

**RSPO PRINCIPLE AND CRITERIA  
PUBLIC SUMMARY REPORT**

- Initial Assessment**
- Annual Surveillance Assessment (2\_2)**
- Recertification Assessment** (Choose an item.)
- Extension of Scope**

<p><b>Client Company name (Parent Company):</b>  <b>Johor Corporation</b></p>
<p>Client company Address:  Level 16, Menara Komtar, Johor Bahru City Centre,  80000 Johor Bahru, Johor Darul Takzim</p>
<p>Certification Unit:  <b>Kulim (M) Berhad</b>  <b>Tereh Palm Oil Mill &amp; Supply Base</b></p> <p>Location of Certification Unit:  Batu 26, Road Committee, Jalan Kampung Peta  Jalan Mersing  86000 Kluang, Johor  Malaysia</p>
<p>Date of Final Report:  19/1/2021</p>

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## Section 1: Scope of the Certification Assessment

1. Company Details			
<b>Parent Company</b>	Johor Corporation		
<b>RSPO Membership Number</b>	1-0080-09-000-00	<b>Membership Approval Date</b>	15/06/2009
<b>Address</b>	Level 16, Menara Komtar, Johor Bahru City Centre 80000 Johor Bahru, Johor Darul Takzim		
<b>Palm Oil Mill / Group Manager / Estate (Certification Unit)</b>	Kulim (M) Berhad – Tereh Palm Oil Mill		
<b>Location / Address</b>	Batu 26, Road Committee, Jalan Kampung Peta, Jalan Mersing 86000 Kluang, Johor, Malaysia		
<b>Website</b>	<a href="http://www.kulim.com.my">www.kulim.com.my</a>		
<b>Management Representative</b>	Salasah Elias	<b>E-mail</b>	<a href="mailto:salazah@kulim.com.my">salazah@kulim.com.my</a>
<b>Telephone</b>	07-8611611	<b>Facsimile</b>	07-8631084

2. Certification Information			
<b>Certificate Number</b>	RSPO 613086	<b>Date of First Certification</b>	23/01/2009
		<b>Certificate Start Date</b>	23/01/2019
		<b>Certificate Expiry Date</b>	22/01/2024
<b>Scope of Certification</b>	Palm Oil and Palm Kernel Production		
<b>Visit Objectives</b>	The objective of the ASA 2 assessment is to conduct a certification assessment to ensure the elements of the scope of registration and the requirements of the management standard are effectively addressed by Tereh POM and Supply base's management system and the ability of the management system to ensure the organisation meets applicable statutory, regulatory and contractual requirements and as applicable, to identify areas for potential improvement of the management system.		
<b>Assessment Cycle</b>	<input type="checkbox"/> Initial Assessment <input type="checkbox"/> Recertification Assessment (Choose an item.) <input checked="" type="checkbox"/> Annual Surveillance Assessment (RA 2 ; ASA 2) <input type="checkbox"/> Scope Extension		
<b>Applicable Standards</b>	<input type="checkbox"/> RSPO P&C 2018 for the Production of Sustainable Palm Oil <input checked="" type="checkbox"/> Malaysia National Interpretation 2019 for RSPO P&C 2018 for the Production of Sustainable Palm Oil <input type="checkbox"/> Group Certification 2016 <input type="checkbox"/> RSPO Independent Smallholders Standard 2019		
<b>Supply Chain Module</b>	<input checked="" type="checkbox"/> Identity Preserved <input type="checkbox"/> Mass Balance		

3. Other Certifications			
Certificate Number	Standard(s)	Certificate Issued by	Expiry Date
EU-ISCC-Cert-DE119-60202023	ISCC	ASG	12/03/2021
A116160	HALAL MS 1500:2009	JAKIM	30/06/2021
QMS 00706	ISO 9001:2015	SIRIM QAS International	14/10/2021
MSPO 698004	MS 2530-4:2013	BSI Services Malaysia Sdn Bhd	01/04/2024
MSPO 698005	MS 2530-3:2013		
BVC-MSPO/SC-0029	MSPO SCCS	Bureau Veritas	10/03/2025

4. Location(s) of Mill & Supply Bases			
Name (Mill / Supply Base)	Location	GPS Coordinates	
		Latitude	Longitude
Tereh Palm Oil Mill	Niyor, Kluang, Johor	2° 13' 03.06" N	103° 21' 05.00" E
Tereh Utara Estate	Paloh, Kluang, Johor	2° 15' 05.20" N	103° 20' 36.04" E
Tereh Selatan Estate	Niyor, Kluang, Johor	2° 11' 38.37" N	103° 21' 08.37" E
Selai Estate	Paloh, Kluang, Johor	2° 06' 14.41" N	103° 23' 14.81" E
Enggang Estate	Paloh, Kluang, Johor	2° 16' 12.10" N	103° 25' 36.58" E
Mutiara Estate	Kahang, Kluang, Johor	2° 17' 16.61" N	103° 28' 52.13" E
Sg Sembrong Estate	Kahang, Kluang, Johor	2° 18' 54.84" N	103° 27' 49.49" E
Sg Tawing Estate	Paloh, Kluang, Johor	2° 17' 46.75" N	103° 21' 11.58" E
Wawasan Estate	Kahang, Kluang, Johor	2° 14' 15.108" N	103° 22' 45.12" E
Felda Paloh Estate	Paloh, Kluang, Johor	2° 14' 51.072" N	103° 22' 07.50" E
Rengam Estate	Renggam, Kluang, Johor	1° 53' 21.97" N	103° 24' 49.02" E

5. Description of Supply Base					
Estate	Total Planted (Mature + Immature) (ha)	HCV (ha)	Infrastructure & Other (ha)	Total Area (ha)	% of Planted
Tereh Utara Estate	2,858.56	73.42	155.39	3087.37	92.59
Tereh Selatan Estate	2,529.78	7.36	170.08	2,707.22	93.46
Selai Estate	1,621.06	32.94	146.17	1,800.17	90.13
Enggang Estate	1,655.81	15.35	63.74	1734.9	95.44

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Mutiara Estate	2,311.92	24.85	115.53	2,452.30	94.27
Sg Sembrong Estate	1,181.98	7.89	52.89	1,242.76	95.11
Sg Tawing Estate	2,083.02	28.38	114.37	2,225.77	93.59
Wawasan Estate	361.91	0.39	0	362.3	99.89
Felda Paloh Estate	1,117.28	0	143.82	1261.1	89.20
Rengam Estate	2,341.69	14.11	62.44	2,418.24	96.83
<b>Total</b>	18,063.01	204.69	1,024.43	19,292.1	93.64

**Remarks:**

**Felda Paloh Estate increase by 143.82 Ha because the estate did not account for infrastructures and other non-plantable areas (swamp) in the previous report. Planted area remains the same.**

**6. Plantings & Cycle**

Estate	Age (Years)					Mature	Immature
	0 - 3	4 - 10	11 - 20	21 - 25	26 - 30		
Tereh Utara Estate	0	0	2,086.70	771.86	0	2,858.56	0
Tereh Selatan Estate	272.19	0	1,953.26	304.33	0	2,257.59	272.19
Selai Estate	0	1,041.13	579.93	0	0	1,621.06	0
Enggang Estate	0	1,216.81	439.00	0	0	1,655.81	0
Mutiara Estate	1,048.66	393.37	570.87	49.72	249.3	1,263.26	1048.66
Sg Sembrong Estate	0	0	586.72	595.26	0	1,181.98	0
Sg Tawing Estate	0	625.09	1259.19	167.79	30.95	2,083.02	0
Wawasan Estate	0	60.76	80.00	0	221.15	361.91	0
Felda Paloh Estate	0	0	0	874.07	243.21	1,117.28	0
Rengam Estate	627.04	504.47	1037.09	0	173.09	1,714.65	627.04
TOTAL	1,947.89	3,841.63	8,592.76	2,763.03	917.70	16,115.12	1947.89

**7. Certified Tonnage of FFB (Own Certified Scope)**

Estate	Tonnage / year			
	Estimated (Jan 20 – Dec 20)	Actual (Oct 2019 – Oct 2020)		Forecast (Jan 21 – Dec 21)
		Previous license period (Oct 2019 – Dec 2019)	Current license period (Jan 2020 – Oct 2020)	
Tereh Utara Estate	73,168.00	13,148.96	58,487.96	64,869
Tereh Selatan Estate	57,142.00	9,896.33	39,780.24	50,197

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Selai Estate	37,090.00	8,527.41	38,830.19	40,767
Enggang Estate	35,877.00	8,324.55	35,307.89	40,443
Mutiara Estate	32,516.00	7,570.35	27,381.13	31,717
Sg Sembrong Estate	30,968.00	5,343.21	19,359.71	23,018
Sg Tawing Estate	43,725.00	8,897.75	36,590.42	40,753
Wawasan Estate	6,868.00	2,731.05	4,915.65	9,299
Felda Paloh Estate	17,926.00	1,756.43	12,020.10	24,272
Rengam Estate	39,615.00	9,299.02	28,651.87	38,353
Total	374,895.00		376,820.22	363,688.00

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

Estate	Tonnage / year			
	Estimated (Jan 20 – Dec 20)	Actual (Oct 2019 – Oct 2020)		Forecast (Jan 21 – Dec 21)
	N/A	<i>Previous license period</i> (Oct 2019 – Dec 2019)	<i>Current license period</i> (Jan 2020 – Oct 2020)	N/A
Kuala Kabong Estate		187.81	410.31	
Sedenak Estate		493.01	0	
<b>Total</b>		1,091.13		

**9. Non-Certified Tonnage of FFB (outside supplier – excluded from certificate)**

Independent FFB Supplier	Tonnage / year			
	Estimated (Jan 20 – Dec 20)	Actual (Oct 2019 – Oct 2020)		Forecast (Jan 21 – Dec 21)
		<i>Previous license period</i> (Oct 2019 – Dec 2019)	<i>Current license period</i> (Jan 2020 – Oct 2020)	
NIL				
<b>Total</b>				

**10. Certified Tonnage**

Mill Capacity: 60 MT/hr	Estimated (Jan 20 – Dec 20)	Actual (Oct 2019 – Oct 2020)		Forecast (Jan 21 – Dec 21)
	FFB	FFB		FFB
	374,895.00	<i>Previous license period</i> (Oct 2019 – Dec 2019)	<i>Current license period</i> (Jan 2020 – Oct 2020)	363,688.00

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		76,175.88	301,735.47	
	<b>CPO</b> <b>(OER: 20.53 %)</b>	<b>CPO</b> <b>(OER: 21.02 %)</b>		<b>CPO</b> <b>(OER: 21.80 %)</b>
	76,965.94	16,312.00	63,117.26	79,283.98
		79,068.54		
	<b>PK</b> <b>(KER: 5.13 %)</b>	<b>PK</b> <b>(KER: 5.49 %)</b>		<b>PK</b> <b>(KER: 5.30 %)</b>
	19,232.11	4,108.52	16,634.08	19,275.46
		20,742.60		
<b>TOTAL</b>	<b>N/A</b>			<b>N/A</b>

<b>11. Actual Sold Volume (CPO)</b>					
<b>Current License period</b>					
	RSPO Certified	Other Schemes Certified		Conventional	Total
		ISCC	Others		
<b>CPO (MT)</b>	54,689.34	-	-	8,125.67	<b>62,815.01</b>
<b>Previous License period</b>					
<b>CPO (MT)</b>	15,413.45	-	-	840.08	16,253.53

<b>12. Actual Sold Volume (PK)</b>					
<b>Current License period</b>					
	RSPO Certified	Other Schemes Certified		Conventional	Total
		ISCC	Others		
<b>PK (MT)</b>	16,050.47	-	-	536.87	<b>16,587.34</b>
<b>Previous License period</b>					
<b>PK (MT)</b>	2,320.81	-	-	1,107.62	3,428.43

<b>13. Independent Smallholders Certification Claims</b>		
	Credit	Physical Volume (MT)
<b>IS-CSPO</b>	-	-
<b>IS-CSPKO</b>	-	-
<b>IS-CSPKE</b>	-	-



## 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,  
59200 Kuala Lumpur, Malaysia.  
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### 2.1 Assessment Methodology, Programme, Site Visits

The on-site assessment was conducted on 09/11/2020 to 12/11/2020. The audit programme is included as Section 2.3.

