr> <tr> <td>7/8/2019</td> <td>Training of FFB grading</td> </tr> <tr> <td>11/7/2019</td> <td>Spraying</td> </tr> <tr> <td>27/5/2019</td> <td>Manuring</td> </tr> <tr> <td></td> <td>24/5/2019</td> <td>Harvesting</td> <td></td> </tr> </tbody> </table>	Date	Training	Remark	29/7/19	RSPO briefing	KYE	11/7/19	Harvesting	8/7/19	PPE for workers	4/4/19	Spraying	4/3/19	Manuring	22-24/10/18	ERT	25/10/18	Scheduled waste	24/5/18	Fire drill	7-8/5/18	First aid trainer	3/4/2019	Operation (PPE and SOP)	TSPOM	3/4/2019	Noise exposure training	7-8/5/2018	First aid & cardio pulmonary resuscitation	22-24/10/2018	ERT training	19/6/18	SWP for operation and non-operation	6/8/2019	Fire drill	16/8/2019	Tractor's driver training	Chamek Estate	7/8/2019	Training of FFB grading	11/7/2019	Spraying	27/5/2019	Manuring		24/5/2019	Harvesting		Complied
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Criterion / Indicator		Assessment Findings			Compliance
		10/4/2019	First aid training	Telok Sengat Estate	
		10/4/2019	Fire drill		
		17/12/2018	Spraying		
		1/11/2019	Spraying		
		25/10/2018	Scheduled Waste Mgt		
		21/10/2018	ERT training		
		11/10/2018	First aid training		
		22/5/2018	Harvesting		
		2/6/2018	Manuring		
<p>Principle 5: Environmental responsibility and conservation of natural resources and biodiversity</p> <p>Criterion 5.1: Aspects of plantation and mill management, including replanting, that have environmental impacts are identified, and plans to mitigate the negative impacts and promote the positive ones are made, implemented and monitored, to demonstrate continual improvement.</p>					

Criterion / Indicator		Assessment Findings	Compliance
5.1.1	An environmental impact assessment (EIA) shall be documented. - Major compliance -	<p>The environmental impact assessment (EIA) was documented as Environmental Aspect & Impact Identification Form; File # BEA/5.1/EAI. Environmental impact assessment was made based on the procedure of Environmental Aspect/Impact Evaluation; Rev. 1; Issue date: Jan 2017. For mill, it was sighted that the aspect identified and impact evaluated covered all mill operational stations activities including operation of vertical sterilizer, maintenance of crude oil pumps, sludge pumps, waste pumps, effluent treatment plant and etc. For estate, the assessment covered all field and facilities operational activities including operation of field upkeeps, machinery repair workshop, spraying and harvesting. Sample:</p> <p>-Area/Field: Replanting; Serial # EAI/2018/09-01; Activity: Felling & Clearing; Aspect: Soil Erosion; Environmental Load Item: Oil palm tree removal (temporary bare ground/top surface); Control: Low Cover Crop (LCC) upon replanting</p> <p>Area/Field: Workshop; Serial # EAI/2018/14-01; Activity: Welding; Aspect: Material Consumption; Environmental Load Item: Welding rods & Acetylene gas; Control: SW disposal of spent welding rod & reuse of gas cylinder</p>	Complied

Criterion / Indicator	Assessment Findings	Compliance
5.1.2	<p>Where the identification of impacts requires changes in current practices, in order to mitigate negative effects, a timetable for change shall be developed and implemented within a comprehensive management plan. The management plan shall identify the responsible person/persons.</p> <p>- Minor compliance -</p>	<p>Complied</p>

<p>5.1.3</p>	<p>This plan shall incorporate a monitoring protocol, adaptive to operational changes, which shall be implemented to monitor the effectiveness of the mitigation measures. The plan shall be reviewed as a minimum every two years to reflect the results of monitoring and where there are operational changes that may have positive and negative environmental impacts. - Minor compliance -</p>	<p>Monitoring plan was established based on DOE license compliance schedule which include scheduled waste storage and disposal record, POME final discharge BOD and boiler stack sampling</p> <p>Among the mill environmental monitoring records available are sighted as following:</p> <ul style="list-style-type: none"> • Effluent monitoring records: Monthly Effluent Sample Report Dated 19/01/2019; Analysis report # MABB 59/19 by Makmal Analisa Bukit Besar, FGV Palm Industries Sdn. Bhd., Kulai; parameter monitored:- pH @ 25°C, BOD, COD, TS, SS, O&G, AN & TN. Sample results shown BOD = 62 mg/L. The mill was given the extension of time by DOE to comply with its final discharge BOD limits @ 20 mg/L until 30/6/2019 as per letter ref. AS(B)J 31/152/000/025 Jilid 6(22) dated 15/5/2019. The mill further applied to extend the contravene period until 30/9/2019 and DOE Johor replied via letter ref. ASJ(B) 31/152/000/025 Jilid 7(06) dated 20/8/2019 requiring mill to pay the additional fee difference. The mill paid on 25/8/2019. • Analysis report # MABB 57/19; Sample type: River Upstream and Downstream; Date: 19/01/2019; BOD: 4 mg/L (upstream); 4mg/L (downstream); by FGV Palm Industries Sdn. Bhd. Lab • Boiler stack sampling records: Stack Emission Monitoring on 8/8/2019 by Spectrum Laboratories (Johore) Sdn. Bhd. (Report ref. # ETD/TSPOM/SE/2019/ 08/19580; Date: 19/8/2019; Lab # E/SE/1908/23770) for Boiler no. 2. Result shown the stack emissions are within limit at 5.25 mg/m³ @ 12% CO₂. Previous monitoring was done on 16/5/2019 by same consultant as per Report ref. # ETD/TSPOM/SE/2019/05/19274; Date: 23/5/2019; Lab # E/SE/1905/19274) for Boiler no. 2. Result shown the stack emissions are within limit at 15.90 mg/m³ @ 12% CO₂ 	<p>Complied</p>
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Criterion / Indicator	Assessment Findings	Compliance
	<ul style="list-style-type: none"> • Online scheduled waste inventory & consignment – updated as of 27/08/2019 where the quantity and storage period were within allowable limit. Latest Scheduled Waste disposal was done on 7/5/2019, consignment # A 007360 for SW 305, # A 007362 (SW 409) & # 007361 (SW 410) by Modern Energy Sdn. Bhd. • Environmental Noise Monitoring; Lab # E/N/1904/23085; Report ref. # DEPT/TSPOM/N/2019-04/19228; Date monitored: 29/4/2019; Date reported: 9/5/2019 • Environmental Air Monitoring; Lab # E/A/1908/23754; Report ref/ # ETD/A/TSPOM/2019-08/19580; Date monitored: 7-8/8/2019; Date monitored: 26/8/2019 <p>TSPOM has been charged and compounded by DOE on the non-compliance towards license requirements (Compound no. K05716 dated 26/6/2019) which was committed on the same date during enforcement officer visit due to issue in handling of scheduled waste. Adequate response made by TSPOM by taking action to comply with the issue and paid the compound accordingly.</p>	
<p>Criterion 5.2: The status of rare, threatened or endangered species and other High Conservation Value habitats, if any, that exist in the plantation or that could be affected by plantation or mill management, shall be identified and and operations managed to best ensure that they are maintained and/or enhanced.</p>		

Criterion / Indicator	Assessment Findings	Compliance
5.2.1	<p>Information shall be collated in a High Conservation Value (HCV) assessment that includes both the planted area itself and relevant wider landscape-level considerations (such as wildlife corridors).</p> <p>- Major compliance -</p> <p>Information available based on the High Conservation Value (HCV) Assessment Report (Multi-site) for Boustead Plantations Berhad covering Telok Sengat Estate, Kulai Young Estate, Chamek Estate, Eldred Estate and Bekoh Estate; July 2018.</p> <p>Assessment was conducted by Malaysian Environmental Consultants (MEC) on 2-11 April 2018 with public stakeholder consultations done on 21-22 May 2018.</p> <p>Results of assessment concluded that there were HCV presence within Telok Sengat certification unit as per following:</p> <ul style="list-style-type: none"> - HCV 1: Mark and label boundaries of HCV areas (Present in Telok Sengat & Chamek Estate) - HCV 2: Mark and label boundaries of HCV areas (Potentially present in Telok Sengat Estate) - HCV 3: Mark and label boundaries of HCV areas (Present in Telok Sengat Estate) - HCV 4: Mark and label boundaries of HCV areas (Present in all estates) - HCV 6: Mark and install signage for each HCV site (Present in all estates) 	Complied

Criterion / Indicator	Assessment Findings	Compliance
<p>5.2.2</p> <p>Where rare, threatened or endangered (RTE) species, or HCVs, are present or are affected by plantation or mill operations, appropriate measures that are expected to maintain and/or enhance them shall be implemented through a management plan.</p> <p>- Major compliance -</p>	<p>Documented in High Conservation Value (HCV) Management Plan -5.5.2; the implementation was established as objectives, targets and action plan which were not fully in-line with recommendation from the HCV assessor. Field visit confirmed that the recommendation for actions from information available based on the High Conservation Value (HCV) Assessment Report (Multi-site) for Boustead Plantations Berhad covering Telok Sengat Estate, Kulai Young Estate, Chamek Estate, Eldred Estate and Bekoh Estate; July 2018 were not fully implemented. Based on the HCV report, few recommendations made by HCV assessor on management and monitoring for identified HCV were not evidence as per following samples:</p> <ul style="list-style-type: none"> - HCV 1: Mark and label boundaries of HCV areas (Present in Telok Sengat & Chamek Estate) - HCV 2: Mark and label boundaries of HCV areas (Potentially present in Telok Sengat Estate) - HCV 3: Mark and label boundaries of HCV areas (Present in Telok Sengat Estate) - HCV 4: Mark and label boundaries of HCV areas (Present in all estates) - HCV 6: Mark and install signage for each HCV site (Present in all estates) <p>Verification made on the HCV report and visit to actual site within designated estate fields confirmed that the management plan to maintain and/or enhance HCV presence was not adequate. Hence, a Major noncompliance has been raised.</p>	<p>Major NC</p>

Criterion / Indicator		Assessment Findings	Compliance
5.2.3	There shall be a programme to regularly educate the workforce about the status of these RTE species, and appropriate disciplinary measures shall be instigated in accordance with company rules and national law if any individual working for the company is found to capture, harm, collect or kill these species. - Minor compliance -	There was a Sustainability Management Program 2019 established at each site implemented as training and briefing session to all workers by management and HQ sustainability team which also includes the Environmental Responsibility & Biodiversity topics. Records shown latest session was conducted on 18/6/2019 for all mill and estates workers including staff and management by the HQ sustainability team. However, due to no clear indication of implemented maintenance and/or enhancement programs for identified HCV presence within the estates, the education program could be further improved upon proper establishments of the HCV management action plan.	Complied
5.2.4	Where a management plan has been created there shall be ongoing monitoring: • The status of HCV and RTE species that are affected by plantation or mill operations shall be documented and reported; • Outcomes of monitoring shall be fed back into the management plan. - Minor compliance -	Due to findings in indicator 5.2.2 above, there was limited management plan and monitoring records available. However, the indicator was still in-compliance with the requirements since existing plan (not based on the recommendations by HCV assessor) still implemented.	Complied
5.2.5	Where HCV set-asides with existing rights of local communities have been identified, there shall be evidence of a negotiated agreement that optimally safeguards both the HCVs and these rights. - Minor compliance -	It has been verified that there has been no instance of HCV set aside that conflicts with the rights of local communities at the estates visited. Thus, negotiated agreement of such nature is not applicable.	Complied
Criterion 5.3: Waste is reduced, recycled, re-used and disposed of in an environmentally and socially responsible manner.			

Criterion / Indicator		Assessment Findings				Compliance																																																														
5.3.1	All waste products and sources of pollution shall be identified and documented. - Major compliance -	<p>I waste products and sources of pollution identified and documented as per Waste Management Plan as per following waste source, type, class & disposal method:</p> <table border="1"> <thead> <tr> <th>Source</th> <th>Type</th> <th>Class</th> <th colspan="2">Disposal method</th> </tr> </thead> <tbody> <tr> <td rowspan="2">Estate fields</td> <td>Chemical container</td> <td>Toxic</td> <td colspan="2">Stored as scheduled waste</td> </tr> <tr> <td>Fertilizer bags</td> <td>Recyclable</td> <td colspan="2">Recycle center</td> </tr> <tr> <td>Estate nursery</td> <td>Polybags</td> <td>Non-biodegradable</td> <td colspan="2">Re-use</td> </tr> <tr> <td rowspan="2">Store (Chemicals)</td> <td>Chemical container</td> <td>Toxic</td> <td colspan="2">Stored as scheduled waste</td> </tr> <tr> <td>Cardboard boxes</td> <td>Recyclable</td> <td colspan="2">Recycle center</td> </tr> <tr> <td>Store (Fertilizers)</td> <td>Fertilizer bags</td> <td>Non-biodegradable</td> <td colspan="2">Re-use</td> </tr> <tr> <td rowspan="5">Workshop</td> <td>Oil filters</td> <td rowspan="4">Toxic</td> <td colspan="2" rowspan="4">Stored as scheduled waste</td> </tr> <tr> <td>Lubricants</td> </tr> <tr> <td>Batteries</td> </tr> <tr> <td>Cotton rags/gloves</td> </tr> <tr> <td>Tyre</td> <td>Recyclable</td> <td>Recycle center</td> </tr> <tr> <td>Scrap iron</td> <td></td> <td></td> </tr> <tr> <td>Line site & office</td> <td>Sewage</td> <td>Health risk</td> <td colspan="2">Septic tank</td> </tr> <tr> <td></td> <td>Domestic waste</td> <td>Biodegradable</td> <td colspan="2">Landfill</td> </tr> <tr> <td>Clinic</td> <td>Clinical waste</td> <td>Toxic</td> <td colspan="2">Stored as scheduled waste</td> </tr> </tbody> </table> <p>Other sources of pollution have been identified and documented in the Environmental Aspect Impact Assessment records.</p>				Source	Type	Class	Disposal method		Estate fields	Chemical container	Toxic	Stored as scheduled waste		Fertilizer bags	Recyclable	Recycle center		Estate nursery	Polybags	Non-biodegradable	Re-use		Store (Chemicals)	Chemical container	Toxic	Stored as scheduled waste		Cardboard boxes	Recyclable	Recycle center		Store (Fertilizers)	Fertilizer bags	Non-biodegradable	Re-use		Workshop	Oil filters	Toxic	Stored as scheduled waste		Lubricants	Batteries	Cotton rags/gloves	Tyre	Recyclable	Recycle center	Scrap iron			Line site & office	Sewage	Health risk	Septic tank			Domestic waste	Biodegradable	Landfill		Clinic	Clinical waste	Toxic	Stored as scheduled waste		Complied
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Criterion / Indicator		Assessment Findings	Compliance
5.3.2	All chemicals and their containers shall be disposed of responsibly. - Major compliance -	Telok Sengat mill's supply base conducted the Triple Rinsing of Empty Chemical Container Training (<i>Latihan 3 Kali Pembilasan Bekas Racun dan Bahan Kimia</i>) to all sprayers gang for both divisions based on the guideline for used plastic pesticide container recycling program (UPPCR). Visit to estates confirmed that all pesticides stored at chemical store where empty chemical containers have been triple-rinsed and punctured. The containers were collected by G-Planter for recycle purposes.	Complied
5.3.3	A waste management and disposal plan to avoid or reduce pollution shall be documented and implemented. - Minor compliance -	Based on specific Boustead Sustainability Guideline – Scheduled Waste Procedure; Ref. # BEA SUS/SW/EQA (SW); Date: 22/12/2014, all identified scheduled wastes generated by mill and estates shall be handled in accordance with legal requirement Environmental Quality (Scheduled Waste) Regulations 2005. However, based on the evidence from site visit and documented information, it was found that the procedure was not implemented effectively in following sites: - Scheduled wastes in Kulai Young Estate were stored more than 180 days period without DOE approval for following wastes: Battery (SW 110) since 9/6/2016; Oil filters (SW 410) since 2/7/2015, Used lubricants oil ((2/7/2015), empty fertilizer bag (29/5/2015), empty chemical container (1/1/2018) - There also scheduled wastes were found being dumped at field PR18A near pocket forest CV in Telok Sengat Estate Hence a minor noncompliance has been raise on the matter.	Minor NC
Criterion 5.4: Efficiency of fossil fuel use and the use of renewable energy is optimised.			

Criterion / Indicator		Assessment Findings	Compliance
5.4.1	A plan for improving efficiency of the use of fossil fuels and to optimise renewable energy shall be in place and monitored. - Minor compliance -	<p>The Plan for Improving Fossil Fuel and Palm GHG includes the monitoring of following parameters:</p> <ul style="list-style-type: none"> - Steam turbine renewable energy (kWh) generated FY 2018: Average 16.78kWh/mt - Biogas engine renewable energy (kWh) generated FY 2018: Average 7.23kWh/mt - Diesel engine consumption FY 2018: 1.49L/mt <ul style="list-style-type: none"> - Steam turbine renewable energy (kWh) generated FY 2019 todate July: Average 16.74kWh/mt - Biogas engine renewable energy (kWh) generated FY 2019 todate July: Average 14.48kWh/mt - Diesel engine consumption: 0.72L/mt <p>It could be confirmed that the renewable energy utilization has been increased while fossil fuel consumption has been reduced from year 2018 to 2019 to date.</p>	Complied
<p>Criterion 5.5: Use of fire for preparing land or replanting is avoided, except in specific situations as identified in the ASEAN guidelines or other regional best practice.</p>			
5.5.1	There shall be no land preparation by burning, other than in specific situations as identified in the 'Guidelines for the Implementation of the ASEAN Policy on Zero Burning' 2003, or comparable guidelines in other regions. - Major compliance -	<p>Group Policy on restricting open burning dated in 2011 has been established. A circular [O.P.C No. 51c, July 1999] stating when there were incidences of Basal Stem Rot [BSR] on the old stands or high risk of Oryctes infestation, then partial burning and pulverisation are to be carried out. Before commenced of burn, a permit should be obtained from DOE and burning strictly not allowed during July – November or whenever a "No Open Burning" circular from local authorities.</p>	Complied

Criterion / Indicator		Assessment Findings	Compliance
5.5.2	Where fire has been used for preparing land for replanting, there shall be evidence of prior approval of the controlled burning as specified in 'Guidelines for the Implementation of the ASEAN Policy on Zero Burning' 2003, or comparable guidelines in other regions. - Minor compliance -	The visit to estate field confirmed no use of fire for land preparation during replanting.	Complied
Criterion 5.6:			
Plans to reduce pollution and emissions, including greenhouse gases, are developed, implemented and monitored.			
5.6.1	An assessment of all polluting activities shall be conducted, including gaseous emissions, particulate/soot emissions and effluent (see Criterion 4.4). - Major compliance -	Based on the assessment done by the mill of all polluting activities as of the Environment Aspect and Impact assessment, identified sources were SW, boiler chimney & POME treatment as the main GHG pollutants. For estate, identified sources were fertilizer, diesel and pesticide chemicals as the main GHG pollutants. Current monitoring was through online boiler smoke density and alarm and quarterly boiler stack monitoring of dust particulate. Other environmental assessment carried out as per Action Plan for Environmental Assessment 2019 established. Sampled boiler stack sampling records: Stack Emission Monitoring on 8/8/2019 by Spectrum Laboratories (Johore) Sdn. Bhd. (Report ref. # ETD/TSPOM/SE/2019/ 08/19580; Date: 19/8/2019; Lab # E/SE/1908/23770) for Boiler no. 2. Result shown the stack emissions are within limit at 5.25 mg/m ³ @ 12% CO ₂ . Previous monitoring was done on 16/5/2019 by same consultant as per Report ref. # ETD/TSPOM/SE/2019/05/19274; Date: 23/5/2019; Lab # E/SE/1905/19274) for Boiler no. 2. Result shown the stack emissions are within limit at 15.90 mg/m ³ @ 12% CO ₂	Complied

Criterion / Indicator		Assessment Findings	Compliance
5.6.2	Significant pollutants and greenhouse gas (GHG) emissions shall be identified, and plans to reduce or minimise them implemented. - Major compliance	Significant pollutants identified are SW generated, POME discharge and boiler stack emissions. These pollutants impact to GHG were calculated through the Palm GHG V3 calculator. Sighted the calculation for previous (2018) year i.e. Palm GHG Report – Telok Sengat Business Unit recorded an overall total GHG emission of 0.77 tCO ₂ e/mt of both CPO and PK products. Summary of emissions are recorded in Appendix K below.	Complied
5.6.3	A monitoring system shall be in place, with regular reporting on progress for these significant pollutants and emissions from estate and mill operations, using appropriate tools. - Minor compliance -	Monitoring mainly done as per mill DOE license. Sampled monitoring conducted for significant pollutants including boiler stack monitoring and POME discharge as above. All monitoring was conducted in-house and through 3 rd party environmental consultant.	Complied

Principle 6: Responsible consideration of employees and of individuals and communities affected by growers and millers.

Criterion 6.1:

Aspects of plantation and mill management that have social impacts, including replanting, are identified in a participatory way, and plans to mitigate the negative impacts and promote the positive ones are made, implemented and monitored, to demonstrate continual improvement.

Criterion / Indicator		Assessment Findings	Compliance
6.1.1	A social impact assessment (SIA) including records of meetings shall be documented. - Major compliance -	Social Impact Assessment is carried out by appointed consultant – Malaysian Environmental Consultants Sdn Bhd on 29.06.2018, covering all the sites including Telok Sengat Palm Oil Mill, Telok Sengat Estate, Kulai Young Estate and Chamek Estate. The assessment is carried out based on RSPO reference covering positive and negative impacts and factors such as access and use rights, economics livelihoods and working conditions, subsistence activities, cultural and religious, health and education facilities and other community values, resulting from changes such as improved transport / communication or arrival of substantial migrant labour force.	Complied

Criterion / Indicator	Assessment Findings	Compliance
6.1.2	<p>There shall be evidence that the assessment has been done with the participation of affected parties.</p> <p>- Major compliance -</p> <p>Evidences that the assessment has been done with participation of affected parties is through the stakeholder meeting carried out by the mill and estates management, as listed below.</p> <ul style="list-style-type: none"> - Stakeholder meeting for Kulai Young Estate was found last conducted on 29.03.2018 with participation from Auxiliary Police Force, worker and contractor workers. - Stakeholder meeting for Mill and Telok Sengat Estate conducted simultaneously on 21.05.2018 with participation from internal and external stakeholder such as Police department, external grower, schools,, consultant, fire department, head of village, etc. Issues noticed being discussed and concern raised by stakeholders are documented in the meeting minute (Sesi(2)2018). E.g. school seeking mill to assist spraying at the perimeter, removal of old trees, etc. - Stakeholder meeting for Chamek Estate was last carried out on 14.11.2018 with participation from NUPW representative, contractor, government agency (MPOB), head of village, supplier, external smallholders, etc. Meeting minutes sighted; issues such as road to Muslim graveyard need to be repaired, cleaning of drainage system, CPR training, etc. raised and responded by the management. - Stakeholder meeting for Telok Sengat Estate last held on 28.03.2019 with participation from NGO, government agency, labour contractor, head of village, suppliers, school, external smallholder, etc. Meeting minutes sighted. Issues discussed during the meeting includes RSPO and MSPO introduction, transportation of FFB (overweight), etc. <p>Stakeholder consultation conducted on 29.08.2019 as at time of audit participated by approx. 43 stakeholder confirmed that they received invitation and attended the stakeholder meeting. All issues that raised and discussed were promptly responded by the management appropriately.</p>	Complied

Criterion / Indicator		Assessment Findings	Compliance
6.1.3	Plans for avoidance or mitigation of negative impacts and promotion of the positive ones, and monitoring of impacts identified, shall be developed in consultation with the affected parties, documented and timetabled, including responsibilities for implementation. - Major compliance -	No management plan established for avoidance or mitigation of negative impacts and promotion of the positive ones and monitoring of impacts identified based on consultation with the affected parties, documented and timetabled, including responsibilities for implementation since no documented Management plan being established by Boustead team as at time of audit. Hence, a Major NC has been raised on the matter.	Major NC
6.1.4	The plans shall be reviewed as a minimum once every two years and updated as necessary, in those cases where the review has concluded that changes should be made to current practices. There shall be evidence that the review includes the participation of affected parties. - Minor compliance -	The SIA is conducted on June 2018 and last review of the management plan and progress of action taken is documented progressively once they are completed. Last review found carried out on December 2019, and evidences as illustrated in the photographs as per sample for Mill and Kulai Young Estate.	Complied
6.1.5	Particular attention shall be paid to the impacts of smallholder schemes (where the plantation includes such a scheme). - Minor compliance -	No smallholder schemes included within the certified Telok Sengat Business Unit	Not applicable
Criterion 6.2: There are open and transparent methods for communication and consultation between growers and/or millers, local communities and other affected or interested parties.			
6.2.1	Consultation and communication procedures shall be documented. - Major compliance -	Boustead Telok Sengat has developed a Communication Procedure. The procedure is to handle communication for internal and external stakeholders. The methods of communication such as formally write in, through phone call, discussion or meeting and etc. External Communication Form (PKSJ-001) and Communication Record (PKSJ-002) was implemented. Consultation and communication procedure are communicated to internal and external stakeholder through Stakeholder meeting on 14.11.2018 and 11.07.2019.	Complied

Criterion / Indicator		Assessment Findings	Compliance
6.2.2	A management official responsible for these issues shall be nominated. - Minor compliance -	Mill and estate has identified and nominated a management staff to responsible for issues related to communication and complaints. Documented evidence sighted such as appointment letter "Lantikan Sebagai Ahli Panel Aduan Dalaman dan Luaran Ldg. Chamek". E.g. <ul style="list-style-type: none"> - Chamek Estate – responsible person is assigned to Mr. Muhammad Faizal Bin Abd Malek (Senior Staff / Estate officer) dated 04.01.2018, - Telok Sengat POM – responsible person is assigned to Mr. Kamarudin Bin A Kadir (Fruit Inspector) dated 02.01.2017, - Kulai Young – responsible person is assigned to Mr. Hasri Bin Sabtu (Estate Supervisor) dated 05.04.2019. - Telok Sengat – responsible person is assigned to Mr. Mohd Hafizi Bin Kamarulzaman (Field conductor) dated 20.04.2019. 	Complied
6.2.3	A list of stakeholders, records of all communication, including confirmation of receipt and that efforts are made to ensure understanding by affected parties, and records of actions taken in response to input from stakeholders, shall be maintained. - Minor compliance -	Telok Sengat mill and estate updated their List of Stakeholders which includes relevant stakeholders for both respective operations. e.g. Telok Sengat Mill – updated FY2019, Chamek Estate – updated 08.11.2018, Telok Sengat Estate – Mar 2019 and Kulai Young Estate - FY2019 All communication recorded / documented in the stakeholder meeting minutes as well as complain records / form.	Complied
Criterion 6.3: There is a mutually agreed and documented system for dealing with complaints and grievances, which is implemented and accepted by all effected parties.			

Criterion / Indicator	Assessment Findings	Compliance
<p>6.3.1</p> <p>The system, open to all affected parties, shall resolve disputes in an effective, timely and appropriate manner, ensuring anonymity of complainants and whistleblowers, where requested.</p> <p>- Major compliance -</p>	<p>System in place as per documented procedure "Prosedur Untuk Berkomunikasi", Complain Committee organization Chart and Flow Chart "Langkah Langkah Rungutan"; which states process for internal and external complaints received. All complains can be made through "Borang Komunikasi Luaran"/ External Communication Form.</p> <p>Suggestion and Complain Box is found available outside office building (Telok Sengat Estate) and at the main guard post (POM and estates) allowing external and internal stakeholder to raise their concern.</p> <p>Beside, Boustead Plantation Berhad – Polisi Pemberian Maklumat (Whistle blower) is in place, dated 11.11.2011 which states company's commitment on preserving the information, protecting reporter from being retaliated, ensuring a complain channel is in place for external and internal communication, etc.</p> <p>Sampled complain records as listed below:-</p> <p>For Chamek Estate – all complaint and request for information can be done through use of "Borang Komunikasi Dalaman dan Luaran Ladang Chamek". Sample of complain form dated 04.07.2019 sighted on issues related to tractor battery change, 25.08.2019 sighted on issues related to house repair, etc. Workers are trained and briefed on Communication and Complain Policy dated 19.09.2018 and participated by 41 workers. Training attendance records and minutes sighted.</p> <p>For Telok Sengat Estate – all complaint and request for information can be done through use of "Borang Aduan / Cadangan Ladang Telok Sengat". Records dated 2.05.2019 (toilet repair, wall repair) 04.05.2019 (Window grill repair), etc. sighted. All repair works done documented in "Buku Rekod Aduan / Cadangan".</p>	<p>Complied</p>

Criterion / Indicator		Assessment Findings	Compliance
6.3.2	Documentation of both the process by which a dispute was resolved and the outcome shall be available. - Major compliance -	No documented complain records available in mill except 'Borang Aduan Kerosakan Rumah' that is meant for worker house repair purposes. Workers interview at mill confirmed that they are not aware of the channel where there can lodge complain on any work and wage related issue but was made aware that the complaint box available at the main guard station is meant for house repair only.	Complied
Criterion 6.4: Any negotiations concerning compensation for loss of legal, customary or user rights are dealt with through a documented system that enables indigenous peoples, local communities and other stakeholders to express their views through their own representative institutions.			
6.4.1	A procedure for identifying legal, customary or user rights, and a procedure for identifying people entitled to compensation, shall be in place. - Major compliance -	Boustead Plantation Sdn Bhd has developed a Procedure to Identify the legal user rights of land. The procedure has detailing the process if there is any land dispute reported. The company has also developed a Fair Compensation Procedure with Reference No. 1, issued date 4/2/2015, version 01. The procedure has clearly stated the process of negotiation and compensation if any land disputes with Legal Department. If the negotiation process failed, legal proceedings will be the next action.	Complied
6.4.2	A procedure for calculating and distributing fair compensation (monetary or otherwise) shall be established and implemented, monitored and evaluated in a participatory way, and corrective actions taken as a result of this evaluation. This procedure shall take into account: gender differences in the power to claim rights, ownership and access to land; differences of transmigrants and long-established communities; and differences in ethnic groups' proof of legal versus communal ownership of land. - Minor compliance -	Procedure as per Criteria 6.4.1. Fair Compensation Procedure with Reference No. 1, issued date 4/2/2015, version 01. The procedure has clearly stated the process of negotiation and compensation if any land disputes with Legal Department. If the negotiation process failed, legal proceedings will be the next action.	Complied

Criterion / Indicator		Assessment Findings	Compliance
6.4.3	The process and outcome of any negotiated agreements and compensation claims shall be documented, with evidence of the participation of affected parties, and made publicly available. - Major compliance -	No issues related to loss of legal customary rights with indigenous peoples, local communities and other stakeholders reported during the time of audit. Trenches, wooden pegs and boundary stones were maintained to differentiate the land ownership.	Complied
Criterion 6.5: Pay and conditions for employees and for contract workers always meet at least legal or industry minimum standards and are sufficient to provide decent living wages.			