The approach to the audit was to treat the mill and supply base as an RSPO Certification Unit. A range of occupational health and safety, environmental, best practice management, and social factors were covered. This includes consideration of topography, palm age, proximity to areas with HCVs, declared conservation areas, local communities engagement and workers welfare and safety.

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 2018 for the Production of Sustainable Palm Oil (MYNI 2019) was used to guide the assessment of information to assess compliance. The comments made by external stakeholders were also taken into account in the assessment.

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 (and 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 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

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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.

All the previous nonconformities are remains closed. The assessment findings for the initial assessment/annual surveillance 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**

<b>Assessment Program</b>					
<b>Name (Mill / Supply Base)</b>	<b>Year 1 (Recertification)</b>	<b>Year 2 (ASA 2_1)</b>	<b>Year 3 (ASA 2_2)</b>	<b>Year 4 (ASA 2_3)</b>	<b>Year 5 (ASA 2_4)</b>
Tereh Palm Oil Mill	✓	✓	✓	✓	✓
Tereh Utara Estate		✓			✓
Tereh Selatan Estate		✓			
Selai Estate	✓				✓
Enggang Estate	✓			✓	
Mutiara Estate			✓		
Sg Sembrong Estate		✓			✓
Sg Tawing Estate	✓			✓	
Wawasan Estate			✓		
Felda Paloh Estate				✓	
Rengam Estate			✓		

**Tentative Date of Next Visit:** November 8, 2021 - November 12, 2021

**Total No. of Mandays:** 12 Mandays

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**2.2 BSI Assessment Team:**

<b>Team Member Name</b>	<b>Role</b> <i>(Team Leader or Team member)</i>	<b>Qualifications</b> <i>(Short description of the team members)</i>
Vijay Kanna Pakirisamy	Trainee Auditor <span style="float: right;">Lead</span>	He holds a bachelor’s degree in Agribusiness Science Management with Honours from University Utara Malaysia in 2010. He gained his working exposure in the plantation sector, serving as an Assistant Manager with KL Kepong and IOI Plantations and as a Sr. Assistant Manager with United Plantations Berhad. Throughout his 10 year tenure in the oil palm industry, he has been part of the operations team that implements standards within the estate such as RSPO, MSPO, ISCC and FINWATCH. He has completed ISO IMS 9001, 14001, 45001(OHS 18001) Lead Auditor Course in November 2019, endorsed RSPO P&C Lead Auditor Course in October 2019 and endorsed MSPO Lead Auditor Course in November 2019. During this assessment, he assessed on the aspects of Occupational, Health & Safety and estate best practises. He is fluent in Bahasa Malaysia and English languages.
Elzy Ovktafia Chairul	Team Member	She graduated from University Putra Malaysia in Diploma of Agriculture, holding the designatory of LISP from the Incorporated Society of Planters. She is involved in audits and technical reviews works mainly for Sustainability Programme includes RSPO, MSPO and 2nd Party Audit for Social Compliance Programme (URSA, ETI) for 2 years in more than 11 countries. She is a qualified Lead Auditor/Auditor for RSPO P&C, RSPO NEXT, RSPO SCC, ISO 9001:2015 and Social Compliance Audit by Verité. Prior to this, she was the Agronomist in R&D Department for almost 5 years in Oil Palm Plantation where her task involved in all Oil Palm Plantation Operations such as conducting experimental trials on Research & Development with technical paper publications, Crop Forecast, Leaf & Soil Sampling Collection, Fertilizer Recommendation, Pest and Diseases Training, Quality Control as well as special project namely Yield Intensification Project and Food for Palm Project for estates. During this assessment, she assessed on the aspects of legal, social and stakeholder engagement. Able to communicate in Bahasa Malaysia and English.
Amir Bahari	Team Member	He obtained qualification in B.Sc. (Hons) Chemistry USM 1985 & Diploma in Palm Oil Milling Tech/Management MPOB 1996. He has been in the plantations industry for 30 years, among others managing rubber factories, palm oil mills and estates. During the tenure of employment he has been trained as an auditor in ISO 9001, ISO 14001, OHSAS 18001 & also RSPO. He has accumulated 38 man-days in the auditing profession after ending career in the plantation industry. During the assessment he covered mills and estates best practices and environmental aspects. He is fluent in both verbal/written in Bahasa Malaysia and English.

**2.3 Assessment Plan**

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

Date	Time	Subjects	VKP	EO	AB
Sunday 8/11/2020	PM	Audit travel to Kluang.	√	√	-
Monday 9/11/2020  <b>Wawasan Estate</b>	0730	Audit Team travelling to Tereh POM	√	√	√
	0830	Opening Meeting: <ul style="list-style-type: none"> <li>• Opening Presentation by Audit team leader.</li> <li>• Confirmation of assessment scope and finalize Audit plan (including stakeholder’s consultation).</li> <li>• Verification on previous audit findings</li> </ul>			
	09.00 – 13.00	<b>Wawasan Estate</b> 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 – 13.00	<b>Meeting with stakeholders</b> (Government, village rep, smallholders, Union Leader, contractor etc.)	-	√	-
	13.00 – 14.00	Lunch	√	√	√
	14.00 – 16.30	<b>Wawasan Estate</b> 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 10/11/2020  <b>Tereh POM</b>	0730	Audit Team travelling Tereh POM			
	8.30 – 12.00	<b>Tereh POM</b> 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.	√	√	√

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	0830 - 1230	RSPO Supply chain requirements for mill - Mass Balance Module - Internal Audit - Outsourcing activities - Purchasing and Goods In - Sales and Goods Out - Outsourcing Activities - Record keeping - Extraction Rate - Processing - Registration of transaction - Claims	√	-	-
	10.30 - 13.00	<b>Meeting with stakeholders</b> (Government, village rep, smallholders, Union Leader, contractor etc.)	-	√	-
	13.00 - 14.00	Lunch break	√	√	√
	14.00 - 16.30	<b>Tereh Palm Oil Mill:</b> Visit to laboratory, weighbridge and palm product storage area. Document Review P1 – P8: SOPs. Review on SEIA documents and records, wage records, employee data, training records, legal permits, mill inspection and internal monitoring records, CIP & implementation etc. Verify previous nonconformities	√	√	√
	16.30 - 17.00	Interim Closing briefing	√	√	√
Wednesday 11/11/2020	0730	Audit Team travelling to Rengam Estate	√	√	√
<b>Rengam Estate</b>	08.30 - 13.00	<b>Rengam Estate</b> 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 - 13.00	<b>Meeting with stakeholders</b> (Government, village rep, smallholders, Union Leader, contractor etc.)	-	√	-
	13.00 - 14.00	Lunch	√	√	√
	14.00 - 16.30	<b>Rengam Estate</b> 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	√	√	√

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Thursday 12/11/2020	0730	Audit team travel to Mutiara Estate	√	√	√
<b>Mutiara Estate</b>	0830 - 1230	<b>Mutiara Estate</b> 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.			
	10.00 - 12.30	<b>Meeting with stakeholders</b> (Government, village rep, smallholders, Union Leader, contractor etc.)	-	√	-
	13.00 - 14.00	Lunch break	√	√	√
	14.00 - 16.00	<b>Mutiara Estate</b> 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)	√	√	√
	16.00 - 16.30	Audit team discussion	√	√	√
	16.30 - 17.00	Closing meeting and presentation of finding	√	√	√
	1700	End of audit	√	√	√
Friday 13/11/2020	AM	Audit team travel back to Kuala Lumpur	√	√	√

### Section 3: Assessment Findings

#### 3.1 Normative requirement applied for this assessment:

- Kulim (M) Berhad Multiple Management Units / Time Bound Plan
- RSPO Principle and Criteria (P&C) 2018 for the Production of Sustainable Palm Oil
- RSPO Group Certification Standard 2016
- Malaysia National Interpretation (2019) for RSPO P&C 2018
- Independent Smallholder Standard 2019

#### 3.2 Multiple Management Units and Time Bound Plan

Requirement	Assessment	Compliance
Does the plan include all current subsidiaries, estates and mills that is under the control of the holding company?	Yes, the plan includes all current subsidiaries, estates and mills that is under management control.	Yes
Have all the estates and mills certified within five years after obtaining RSPO membership?	Yes, all the estates and mills certified within 5 years after obtaining RSPO membership. Only Indonesian units, PT RAJ & PT TPR have not been certified yet and is proposed to be certified in 2021.	Yes
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.	No. There have not been any new acquisitions.	Yes
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?	There have been no changes to the time bound plan since all the estates and mill under Johor Corporation are already RSPO certified.  This is consistent with the RSPO ACOP reporting. The link provided below: <a href="https://rspo.org/members/310/Johor-Corporation">https://rspo.org/members/310/Johor-Corporation</a>	Yes
Have there been any isolated lapses in implementation of the plan? If yes a <b>Minor</b> non-compliance shall be raised	There is no isolated lapse in Time Bound Plan except for smallholder proposed certification program that halted due to unstable supply to our mill.	Yes
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 <b>Major</b> non-compliance shall be raised	There has been no fundamental failure to proceed with the implementation of the plan.	Yes

<b>Un-Certified Units or Holdings</b>		
No replacement after dates defined in NIs Criterion 7.3: <ul style="list-style-type: none"> <li>• Primary forest.</li> <li>• Any area required to maintain or enhance HCVs in accordance with RSPO P&amp;C criterion 7.3.</li> </ul>	As of to date there are no new plantings that replace primary forest under Johor Corporation.	Yes
Any new plantings since January 1 <sup>st</sup> 2010 shall comply with the RSPO New Plantings Procedure.	There are no new plantings since January 1 <sup>st</sup> 2010 at Johor Corporation estates.	Yes
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.	No land conflict under all certification units.	Yes
Any Labor disputes are being resolved through a mutually agreed process, in accordance with RSPO P&C criterion 6.3.	No labour dispute within all certification units.	Yes
Any Legal non- compliance is being addressed through measures consistent with the requirements of RSPO P&C criteria 2.1	No legal non-compliance within all certification units.	Yes
Did the company conduct internal audit against the uncertified management units requirement? If yes, a positive assurance statement shall be available.	RSPO internal audit assessment for all uncertified units been conducted and the report had been submitted to all unit for improvement plan. The report indicated no systematic failures to proceed with implementation that should be raised as major Nonconformities.	Yes
Have there been any stakeholder (including NGO) consultation conducted?	None noted. No stakeholder comments or complaints received.	Yes

### 3.3 Progress of scheme smallholders and/or outgrowers

<b>Progress of scheme smallholders or outgrowers towards compliance with relevant standards</b>		
<b>Requirement</b>	<b>Remarks</b>	<b>Compliance</b>
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 as there are no scheme smallholders or scheme outgrowers under the certification unit.	Yes



### 3.4 Details of Nonconformities

The nonconformities are listed below. The findings summary of the assessment by criteria are listed in Appendix A. During this Assessment there were One (1) Minor nonconformities raised. The Tereh Palm Oil Mill and Supply Base Certification unit submitted Corrective Action Plans for the nonconformity. Corrective action plans with respect to the nonconformity was reviewed by the BSI audit team and accepted.