<p>6.5.1</p>	<p>Documentation of pay and conditions shall be available. - Major compliance -</p>	<p>Workers are paid according to minimum wage council 2018 and earned more than MYR1,100 / month based on the task assigned to them; either on daily basis, piece rated FFB and FFB tonnage. Their salary paid once a month on every 7th day of the following of the month through saving account. Pay-slip is provided to them details their wages earned including deductions made. For migrant workers, facility has being practicing the coordination and salary disbursement through appointed contractor (e.g. Cipta Melati Enterprise – Kulai Young Estate). Statutory deduction are done appropriately accordance with legal law requirement. i.e. SOCSO contribution from both employer and employee is followed according to the legal requirement for local employees, and paid to local authority – PERKESO on timely manner. Borang 8A – Pertubuhan Keselamatan Social for April, May, June and July 2019 presented and found in order. Kulai Young Estate – SOCSO Contribution Code : E1101519F, Mill – E1100004722K. EPF / KWSP contribution found done accordingly from both parties; local employer and employee and submitted in timely manner. Form A KWSP 6 verified for month of April, May, June and July 2019, confirmed consistently done according to the requirement. Kulai Young registration number: 000144, Mill registration number: 5624487 Deduction made to workers salary are statutory deduction such as SOCSO, SIP, Welfare Fund, Mosque Fund, Tabung Haji, Union Fee and EPF. All deduction are made with authorization issued by the Labor office under Ministry of Human Resource. i.e. TK(NJ)U-21 for Tabung Haji and Union Fee, PP3/29/028/2007 for Mosque Fee.</p> <ul style="list-style-type: none"> - Foreign workers that is deployed to the estate Kulai Young was found not contributing to SOCSO after their FWCS expired. All 8 selected migrant workers (Indonesia) found not contributing to the Perkeso. - Deduction found in Kulai Estate’s workers monthly wages for Welfare Fund, Electricity and Shop Debt was found done without prior approval by the relevant government body; i.e. labor office. 	<p>Complied</p>
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Criterion / Indicator		Assessment Findings	Compliance
		<p>- Substitution / double booking on pay slip found on 1 randomly selected migrant worker from Indonesia in Kulai Young Estate.</p> <p>These findings were raised under indicator 2.1.1 since involving legal noncompliance.</p>	
6.5.2	<p>Labour laws, union agreements or direct contracts of employment detailing payments and conditions of employment (e.g. working hours, deductions, overtime, sickness, holiday entitlement, maternity leave, reasons for dismissal, period of notice, etc.) shall be available in the languages understood by the workers or explained carefully to them by a management official.</p> <p>- Major compliance -</p>	<p>There were issues related to contracts of employments and the findings were raised under indicator 2.1.1 since involving legal noncompliance.</p>	Complied

<p>6.5.3</p>	<p>Growers and millers shall provide adequate housing, water supplies, medical, educational and welfare amenities to national standards or above, where no such public facilities are available or accessible. - Minor compliance –</p>	<p>Kulai Young Estate</p> <p>There are approx. 36 housing provided to workers in the estate that is supplied with necessity such as bed and cooking facility. Water sourced from well is provided at no charge to workers while electricity is paid by workers at their own cost. Should any damage found in the housing area, workers may report using "Borang Laporan Kerosakan Rumah Ladang". 6 cases found raised during the month of July 2019 and closed / repaired by estate management.</p> <p>Ruj No.: BIL()PKDKJ/500/10/08/20 dated 11.12.2018, issued by Pejabat Kesihatan Daerah Kulai, Johor, evidenced that the source water have being sampled, analyzed and confirmed complying to Malaysia Ministry of Health drinking water standard. License/Approval obtained from Badan Kawal Selia Air Negeri Johor – BAKAJ (Ruj: SUKJ(BAKAJ):334/300/05/02/07/06 dated 14.01.2019, reminder for renewal of expired license dated 31.12.2018) is in place and evidenced of monthly payment for the use of natural sourced water (tube well).</p> <p>Telok Sengat Mill</p> <p>Approx. 56 housing provided to mill workers that is supplied with necessity; i.e. water from Syarikat Air Johor and electric from Tenaga Nasional Berhad. Water supplied by the SAJ is subsidized by the mill management while electric usage is paid by the workers individually to TNB. Houses found to be in good order and inspected by nominated person (En. Kamaruddin – FFB Inspector) and Hospital Assistant (En. Abdul Manaf) on weekly basis and documented in "Worker's Minimum Standards of Housing Guidelines". Inspection records dated 05.08.2019, 15.08.2019, 04.07.2019, 10.07.2019, 17.07.2019, 23.03.2019.</p> <p>Chamek Estate</p> <p>42 housing provided that is supplied with SAJ water and TNB electric supply. Houses found to be in good order and inspected by nominated person –</p>	<p>Complied</p>
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Criterion / Indicator		Assessment Findings	Compliance
		Hospital Assistant (N Sugumaran) on weekly basis and documented in 'Pemeriksaan Kawasan Perumahan Pekerja Ladang Chamek". Inspection records for the last 5 months sighted. E.g. 05.08.2019, 15.08.2019 & 23.08.2019.	
6.5.4	Growers and millers shall make demonstrable efforts to monitor and improve workers' access to adequate, sufficient and affordable food. - Minor compliance –	There were sundry shops found inside all visited estate's area. During site visit to the sundry shop found that price was displayed on the foods and goods. Interviewed with the workers confirmed that the price of goods and foods selling in the sundry shop were reasonable. Besides, most of the workers will purchase their sundries at the nearby town.	Complied
Criterion 6.6: The employer respects the rights of all personnel to form and join trade unions of their choice and to bargain collectively. Where the right to freedom of association and collective bargaining are restricted under law, the employer facilitates parallel means of independent and free association and bargaining for all such personnel.			
6.6.1	A published statement in local languages recognising freedom of association shall be available. - Major compliance -	<p>Boustead Plantations Berhad has developed Freedom of Association Policy dated 11/11/2011 signed by Senior General Manager, En. Shoib Abdullah and was publicly available on the notice board. The company is committed and allowed their stakeholders such as employees, clients, business partner, etc. to form or to join any association and to collectively bargaining with the management.</p> <p>Policy communicated internally via orientation training while external parties such as spare part supplier and FFB Supplier communicated thru Stakeholder meeting dated 07.06.2019 at Telok Sengat Mill, 29.03.2018 at Kulai Young Estate, 14.11.2018 at Chamek Estate and 28.03.2019 for POM. Stakeholder consultation conducted during the audit confirmed that they have attended the stakeholder meeting with the Boustead management and communicated on all polices including freedom of association.</p>	Complied

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Criterion / Indicator		Assessment Findings	Compliance
6.6.2	Minutes of meetings with main trade unions or workers representatives shall be documented. - Minor compliance -	Meeting with Union representative for MILL carried out on every quarterly with workers representative on 08.07.2019 and 05.01.2019. Both meeting minutes available and sighted. Topic discussed and briefed include method of reporting should workers face any issues in regard to work, activities proposed by the members, etc. NUPW local committee meeting is also carried out on 24.06.2019 for Telok Sengat Estate, where election of the committee was held.	Complied
Criterion 6.7: Children are not employed or exploited.			
6.7.1	There shall be documentary evidence that minimum age requirements are met. - Major compliance -	Boustead management has developed Employment of Child and Age Limit Policy dated 11/1/2011, that states it commitment to comply with the Children and Young Persons (Employment) Act 1966 and ILO Convention 138 (1973) Article 1-3. No workers less than 16 years old will be recruited and less than 18 years old for hazardous work. Document verified on the Employee Master List confirmed that all the workers employed were above 18 years old. During site visit also confirmed that no child labor found working in any estate and mill under Boustead business unit. Age verification of workers is done during interview through government issued identity card while migrant workers are vetted by the government agencies (including compliance of minimum age prior entering to Malaysia) based on their traveling document; i.e. passport. Individual personal file were selected during the audit and found with copy of identity card and passport for references.	Complied
Criterion 6.8: Any form of discrimination based on race, caste, national origin, religion, disability, gender, sexual orientation, union membership, political affiliation, or age, is prohibited.			

Criterion / Indicator		Assessment Findings	Compliance
6.8.1	A publicly available equal opportunities policy including identification of relevant/affected groups in the local environment shall be documented. - Major compliance -	Boustead management has established Equal Opportunity Policy dated 11/1/2011 signed by Senior General Manager and was publically available, displayed on the notice board. The company will ensure all the relevant parties will be treated equally and no discrimination based on race, caste, nationalities, religion, gender, age and etc.	Complied

<p>6.8.2</p>	<p>Evidence shall be provided that employees and groups including local communities, women, and migrant workers have not been discriminated against. - Major compliance -</p>	<p>Through document review on the list of employees, found that the composition of workers consisted of local, foreign workers, male and female workers. Interviewed with the sampled female and male workers from different nationalities confirmed that no discrimination practices in the estates and mill. Overtime were given to all the workers without any prejudice based on caste, gender, race and nationalities. They are allowed to transfer work station by getting approval from management if they felt unfit on the work assigned.</p> <p>Gender committee for Kulai Young Estate is in place lead by Siti Aishah (Checkroll Clerk) and last meeting was held on 25.10.2018; talks on procedure on how to lodge complaint on issues related to sexual harassment, proposing on sport activities, child play ground, etc. However, as at time of audit, the gender committee is no longer active as the Chairperson have left the company since May 2019 and as at current, the estate management is in progress of establishing a new committee with proposed Chairperson – Ms. Noor Aqilah.</p> <p>Gender committee for Mill and Telok Sengat is combined with participation from both side; lead by the chairperson Pn. Zaliha Bt Ahmad and AJK – Pn Masitah Bte Said. Meeting minutes dated 17.01.2019 was held at Telok Sengat Estate, meeting minutes sighted. Topic discussed includes, election of the committee to be done biannually, proposal of activities, stray dogs, etc. Meeting was also held dated on 09.07.2019.</p> <p>Gender committee for Chamek Estate is established on July 2018 and had their first meeting on 4th July 2018. As at current, the gender committee is lead by the Chief Clerk (Puan Norafizza Binti Rossmi). According to the chairperson, due to poor participation and minimum members available as at current, meeting will be held bi-annually whenever required. Based on the last meeting minutes dated 29.09.2018, members are briefed on company policies including method of complain should there be any sexual</p>	<p>Complied</p>
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Criterion / Indicator		Assessment Findings	Compliance
		harassment. Activities proposed during the meeting includes prayers day, cooking classes, etc.	
6.8.3	It shall be demonstrated that recruitment selection, hiring and promotion are based on skills, capabilities, qualities, and medical fitness necessary for the jobs available. - Minor compliance -	Depending on the nature of work positions, the operating unit management takes into considerations the needs for technical qualifications/experience and related skills in recruitment selection, hiring and promotion exercises. Recruitment of the workers are based on skills and experience that is verified through education background, previous work experience, medical fitness and skills; that is documented in the application form. It was verified that the promotions to higher position at the estates and mill were based on performance evaluations that considered the skill, capabilities and qualities of the employees. Workers interview confirmed that they have been interviewed & evaluated on their skill, experience and education background.	Complied
Criterion 6.9: There is no harassment or abuse in the work place, and reproductive rights are protected.			

Criterion / Indicator		Assessment Findings	Compliance
6.9.1	Policy to prevent sexual and all other forms of harassment and violence shall be implemented and communicated to all levels of the workforce. - Major compliance -	Boustead Plantations Berhad has developed a Sexual Harassment Policy signed by Senior General Manager, En. Shoib Abdullah dated 11/1/2011. The company will ensure the comfort and security of every employees, clients, business partners and public that involved in the plantations' activities. The policy has clearly stated the types of sexual harassment such as verbal, visual, psychology, physical and etc. Latest communication of the policy was conducted in the stakeholder meeting on 14.11.2018 between Chamek Estate management and stakeholder, and meeting with trade union representative on 11.07.2019. Meeting minutes sighted, encompassing briefing on policies such as freedom of association, human rights, complain policy, harassment, forced labour, etc. Furthermore, the policy displayed on the notice board outside the office. Besides Chamek Estate, stakeholder meeting for Kulai Young Estate conducted on 29.03.2018 while Mill and Telok Sengat Estate conducted simultaneously on 21.05.2018 with participation from internal and external stakeholder.	Complied
6.9.2	A policy to protect the reproductive rights of all, especially of women, shall be implemented and communicated to all levels of the workforce. - Major compliance -	Reproductive Rights Policy dated 11/8/2015 signed by Senior General Manager was available. The company will respects the rights of women to make decision without any discrimination, force or threaten by others. Every workers are given freedom to decide for the family planning that does not violate the regulations. Latest communication of the policy was conducted in the stakeholder meeting on 14.11.2018 between Chamek Estate management and stakeholder, and meeting with trade union representative on 11.07.2019. Meeting minutes sighted, encompassing briefing on policies such as freedom of association, human rights, complain policy, harassment, forced labour, etc. Furthermore, the policy displayed on the notice board outside the office. Besides Chamek Estate, stakeholder meeting for Kulai Young Estate conducted on 29.03.2018 while Mill and Telok Sengat Estate conducted simultaneously on 21.05.2018 with participation from internal and external stakeholder.	Complied

Criterion / Indicator		Assessment Findings	Compliance
6.9.3	A specific grievance mechanism which respects anonymity and protects complainants where requested shall be established, implemented, and communicated to all levels of the workforce. - Minor compliance -	The company has developed 'Complaint on Sexual Harassment Procedure and Flowchart on Actions to be Taken' if any case reported. Latest communication of the policy was conducted in the stakeholder meeting on 14.11.2018 between Chamek Estate management and stakeholder, and meeting with trade union representative on 11.07.2019. Meeting minutes sighted, encompassing briefing on policies such as freedom of association, human rights, complain policy, harassment, forced labour, etc. Furthermore, the policy displayed on the notice board outside the office. Besides Chamek Estate, stakeholder meeting for Kulai Young Estate conducted on 29.03.2018 while Mill and Telok Sengat Estate conducted simultaneously on 21.05.2018 with participation from internal and external stakeholder.	Complied
Criterion 6.10: Growers and mills deal fairly and transparently with smallholders and other local businesses.			
6.10.1	Current and past prices paid for Fresh Fruit Bunches (FFB) shall be publicly available. - Minor compliance -	Price of current FFB price is prominently displayed at the mill outside the weighbridge counter and updated on monthly basis. Sighted the price as of 27.08.2019 is RM17.81. Price of past FFB price can be obtained through 'Monthly FFB Purchase' file, based on "Telok Sengat Palm Oil Mill Own Estate – Boustead Estates Agency Sdn Bhd (Marketing Department)" letter issued by Marketing department on monthly basis. Calculation of FFB price is based on 'Kadar Perahan 1% (MPOB)' guideline. Each of the grower will be updated on the new price and issued with "Computation of Payment for FFB Purchased" for reference and cross –checking.	Complied