The implementation of the corrective action plans to address the minor nonconformity will be followed up during the next surveillance assessment.. The below is the summary of the non-conformity raised during this assessment.

Non-conformity			
<b>NCR Ref #</b>	1984918-202011-N1	<b>Clause &amp; Category (Critical / Minor)</b>	3.7.2 (Minor)
<b>Date Issued</b>	12/11/2020	<b>Due Date</b>	Next Annual Surveillance Assessment
<b>Closed (Yes / No)</b>	No	<b>Date of nonconformity Closure</b>	"Open"
<b>Statement of Nonconformity:</b>	Training provided dated 07.2.2020 on the waste management was ineffective.		
<b>Requirement Reference:</b>	Records of training are maintained		
<b>Objective Evidence:</b>	The PIC of the Scrap Yard did not show awareness on the requirement of handling potential pollution at the Scrap Iron Yard area (potential oil leakage from old vehicles/machines/tractors). This was evidenced during the interview made at site with the PIC.		
<b>Corrections:</b>	Re-training, briefing and demonstration of Standard Operation Procedure (SOP) on handling of scrap iron at scrap Iron Yard will be conducted on 19.11.2020. Evaluation of training to assess understanding of the training of workers.		
<b>Root Cause Analysis:</b>	Training evaluation was not carried out by Estate Management on participant's understanding over Scrap Iron management SOP.		
<b>Corrective Actions:</b>	1. Training and awareness will be provided by Estate on tractor implement and all requirement of handling potential pollution at the Scrap Iron Yard area (potential oil leakage from old vehicles/machines/tractors).  2. On site assessment to be carried out after 3 weeks of training.  3. Internal inspection carried out quarterly to the scrap iron yard area.  4. Evaluation of training to assess understanding of the training of workers.		
<b>Assessment Conclusion:</b>	The corrective action plan is accepted. Effectiveness of corrective action taken will be further verified during the next assessment.		

Positive Findings	
PF #	Description
PF 1	Good commitment and corporation from the management.

<b>PF 2</b>	Positive feedbacks from internal and external stakeholders.
<b>PF 3</b>	Well maintained labour quarters at the mill and all estates.
<b>PF 4</b>	Generally well implementation of Good Agricultural Practices (GAP).

**3.4.1 Status of Nonconformities Previously Identified and Observations**

Non-conformity			
<b>NCR Ref #</b>	1838700-201906-N1	<b>Clause &amp; Category (Critical / Minor)</b>	6.5.3 (Minor)
<b>Closed (Yes / No)</b>	Yes	<b>Date of nonconformity Closure</b>	12/11/2020
<b>Statement of Nonconformity:</b>	Houses at the Sg Sembrong Estate linesite are kept in a poor state of repair contrary to the requirements of Section 6 (1)(c) of the Workers' Minimum Standard of Housing Act 1990.		
<b>Requirement Reference:</b>	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.		
<b>Objective Evidence:</b>	Houses at the linesite located at Sg Sembrong Estate North Division and Central Division are kept in poor state of repair as evidenced during audit, and supported by a census carried out by the Estate. a. At North Division, 13 out of 19 units of houses require replacement of the toilet flush system. b. At Central Division, 10 out of 14 units of houses have faulty toilet flushing system. c. At Central Division, 12 out of 14 houses have doors that could not be locked properly. This is not in compliance with the requirements of Section 6(1)(c) of the Workers' Minimum Standard of Housing Act 1990 which states "Where workers and their dependents are provided with housing at their place of employment it shall be the duty of the employer of such place of employment to ensure that the buildings are kept in a good state of repair ..."		
<b>Corrections:</b>	Ladang Sg Sembrong has taken into action immediate repair and replacement of the faulty toilet flushing system and repairs of un-functional door knob and lock. Currently estate has completed repairs at 14 units and work will be continuously carry out at other units scheduled to complete by middle of November 2019. Employees are reminded during rollcall that they are to report any breakdown (damages) of their quarters immediately through the normal channel of reporting provided.		
<b>Root Cause Analysis:</b>	<p>All the highlighted units with the said problems are actually substandard housing that are. Kulim has decided to carry out the staggered upgrading of respective units involved. Budget for the whole upgrading are to be prepared by respective OUs for year 2020 budget.</p> <p>For Sg Sembrong, all substandard been census, those unit involved been included and major repair are expected to be carried out in consistence with those upgrading budget.</p> <p>The OU acknowledged on the need to carry out the general repair as highlighted and been recorded in order to provide safety and convenience for the employees.</p>		
<b>Corrective Actions:</b>	Estate to review and enforce The Linesite Inspection Monitoring Template to be monitored both through the weekly linesite inspection rounds by HA and Breakdowns Reporting Record monitored at Office.		

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<b>Assessment Conclusion:</b>	<p>ASA 2 Verification</p> <p>Based on interviews, observations and visit made to the linesites, there is evidence that all workers of the Tereh Complex are being provided with adequate housing, water supplies, medical and welfare amenities in accordance with the requirements of the Workers’ Minimum Standard of Housing Act 1990. No major damaged sighted, only minor repairs required and it was being monitored by the management. The records of housing inspection is used and reflected the real situation at housing area visited. Therefore, the minor NC is closed on 12.11.2020.</p>
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Non-conformity			
<b>NCR Ref #</b>	1838700-201906-N2	<b>Clause &amp; Category (Critical / Minor)</b>	4.1.3 (Minor)
<b>Closed (Yes / No)</b>	Yes	<b>Date of nonconformity Closure</b>	12/11/2020
<b>Statement of Nonconformity:</b>	No records of action taken to address the consistently high nitrate readings shown in the monthly laboratory results analyzed by UTCL.		
<b>Requirement Reference:</b>	Records of monitoring and any actions taken shall be maintained and available, as appropriate.		
<b>Objective Evidence:</b>	The monthly watercourse analysis at LTU showed readings of nitrate was consistently exceeding allowable limits of Standard IIA of the National Water Quality and Standards for Malaysia since year 2018. Similarly, analysis results for January and July 2019 at LTS exceed the above Standards limit.		
<b>Corrections:</b>	<p><u>Ladang tereh Utara</u> Tereh immediately conducted the investigation and found that high readings of nitrate and phosphate from the inlet are due to chemical overflow from immediate neighboring estate. Estate had officially notified the neighboring estate on the sampling result and discussion was carried out with them</p> <p><u>Tereh Selatan Estate</u> Investigation have been done and was found that the sampler (Randi) had taken water samples from the inlet and outlet point at stagnant water (with no water flow due to prolong dried weather). Training been conducted to water sampling team on the procedure responsible to take the water sample at the inlet and outlet</p>		
<b>Root Cause Analysis:</b>	<p><u>Ladang Tereh Utara</u> Estate had conducted the respective analysis but not being documented</p> <p><u>Tereh Selatan Estate</u> Management has conducted the respective test accordingly but no document and appropriate action plan was carried out due to lack of guideline</p>		
<b>Corrective Actions:</b>	<p><u>Ladang Tereh Utara</u> Estate to appoint PIC to monitor the water sampling activity, result analysis and monitoring as well as the appropriate action plan.</p> <p><u>Tereh Selatan Estate</u> Estate to appoint PIC to monitor the water sampling activity, result analysis and monitoring as well as the appropriate action plan. SQD to review the Water Sampling procedure to provide clearer guide for the respective activity.</p>		

<b>Assessment Conclusion:</b>	<p>ASA 2 Verification</p> <p>Sampling of water and analysis for the monitoring of outlet water quality are made by all the estates visited with results available for verification. Variation of any parameters will trigger the estate to take action particularly during the manuring activities. Guidelines on the sampling method were available to be taken at water flow. The PIC for this monitoring is the Assistant of the respective estates. The management plan is available in the estate Water Management Plan 2020. Documents were sighted and verified. Hence the NCR raised was closed on 12.11.2020.</p>
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Non-conformity			
<b>NCR Ref #</b>	1838700-201906-N3	<b>Clause &amp; Category (Critical / Minor)</b>	4.7.3 Minor
<b>Closed (Yes / No)</b>	Yes	<b>Date of nonconformity Closure</b>	12/11/2020
<b>Statement of Nonconformity:</b>	Safety Data Sheet and Kulim Safe Operating Procedure clearly stated the requirement that Manurers are required to wear Safety Glasses as one of the PPE items.		
<b>Requirement Reference:</b>	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.		
<b>Objective Evidence:</b>	During field visit found at field P01/01 on 16.10.2019, a gang of Manurers was not wearing the Safety Glasses that was issued to them on 15.10.2019.		
<b>Corrections:</b>	<ol style="list-style-type: none"> <li>1. Providing safety glasses with proper aeration to prevent vapor build up that will inhibits workers' vision.</li> <li>2. Briefing on the importance of wearing PPEs while carrying out fertilizer application had been conducted on 17th October 2019</li> </ol>		
<b>Root Cause Analysis:</b>	Workers negligence to follow instructions by supervisor and Assistant Manager due to wearing safety glasses inhibits their vision and the safety glasses tend to fall off while carrying out the fertilizer application process.		
<b>Corrective Actions:</b>	PPE inspection before going to the field. To attach retainer straps on the safety glasses to prevent it from falling off while carrying out work.		
<b>Assessment Conclusion:</b>	<p>ASA 2 Verification</p> <ol style="list-style-type: none"> <li>1. Manurers were provided with safety glasses to be worn during manuring applications.</li> <li>2. The management have implemented a PPE checklist where the supervisor/staff inspects all required PPE prior to commencing manuring work in the estates.</li> </ol> <p>Mechanism to ensure compliance is now in place, thus the previous minor NC is effectively closed on 12.11.2020.</p>		