Criterion / Indicator	Assessment Findings	Compliance
6.10.2	<p>Evidence shall be available that growers/millers have explained FFB pricing, and pricing mechanisms for FFB and inputs/services shall be documented (where these are under the control of the mill or plantation).</p> <p>- Major compliance -</p> <p>Telok Sengat POM does receives FFB from own estate and 7 external estates such as Bukit Tinggi Estate, Estate, Jaya Sewajar, Tanjong Buai Oil Palm, Asia Elmark, UM Plantation, Ang Tong Mixed Holding and Avon River. Each of the grower will be provided with written "Computation of Payment for FFB Purchased" letter, that entailed the price per MT on monthly basis and total of supplied FFB. The FFB pricing and pricing mechanisms is communicated during 'MILL Coordinating Committee Meeting'. Meeting minutes sighted dated 18.12.2018.</p> <p>Contract for transporting workers and FFB in place that is signed and agreed by both parties that covers the pricing/pay rate, payment terms, terms and condition, areas of services, etc. Contracts found renewed annually and are paid promptly according to the terms.</p>	Complied

Criterion / Indicator	Assessment Findings	Compliance
6.10.3	<p>Evidence shall be available that all parties understand the contractual agreements they enter into, and that contracts are fair, legal and transparent.</p> <p>- Minor compliance -</p> <p>Suppliers and contractors used by the estates and mill; i.e. transporting FFB to mill and for activities such as harvesting, manuring, sanitation, pruning, infield collection, etc. Selected samples of contracts as below:-</p> <p><u>Kulai Young Estate</u> 2 randomly selected samples (for transporting FFB and contract labor) as listed below:- (1) Company No.: JM0458128W (Cipta Melati), dated 01.01.2019 ~ 31.12.2019 (2) Company No.: 550706T (Loh Swee Sang), dated 01.01.2019 ~ 31.12.2019</p> <p><u>Telok Sengat POM</u> 3 randomly selected contractors (2 - FFB supplier and 2 FFB Transportation) as below:- (1) Company No.: 440251P (Jaya Sewajar Sdn Bhd), dated 1995 valid up to date. (Contract valid based on clause 12 - unless terminated by either party with 2 months' notice in advance) (2) Company No.: 581864 U (Asia Elmark Sdn Bhd), dated 20.11.2018, remains valid as at time of audit. Contract Ref: BEA/OCP/XI/2018 (3) Company No.: 21873-W (Yew Tan Enterprise), dated 12.10.2011 remain valid as at time of audit (Contract valid based on clause 6 – Term; unless terminated by either party with 2 months' notice in advance) - Company No.: 612175-V (Sing Rubber & Transport Sdn Bhd), dated 26.08.2019, contract remain valid as at time of audit.</p>	Complied

<p>6.10.4</p>	<p>Agreed payments shall be made in a timely manner. - Minor compliance -</p>	<p>Payment for suppliers and contractors as specified in 6.10.3 is made according to the Boustead payment cycle (e-payment schedule – Appendix B) i.e. invoices received before and on 5th of the month, payment will be made on 10th and if payment made before and on 15th of the month, payment will be made on 20th. Sampled payment records as shown below evidence that all invoices generated are paid on timely manner in accordance with Boustead payment schedule. Stakeholder consultation involving supplier and contractors confirmed that payment are made promptly once invoice is generated.</p> <p><u>Kulai Young Estate</u> <u>April 2019</u> (1) Inv. No.: C1506819005 /31.03.2019, Payment voucher: 0939 / paid 10.04.2019 (2) Inv. No.: L0106819005 /31.03.2019, Payment voucher: 0938 / paid 10.04.2019 <u>May 2019</u> (1) Inv. No.: C1506819008 /25.05.2019, Payment voucher: 0024 / paid 31.05.2019 (2) Inv. No.: L0106819007 /25.05.2019, Payment voucher: 0026 / paid 31.05.2019 <u>June 2019</u> (1) Inv. No.: C1506819010 /12.06.2019, Payment voucher: 0042 / paid 20.06.2019 (2) Inv. No.: L0106819009 /12.06.2019, Payment voucher: 0041 / paid 20.06.2019</p> <p><u>Telok Sengat POM</u> <u>June 2019</u> (1) Inv. No.: 006/2019 / 30.06.2019, payment voucher dated 15.07.2019 (2) Inv. No.: AE00168 / 30.06.2019, payment voucher dated 12.07.2019</p>	<p>Complied</p>
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Criterion / Indicator	Assessment Findings	Compliance
	<p>(3) Inv. No.: YT1906-00001 / 30.06.2019, payment voucher dated 22.07.2019</p> <p>(4) Inv. No.: SR190099 /30.06.2019 , payment voucher: OR1907-010, 19.07.2019</p> <p><u>May 2019</u></p> <p>(1) Inv. No.: 005/2019 / 31.05.2019, payment voucher dated 11.07.2019</p> <p>(2) Inv. No.: AE00166 / 11.06.2019, payment voucher dated 24.06.2019</p> <p>(3) Inv. No.: YT1905-00001 / 31.05.2019, payment voucher dated 05.07.2019</p> <p>(4) Inv. No.: SR190082 / 31.05.2019, payment voucher dated 24.06.2019</p> <p><u>April 2019</u></p> <p>(1) Inv. No.: 004/2019 / 30.04.2019, payment voucher dated 27.05.2019</p> <p>(2) Inv. No.: AE00163 / 30.04.2019, payment voucher dated 27.05.2019</p> <p>(3) Inv. No.: YT1904-00001 / 30.04.2019, payment voucher dated 21.06.2019</p> <p><u>July 2019</u></p> <p>(4) Inv. No.: SR190120 / 31.07.2019, payment voucher dated 14.08.2019</p> <p><i>Note: date of invoice as stated above is default computer generated on end of month. Submission of invoices are mainly made at the mid of the month which falls on 2nd payment cycle of Boustead payment schedule.</i></p> <p>Interview with suppliers and contractors during stakeholder consultation states that payment from Boustead Plantation for mill and estates are paid promptly without any delay.</p>	
<p>Criterion 6.11: Growers and millers contribute to local sustainable development where appropriate.</p>		

Criterion / Indicator	Assessment Findings	Compliance
6.11.1	<p>Contributions to local development that are based on the results of consultation with local communities shall be demonstrated.</p> <ul style="list-style-type: none"> - Minor compliance – <p>Contribution to local development and communities will be made upon request received from stakeholder and any external party. Other than the activities proposed and organized through NUPW and Gender Committee, there are other communities contribution such as donations that made to NUPW, school and mosque upon request made. Sampled records sighted as at time of audit as listed below.</p> <p>Kulai Young Estate</p> <ul style="list-style-type: none"> - 'Aktiviti Gotong Royong' / Cooperation Event organized dated 23.08.2019 in the estate. <p>Chamek Estate</p> <ul style="list-style-type: none"> - Contribution for Scholarship Event organized by NUPW dated 17.04.2019 - Contribution for Religious School Award Ceremony & Welfare (Majlis ANugerah Cemerlang & mesyuarat Agung Badan Kebajikan Sek. Agama Kampung Melayu Chamek) dated 16.04.2019 - Contribution for Celebration of Prophet Muhammad's Birthday to Sek. Keb. Kampung Chamek dated 16.01.2019. - Donation made to Sri Maha Mariamman Temple Chamek dated 13.10.2018. - Stakeholder consultation carried out during the audit covering schools, clinics and head of village states that Boustead business unit are very cooperative and responsive to any request made; including donation, financial support & contribution, participation in any external event, etc. 	Complied
6.11.2	<p>Where there are scheme smallholders, there shall be evidence that efforts and/or resources have been allocated to improve smallholder productivity.</p> <ul style="list-style-type: none"> - Minor compliance – <p>There is no scheme smallholder involved in the certification unit.</p>	Not applicable
<p>Criterion 6.12: No forms of forced or trafficked labour are used.</p>		

<p>6.12.1</p>	<p>There shall be evidence that no forms of forced or trafficked labour are used. - Major compliance -</p>	<p>There is no form of forced or trafficked labour used in mil and estates. Workers are allowed to choose to work overtime or to refuse after normal work hour without being forced or being influence by the management. No signs of trafficked labour found; majority of the randomly selected migrant workers are with valid work permit, issued under Boustead under Plantation Workers, while local workers are with NRIC / Identity card. Migrant workers are only hired at estates while POM workers are all local workers / Malaysian citizen. Workers interview confirmed that all overtime hours including working on rest and holiday are on voluntary basis.</p> <p><u>Kulai Young Estate</u> Passport B5782219 / Indonesia, Permit: PE7621396, Valid: 23.04.2020 Passport B2901610 / Indonesia, Permit: PE6931463, Valid: 06.02.2020 Passport B3624666 / Indonesia, Permit: PE8455813, Valid: 28.07.2020 Passport B9251523 / Indonesia, Permit: PE7730879, Valid: 12.05.2020 Passport B5783196 / Indonesia, Permit: PE7621395, Valid: 23.04.2020 Passport B5793761 / Indonesia, Permit: PE1436937, Valid: 28.07.2019 & Special Pass J18K986B5R40 valid: 04.09.2019, pending for medical check. Passport B3629153 / Indonesia, Permit: PE7149696, Valid: 19.07.2019 Passport B7654594 / Indonesia, Permit: PE7654594, Valid: 16.06.2020</p> <p><u>Chamek Estate</u> Passport C2490376 / Indonesia, Permit: PE7497726, Valid: 18.05.2020 Passport C0695112 / Indonesia, Permit: PE6265874, valid: 11.11.2019 Passport C1960362 / Indonesia, Permit: PE7497727, valid: 18.05.2020 Passport AU227579 / Indonesia, Permit: PE6365873, valid: 11.11.2019 Passport P3030018 / India, Entry Visa: VE0560156 Passport M2638018 / India, Entry Visa: VE0560155 (valid for 3 months, issue: 18.07.2019)</p> <p>Telok Sengat Estate</p>	<p>Complied</p>
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Criterion / Indicator	Assessment Findings	Compliance
	Passport BT0388161 / Bangladesh, Permit: PE1767167, valid: 26.09.2019 Passport BR0424258 / Bangladesh, Permit: PE1767165, valid: 26.09.2019 Passport BH0373527 / Bangladesh, Permit: PE1767162, valid: 26.09.2019 Passport BQ0721586 / Bangladesh, Permit: PE6098368, valid: 15.11.2019 Passport BX0324371 / Bangladesh, Permit: PE7172223, valid: 15.11.2019 Passport B3627075 / Indonesia, Permit: PE8026768, valid: 24.06.2020 Passport B3627224 / Indoensia, Permit: PE8026957, valid: 24.06.2020 Passport B3627047 / Indonesia, Permit: PE8026961, valid: 24.06.2020 Passport B8297600 / Indonesia, Permit: PE7623458, valid: 10.03.2020 Passport B6307517 / Indonesia, Permit: PE6307517, valid: 03.12.2019	

<p>6.12.2</p>	<p>Where applicable, it shall be demonstrated that no contract substitution has occurred. - Minor compliance –</p>	<p>Migrant workers are hired and used in estate for harvesting, pruning, manuring, loose fruit collection and 'Supply Lent-Labour'. They are hired in the estates based on Boustead Estate Agency Sdn Bhd work permit under the category of Plantation Workers; as evidenced in the passport; and provided with contract of employment, signed by the Boustead management and the migrant workers. However, these migrant workers are then handed over to the labour contractors; who will be disbursing / paying the migrant workers monthly salary based on the rate as agreed between the labour contractor and migrant workers, manages their day to day works and deployment to the estates.</p> <p>Based on the service contract between Boustead and Labour Contractor, it is the labour contractor responsibility to ensure all task and work assigned by Boustead estate to be completed by the labour contractor's workers. Workers, labour contractor and Boustead estate management interview states that all migrant workers are under the labour contractor payroll and hired through Boustead Estate Agency's quota.</p> <p>Generally, there is substitution of contract sighted for all migrant workers used at the estates. Interview with labour contractors states that:-</p> <ul style="list-style-type: none"> - They are taking charge of the migrant workers task and assigning their daily job deployment, including deployment to other estate if necessary. - Receiving worked payment from Boustead estate management - Paying monthly salary / wage to all migrant workers on every 7th of the month in cash. - Issuing pay-slip to all migrant workers once their salary is paid. - Had an agreement / contract sign with migrant workers; and knows that there is a contract signed between workers and Boustead. - Used Boustead migrant workers quota since they have limited quota on hiring migrant workers. 	<p>Minor NC</p>
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		Sighted there is inconsistent pay-slip received by the migrant worker from labour contractor against copy of pay-slip furnished to the Kulai Young estate management. E.g. as below.							
Payslip received from Labour Contractor				Payslip received by migrant worker					
Income (RM)		Deduction (RM)		Income (RM)		Deduction (RM)			
95A	733.95	Adv	150.00	95A	399.15	Adv.	0		
95C	629.40			95C	602.40	Elec	25.50		
96A	201.00			96A	411.60	Shop Debt	297.80		
97A	1,157.76			97A	1,253.76				
Allow	100.00			Kong	35.00	FFB	5.00		
SGP	200.00			Allow	100.00				
				SGP	200.00				
Total	3,022.11		150.00		3,001.91		323.30		
		<p>Currently, migrant workers are managed by the labour contractors consist of Boustead foreign worker quota. e.g.</p> <ul style="list-style-type: none"> - Kulai Young Estate – 1 contractor - Cipta Melati Enterprise, - Chamek Estate – 2 contractor - Perusahaan Mewah Hijau & Lokman Khalid Baba Resources, - Telok Sengat – 7 contractor - Abu Bakar Bin Syed Alyallatas, Hau Peng Jhai, Hau Peng Kai, Hong Fah Enterprise, Lee Kok Wee, Voon Siaw Phin. 							

Criterion / Indicator		Assessment Findings	Compliance
		Only contract between worker and estates are available for review (except Telok Sengat Estate) while access to contract between worker and contract is not available despite request made during the audit. Hence, a Minor NC has been raised on the matter.	
6.12.3	Where temporary or migrant workers are employed, a special labour policy and procedures shall be established and implemented. - Major compliance -	Documented procedure in place as per "Foreign Workers Procedure" Date of issue: Jan 2016, Rev. 1. Procedure outline steps and process of how migrant / foreign workers can be hired including medical screening up to extension of work permit for another 5 years. Boustead Plantation Berhad – Polisi Pekerja Buruh Asing dated 13.04.2016 (policy statement) is place stating company's commitment to ensure all foreign workers are hired shall accordance with local regulation and acts of Malaysia and paid with minimum wage as stipulated in the minimum wage council as at current.	Complied
Criterion 6.13: Growers and millers respect human rights.			

Criterion / Indicator		Assessment Findings	Compliance
6.13.1	A policy to respect human rights shall be documented and communicated to all levels of the workforce and operations (see Criteria 1.2 and 2.1). - Major compliance -	The company has developed Human Rights Policy dated 11/1/2016 signed by Senior General Manager. The company is committed to ensure every individual are treated with fairness, dignity and respect. The company will respect the rights of every individual. They also recognize their responsibilities to respect human rights and avoid complicity in human rights abuses. Latest communication of the policy was conducted in the stakeholder meeting on 14.11.2018 between Chamek Estate management and stakeholder, and meeting with trade union representative on 11.07.2019. Meeting minutes sighted, which includes briefing on policies such as freedom of association, human rights, complain policy, harassment, forced labor, etc. The policies are displayed on the notice board outside the office. Besides Chamek Estate, stakeholder meeting for Kulai Young Estate conducted on 29.03.2018 while Mill and Telok Sengat Estate conducted simultaneously on 21.05.2018 with participation from internal and external stakeholder.	Complied
6.13.2	As long as children of foreign workers in Sabah and Sarawak are ineligible to attend government school, the plantation companies should engage in a process to secure these children access to education as a moral obligation.	Not applicable as the audit is at the peninsular of Malaysia.	Complied
Principle 7: Responsible development of new plantings			
Telok Sengat Business Unit did not carry out any new plantings since November 2005. Therefore, Principle 7 is not applicable during this surveillance assessment. The immature areas are replanted area.			
Principle 8: Commitment to continual improvement in key areas of activity			
Criterion 8.1: Growers and millers regularly monitor and review their activities, and develop and implement action plans that allow demonstrable continual improvement in key operations.			

Criterion / Indicator	Assessment Findings	Compliance
<p>8.1.1</p> <p>The action plan for continual improvement shall be implemented, based on a consideration of the main social and environmental impacts and opportunities of the grower/mill, and shall include a range of Indicators covered by these Principles and Criteria.</p> <p>As a minimum, these shall include, but are not necessarily be limited to:</p> <ul style="list-style-type: none"> • Reduction in use of pesticides(Criterion 4.6); • Environmental impacts (Criteria 4.3, 5.1 and 5.2); • Waste reduction (Criterion 5.3); • Pollution and greenhouse gas (GHG) emissions (Criteria 5.6 and 7.8); • Social impacts (Criterion 6.1); <ul style="list-style-type: none"> • Optimising the yield of the supply base. <p>- Major compliance -</p>	<p>The continual improvement on its environmental impacts taken were:</p> <ul style="list-style-type: none"> • reduce emission by daily inspection and monitoring for their FFB Transport to prevent any leakage and problem that could adverse impact the environment • reduction of diesel usage / GHG emission. • maintain water quality • reduce soil erosion • improve soil fertility <p>Documented in Environmental and Social Improvement plan. The plan stated the Aspect Identified, Impact Identified, Action Plan, Time frame and Person In-Charge. The plan is subjected to be review every 2 years or when required. The management plan covers as follows:</p> <ol style="list-style-type: none"> i. Pay and living conditions ii. Communication and consultation iii. Fair pricing iv. Soil v. Water vi. Energy vii. Operational procedure viii. Training ix. Compliance to laws and regulation x. Local development xi. Water course and wet land xii. Pollution xiii. Emission xiv. Waste 	<p>Complied</p>

Appendix B: Approved Time Bound Plan

Details of Time Bound Plan as submitted by Boustead Plantations Berhad (Updated 4/7/2019)

No	PMU	Loc	Main Assessment	Certification Status	Status	Updated Information for Partial Certification, Clause 4.5.3 RSPO Time-bound Plan & 4.5.4 Requirements for uncertified management units
1.	Sg. Jernih BU	Pahang	11 Sep 2011	Stage 2	Certification completed	nil
			11 Sep 2016	Re-certification	Recertification completed	nil
2.	Nak BU	Sabah	16 May 2015	Stage 2	Certification completed	nil
			May 2017	Include LTTS	Certification completed	nil
3.	Trong BU	Perak	20 July 2017	Stage 2	Certification completed	nil
4.	Segaria BU	Sabah	Dec 2017	Stage 2	Certification completed	nil
5.	Segamaha BU	Sabah	Oct 2018	Stage 2	Certification completed	nil
6.	Telok Sengat BU	Johor	August 2019	Stage 2	In-progress	nil
7.	Lepan Kabu Bekoh Eldred	Kelantan Johor Johor	2020	-	Deferred to 2020 (initially 2019)	Lepan Kabu Mill ceased operation in May 2018. In July 2019, LKE undergo MSPO Audit. Lepan Kabu, Bekoh, and Eldred (All estates without own mill- loose estates)
8.	Rimba Nilai (Sugut) BU	Sabah	2020	-	Initial certification audit planned on Sep 2020 postponed to another date yet to be confirmed within 2020	-
9.	Loagan Bunut BU	Sarawak	2021	-	Internal audit in progress	-
10.	Pertama BU	Sabah	2021	-		New Acquisition in 2018 from Duta Plantations Berhad. As per RSPO Certification System for P&C June 2017; new acquisitions shall be certified within a three-year timeframe.
11.	Kanowit BU	Sarawak	2022	-	Internal audit planned on 2021	-

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12.	Tawai BU	Sabah	2022	-	Internal audit planned on 2021	New Acquisition in 2019 from Sit Seng & Sons Realty Sdn Bhd As per RSPO Certification System for P&C June 2017; new acquisitions shall be certified within a three-year timeframe.
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Legend:

	Certified Management Units
	Uncertified Management Units

Appendix C: GHG Reporting Executive Summary

The GHG emissions that were produced in **2018** for **Telok Sengat Business Unit** was calculated using the PalmGHG Calculator version 3.0.1. The assessment team had verified the data input in the PalmGHG Calculator against operations records. PalmGHG Calculation Options selected 'Full version' and 'Exclude LUC Emission' calculation option is not applied. The records verified includes:

- i. Estates area planted data
- ii. Fuel consumed
- iii. Mill datas include CPO produced, PKO Produced and FFB Processed
- iv. Fertilizer consumed data for both estates and smallholders.

The summary of the Net GHG emitted in **2018** for **Telok Sengat Business Unit** are as following:

Emission per product	tCO ₂ e/tProduct
CPO	1.17
PKO	1.17

Extraction	%
OER	21.28
KER	4.92

Production	t/yr
FFB Process	118,443.51
CPO Produced	25,204.78
PKO Produced	5,827.42

Land Use	Ha
OP Planted Area	4,956.50
OP Planted on peat	0
Conservation (forested)	0
Conservation (non-forested)	60.70
Total	4,956.50

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Summary of Field Emission and Sink

	Own Crop*		Group		3 rd Party		Total	
	tCO ₂ e	tCO ₂ e / FFB	tCO ₂ e	tCO ₂ e / FFB	tCO ₂ e	tCO ₂ e / FFB	tCO ₂ e	tCO ₂ e / FFB
Emission								
Land Conversion	31875.96	0.43	0	0	0	0	31875.96	0.43
CO ₂ Emission from fertilizer	2975.43	0.04	0	0	0	0	2975.43	0.04
NO ₂ Emmision	4656.27	0.05	0	0	0	0	4656.27	0.05
Fuel Consumption	1999.07	0.02	0	0	0	0	1999.07	0.02
Peat Oxidation	0	0	0	0	0	0	0	0
Sink								
Crop Sequestration	-30701.12	-0.42	0	0	0	0	-30701.12	-0.42
Conservation Sequestration	0	0	0	0	0	0	0	0
Total	10805.61	0.12	0	0	0	0	10805.61	0.12

**Note: Includes both estates and smallholders*

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Summary of Mill Emission and Credit

	tCO ₂ e	tCO ₂ e/tFFB
Emission		
POME	19180.66	0.16
Fuel Consumption	1437.93	0.01
Grid Electricity Utilisation	0	0
Credit		
Export of Grid Electricity	-2.91	0
Sales of PKS	0	0
Sales of EFB	0	0
Total	20615.68	0.17

Summary of Kernel Crusher Emission and Credit (if applicable)

Emissions	tCO ₂ e
PK from own mill	7308.78
PK from other source	0
Fuel Consumptions	0
Total Crusher emissions	0

*This mill has no kernel crusher operation.

Palm Oil Mill Effluent (POME) Treatment:	
Divert to Compost (%)	0
Divert to anaerobic diversion (%)	100

POME Diverted to Anaerobic Digestion:	
Divert to anaerobic pond (%)	100
Divert to methane captured (flaring) (%)	0
Divert to methane captured (energy generation) (%)	0

Appendix D: General Chain of Custody Requirements for the Supply Chain

5.1 Applicability of the general chain of custody requirements for the supply chain			
	Requirement	Evidence For any N/A raised, justification is required.	Compliance (Yes / No or N/A)
5.1.1	The General Chain of Custody requirements of the RSPO Supply Chain Standard shall apply to any organization throughout the supply chain that takes legal ownership and physically handles RSPO Certified Sustainable oil palm products at a location under the control of the organization including outsourced contractors. After the end product manufacturer, there is no further requirement for certification.	Boustead Plantations Bhd headquarter has the physically handle the RSPO Certified Sustainable oil palm products. All trading, contract and sales are managed by Marketing department at HQ and held the palmTrace registration number for respective mill (Telok Sengat Palm Oil Mill: RSPO_PO1000003738).	Yes
5.1.2	Traders and distributors require a licence obtained from RSPO Secretariat to sell RSPO certified product but do not themselves require certification. When selling RSPO certified products, a licensed trader and/or distributor shall pass on the certification number of the product manufacturer and the applicable supply chain model.	Telok Sengat POM is not a trader or distributor.	N/A
5.1.3	Either the operator at site level or its parent company seeking certification shall be a member of the RSPO and shall register on the RSPO IT platform.	Boustead Plantations Berhad held RSPO membership number: 1-0012-04-000-00. Company has registered in PalmTrace system as follows: Members ID – Boustead Plantations Berhad – Telok Sengat Business Unit: (RSPO_PO1000003738). Member category: Oil Mill	Yes
5.1.4	Processing aids do not need to be included within an organization’s scope of certification.	Processing aids was not in used at Telok Sengat Palm Oil Mill.	N/A
5.2 Supply chain model			

5.2.1	The site can only use the same supply chain model as its supplier or go to a less strict system. Declassification/downgrading can only be done in the following order: Identity Preserved -> Segregated -> Mass Balance.	Procedure namely Mill RSPO Supply Chain Standards, dated July 2016, Revised Date: April 2019, Revision: 7.0 was established which covered control of documents, delivery of FFB, purchasing and goods in, process monitoring, CPO and PK despatch, records keeping, product claim, outsourced contractor, training, management review & internal audit, reclassification of Mill's supply, processing, complaints. The supply chain model for POM was Mass Balance Module.	Yes
5.2.2	The site can use one (1) or a combination of supply chain models as audited and certified by the CB.	Telok Sengat Palm Oil Mill was certified with Mass Balance Module.	Yes
5.3. Documented Procedures			
5.3.1	The site shall have written procedures and/or work instructions or equivalent to ensure the implementation of all elements of the applicable supply chain model specified. This shall include at minimum the following: <ul style="list-style-type: none"> • Complete and up to date procedures covering the implementation of all the elements of the supply chain model requirements. 	Telok Sengat Palm Oil Mill implemented the supply chain program based on Bousted Plantations Supply Chain (SCC) Procedures; dated: July 2016, Revised Date: April 2019, Revision: 7.0. The procedure was prepared by Sustainability Unit and approved by Sustainability Chairman which covering the implementation of all supply chain requirements.	Yes
	<ul style="list-style-type: none"> • Complete and up to date records and reports that demonstrate compliance with the supply chain model requirements (including training records). 	Up-to-date records available including the following: <ul style="list-style-type: none"> - Telok Sengat Palm Oil Mass Balancing Record for Oil Mills - CPO sales contract - PK sales contract - Despatch records 	Yes
	<ul style="list-style-type: none"> • Identification of the role of the person having overall responsibility for and authority over the implementation of these requirements and compliance with all applicable requirements. This person shall be able to demonstrate awareness of the organization's procedures for the implementation of this standard. 	The procedure also specified the RSPO Chairman shall have the overall responsibility for the implementation of the procedure with assignment of relevant personnel from various departments to assist in the implementation. Sighted the Letter of Appointment; Ref. # BEA/SUST-RSPO/TSPOM; Dated: 6/6/2018 for the appointment of Mill Manager as the person incharge for maintaining the compliance of requirement with	Yes

		regard to RSPO P&C and RSPO supply chain certification system. Appointment made by the company sustainability Chairman.	
5.3.2	The site shall have a written procedure to conduct annual internal audit to determine whether the organization; i) conforms to the requirements in the RSPO Supply Chain Certification Standard and the RSPO Market Communications and Claims Documents.	Procedure namely Mill RSPO Supply Chain Standards, dated: July 2016, Revised Date: April 2019, Revision: 7.0 was established which covered the internal audit under. The internal audit will be plan to be conducted once a year. However, for Telok Sengat POM, the SC internal audit yet to be conducted. Hence, a Major NC has been raised on the matter.	Major NC
	ii) effectively implements and maintains the standard requirements within its organization	Since the internal audit yet to be conducted, this indicator unable to be verified and not applicable for the time being.	N/A
5.4. Purchasing and goods in			
5.4.1	The receiving site shall ensure that purchases of RSPO certified oil palm products are in compliance and the following minimum information for RSPO certified products is made available by the supplier in document form: <ul style="list-style-type: none"> • The name and address of the buyer; • The name and address of the seller; • The loading or shipment/delivery date; • The date on which the documents were issued; • A description of the product, including the applicable supply chain model (Identity Preserved, Segregated or Mass Balance or the approved abbreviations); • The quantity of the products delivered; • Any related transport documentation; • Supply Chain certificate number of the seller; • A unique identification number 	The daily records are prepared at the entry point at the weighbridge. Daily summary and monthly summary documented for all the certified FFB. Records verified by internal and external audit. Telok Sengat POM has system to verify at the weighbridge. Telok Sengat POM received FFB from own estate (Telok Sengat Estate, Kulai Young Estate and Chamek Estate) and 20% from outsider. Sighted sampled as following: 1. Telok Sengat Estate Despatch Note: TSEG2010-228 Weighbridge Ticket: 95298 Date: 29/7/2019 Field: PJ10C Tonnage: 7890 kg Transporter: WRD3203	Yes

		<p>2. Chamek Estate Despatch Note: 3808 Weighbridge Ticket: 95334 Date: 29/7/2019 Field: 12A, 95A, 97B Tonnage: 32,050 kg Transporter: JMR6789</p> <p>3. Kulai Young Estate Despatch Note: 01334 Weighbridge Ticket: 95321 Date: 29/7/2019 Field: PJ10, PM95 Tonnage: 12,820 kg Transporter: JMT6388</p>	
	<ul style="list-style-type: none"> Information shall be complete and can be presented either on a single document or across a range of documents issued for RSP0 certified oil palm products (for example, delivery notes, shipping documents and specification documentation). 	<p>The daily records are prepared at the entry point at the weighbridge. Daily summary and monthly summary documented for all the certified FFB. Records verified by internal and external audit.</p> <p>Telok Sengat POM has system to verify at the weighbridge. Telok Sengat POM received FFB from own estate (Telok Sengat Estate, Kulai Young Estate and Chamek Estate) and 20% from outsider. Sighted sampled as following:</p> <p>1. Telok Sengat Estate Despatch Note: TSEG2010-228 Weighbridge Ticket: 95298 Date: 29/7/2019 Field: PJ10C Tonnage: 7890 kg</p>	<p>Yes</p>

		<p>Transporter: WRD3203</p> <p>2. Chamek Estate Despatch Note: 3808 Weighbridge Ticket: 95334 Date: 29/7/2019 Field: 12A, 95A, 97B Tonnage: 32,050 kg Transporter: JMR6789</p> <p>3. Kulai Young Estate Despatch Note: 01334 Weighbridge Ticket: 95321 Date: 29/7/2019 Field: PJ10, PM95 Tonnage: 12,820 kg Transporter: JMT6388</p>	
	<ul style="list-style-type: none"> The site receiving RSPO certified oil palm products shall ensure that the products are verified as being RSPO certified. For sites that are required to announce and confirm trades in the RSPO IT platform, this shall include making Shipping Announcements/Announcements and Confirmations on the RSPO IT platform per shipment or group shipments. Refer to section 5.7.1 of this document for further guidance. 	<p>The daily records are prepared at the entry point at the weighbridge. Daily summary and monthly summary documented for all the certified FFB. Records verified by internal and external audit.</p> <p>Telok Sengat POM has system to verify at the weighbridge. Telok Sengat POM received FFB from own estate (Telok Sengat Estate, Kulai Young Estate and Chamek Estate) and 20% from outsider. Sighted sampled as following:</p> <p>1. Telok Sengat Estate Despatch Note: TSEG2010-228 Weighbridge Ticket: 95298 Date: 29/7/2019</p>	<p>Yes</p>