Opportunity for Improvement	
OFI#	Description
OFI 1	<p><b>1838700-201906-I1</b>  <b>Indicator 6.5.3</b></p> <p><b>Details:</b>            Contracts signed between the estates, mill and their respective contractors are fair, legal and transparent, as confirmed during audit interviews. The contractors understand the type of job to be undertaken, duration of contract, payment terms and pricing mechanism. For improvement, a Bahasa Malaysia version of the contract would enable non-English speaking contractors to understand the detailed provisions on the contract better.</p> <p><b>Assessment Conclusion:</b>            Contracts signed between the estates, mill and their respective contractors were available in bilingual, English and Bahasa Malaysia for better understanding of the detailed provisions of the contract.</p>
OFI 2	<p><b>1838700-201906-I2</b>  <b>Indicator 6.5.2</b></p> <p><b>Details:</b>            Employment contracts prepared in Bahasa Malaysia were carefully explained to all Indonesian and Bangladeshi migrant workers prior to signing. To provide better understanding to the Bangladeshi workers, the Company had also prepared a translated version of the contracts in Bengali. For further improvement, the Bangladeshi workers should also sign on the translated version of their employment contracts.</p> <p><b>Assessment Conclusion:</b>            Employment contracts that were provided in the native language of the workers were explained, understood and acknowledged by undersigning on the bottom of the pages.</p>

### 3.4.2 Summary of the Nonconformities and Status

CAR Ref.	Category (Critical / Minor)	P&C Indicator	Issued Date	Status & Date (Closure)
1683546-201809-M1	Major	6.5.1	28/09/2018	Closed out on 24.12.2018
1683546-201809-N1	Minor	2.1.3	28/09/2018	Closed out on 14.10.2019
1683546-201809-N2	Minor	4.3.2	28/09/2018	Closed out on 14.10.2019
1838700-201906-N1	Minor	6.5.3	17/10/2019	Closed out on 12.11.2020
1838700-201906-N2	Minor	4.1.3	17/10/2019	Closed out on 12.11.2020
1838700-201906-N3	Minor	4.7.3	17/10/2019	Closed out on 12.11.2020
1984918-202011-N1	Minor	3.7.2	12/11/2020	"Open"

### 3.5 Stakeholders and previous land owner / user consultation

Stakeholder consultation involved internal and external stakeholders. External stakeholders were contacted by telephone to arrange meetings at a location convenient to them to discuss Tereh POM and Supply Base Certification Unit’s environmental and social performance, legal and any known dispute issues.

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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	
<b>Internal Stakeholders</b> <ol style="list-style-type: none"> <li>Ladang Felde Paloh</li> <li>SK Ladanh Tereh</li> <li>Ladang See Sun</li> <li>Ladang Sembrong</li> <li>Ketua Kampung Rengam</li> <li>Kg. Asli Sg. Peroh</li> <li>Kg Paya Baru Layang</li> </ol>	<b>Union/Contractors</b> <ol style="list-style-type: none"> <li>NUPW Kluang</li> <li>Penerang Hati Enterprise</li> <li>Tan Transporting Services &amp; Transport Co.</li> <li>Chahyono Contractor</li> </ol>
<b>Government Departments</b> <ol style="list-style-type: none"> <li>Jabatan Tenaga Kerja Kluang</li> <li>Jabatan Alam Sekitar</li> <li>Jabatan Perhilitan</li> <li>KTM Rengam</li> </ol>	<b>NGO</b> <ol style="list-style-type: none"> <li>No complaint by NGO for Tereh POM's certification unit. Therefore, NGO was not contacted.</li> </ol>

Stakeholders comment	
<b>1</b>	<p><b>Feedbacks:</b>  <u>Local Community Head (Kampung Tengah Rengam &amp; Kampung Orang Asli Sungai Peroh)</u>                      The management has a very good rapport with the communities. Assistance and supports such as contribution for gotong-royong, ceremony, etc. Estate also provide the job opportunity to the villagers.</p> <p>Kg Orang Asli Sg Peroh has requests below:</p> <ol style="list-style-type: none"> <li>In any emergency, orang Asli community can go to estate's clinic since their area is far from town.</li> <li>Hope estate can increase the safety practice among worker where sometimes PPE is not worn properly by the workers.</li> </ol> <p><b>Management Responses:</b>                      Noted on the issue.</p> <p><b>Audit Team Findings:</b>                      No further information.</p>
<b>2</b>	<p><b>Feedbacks:</b>  <u>Neighboring Estates (KLK Ladang See Sun &amp; FGV Ladang Paloh)</u></p> <ol style="list-style-type: none"> <li>No encroachment or dispute from Rengam Estate to KLK. They have established the clear boundary</li> </ol>

	<p>and no land dispute.</p> <p>2. FGV Ladang Paloh has rent the worker’s quarters to Wawasan Estate workers. The management paid RM 150/month including water and electricity bills. No other issue or complaint from FGV workers on their stay in the FGV quarters.</p> <p><b>Management Responses:</b> Noted on the information.</p> <p><b>Audit Team Findings:</b> No further information.</p>
<b>3</b>	<p><b>Feedbacks:</b> <u>KTMB Rengam</u> KTMB has their own big reserves area which is not disturbed by the estate. So far, there are no complaints on the Estate operations and no illegal trespassers.</p> <p><b>Management Responses:</b> Noted on the information.</p> <p><b>Audit Team Findings:</b> No further information.</p>
<b>4</b>	<p><b>Feedbacks:</b> <u>Contractors</u> There is no late payment issue from Estate to contractors. Agreement is valid and signed by both parties. Contractor workers’ pay slip were kept in office.</p> <p><b>Management Responses:</b> Noted on the information.</p> <p><b>Audit Team Findings:</b> No further information.</p>
<b>5</b>	<p><b>Feedbacks:</b> <u>Gender Committee</u> No sexual harassment case reported. New mother’s need assessment was conducted concurrently during the gender committee meeting. Meeting and activities were actively conducted and participated by the members.</p> <p><b>Management Responses:</b> Noted on the information.</p> <p><b>Audit Team Findings:</b> No further information.</p>
<b>6</b>	<p><b>Feedbacks:</b> <u>Locals &amp; Foreign Workers</u> Most of the workers interview happy and satisfied with the job, salary, housing, etc. During CMCO they are still working and get paid normally. Only the SOP need to be followed strictly. If they have complaint, they will use the enquiry register or complaint book to raise their concern. So far, only the issue on housing repairs raised.</p> <p><b>Management Responses:</b> Noted on the information.</p> <p><b>Audit Team Findings:</b> No further information.</p>

List of land owner / user contacted					
Name	Years of ownership / used	Land area (ha)	Agreement (Yes / No)	Agreement base on FPIC (Yes/No)	Compliance on the agreement terms and conditions
NA	NA	NA	NA	NA	NA



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Previous land owner / user comment	
NA	<b>Feedbacks:</b> NA
	<b>Management Responses:</b> NA
	<b>Audit Team Findings:</b> NA

**3.6 Impartiality and conflict of interest**

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

**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 Tereh Palm Oil Mill and Supply Base has complied with the RSPO Principles and Criteria 2018 for Sustainable Palm Oil (MYNI 2019) 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 Tereh Palm Oil Mill and Supply Base is continued.

Report prepared by	Acceptance of Assessment Conclusion
<b>Name: VIJAY KANNA PAKIRISAMY</b>	<b>Name: SALASAH ELIAS</b>
<b>Company Name: BSI SERVICES</b>	<b>Company Name: KULIM (MALAYSIA) BERHAD</b>
<b>Title: CLIENT MANAGER</b>	<b>Title: DEPUTY GENERAL MANAGER</b>
<b>Signature:</b> 	<b>Signature:</b> <i>(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.)</i> 
<b>Date: 15 December 2020</b>	<b>Date: 28 DECEMBER 2020</b>



**Appendix A: Summary of Findings**

Criterion / Indicator	Assessment Findings	Compliance	
<b>Principle 1: Behave ethically and transparently</b>			
<b>Criterion 1.1:</b> The unit of certification provides 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	<p><b>(C)</b> Documents that are specified in the RSPO P&amp;C are made available to the public.</p> <p>- Critical (Major) compliance -</p>	<p>Kulim (Malaysia) Berhad subscribes to the Sustainability Palm Oil (SPO) Transparency Program. The program ensures relevant documents are made publicly and readily available via the Company’s Corporate Department if they do not cause breach of confidentiality and cause detrimental sustainability or social outcomes. Among the documents that were made available for viewing are:</p> <ul style="list-style-type: none"> <li>a) Land title (held as hard copy by the property department)</li> <li>b) Health and safety plan</li> <li>c) Plans and impact assessment- environmental &amp; social</li> <li>d) Pollution prevention plans</li> <li>e) Details of complaints and grievances</li> <li>f) Negotiation procedures</li> <li>g) Continuous improvement plan</li> <li>h) Biodiversity plans</li> <li>i) Policy documents (sustainability handbook) In addition to the website, the policies were also displayed at various locations at the operating units including the main notice boards of the estates, mill offices and muster ground notice boards for employees and visitors to view.</li> </ul>	Complied
1.1.2	<p>Information is provided in appropriate languages and accessible to relevant stakeholders.</p> <p>- Minor compliance -</p>	<p>Documents were in English or Bahasa Malaysia and made publicly available in the respective office and website (<a href="http://www.ypjp.com.my">www.ypjp.com.my</a>)</p>	Complied

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1.1.3	<p><b>(C)</b> Records of requests for information and responses are maintained.          - Critical (Major) compliance -</p>	<p>There is evidence that Tereh Complex CU keeps and maintains requests for information and responses. Samples seen as below:</p> <ol style="list-style-type: none"> <li>1. Wawasan Estate: Visit request from ALP Peyatim and CEO YPJH) on 11 Aug 2020.</li> <li>2. Rengam Estate: Jabatan Tenaga Kerja Kluang visit to Rengam Estate on 16/01/2019.</li> <li>3. Mutiara Estate: Request for donation from SK Ladang Mutiara on 13/02/2020. Management agreed to contribute RM 300.</li> </ol>	Complied
1.1.4	<p><b>(C)</b> Consultation and communication procedures are documented, disclosed, implemented, made available, and explained to all relevant stakeholders by nominated representative.          - Critical (Major) compliance -</p>	<p>All units within the Tereh Complex subscribe to Kulim (Malaysia) Berhad’s documented Consultation and Communications Procedures (Doc No: SQD/SMS/1.1 dated 01/08/2020). The aim of this plan is to ensure an open and transparent communication methods with local communities and other stakeholders. The guideline is specific to communicate and consult in respect of social aspects, impacts and performance.</p> <p>For Wawasan Estate under YPJ Plantations, sighted the Complaint and Grievance Procedure (Doc No: YPJP-SOP-59 version 1.0 dated 05/04/2018). Estate will act 14 days from the date of complaint. The person in charge appointed is Mr Mohd Fadzil Bin Isib on 01/01/2020.</p> <p>In Kulim (Malaysia) Berhad, the SOP for Grievance (Doc No: SQD/SMS/4.1 dated 01/08/2020). The complaints will be acted within 7-21 days by the management. Person in charge appointed are:</p> <ol style="list-style-type: none"> <li>1. Tereh POM: Mr Mohd Saiful Mansor as per appointment letter dated 01/02/2020.</li> <li>2. Rengam Estate: Ms Fauziah Bt Gapar as per appointment letter dated 01/01/2018.</li> <li>3. Mutiara Estate: Mr. Abas bin Abdul Wahab as per appointment</li> </ol>	Complied

		letter dated 01/01/2019.	
		This is explained through the stakeholder’s meeting for all supply bases and Tereh POM conducted on 26/08/2020 while for Rengam Estate, the stakeholder’s meeting conducted on 21/10/2020. In Mutiara Estate, the stakeholder meeting conducted on 27/08/2020.	
1.1.5	There is a current list of contact and details of stakeholders and their nominated representatives. - Minor compliance -	Each unit within the Tereh Complex has its own list of stakeholders. The stakeholders comprise FFB suppliers, transporters, contractors, government agencies such as Dept of Safety and Health, Indonesian Consulate, Labour Department, Department of Immigration, Department of Environment, nearby plantations such as Felde Paloh Estate, Rengam Estate, surrounding settlements, nearby schools, clinics, etc.	Complied
<b>Criterion 1.2:</b> The unit of certification commits to ethical conduct in all business operations and transactions.			
1.2.1	A policy for ethical conduct is in place and implemented in all business operations and transactions, including recruitment and contracts. - Minor compliance -	<p>All Mill and Estates within the Tereh Complex subscribe to Kulim (Malaysia) Berhad Corporate Integrity Pledge signed by its Executive Director dated 15 November 2018. Additionally, there are also the following policies of Kulim (Malaysia) Berhad signed by its Executive Director on 1 May 2018:</p> <ul style="list-style-type: none"> <li>a) Ethics Policy;</li> <li>b) No Gift and Entertainment Policy; and</li> <li>c) Conflict of Interest Policy.</li> </ul> <p>These Policies were communicated to all levels of workforce as follows:</p> <ul style="list-style-type: none"> <li>a) Ladang Tereh Mill had every employee to affirm a Corporate Integrity Oath on 5 May 2019. Further awareness briefings were given on during morning muster on 25/10/2020.</li> <li>b) Rengam Estate has conducted the policy briefing to workers on 04/09/2020.</li> </ul>	Complied

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		<p>c) Mutiara Estate had conducted the policy briefing to workers 02/09/2020.</p> <p>Interviews conducted with workers at the Mill and Estates confirmed their understanding of this ethical conduct and integrity requirements.</p> <p>In Wawasan Estate, the Business Ethic Code was signed by CEO on 01 Oct 2020. It is included in the recruitment. Transporter (Penerang Hati Enterprise) dated 01 Oct 2019 – 31 December 2020. Sighted the Surat Perakuan Vendor -Anti Rasuah &amp; Korupsi.</p> <p>Tereh POM:</p> <p>a) Transporter (Teo Tuan Kwee) dated 15/06/2020. The addendum to the letter of acceptance dated 11/10/2020 which contractor shall comply with all Kulim’s relevant business policies and all Certification Program standard requirements related to the execution of the contract.</p> <p>b) Foreign worker agent agreement: PT Hamparan Karya Insani dated 13/02/2020 (KDN/16031/KBALL264719). The Vendor’s Letter of Declaration, Anti-Bribery and Corruption was signed on 19/10/2020.</p> <p>Rengam Estate:</p> <p>a) Transporter (Lai Cheong &amp; Sons), contract no: MPSB/Rengam 5/2017 dated 14/02/2018. The addendum to the letter of acceptance was signed on 09/10/2020. The contractor shall comply with all Kulim’s relevant business policies and all certification program standard requirements related to the execution of the contract.</p>	
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		Mutiara Estate: a) Road maintenance works (Chahyono contractor), contract no: KMB/Mutiara 1/5/2020. The addendum to the letter of acceptance was signed on 15/10/2020. The contractor shall comply with all Kulim's relevant business policies and all certification program standard requirements related to the execution of the contract.	
1.2.2	A system is in place to monitor compliance and the implementation of the policy and overall ethical business practice. - Minor compliance -	Evaluation of legal requirements and compliance status with legal requirement is monitored by operating units, Sustainability Team, OHS Department and head office audit Department. Evaluation of compliance is part of the audit checklist as the sustainability team was assigned to cover RSPO P&C requirements. Bi-monthly legal evaluation was done each operating unit and compiled by RC executive.	Complied
<b>Principle 2: Operate legally and respect rights</b>			
<b>Criterion 2.1:</b> There is compliance with all applicable local, national and ratified international laws and regulations.			
2.1.1	<b>(C)</b> The Unit of Certification complies with legal requirements - Critical (Major) compliance -	Legal register covering the applicable local and international laws and regulations are available. Compliance to each applicable law and regulation is monitored by the operating units and head office sustainability team. Sample of licenses and permits checked at Tereh POM and supply bases:  <u>Tereh POM</u> 1. MPOB License; License Number: 500048604000; License valid from 01.06.2020 till 31.05.2021 2. Diesel Storage License; License Number: BPGK JH (KLU) 0730 SK; Valid from 01.10.2020 till 01.10.2021	Complied

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		<p>3. Schedule of Compliance – License to Occupy or use Prescribe Premises (Environmental Quality Act 1974); License Number: 004685: License valid from 01.07.2020 till 30.06.2021</p> <p>4. SPAN License; License Number: SPAN/EKS/(PT)/800-4(1)/3/14; License valid from 13.04.2020 till 04.12.2023</p> <p><u>Rengam Estate</u></p> <p>1. MPOB License; License Number: 50122550200; License Validity: 01.04.2020 till 31.03.2021.</p> <p>2. Purchase &amp; Storage: Diesel, Petrol, Kerosene &amp; Fertiliser; License Number: KPDN HEP 0027SK; License Validity: 23.02.2020 till 22.02.2021</p> <p>3. Air Compressor License; License Number: 682140; License Validity: 23.02.2020 till 22.02.2021</p> <p>4. Gun License (IPD Kluang); License Number: U02367B, U02362B, L970090, AA105757 &amp; AA105765); Validity Period: 17.06.2021 till 16.06.2021)</p> <p><u>Mutiara Estate</u></p> <p>1. MPOB License (FFB); License Number: 502458002000; License Period: 01.11.2020 till 31.10.2021.</p> <p>2. MPOB License (Nursery); License Number: 619240011000; License Period 10.05.2020 till 30.04.2021.</p> <p>3. Diesel and Petrol Permit; Serial Number: J 000532; Reference Number: BPGK JH (KLU) 1368 SK; Diesel – 30, 000 Litres &amp; Petrol – 600 Litres); License valid from 28.01.2020 till 27.01.2021.</p>	
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		<p>4. BAKAJ License; License Number: BAKAJ/334/300/05/07/07/26; Maximum Water Abstraction: 60m<sup>3</sup>/hari; License Valid till 31.12.2020.</p> <p><u>Wawasan Estate</u></p> <ol style="list-style-type: none"> <li>1. MPOB License; License Number: 503879302000; License Valid from 01.03.2020 till 28.02.2021.</li> <li>2. Land Title; No. Hak Milik: 41253; Mukim Paloh, Lot No: 2854; Lot Area: 362.4 Ha; Registered on 14 January 2010.</li> </ol>	
2.1.2	<p>A documented system for ensuring legal compliance is in place. This system has a means to track changes to the laws and regulations.</p> <p>- Minor compliance -</p>	<p>Documented procedures have been established and implemented; refer to:</p> <ol style="list-style-type: none"> <li>1. Prosedur Pematuhan Keperluan Undang-Undang; YPJ Plantations Sdn Bhd; Doc Number: YPJP-SOP-77; Version 1.0; Effective Date: 25.10.2020</li> <li>2. Compliance to Legal Requirement; Kulim (Malaysia) Berhad; Doc No: SQD/SMS/2.0; Doc Date: 01.08.2020; Issue No: 01.</li> </ol> <p>All legal requirement was documented in Legal and Other Requirement Register. Compliance to each applicable law and regulation is monitored by the operating units. The legal register at all sites were reviewed/updated on a yearly basis / as and when needed for new updates/licenses. Sighted the document 'Summary of Compliance' available at the mill and estate undersigned by the Top Management. The document lists the latest applicable laws and amendments, revision dates and acknowledgement by the management.</p> <p>All the legal and other requirements were registered accordingly and documented in the legal requirement register including new updates for:</p>	Complied

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		<ol style="list-style-type: none"> <li>1. Fees (Employment Pass, Visit Pass (Temporary Employment) and Work Pass (Remission of Fees) Order 2020.</li> <li>2. Prevention and Control of Infectious Diseases (Compounding of Offences) (Amendment) (No.6) Regulations 2020.</li> <li>3. Minimum Wages Order 2020.</li> <li>4. Employment Provident Fund (Amendment) Rules 2020.</li> </ol>																																	
2.1.3	<p>Legal or authorised boundaries are clearly demarcated and visibly maintained, and there is no planting beyond these legal or authorised boundaries.</p> <p>- Minor compliance -</p>	<p>The Estates have maps showing the locations of boundary stones that have been physically located and marked. Inspection of boundary stones/markers/trenching at the 3 estates, during the field inspection confirmed that they were clearly marked and maintained. All the physical markers/boundary stones along the legal boundaries between was visibly available.</p> <table border="1" style="margin-left: auto; margin-right: auto;"> <thead> <tr> <th>No</th> <th>Estate</th> <th>Boundary</th> <th>Neighbouring Unit</th> </tr> </thead> <tbody> <tr> <td>1</td> <td>Wawasan</td> <td>P03 Blk 3</td> <td>FGV Ldg Paloh</td> </tr> <tr> <td>2</td> <td>Wawasan</td> <td>P11 Blk 4</td> <td>Sg Sembrong</td> </tr> <tr> <td>3</td> <td>Mutiara</td> <td>PR19/Blk 1</td> <td>Ldg Zamrud</td> </tr> <tr> <td>4</td> <td>Mutiara</td> <td>P16 Blk 2</td> <td>RISDA Sg Chales</td> </tr> <tr> <td>5</td> <td>Rengam</td> <td>P17 Blk 1</td> <td>KLK Ldg See San</td> </tr> <tr> <td>6</td> <td>Rengam</td> <td>P 17 Blk 1</td> <td>Kebun Rengam SB</td> </tr> <tr> <td>7</td> <td>Rengam</td> <td>P05 Blk 4</td> <td>SDP Ldg Sembrong</td> </tr> </tbody> </table>	No	Estate	Boundary	Neighbouring Unit	1	Wawasan	P03 Blk 3	FGV Ldg Paloh	2	Wawasan	P11 Blk 4	Sg Sembrong	3	Mutiara	PR19/Blk 1	Ldg Zamrud	4	Mutiara	P16 Blk 2	RISDA Sg Chales	5	Rengam	P17 Blk 1	KLK Ldg See San	6	Rengam	P 17 Blk 1	Kebun Rengam SB	7	Rengam	P05 Blk 4	SDP Ldg Sembrong	Complied
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<b>Criterion 2.2:</b> All contractors providing operational services and supplying labour, and Fresh Fruit Bunch (FFB) suppliers, comply with legal requirements.																																			
2.2.1	<p>A list of contracted parties is maintained.</p> <p>- Minor compliance -</p>	<p>The contracted parties were listed in the stakeholder's list in each unit as in clause 1.1.5</p>	Complied																																