		<p>Field: PJ10C Tonnage: 7890 kg Transporter: WRD3203</p> <p>2. Chamek Estate Despatch Note: 3808 Weighbridge Ticket: 95334 Date: 29/7/2019 Field: 12A, 95A, 97B Tonnage: 32,050 kg Transporter: JMR6789</p> <p>3. Kulai Young Estate Despatch Note: 01334 Weighbridge Ticket: 95321 Date: 29/7/2019 Field: PJ10, PM95 Tonnage: 12,820 kg Transporter: JMT6388</p> <p>However, there was no RSPO certified product since Telok Sengat Bussines Unit is yet to be certified with RSPO.</p>	
	<ul style="list-style-type: none"> A check of the validity of the Supply Chain Certification of suppliers is required for all sites that are SC certified. This shall be checked via the list of RSPO Supply Chain Certified sites on the RSPO website (www.rspo.org) at least annually or through the RSPO IT Platform by confirmation of (shipping) announcements. 	<p>As this is initial assessment, no purchased of certified FFB has been done.</p>	<p>Yes</p>

	<ul style="list-style-type: none"> The validity of licence for traders and distributors shall also be checked via the RSPO website at least annually or through the RSPO IT platform by confirmation of shipping announcements / announcements. 	As this is initial assessment, no purchased of certified FFB has been done.	Yes
5.4.2	The site shall have a mechanism in place for handling non-conforming oil palm products and/or documents.	Telok Sengat POM was certified under Mass Balance Module and received FFB from own estate (Telok Sengat Estate, Kulai Young Estate and Chamek Estate) and 20% from outsider. Procedure namely Mill RSPO Supply Chain Standards, dated: July 2016, Revised Date: April 2019, Revision: 7.0 was established which covered	Yes
5.5. Outsourcing activities			
5.5.1	<p>In cases where an operation seeking or holding certification outsources activities to independent third parties (e.g. subcontractors for storage, transport or other outsourced activities), the operation seeking or holding certification shall ensure that the independent third party complies with the requirements of the RSPO Supply Chain Certification Standard. A CPO mill and independement mil cannot outsource processing activities like refining or crushing.</p> <p>This requirement is not applicable to outsourced storage facilities where the management of the oil palm product(s) and instructions for tank movements are controlled by the certified organization (not the tank farm manager).</p>	<p>There was no outsourcing process in Telok Sengat POM except outsource activity for transporting of CPO.</p> <p>However, no communication between the mill and the transporter (Yewtan Enterprise Sdn Bhd) with regards the mill shall ensure the transporter complies with the requirement of RSPO supply chain certification standard. Hence, a Major NC has been raised on the matter.</p>	Major NC
5.5.2	<p>Sites which include outsourcing within the scope of their RSPO Supply Chain certificate shall ensure the following:</p> <p>a. The site has legal ownership of all input material to be included in outsourced processes;</p>	There was no outsourcing process in Telok Sengat POM except outsource activity for transporting of CPO.	Yes
	<p>b. The site has an agreement or contract covering the outsourced process with each contractor through a signed and enforceable agreement with the contractor. The onus is on the site to ensure that</p>	There was no outsourcing process in Telok Sengat POM except outsource activity for transporting of CPO.	Yes

	certification bodies (CBs) have access to the outsourcing contractor or operation if an audit is deemed necessary.		
	c. The site has a documented control system with explicit procedures for the outsourced process which is communicated to the relevant contractor.	There was no outsourcing process in Telok Sengat POM except outsource activity for transporting of CPO.	Yes
	d. The site seeking or holding certification shall furthermore ensure (e.g. through contractual arrangements) that independent third parties engaged provide relevant access for duly accredited CBs to their respective operations, systems, and any and all information, when this is announced in advance.	There was no outsourcing process in Telok Sengat POM except outsource activity for transporting of CPO.	Yes
5.5.3	The site shall record the names and contact details of all contractors used for the processing or physical handling of RSPO certified oil palm products.	There was no outsourcing process in Telok Sengat POM except outsource activity for transporting of CPO. The transporter that involve for outsourcing activity was include in the stakeholder list.	Yes
5.5.4	The site shall at its next audit inform its CB of the names and contact details of any new contractor used for the processing or physical handling of RSPO certified oil palm products.	There was no outsourcing process in Telok Sengat POM except outsource activity for transporting of CPO. So far, no new contractor used for processing or physical handling of product since TSPOM yet to be certified with RSPO.	Yes
5.6. Sales and goods out			
5.6.1	<p>The supplying site shall ensure that the following minimum information for RSPO certified products is made available in document form.</p> <ul style="list-style-type: none"> • The name and address of the buyer; • The name and address of the seller; • The loading or shipment/ delivery date; • The date on which the documents were issued; • A description of the product, including the applicable supply chain model (Identity Preserved, Segregated or Mass Balance or the approved abbreviations); 	All relevant information for RSPO certified products will be made available in document form as per CPO agreement. However, no sales and goods out for certified products. Telok Sengat POM is yet to be certified with RSPO.	Yes

	<ul style="list-style-type: none"> The quantity of the products delivered; Any related transport documentation; Supply chain certificate number of the seller; A unique identification number 		
	<ul style="list-style-type: none"> Information shall be complete and can be presented either on a single document or across a range of documents issued for RSPO certified oil palm products (for example, delivery notes, shipping documents and specification documentation). 	All relevant information for RSPO certified products will be made available in document form as per CPO agreement. However, no sales and goods out for certified products. Telok Sengat POM is yet to be certified with RSPO.	Yes
	<ul style="list-style-type: none"> For sites that are required to announce and confirm trades in the RSPO IT platform, this shall include making Shipping Announcements / Announcements and Confirmations on the RSPO IT platform per shipment or group of shipments. Refer to section 5.7.1 of this document for further guidance. 	All relevant information for RSPO certified products will be made available in document form as per CPO agreement. However, no sales and goods out for certified products. Telok Sengat POM is yet to be certified with RSPO.	Yes
5.7. Registration of transactions			
5.7.1	<p>Supply chain actors who:</p> <ul style="list-style-type: none"> are mills, traders, crushers and refineries and; take legal ownership and/or physically handle RSPO Certified Sustainable oil palm products that are available in the yield scheme of the RSPO IT Platform (Figure 2 and 3, Refer Annex 1) shall register their transaction in the RSPO IT platform and confirm upon receipt where applicable. 	<p>The registration of PalmTrace was carried out by the HQ Sales Department. All transactions will be registered accordingly in the PalmTrace.</p> <p>Company has registered in PalmTrace system as follows: Members ID – Boustead Plantations Berhad – Telok Sengat Business Unit: (RSPO_PO1000003738). Member category: Oil Mill</p> <p>However, Telok Sengat POM is yet to be certified with RSPO. No any transaction of certified CPO IP and PK IP was conducted yet.</p>	Yes

5.7.2	The involved supply chain actors mentioned in 5.7.1 shall do the following actions in the RSPO IT Platform:	The registration of PalmTrace was carried out by the HQ Sales Department. All transactions will be registered accordingly in the PalmTrace. However, Telok Sengat POM is yet to be certified with RSPO.	Yes
	<ul style="list-style-type: none"> Shipping Announcement / Announcement: When RSPO certified volume is sold as certified, the volumes of products that are in the yield scheme (Figure 2 and 3, refer Annex 1) shall be registered as a Shipping Announcement / Announcement in the RSPO IT Platform. The declaration time to do Shipping announcement / Announcement is based on members' own standard operating procedures. 		
	<ul style="list-style-type: none"> Trace: When RSPO certified volumes are sold as RSPO certified to actors in the supply chain beyond the refinery, the volume shall be traced at least annually. Tracing triggers the generation of a trace document with a unique traceability number. Tracing can be done in a consolidated way at least annually. 	The registration of PalmTrace was carried out by the HQ Sales Department. All transactions will be registered accordingly in the PalmTrace. However, Telok Sengat POM is yet to be certified with RSPO.	Yes
	<ul style="list-style-type: none"> Remove: RSPO certified volumes sold under other scheme or as conventional, or in case of underproduction, loss or damage shall be removed. 	The registration of PalmTrace was carried out by the HQ Sales Department. All transactions will be registered accordingly in the PalmTrace. However, Telok Sengat POM is yet to be certified with RSPO.	Yes
	<ul style="list-style-type: none"> Confirm: Acknowledge the purchase of RSPO certified volume by confirming Shipping Announcements / Announcements. 	The registration of PalmTrace was carried out by the HQ Sales Department. All transactions will be registered accordingly in the PalmTrace. However, Telok Sengat POM is yet to be certified with RSPO.	Yes
5.8. Training			
5.8.1	The organization shall have a training plan on RSPO Supply Chain Standards requirements, which is subject to on-going review and is supported by records of the training provided to staff.	Telok Sengat Palm Oil Mill implemented the supply chain program based on Bousted Plantations Supply Chain (SCC) Procedures; dated: July 2016, Revised Date: April 2019, Revision: 7.0 which include the competency and training. As per procedure, re-training shall be conducted at once a year an interval.	Major NC

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		However, there was no training related to RSPO supply chain conducted at Telok Sengat POM. Thus, Major NCR was raised.	
5.8.2	Appropriate training shall be provided by the organization for personnel carrying out the tasks critical to the effective implementation of the supply chain certification standard requirements. Training shall be specific and relevant to the task(s) performed.	There was no training related to RSPO supply chain conducted at Telok Sengat POM. Cross refer with indicator 5.8.1.	Yes
5.9. Record Keeping			
5.9.1	The organization shall maintain accurate, complete, up-to-date and accessible records and reports covering all aspects of these RSPO Supply Chain Certification Standard requirements.	Telok Sengat Palm Oil Mill has maintained the accurate, complete, up-to-date and accessible records and reports covering all aspects of these RSPO Supply Chain Certification requirements.	Yes
5.9.2	Retention times for all records and reports shall be a minimum of two (2) years and shall comply with legal and regulatory requirements and be able to confirm the certified status of raw materials or products held in stock.	Procedure namely Mill RSPO Supply Chain Standards; dated: July 2016, Revised Date: April 2019, Revision: 7.0 has defined at least 7 years of retention time for all records.	Yes
5.9.3	The organization shall be able to provide the estimate volume of palm oil/palm kernel oil content (separate categories) in the RSPO certified oil palm product and keep an up to date record of the volume purchased (input) and claimed (output) over a period of twelve (12) months.	The forecast volume for a period of twelve (12) month was stated in the public summary report.	Yes
5.10. Conversion factors			
5.10.1	Where applicable a conversion rate shall be applied to provide a reliable estimate for the amount of certified output available from the associated inputs. Organizations may determine and set their own conversion rates which shall be based upon past experience, documented and applied consistently. Guidance on conversion rates is published on the RSPO website (www.rspo.org); RSPO Rules for Physical Transition of Oleochemicals and its Derivaties. This is relevant for derivatives of Palm Oil and Palm Kernel Oil, as used in the oleochemical and personal care industries.	Applicable conversion factors were only Oil Extraction Rate (OER) and Kernel Extraction Rate (KER). Conversion factor of CPO and PK production is depending on the actual OER and KER.	Yes

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5.10.2	Conversion rates shall be periodically updated to ensure accuracy against actual performance or industry average if appropriate.	The facility is using the actual extraction rate and therefore updating of rates is not necessary.	Yes
5.11. Claims			
5.11.1	The site shall only make claims regarding the use of or support of RSPO certified oil palm products that are in compliance with the RSPO Rules on Market Communications and Claims.	The procedure for claims is stated in Mill RSPO Supply Chain Standards dated July 2016, Revised Date: April 2019, Revision: 7.0 in case of necessary. No claims made by Telok Sengat POM since Telok Sengat BU is yet to be certified with RSPO.	Yes
General corporate communications			
4.1	A corporate communication is one made by any RSPO member that highlights its membership of the RSPO and/or its commitment to the principles of the RSPO. Corporate communication is an 'off-product' claim.	Procedure namely Mill RSPO Supply Chain Standards, dated: July 2016, Revised Date: April 2019, Revision: 7.0 clearly stated that the communication will be comply with the rules of respective certification scheme, eg: RSPO. However, Telok Sengat POM was not used any RSPO trademark.	N/A
4.2	In corporate communications a member is allowed to: a. Display its RSPO membership status b. Display the RSPO web address (www.rspo.org) c. State that the member supports the work of the RSPO d. State the member's history with regard to the RSPO. e. Use the RSPO trademark to promote its membership of the RSPO. Additionally, where an RSPO member displays the RSPO trademark in digital format this must be accompanied by the text 'Check our progress at www.rspo.org ' where the link must lead to the member's profile page.	Procedure namely Mill RSPO Supply Chain Standards, dated: July 2016, Revised Date: April 2019, Revision: 7.0 clearly stated that the communication will be comply with the rules of respective certification scheme, eg: RSPO. However, Telok Sengat POM was not used any RSPO trademark.	N/A
4.3	In corporate communications RSPO members must not make any statement that may lead consumers to believe that RSPO membership by itself implies the selling of RSPO-certified oil palm products.	Procedure namely Mill RSPO Supply Chain Standards, dated: July 2016, Revised Date: April 2019, Revision: 7.0 clearly stated that the communication will be comply with the rules of respective certification scheme, eg: RSPO. However, Telok Sengat POM was not used any RSPO trademark.	N/A

4.4	Members must ensure that all communication is consistent, clear and cannot mislead consumers or other stakeholders as to the certified content of oil palm products in the member's own products.	Procedure namely Mill RSPO Supply Chain Standards, dated: July 2016, Revised Date: April 2019, Revision: 7.0 clearly stated that the communication will be comply with the rules of respective certification scheme, eg: RSPO. However, Telok Sengat POM was not used any RSPO trademark.	N/A
4.5	Members are not allowed to use the RSPO corporate logo as shown in the RSPO Rules on Market Communications & Claims document. This is for the sole use of the RSPO secretariat.	No use of RSPO corporate logo at Telok Sengat POM.	N/A
Business to business communications			
5.1	Business to Business communication relates to RSPO members in the supply chain selling to and/or communicating with other organizations in the supply chain about the use of certified sustainable oil palm products.	Procedure namely Mill RSPO Supply Chain Standards, dated: July 2016, Revised Date: April 2019, Revision: 7.0 clearly stated that the communication will be comply with the rules of respective certification scheme, eg: RSPO. All the products sold under certified product need to display the certificate number and model of RSPO SCC on the despatch note/weighbridge ticket.	N/A
5.2	When confirming the sale of certified oil palm products, members must adhere to the requirements of the RSPO SCCS. This includes stating the supply chain model and certificate number under which the claim is being made.	Procedure namely Mill RSPO Supply Chain Standards, dated: July 2016, Revised Date: April 2019, Revision: 7.0 clearly stated that all sale of certified oil palm products must be printed (at weighbridge ticket) with certificate number and RSPO SCC model.	N/A
5.3	Where a distributor or wholesaler takes title to products containing certified sustainable oil palm products, the requirements of the RSPO SCCS can follow either of two options: a. If the distributor or wholesaler holds only a Distributor license, it may only communicate RSPO-certified oil palm products by linking the product to the manufacturer using the manufacturer's SCCS certificate number. This covers both brand and own brand products. However, in the case of own brand products it is essential that	Telok Sengat POM is not under distributor or wholesaler category. Thus, this requirement is not applicable.	N/A