<p>2.2.2</p>	<p>All contracts, including those for FFB supply, contain specific clauses on meeting applicable legal requirements, and this can be demonstrated by the third party.</p> <p>Evidence of legal due diligence of all contracted third parties, recruitment agencies (licensed/ accredited) for migrant workers, service providers and labour contractors, is available.</p> <p>- Minor compliance -</p>	<p>There is no outside FFB supplied to Tereh POM.</p> <p>Other contracts were verified to comply with Malaysian Laws as below:</p> <p>Wawasan Estate:</p> <p>a) Transporter (Penerang Hati Enterprise) dated 01 Oct 2019 – 31 December 2020.</p> <p>Tereh POM:</p> <p>a) Transporter (Teo Tuan Kwee) dated 15/06/2020.</p> <p>b) Foreign worker agent agreement: PT Hamparan Karya Insani dated 13/02/2020 (KDN/16031/KBALL264719).</p> <p>Rengam Estate:</p> <p>a) Transporter (Lai Cheong &amp; Sons), contract no: MPSB/Rengam 5/2017 dated 14/02/2018. The addendum to the letter of acceptance was signed on 09/10/2020. The contractor shall comply with all Kulim’s relevant business policies and all certification program standard requirements related to the execution of the contract.</p> <p>Mutiara Estate:</p> <p>a) Road maintenance works (Chahyono contractor), contract no: KMB/Mutiara 1/5/2020. The addendum to the letter of acceptance was signed on 15/10/2020. The contractor shall comply with all Kulim’s relevant business policies and all certification program standard requirements related to the execution of the contract.</p>	<p>Complied</p>
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		<p>The due diligence was conducted through the Surat Perakuan Vendor-Anti Rasuah &amp; Korupsi on 26/10/2020 or through the addendum agreement signed by supplier.</p>	
<p>2.2.3</p>	<p>All contracts, including those for FFB supply, contain clauses disallowing child, forced and trafficked labour. Where young workers are employed, the contracts include a clause for their protection.</p> <p>- Minor compliance -</p>	<p>There is no outside FFB supplied to Tereh POM.          Other contracts were verified below:          Wawasan Estate:              a) Transporter (Penerang Hati Enterprise) dated 01 Oct 2019 – 31 December 2020.</p> <p>Tereh POM:              a) Transporter (Teo Tuan Kwee) dated 15/06/2020.              b) Foreign worker agent agreement: PT Hamparan Karya Insani dated 13/02/2020 (KDN/16031/KBALL264719). The addendum to the contract agreement was signed on 08/10/2020 where supplier shall not employ child, forced and trafficked labor Where young workers are employed, the works given must in accordance with the law of Malaysia.</p> <p>Mutiara Estate:              a) Road maintenance works (Chahyono contractor), contract no: KMB/Mutiara 1/5/2020. The addendum to the letter of acceptance was signed on 15/10/2020. The contractor shall comply with all Kulim’s relevant business policies and all certification program standard requirements related to the execution of the contract.</p>	<p>Complied</p>

		Under the addendum in the Surat Perakuan Vendor-Anti Rasuah & Korupsi which mentioned that the contractor will comply all the estate's policies.	
<b>Criterion 2.3:</b> All FFB supplies from outside the unit of certification are from legal sources.			
2.3.1	<p><b>(C)</b> For all directly sourced FFB, the mill requires:</p> <ul style="list-style-type: none"> <li>Information on geo-location of FFB origins</li> <li>Evidence of the ownership status or the right/claim to the land, or valid use of land by the grower/smallholder</li> <li>One or more supporting documents for claims</li> <li>Valid MPOB license</li> </ul> <p>- Critical (Major) compliance -</p>	<p>Tereh mill received only crop from the Kulim Plantation Estates and its own supply bases within the certification scope, or other if any are diversion from the sister mills (RSPO Certified) as results of breakdown or annual maintenance.</p> <p>All the estates from the same certification scope possessed the following information sighted and verified during the audit</p> <ol style="list-style-type: none"> <li>All FFB from the supply base estates supported by the delivery documents and weighbridge tickets.</li> <li>Valid land title with ownership status (refer indicator 4.4.1)</li> <li>Valid MPOB licence <ul style="list-style-type: none"> <li>Felda Paloh Estate; MPOB License; License No: 560025002000; License Valid from 01.04.2020 till 31.03.2021.</li> <li>Wawasan Estate; MPOB License; License Number: 503879302000; License Valid from 01.03.2020 till 28.02.2021.</li> </ul> </li> <li>All delivery documents were verified with volumes of FFBs received by the mill.</li> </ol>	Complied
2.3.2	<p>For all indirectly sourced FFB, the unit of certification obtains from the collection centres, agents or other intermediaries, the evidence as listed in Indicator2.3.1.</p> <p>- Minor compliance -</p>	There are no indirectly sourced FFB for Tereh POM as all FFB are sourced from the certified supply base within the certification unit.	Not Applicable

Principle 3: Optimise productivity, efficiency, positive impacts and resilience																																																		
Criterion 3.1: There is an implemented management plan that aims to achieve long-term economic and financial viability.																																																		
3.1.1	<p><b>(C)</b> A business or management plan (minimum three years) is documented that includes, where applicable, a jointly developed business case for Scheme Smallholders.</p> <p>- Critical (Major) compliance -</p>	<p>The 3 estates, i.e Mutiara, Wawasan and Rengam continued to commit to long term economic and financial viability. The annual budgets for 2021 to 2025 were sighted. The budget covers activities for upkeep, cultivation, harvesting &amp; evacuation, welfare, capital expenditure, RSPO/MSPO compliance etc. The budget also included projections on yield/ha, and total cost of production per m ton &amp; per ha and CAPEX - capital expenditure mainly for buildings, furniture and others asset related expenses. The estates possessed the following format for the annual budget.</p> <table border="1" style="margin-left: auto; margin-right: auto;"> <thead> <tr> <th>Year</th> <th>2021</th> <th>2022</th> <th>2023</th> <th>2024</th> <th>2025</th> </tr> </thead> <tbody> <tr> <td>Mature Ha</td> <td>x</td> <td>x</td> <td>x</td> <td>x</td> <td>x</td> </tr> <tr> <td>Immature Ha</td> <td>x</td> <td>x</td> <td>x</td> <td>x</td> <td>x</td> </tr> <tr> <td>Total Ha</td> <td>x</td> <td>x</td> <td>x</td> <td>x</td> <td>x</td> </tr> <tr> <td>FFB Tons</td> <td>x</td> <td>x</td> <td>x</td> <td>x</td> <td>x</td> </tr> <tr> <td>Yld/Ha</td> <td>x</td> <td>x</td> <td>x</td> <td>x</td> <td>x</td> </tr> <tr> <td>RM/mt FFB</td> <td>x</td> <td>x</td> <td>x</td> <td>x</td> <td>x</td> </tr> <tr> <td>RM/ha</td> <td>x</td> <td>x</td> <td>x</td> <td>x</td> <td>x</td> </tr> </tbody> </table> <p>Similarly Tereh Mill has a business plan prepared annually in the form of year budget and the projection for 5 years prepared as guidance for future planning. The business plan among others contains;</p> <p>a) FFB yield &amp; CPO /CPK production forecast</p>	Year	2021	2022	2023	2024	2025	Mature Ha	x	x	x	x	x	Immature Ha	x	x	x	x	x	Total Ha	x	x	x	x	x	FFB Tons	x	x	x	x	x	Yld/Ha	x	x	x	x	x	RM/mt FFB	x	x	x	x	x	RM/ha	x	x	x	x	x
Year	2021	2022	2023	2024	2025																																													
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Complied

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- b) Extraction Ratios – OER / KER,
- c) Cost of production
  - administration / labour overhead
  - processing cost labour, maintenance, consumables
  - depreciation and head office charges
- d) EVIT running accounts
- e) CAPEX - capital expenditure.

Year	2021	2022	2023	2024	2025
FFB processed	x	x	x	x	x
OER	x	x	x	x	x
KER	x	x	x	x	x
Administration	x	x	x	x	x
Production cost	x	x	x	x	x
Maintenance	x	x	x	x	x
Depreciation	x	x	x	x	x
Gen Expenditure	x	x	x	x	x
RM/mt FFB	x	x	x	x	x
RM/mt CPO	x	x	x	x	x

Budget/business management plan for all units were sighted and verified.

<p>3.1.2</p>	<p>An annual replanting programme projected for a minimum of five years with yearly review, is available.          - Minor compliance -</p>	<p>The long-range replanting programs (LRRP) until 2025 were sighted on all the estates. The programs are reviewed annually and incorporated into their annual financial budget. The programs sighted for the forthcoming 5 years in hectares are as follows:</p> <table border="1" data-bbox="1182 539 1825 837"> <thead> <tr> <th></th> <th><i>Year</i></th> <th><i>Mutiara</i></th> <th><i>Wawasan</i></th> <th><i>Rengam</i></th> </tr> </thead> <tbody> <tr> <td>1</td> <td>2021</td> <td>0</td> <td>0</td> <td>0</td> </tr> <tr> <td>2</td> <td>2022</td> <td>0</td> <td>0</td> <td>0</td> </tr> <tr> <td>3</td> <td>2023</td> <td>0</td> <td>0</td> <td>0</td> </tr> <tr> <td>4</td> <td>2024</td> <td>258.75</td> <td>0</td> <td>221.96</td> </tr> <tr> <td>5</td> <td>2025</td> <td>0</td> <td>0</td> <td>0</td> </tr> </tbody> </table>		<i>Year</i>	<i>Mutiara</i>	<i>Wawasan</i>	<i>Rengam</i>	1	2021	0	0	0	2	2022	0	0	0	3	2023	0	0	0	4	2024	258.75	0	221.96	5	2025	0	0	0	<p>Complied</p>
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<p>3.1.3</p>	<p>The unit of certification holds management reviews at planned intervals appropriate to the scale and nature of the activities undertake.          - Minor compliance -</p>	<p><u>Tereh POM</u>          The management review meeting for Tereh POM was conducted on 16.10.2020 where the meeting was chaired by the Mill Manager. The management review discussed on Internal Audit Findings, Operational Performance &amp; Product Conformity, Customer Feedback among others.</p> <p><u>Rengam Estate</u>          The management review meeting was conducted on 18.09.2020, chaired by the Acting Manager of Rengam Estate. The meeting minutes was available for verification.</p> <p><u>Mutiara Estate</u></p>	<p>Complied</p>																														

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		<p>The management review meeting was conducted on 13.010.2020, chaired by the Acting Manager of Rengam Estate. The meeting minutes was available for verification.</p> <p><u>Wawasan Estate</u></p> <p>The management review meeting for Wawasan Estate was conducted on 18.08.2020 where the meeting was chaired by the General Manager. The management review discussed on Operational Performance, Customer Feedback, Changes in Management, Internal Audit Findings, CAP Status and Grievances among others.</p>	
<p><b>Criterion 3.2:</b> The unit of Certification regularly monitors and reviews their economic, social and environmental performance and develops and implements action plans that allow demonstrable Continuous improvement in key operations.</p>			
<p>3.2.1</p>	<p><b>(C)</b> The action plan for continuous improvement is implemented, based on consideration of the main social and environmental impacts and opportunities of the unit of certification.</p> <p>- Critical (Major) compliance -</p>	<p>Continuous Improvement Plans to address the Social, Environmental, Productivity and OSH aspects were available in Tereh POM and its supply bases for verification.</p> <p><u>Tereh POM</u></p> <ol style="list-style-type: none"> <li>1. Repair housing ceiling for workers quarters and replacement of domestic water piping.</li> <li>2. Repainting and Repair Clinic’s building. Purchase new furniture for the Clinic.</li> <li>3. Repair Ceiling for the kindergarten and surau.</li> <li>4. Install integrated Biogas Plant</li> <li>5. Introduce sludge dewatering System</li> <li>6. Upgrading of water catchment for treatment increased capacity.</li> </ol>	<p>Complied</p>