	<p>customers are aware that the product has been made on behalf of the distributor or wholesaler, with specific evidence either through on-pack claims or documentation.</p> <p>b. If the distributor or wholesaler is supply chain-certified they should follow the requirements outlined in section 5.2.</p>		
5.4	<p>A certified member can provide information to its customers detailing the presence of certified palm oil contained within a product even if it is not eligible for a product-specific under RSPO rules. The end product must not be labelled as certified or sold in such a way that implies RSPO certification.</p> <p>For example, a retailer or food service company may require a breakdown of all palm based ingredients within an end product and the certified status of each. This information may be provided by a certified RSPO member without constituting a product-specific claim.</p>	<p>Telok Sengat POM is producing crude palm product and does not involved in any labelling of end product and the presence of certified palm oil contained within a product. This requirement is for the next supply chain actor and not applicable for POM.</p>	N/A
Business to consumer communication			
6.1	<p>Only RSPO members that have supply chain certification are allowed to make business to consumer claims about the certified sustainable oil palm products contained within product(s), which are known as 'product-specific' claims. Product-specific claims are voluntary.</p>	<p>No business to consumer communication on product specific claim made Telok Sengat POM and only produce crude and unfinished product. This is not applicable for POM.</p>	N/A
6.2	<p>Only RSPO members who have supply chain certification are authorised to use the RSPO trademark and/or RSPO label, with the exception of RSPO Credits and of retailers in accordance with 6.8 below.</p>	<p>No business to consumer communication on product specific claim made Telok Sengat POM and only produce crude and unfinished product. This is not applicable for POM.</p>	N/A
6.3	<p>When on-pack claims on RSPO-certified sustainable oil palm products are used, the RSPO trademark and associated identification number must be present.</p>	<p>No business to consumer communication on product specific claim made Telok Sengat POM and only produce crude and unfinished product. This is not applicable for POM.</p>	N/A
6.4	<p>Business to consumer communication shall not include information about the claimant's RSPO membership status.</p>	<p>No business to consumer communication on product specific claim made Telok Sengat POM and only produce crude and unfinished product. This is not applicable for POM.</p>	N/A

6.5	Members shall not communicate to consumers information about their suppliers' RSPO membership status.	No business to consumer communication on product specific claim made Telok Sengat POM and only produce crude and unfinished product. This is not applicable for POM.	N/A
6.6	Use of the RSPO trademark is restricted to claims about RSPO-certified sustainable palm oil products and it is not authorised for use in relation to any other ingredient.	No business to consumer communication on product specific claim made Telok Sengat POM and only produce crude and unfinished product. This is not applicable for POM.	N/A
6.7	Use of any other trademark or logo to highlight the presence of RSPO-certified sustainable oil palm products is an unauthorised product-specific claim.	No business to consumer communication on product specific claim made Telok Sengat POM and only produce crude and unfinished product. This is not applicable for POM.	N/A
6.8	RSPO members who are retailers or food service companies can apply for an RSPO trademark license for use in business to consumer communications, provided they can demonstrate the validity of these claims to an RSPO-accredited certification body (CB). This will be undertaken via a remote audit, prior to the trademark use, during which the retailer or food service company will need to demonstrate that the use of the trademark is in compliance with the rules contained within this document and that the claim itself can be supported through a certified supply chain. Any other palm oil claims, including those highlighting the absence of palm oil, must be highlighted to the CB during the audit to ensure that all claims comply with the requirements of these rules. The CB will confirm the outcome of these audits, to be conducted annually, to RSPO who may continue to grant a trademark license or withdraw permission based upon the audit findings. This is in keeping with the rules applying to RSPO supply chain certified members. The guidance document for audits is available on www.rsपो.org .	No business to consumer communication on product specific claim made Telok Sengat POM and only produce crude and unfinished product. This is not applicable for POM.	N/A
MODULE A – IDENTITY PRESERVED & SEGREGATED SPECIFIC RULES			
Certified oil palm content (IP)			
	For IP, 95% or above of the oil palm content must be RSPO IP-certified.	Not applicable.	N/A

	For SG, 95% or above of the oil palm content must be SG, or a combination of SG and IP.	Not applicable.	N/A
	Where there is any percentage of non-certified oil palm within the product, the reason for this must be fully justified and an action plan for moving to fully certified oil palm must be in place, in accordance with the requirements of the RSPO SCCS. In addition, the volume of non-certified oil palm products must be covered by the purchase of RSPO Credits of equivalent volume.	Not applicable.	N/A
Labelling and trademark (IP)			
	Members are allowed to use the RSPO label in one of the following ways: a. RSPO trademark which includes the tag 'CERTIFIED' or b. RSPO trademark which includes the tag 'This product contains certified sustainable palm oil'. Wherever a RSPO trademark is displayed, the applicable trademark license number must be shown immediately under or next to the trademark or the 'statement'. Font must be Calibri, font size must be at least 4pt (1.4 mm or 0.06 inch). In on-pack communications, the RSPO trademark can be printed anywhere on the pack.	Not applicable.	N/A
Messaging (IP)			
	Messaging ALLOWED in storytelling in product-related communications may include some or all of the following elements: <ul style="list-style-type: none"> The oil palm products contained in this product have been certified to come from RSPO sources. www.rspo.org By choosing this product, you are sure it contains RSPO-certified palm oil. For more information: www.rspo.org RSPO-certified sustainable oil palm products were kept apart from other oil palm products throughout the supply chain. www.rspo.org 	Not applicable.	N/A

	<ul style="list-style-type: none"> • Certified sustainable oil palm products can be traced back to RSPO-certified mills and plantations. www.rspo.org • The entire supply chain is monitored by independent, RSPO-accredited auditors. www.rspo.org • RSPO-certified sustainable palm oil has been produced to stringent environmental and social criteria. www.rspo.org • References to (or images of) particular RSPO-certified production units, if the relationship to those units can be shown by company records. 		
MODULE B – MASS BALANCE SPECIFIC RULES			
Minimum Mass Balance content (MB)			
	95% or above of the oil palm content must be RSPO MB-certified.	Telok Sengat POM is 100% producing crude palm products.	Yes
	Where there is any percentage of non-certified oil palm within the product, the reason for this must be fully justified and an action plan for moving to fully certified oil palm must be in place, in accordance with the requirements of the RSPO SCCS. In addition, the non-certified volume must be covered by equivalent volume of RSPO Credits.	As this is initial assessment, no certified content yet.	Yes
Labelling and trademark (MB)			
	<p>Members are allowed to use the RSPO label in one of the following ways:</p> <ul style="list-style-type: none"> • Surrounded by the text: 'Certified sustainable palm oil'. • The RSPO label MUST contain the tag 'MIXED'. The tag MIXED designates oil palm products sourced under the Mass Balance (MB) supply chain system, which administratively balances inputs and outputs of certain palm oil volumes. The tag 'MIXED' on a product does not guarantee that the product itself contains the certified material; some or all of it may reside in a product that does not carry a claim. 	Telok Sengat POM is producing 100% crude palm product and does not involved in any labelling of end product.	N/A

	<ul style="list-style-type: none"> • The RSPO label can also include the statement: '[The palm oil contained in this product] contributes to the production of certified sustainable palm oil'. • Wherever the RSPO trademark is displayed, the applicable trademark license number must be shown immediately under or next to the trademark or the 'statement'. Font must be Calibri, font size must be at least 4 pt (1.4 mm or 0.06 inch). • In on-pack communications, the RSPO trademark can be printed anywhere on the pack. Further guidance on use of the trademark is provided in the RSPO Trademark License Terms and Conditions and in Annex 1 of the Rules on Market Communications & Claims document. 		
Messaging (MB)			
	<p>Messaging ALLOWED in storytelling in product-related communications includes:</p> <ul style="list-style-type: none"> • [Oil palm products]/[palm oil]/[palm kernel oil] from RSPO-certified mills and plantations were mixed with non-certified oil palm products in the supply chain. • The volume of [oil palm products][palm oil]/[palm kernel oil] in this product reflects an equivalent volume of palm oil or palm kernel oil produced by RSPO certified mills and plantations. • In off-product communications, reference to (or images of) particular RSPO-certified production units, if the relationship to those units can be shown in company records is allowed. 	As this is initial assessment, no messaging made yet.	N/A
	<p>Messaging NOT ALLOWED in storytelling in product-related communications:</p> <p>Anything that can lead consumers to believe that RSPO-certified palm products are (certified to be) part of the product.</p>	As this is initial assessment, no messaging made yet.	N/A
MODULE C – PARTIAL PRODUCT CLAIMS			

	<p>To increase awareness among consumers of the availability of sustainable oil palm products and to help accelerate the uptake, it is permissible to make a claim on product when the percentage of the oil palm content is less than 95% certified, but only when the following conditions have been met:</p> <ul style="list-style-type: none"> • The member making the claim is the end product manufacturer, is an RSPO member and is certified against the RSPO SCCS or is an RSPO retailer member authorized to use the trademark by the RSPO. • At least 50% of the oil palm content has been supplied through an RSPO certified supply chain as IP, SG or MB. • The remainder of the oil palm content that is not RSPO-certified is covered by the purchase of RSPO Credits to an equivalent volume. • The product-specific claim is limited to only the following phrase: 'This product contributes to the production of certified sustainable palm oil'. • The use of the RSPO label with this claim is mandatory and must include the tag '50% MIXED'. No other percentage is allowable within this claim. 	Not applicable.	N/A
MODULE D – COMBINED SUPPLY CHAIN MODELS SPECIFIC RULES			
	<p>Where a mixture of inputs supplied through different RSPO supply chain models are present in a product, the following applies:</p> <p>75% IP + 20% SG => 95% SG claim is made 65% SG + 30% MB => 95% MB claim is made 55% MB + 40% B&C => 95% partial product claim can be made 45% SG + 55% B&C < 50% B&C claim can be made</p>	Not applicable.	N/A
	<p>Where one supply chain model accounts for 95% of the oil palm content, the claim for this specific model may be made:</p>	Not applicable.	N/A

	95% IP + 5% MB => 95% IP IP claim can be made 95% SG + 5% MB => 95% SG SG claim can be made 95% MB + 5% C => 95% MB MB claim can be made		
5.12. Complaints			
5.12.1	The organization shall have in place and maintain documented procedures for collecting and resolving stakeholder complaints.	Procedure namely Mill RSPO Supply Chain Standards, dated: July 2016, Revised Date: April 2019, Revision: 7.0 0 clearly stated that the mill shall have in place and maintain the relevant documentations pertaining to the stakeholder’s complaints. The separate procedure for communication was established which was endorsed by Mill Manager.	Yes
5.13. Management Review			
5.13.1	The organization is required to hold management reviews annually at planned intervals, appropriate to the scale and nature of the activities undertaken.	Management review yet to be conducted by Telok Sengat POM. Thus, the Major NCR was raised.	Major NC
5.13.2	The input to management review shall include information on: <ul style="list-style-type: none"> • Results of internal audits covering RSPO Supply Chain Certification Standard. • Customer feedback. • Status of preventive and corrective actions. • Follow-up actions from management reviews. • Changes that could affect the management system. • Recommendations for improvement. 	Management review yet to be conducted by Telok Sengat POM. Cross refer with indicator 5.13.1.	N/A
5.13.3	The output from the management review shall include any decisions and actions related to: <ul style="list-style-type: none"> • Improvement of the effectiveness of the management system and its processes. • Resource needs. 	Management review yet to be conducted by Telok Sengat POM. Cross refer with indicator 5.13.1.	N/A

Appendix E: CPO Mill Supply Chain Assessment Report (Module E- CPO Mills: Mass Balance)

E.1 Definition			
	Requirement	Evidence For any N/A raised, justification is required.	Compliance (Yes / No or N/A)
E.1.1	Certification for CPO mills is necessary to verify the volumes of certified and uncertified FFB entering the mill and sales volume of RSPO certified products. A mill may be taking delivery of FFB from uncertified growers, in addition to those from its own and 3rd party certified supply base. In that scenario, the mill can claim only the volume of oil palm products produced from processing of the certified FFB as MB.	Telok Sengat palm oil mill received certified FFB and uncertified FFB. Therefore qualifies for the Mass Balance supply chain system and module. During the P&C assessment, the audit team verified the volumes and sources of certified FFB entering the mill, the implementation of processing controls and volume sales of RSPO certified products.	Yes
E.2 Explanation			
E.2.1	The estimated tonnage of CPO and PK products that could potentially be produced by the certified mill must be recorded by the CB in the public summary of the P&C certification report. For an independent mill, the estimated tonnage of CPO and PK products must be recorded in the RSPO IT platform, supply chain certificate and public summary audit report. This figure represents the total volume of certified oil palm product (CPO and PK) that the certified mill is allowed to deliver in a year. The actual tonnage produced shall then be recorded in each subsequent annual surveillance report.	The estimated tonnage of CPO and PK products that could potentially be produced by the certified mill is recorded in this public summary report.	Yes
E.2.2	The mill must also meet all registration and reporting requirements for the appropriate supply chain through the RSPO supply chain managing organization (RSPO IT platform).	Company has registered in PalmTrace system as follows: Members ID – Boustead Plantations Berhad – Telok Sengat Business Unit: (RSPO_PO1000003738). Member category: Oil Mill	Yes
E.3 Documented procedures			

E.3.1	<p>The site shall have written procedures and/or work instructions to ensure the implementation of all the elements specified in these requirements. This shall include at minimum the following:</p> <p>a. Complete and up to date procedures covering the implementation of all the elements in these requirements;</p>	<p>Telok Sengat Palm Oil Mill implemented the supply chain program based on Bousted Plantations Supply Chain (SCC) Procedures; dated: July 2016, Revised Date: April 2019, Revision: 7.0. The procedure was prepared by Sustainability Unit and approved by Sustainability Chairman which covering the implementation of all supply chain requirements.</p>	Yes
	<p>b. The name of the person having overall responsibility for and authority over the implementation of these requirements and compliance with all applicable requirements. This person shall be able to demonstrate awareness of the site procedures for the implementation of this standard.</p>	<p>The procedure also specified the RSPO Chairman shall have the overall responsibility for the implementation of the procedure with assignment of relevant personnel from various departments to assist in the implementation. Sighted the Letter of Appointment; Ref. # BEA/SUST-RSPO/TSPOM; Dated: 6/6/2018 for the appointment of Mill Manager as the person incharge for maintaining the compliance of requirement with regard to RSPO P&C and RSPO supply chain certification system. Appointment made by the company sustainability Chairman.</p>	Yes
E.3.2	<p>The site shall have documented procedures for receiving and processing certifies an non-certified FFBs.</p>	<p>Telok Sengat Palm Oil Mill implemented the supply chain program based on Bousted Plantations Supply Chain (SCC) Procedures; dated: July 2016, Revised Date: April 2019, Revision: 7.0. The procedure was prepared by Sustainability Unit and approved by Sustainability Chairman which covering the implementation of all supply chain requirements.</p>	Yes
E.4 Purchasing and goods in			
E.4.1	<p>The site shall verify and document the volumes of certified and non-certified FFBs received.</p>	<p>The daily records are prepared at the entry point at the weighbridge. Daily summary and monthly summary documented for all the certified FFB. Records verified during the audit as per appendix D: General Chain of Custody Requirements for the Supply Chain</p>	Yes

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E.4.2	The site shall inform the CB immediately if there is a projected overproduction of certified tonnage.	Procedure namely Mill RSPO Supply Chain Standards, dated: July 2016, Revised Date: April 2019, Revision: 7.0 was clearly stated that if there is a projected overproduction of certified volume, mill shall inform RSPO chairman and marketing department complete with justification and they will be notify the respective CB accordingly.	Yes
E.5 Record keeping			
E.5.1	a. The site shall record and balance all receipts of RSPO certified FFB and deliveries of RSPO certified CPO and PK on a real-time basis and / or three-monthly basis by RSPO.	Records and balance of all receipts of RSPO certified FFB and deliveries of RSPO certified CPO and PK in Daily Production Report and Mass Balancing Records which data sourced from weighbridge system. Verification of the records shows that the mill was able to record on real-time basis.	Yes
	b. All volumes of palm oil and palm kernel oil that are delivered are deducted from the material accounting system according to conversion ratios stated	Computerized system in place with the delivery deducted accordingly. Verified the mass balancing records accordingly.	
	c. The site can only deliver Mass Balance sales from a positive stock. Positive stock can include product ordered for delivery within three (3) months. However, a site is allowed to sell short. (i.e. product can be sold before it is in stock.) For further details refer to Module C.	The Mill aware that only positive stock can be delivered. However, Telok Sengat POM yet to be certified with RSPO.	