		<p>7. Install automatic power cut off at all mill airlock to increase safety.</p> <p><u>Rengam Estate</u></p> <ol style="list-style-type: none"> <li>1. Install Safety Signages at workstation.</li> <li>2. Install meter reading tube for diesel skid tank.</li> <li>3. Add new furniture for staff house.</li> <li>4. Repaint staff quarters, linesite &amp; office compound.</li> <li>5. Replace surau dome.</li> <li>6. Planting cover crops – Mucuna bracteate @ replanting P20</li> <li>7. Construction of silt pit.</li> </ol> <p><u>Mutiara Estate</u></p> <ol style="list-style-type: none"> <li>1. Replacement of Safety Signage</li> <li>2. Repainting Housing – 20 unit</li> <li>3. Upgrading Surau</li> <li>4. Sports Program for Workers (Futsal)</li> <li>5. Repainting Boundary Pegs</li> <li>6. Repainting Buffer Zone Pegs &amp; Trunk</li> <li>7. Upgrading Field Road</li> <li>8. Desilting Drain</li> </ol> <p><u>Wawasan Estate</u></p> <ol style="list-style-type: none"> <li>1. Purchase of buffalo to replace mechanical tractor to reduce the use of diesel and directly reduce the source or pollution.</li> <li>2. Replace all signboards at HCV areas.</li> </ol>	
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3.2.2	<p>As part of the monitoring and continuous improvement process, annual reports are submitted to the RSPO Secretariat using the [RSPO metrics template].</p> <p><b>PROCEDURAL NOTE:</b></p> <p>The RSPO metrics template is awaiting decision/agreement by RSPO and the issue is still being discussed.</p> <p>Until such metrics is agreed and developed, companies will carry on with existing reporting e.g. PalmGHG, Annual Communication of Progress (ACOP) reporting, and information provided to Certification Body and feedback via RSPO Secretariat is required.</p> <p>- Minor Compliance -</p>	<p>The RSPO metric template is not available yet. Annual ACOP reporting was available for the year 2019 with the link attached: <a href="https://rspo.org/members/310/Johor-Corporation">https://rspo.org/members/310/Johor-Corporation</a></p>	Complied
<b>Criterion 3.3:</b> Operating procedures are Appropriately documented, consistently implemented and monitored.			
3.3.1	<p><b>(C)</b> Standard Operating Procedures (SOPs) for the unit of certification are in place.</p> <p>- Critical (Major) compliance -</p>	<p>Standard Operating Procedures were available for Tereh POM &amp; its Supply Bases. Among the SOP's that were sampled were:</p> <p><u>Kulim Plantations (M) Berhad</u></p> <ol style="list-style-type: none"> <li>1. Transparency; Doc No: SQD/SMS/1.0; Doc Date 01/08/2020</li> <li>2. Core labour Standard; Doc No: SQD/SMS/4.0; Doc Date: 01.08.2020</li> <li>3. Waste Management; Doc No: SQD/SMS/6.2; Doc Date: 01.08.2020.</li> <li>4. Agrochemicals Management; Doc No: SQD/SMS/6.1; Doc Date: 01.08.2020</li> <li>5. Immature/ Mature Area – Rat Baiting; Doc No: LR-SOP-W07</li> </ol> <p><u>YPJ Plantations Sdn Bhd</u></p> <ol style="list-style-type: none"> <li>1. Workers Recruitment Procedure; Doc No: YPJ-SOP-78; Doc Date: 25.10.2020</li> </ol>	Complied

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		<ol style="list-style-type: none"> <li>2. Covid 19 (PKPB); Doc No: YPJ-SOP-72; Doc Date: 12.05.2020</li> <li>3. River Reserve Preservation Procedure; Version 1.0; Doc No: YPJ-SOP-62; Doc Date: 05.04.2018</li> <li>4. Traceability Procedure; Version 2.0; Doc No: YPJ-SOP-64; Date: 05.04.2018</li> <li>5. Prosedur Pematuhan Keperluan Undang-Undang; Doc Number: YPJP-SOP-77; Version 1.0; Effective Date: 25.10.2020</li> </ol>	
3.3.2	A mechanism to check consistent implementation of procedures is in place. - Minor Compliance -	<p>The following mechanism is available and adopted as standard practices and procedures in the mill and estates operations.</p> <p>Tereh Palm Oil Mill</p> <ul style="list-style-type: none"> <li>• Mill inspectorate Visit program 2x /year</li> <li>• Internal audit by Sustainability Unit 2x /year</li> <li>• Task Force visits</li> <li>• Monthly and weekly ad hoc meetings</li> <li>• Daily /monthly production &amp; financial report</li> <li>• Daily and monthly lab analysis report.</li> <li>• Daily supervision by the mill Supervisors/Executives</li> </ul> <p>Supply Base Estates</p> <ul style="list-style-type: none"> <li>• Plantation Inspectorate Visit program 2x /year</li> <li>• Internal audit by Sustainability Unit 2x /year</li> <li>• Task Force visits</li> <li>• Monthly and weekly ad hoc meeting</li> <li>• Daily /monthly production &amp; financial report</li> <li>• Daily supervision by the field staff/Executives.</li> </ul>	Complied
3.3.3	Records of monitoring and any actions taken are maintained and available. - Minor Compliance -	Operating units visited maintain all records of monitoring and available for review. The mill Advisor and Plantation Advisor (PA) are accountable to monitor the estates compliance towards the SOP, Budget and Productivity.	Complied

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		<p>Various checklists were available and being used by the estates and mill for operations, health and safety monitoring, workers welfare and environmental issues.</p>	
<p><b>Criterion 3.4:</b> A comprehensive Social and Environmental Impact Assessment (SEIA) is undertaken prior to new plantings or operations, and a social and environmental management and monitoring plan is implemented and regularly updated in ongoing operations.</p>			
<p>3.4.1</p>	<p><b>(C)</b> In new plantings or operations including mills, an independent SEIA, undertaken through a participatory methodology involving the affected stakeholders and including the impacts of any smallholder/out-grower scheme, is documented.          - Critical (Major) compliance -</p>	<p>There is no new planting at Tereh POM’s certification unit.          In Wawasan Estate, the SIA register 2020 was established on 28/09/2020. Issues sampled as below:</p> <ol style="list-style-type: none"> <li>1. Rubbish collection at linesite in weekly basis.</li> <li>2. The open burning for rubbish near the office during the internal audit.</li> </ol> <p>In Tereh POM, the SIA 2020 dated 15/09/2020 is available. Issues sampled as below:</p> <ul style="list-style-type: none"> <li>• SIA 08: Give awareness the LOTO system to workers to avoid any accident in workplace.</li> </ul> <p>In Rengam Estate, SIA management plan 2020 dated 09/09/2020 was established. Issues sampled as below:</p> <ul style="list-style-type: none"> <li>• SIA06: Contractor don’t have the clear condition of offer letter for workers.</li> <li>• SIA07: Contractor must comply with all the company SOP. Policy and certification requirement as per contract agreement.</li> </ul> <p>In Mutiara Estate, SIA management plan 2020 dated 15/09/2020 was established. Issues sampled as below:</p> <ul style="list-style-type: none"> <li>• SIA03: The estate management need to monitor the water analysis from external laboratory and medical result for workers involving high Zink in water.</li> </ul>	<p>Complied</p>

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<p>3.4.2</p>	<p>For the unit of certification, a SEIA is available and social and environmental management and monitoring plans have been developed with participation of affected stakeholders. - Minor Compliance -</p>	<p>The Social &amp; Environment Management Plan for period 2020 is available for the CU. The plan among others incorporated the objectives, category, action, frequency, person in charge and monitoring period. Among others issues as extracted below:</p> <ul style="list-style-type: none"> <li>a) To ensure compliance to SOP and legal requirement regarding social (appointment of person in charge/committee to handle social matters, communication on policies/SOP on social to relevant stakeholders, monitoring of pay and agreement of workers and contractor’s workers and to maintain housing and facilities provided to workers).</li> <li>b) To contribute to local communities’ development</li> <li>c) Community and employee alert on the present pandemic Covid -19</li> <li>d) Exhibition of license /permits at notice boards of main office</li> <li>e) PPE issuance and compliance for employees</li> <li>f) To provide uniform for the mill workers.</li> <li>g) CSR issuance of chicken, beef during festive holidays.</li> <li>h) Introduction of “Anti-Bribery Management System” policy</li> <li>i) Enhance understanding on LOTO guidelines in mill.</li> <li>j) Work offer to employees where necessary for OT works.</li> <li>k) WOW program for the female employees for income generation and foster better relationship.</li> </ul>	<p>Complied</p>
<p>3.4.3</p>	<p><b>(C)</b> The social and environmental management and monitoring plan is implemented, reviewed and updated regularly in a participatory way. - Critical (Major) compliance -</p>	<p>The Social/Environmental Action Plan 2020 available for each unit were available having information i.e. issues, management plan, PIC and time frame. The input is gathered from the meeting minutes among others;</p> <ul style="list-style-type: none"> <li>a) Gender Committee, NUPW,</li> <li>b) Safety Meeting,</li> <li>c) Complaint &amp; Request from internal &amp; external stakeholders</li> <li>d) Management meeting at estates/mill and regional level.</li> <li>e) Dialogue during the morning muster.</li> </ul>	<p>Complied</p>

		f) Interview approach with employees.	
<b>Criterion 3.5:</b> A system for managing human resources is in place.			
3.5.1	Employment procedures for recruitment, selection, hiring, promotion, retirement and termination are documented and made available to the workers and their representatives where applicable. - Minor Compliance -	In Wawasan Estate, the employment procedures for foreign workers sighted (SOP: TPJP-SOP-78 Version 1.0 dated 25/10/2020) and local worker (SOP: YPJP-SOP-79 Version 1.0 dated 25/10/2020). There is termination, promotion, retirement, etc. included in the SOP. In Kulim (Malaysia) Berhad, the recruitment of local workers for operating units Revision 00 Issue 01 dated 01/10/2020 and Recruitment of New Foreign Workers Revision 01 Issue 01 dated 01/01/2019 are made available during the audit. The process flow started from estates operations department (EOD) conducts a survey on new foreign workers (FW) required by operating units (OU) concerned until new foreign workers delivered to the operating units concerned.	Complied
3.5.2	Employment procedures are implemented, and records are maintained. - Minor Compliance –	The employment procedures are made available during the audit.	Complied
<b>Criterion 3.6:</b> An occupational health and safety (H&S) plan is documented, effectively communicated and implemented.			
3.6.1	<b>(C)</b> All operations are risk assessed to identify H&S issues. Mitigation plans and procedures are documented and implemented. - Critical (Major) compliance -	All operations have been risk assessed, where procedures and actions were documented and implemented to address the identified risks associated to the work units.  <u>Tereh POM</u>	Complied