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Supply Chain Declaration *(Applicable For Appendix E)*

A. Monthly Records of Certified and Uncertified FFB Received since the last audit				
No.	Month - Year	Volume of FFB from certified supply bases (mt)	Volume of FFB from uncertified supply bases (mt)	Total FFB/Month (mt)
Nil	N/A	N/A	N/A	N/A

B. Monthly Records of Certified CPO & PK since the last audit			
No.	Month - Year	Certified CPO (mt)	Certified PK (mt)
Nil	N/A	N/A	N/A

C. Records of Certified CPO & PK Sold under PalmTrace to Buyers since the last audit (if any)					
No.	Month - Year	Buyers Name	Palmtrace Trading License Number	Certified CPO Sold (mt)	Certified PK Sold (mt)
Nil	N/A	N/A	N/A	N/A	N/A

D. Records of CPO & PK Sold under other schemes to Buyers since the last audit (if any)				
No.	Buyers Name	Scheme Name	CPO Sold (mt)	PK Sold (mt)
Nil	N/A	N/A	N/A	N/A

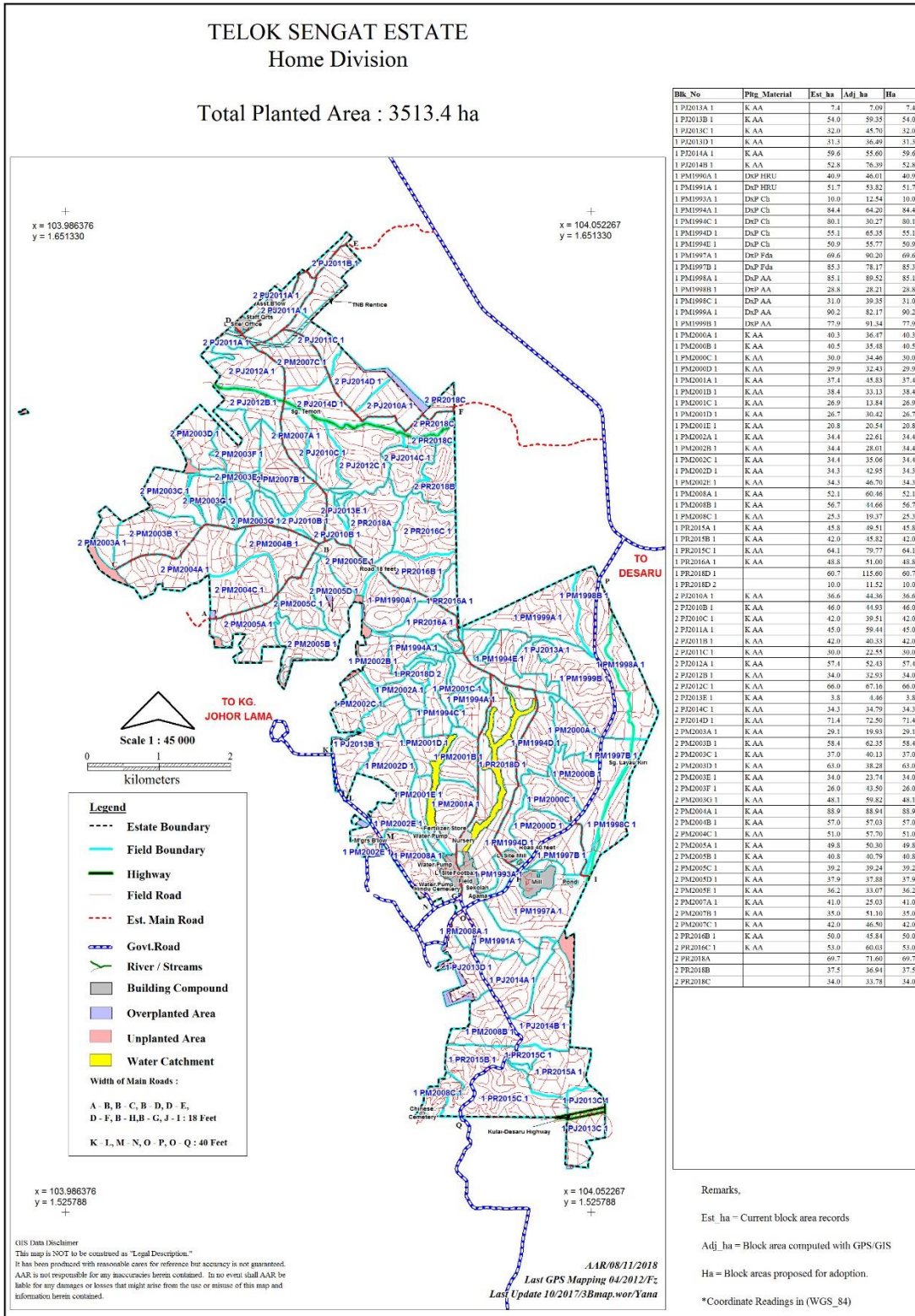
E. Records of CPO & PK Sold as conventional to Buyers since the last audit (if any)			
No.	Buyers Name	CPO Sold (mt)	PK Sold (mt)
Nil	N/A	N/A	N/A

F. Records of Certified CPO Sold under RSPO Credits to Buyers since the last audit (if any)			
No.	Buyers Name	PalmTrace Trading License Number	RSPO Credits of Certified CPO Sold (mt)
Nil	N/A	N/A	N/A

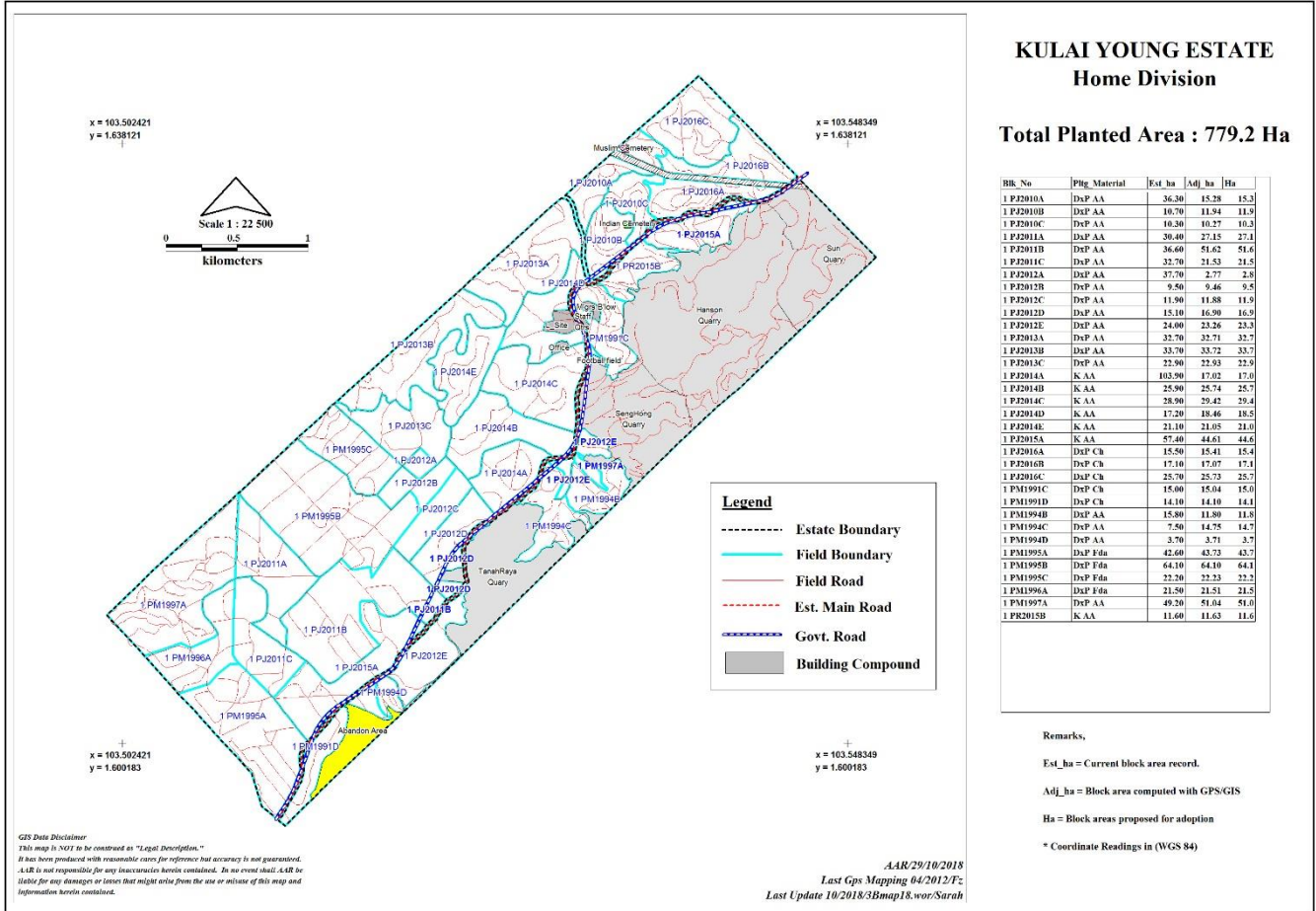
Appendix F: Location Map of Telok Sengat Palm Oil Mill and Supply bases



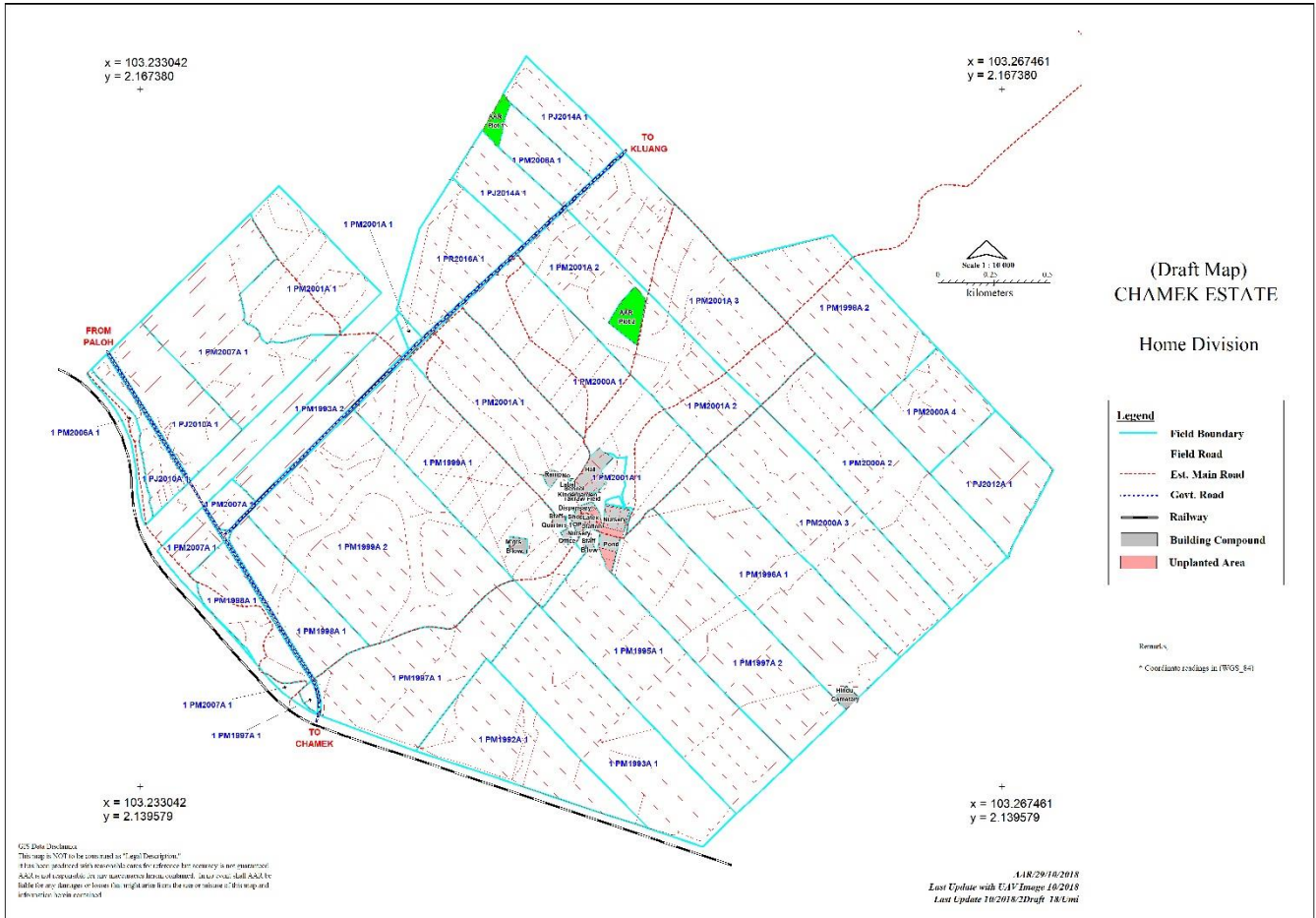
Appendix G: Telok Sengat Estate Field Map



Appendix H: Kulai Young Estate Field Map



Appendix I: Chamek Estate Field Map



Appendix J: List of Smallholder Sampled

Not applicable

Appendix K: List of Abbreviations

a.i	Active Ingredient
BOD	Biochemical Oxygen Demand
CB	Certification Bodies
CHRA	Chemical Health Risk Assessment
COD	Chemical Oxygen Demand
CPO	Crude Palm Oil
CSPO	Certified Sustainable Palm Oil
CSPKO	Certified Sustainable Palm Kernel 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
IP	Identity Preserved
IS - CSPO	Independent Smallholder Certified Sustainable Palm Oil
IS – CSPKO	Independent Smallholder Certified Sustainable Palm Kernel Oil
IS – CSPKE	Independent Smallholder Certified Sustainable Palm Kernel Expeller
ISCC	International Sustainable Carbon Certification
LD50	Lethal Dose for 50 sample
MB	Mass Balance
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
RSPO	Roundtable on Sustainable Palm Oil
P&C	Principles & Criteria
RTE	Rare, Threatened or Endangered species
SCCS	Supply Chain Certification Standard
SEIA	Social & Environmental Impact Assessment
SIA	Social Impact Assessment
SOP	Standard Operating Procedure
TSPOM	Telok Sengat Palm Oil Mill