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		<p>HIRARC was used to assess the risk associated to all work stations in the mill. HIRARC was available for work units such as Loading Ramp, Vertical Sterilizer, Threshing, Press Station, Clarification and Kernel Plant among others. HIRARC was reviewed on 15<sup>th</sup> September 2020 for all work units. Covid 19 have also been risk assessed and available in the HIRARC form.</p> <p>Medical Surveillance was conducted annual medical surveillance for 17 of their workers exposed to N-Hexane and Cholinesterase. The assessment was conducted by registered DOSH Doctor, DR. Zainudin Bin Muid (HQ/08/DOC/00/468) on 04.08.2020. All workers were declared fit to work by the doctor based on the test results that shows no trace of N-Hexane, Mineral Oils or chemical contamination.</p> <p>Noise Risk Assessment was conducted at Tereh POM as required by DOSH under Occupational Safety and Health (Noise Exposure) Regulations 2019. The assessment was conducted by Noise Risk Assessor, Dr. Syed Abdul Hamid B. Syed Hassan (JKKP HIE 127/5/3-1) on 06.02.2020. The Noise Risk Assessment Draft Report (Report No: JKKP HIE 127/5/3-1 (No. 169) – 2020/004) was available for verification. The management was due to be briefed by the assessor on the assessment report on 1<sup>st</sup> Nov 2020. The briefing has been postponed due to the rise in COVID 19 cases and the declaration of CMCO in a number of states. The communication between the management and mill was verified and accepted.</p> <p>Audiometric Test was conducted on 22.12.2019 as required under the Noise Exposure Regulation by Kulim Safety Training and Services Sdn. Bhd. A total of 79 employees were tested, where 7 workers were tested to have hearing Impairment and 4 workers</p>	
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		<p>were tested to have Standard Threshold Shift (STS) while the rest were declared to have normal hearing. The 4 workers tested to have STS were required to be tested within 3 months from the testing date as per Audiometric Testing Report recommendations. The retest was conducted for the 4 workers on 12.03.2020 with results HSE categorization description: Acceptable Hearing Ability.</p> <p><u>Rengam Estate</u> HIRARC was available for all operations in the estate to identify risk associated to all job scopes. Hirarc was reviewed for all operations on 22.09.2020. The latest Hirarc review was conducted on 03.11.2020 due to an accident that occurred on 27.10.2020 involving a harvester. The necessary recommended improvement control measures were taken by the estate.</p> <p>CHRA Report (JKKP HQ/03/ASS/00/154-2018/043) was available for verification. The report assessment was conducted by QMSPRO Sdn. Bhd registered DOSH Assessor on 18<sup>th</sup> April 2018 to 13<sup>th</sup> August 2018, valid for 5 years.</p> <p><u>Mutiara Estate</u> Hirarc was available to address all identified risks in the estate's operations. The latest review of Hirarc was conducted on 01.06.2021. Among the Hirarc verified was Harvesting, Pruning, Spraying and Ramp.</p> <p>CHRA Report (JKKP HQ/03/ASS/00/154-2018/033) was available for verification. The report assessment was conducted by QMSPRO Sdn. Bhd registered DOSH Assessor on 25<sup>th</sup> March 2018 – 13<sup>th</sup> August 2018, valid for 5 years.</p>	
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		<p><u>Wawasan Estate</u></p> <p>HIRARC was used to identify all possible risks in the estate operations. The latest HIRARC review was approved on 23.07.2020 by the management for Census, Boundary Marking, Buffalo Maintenance, Waste Management and Spraying among others.</p>	
3.6.2	<p><b>(C)</b> The effectiveness of the H&amp;S plan to address health and safety risks to people is monitored.</p> <p>- Critical (Major) compliance -</p>	<p>The effectiveness of the HIRARC is monitored and ensured through checklist and trainings that were conducted by Tereh POM and Supply Base Estate in each of the operations. Site visits around the mill and estates indicated the control measures of the HIRARC were followed and ensured by the respective managements.</p>	Complied
<b>Criterion 3.7:</b> All staff, workers, Scheme Smallholders, out-growers, and contract workers are appropriately trained.			
3.7.1	<p><b>(C)</b> A documented programme that provides training is in place, which is accessible to all staff, workers, Scheme Smallholders and out-growers, taking into account gender-specific needs, and which covers applicable aspects of the RSPOP&amp;C, in a form they understand, and which includes assessments of training.</p> <p>- Critical (Major) compliance -</p>	<p>Tereh POM and supply base estates have established a training program for all workers reviewed on a yearly basis. Sighted the training program "<i>Program Latihan Pendedahan Keselamatan Dan Kesehatan Dalam Semua Aspek Pekerjaan Tahun 2020</i>" (Safety &amp; Health Awareness Program for All Working Aspects Year 2020)</p> <p>Covid-19 training and briefings were sighted at the estates. Interview with the workers and staff indicated that they were aware on the SOP during the CMCO such as social distancing, regular sanitization and use of PPE (Face Mask).</p>	Complied
3.7.2	<p>Records of training are maintained.</p> <p>- Minor Compliance -</p>	<p>Estates visited have established a training program for all workers based on the training need analysis conducted on a yearly basis.</p> <p>Records of trainings were maintained by the operating units as below: -</p>	Non-compliance



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Tereh POM	
Training	Date
Training on Water Sampling, Effluent Sampling & Water Treatment	01.11.1010
Schedule Waste Training	11.07.2020
Grading Training	27.02.2020
Training for Shovel & Tractor Driver	01.10.2020
Training Thresher & Press Station	01.07.2020
PCD Cleaning Training	02.10.2020
First Aid Training	08.10.2020
Fire Drill Training	01.09.2020
Chemical Safety & Chemical Handling	07.10.2020
Rengam Estate	
Training	Date
Scheduled Waste Training	07.02.2020
ERP and CPR Training	20.10.2020
Fire Drill and Use of Fire Extinguisher Training	20.10.2020
First Aid Training	23.10.2020
PCD Training	15.07.2020
Tractor/Lorry & MB Safe Driving	03.08.2020

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**The PIC of the Scrap Yard did not show awareness on the requirement of handling potential pollution at the Scrap Iron Yard area (potential oil leakage from old vehicles/machines/tractors). This was evidenced during the interview made at site with the PIC. Therefore a minor nonconformity was raised.**

Mutiara Estate

Training	Date
Tractor, Lorry and MB Driver Training	21.09.2020
Replanting (P19) Training	09.09.2020
Schedule Waste Training	09.09.2020
Diesel Tank and Ramp Training	07.09.2020
Chemical Handling & Premix Training	11.08.2020
Chemical Store Training	11.08.2020
Engine Room Training	20.07.2020
Water Catchment & HCV Area Training	24.06.2020
Triple Rinse and Soak Away Sumo Training	22.06.2020

Wawasan Estate

Training	Date
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		<table border="1"> <tr> <td>Policy, Legal Compliance &amp; Grievance Procedure Trainings</td> <td>15.10.2020</td> </tr> <tr> <td>First Aid Training</td> <td>14.10.2020</td> </tr> <tr> <td>Fire Drill and Emergency Evacuation Training</td> <td>14.10.2020</td> </tr> <tr> <td>Training on 5S, Waste Management, HCV &amp; Biodiversity and Buffer Zone.</td> <td>22.10.2020</td> </tr> <tr> <td>Covid-19 Briefing</td> <td>27.05.2020</td> </tr> <tr> <td>Health &amp; Cleanliness Briefing</td> <td>22.10.2020</td> </tr> </table>	Policy, Legal Compliance & Grievance Procedure Trainings	15.10.2020	First Aid Training	14.10.2020	Fire Drill and Emergency Evacuation Training	14.10.2020	Training on 5S, Waste Management, HCV & Biodiversity and Buffer Zone.	22.10.2020	Covid-19 Briefing	27.05.2020	Health & Cleanliness Briefing	22.10.2020	
Policy, Legal Compliance & Grievance Procedure Trainings	15.10.2020														
First Aid Training	14.10.2020														
Fire Drill and Emergency Evacuation Training	14.10.2020														
Training on 5S, Waste Management, HCV & Biodiversity and Buffer Zone.	22.10.2020														
Covid-19 Briefing	27.05.2020														
Health & Cleanliness Briefing	22.10.2020														
3.7.3	<p>Appropriate training is provided for personnel carrying out the tasks critical to the effective implementation of the Supply Chain Certification Standard (SCCS). Training is specific and relevant to the task(s) performed.</p> <p>- Minor Compliance -</p>	RSPO Supply Chain & Traceability training have been conducted by the Tereh POM on 12.10.2020 for all personals carrying out the tasks critical to SCCS in the mill including weighbridge clerk, office staffs and auxiliary police.	Complied												
<p><b>Criterion 3.8:</b> Supply chain requirement for mills (note: All supply chain requirements are considered as <b>Critical (C)</b>. However, it will not contribute to suspension if there is more than 5 non-compliance within a principle)</p>															
3.8.1	<p>Identity Preserved Module</p> <p>A mill is deemed to be Identity Preserved (IP) if the FFB processed by the mill are sourced from plantations/estates that are certified against the RSPO Principles and Criteria (RSPO P&amp;C), or against the Group Certification scheme.</p> <p>Certification for CPO mills is necessary to verify the volumes and sources of certified FFB entering the mill, the implementation of any processing controls (for example, if physical separation is used), and volume sales of RSPO certified products. If a mill processes certified and uncertified FFB without physically separating them, then only Mass Balance Module is applicable.</p>	Tereh POM process the FFB from own supply bases only, therefore is deemed IP. There is no physical separation required as there are no uncertified FFB received by Tereh POM.	Complied												

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3.8.2	<p>Mass Balance Module</p> <p>A mill is deemed to be Mass Balance (MB) if the mill process FFB from both RSPO certified and uncertified plantations/estates. 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.</p>	Tereh POM is using IP module hence this is not applicable.	Not Applicable
3.8.3	<p>The estimated tonnage of CPO and PK products that could potentially be produced by the certified mill shall be recorded by the certification body (CB) in the public summary of the P&amp;C certification 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.</p>	The estimated CPO and PK for 12 months period is recorded under the CPO & PK produced and sold in this report.	Complied
3.8.4	<p>The mill shall also meet all registration and reporting requirements for the appropriate supply chain through the RSPO IT platform.</p>	The parent company (Johor Corporation) is the member of RSPO [membership no.: 1-0080-09-000-00] and the mill is registered in the Palm Trace system [member ID: RSPO_PO1000001263].	Complied
3.8.5	<p>Documented procedures</p> <p>The mill 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:</p> <ul style="list-style-type: none"> <li>a) Complete and up to date procedures covering the implementation of all the elements of the supply chain model requirements.</li> <li>b) Complete and up to date records and reports that demonstrate compliance with the supply chain model requirements (including training records).</li> <li>c) 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</li> </ul>	<p>Traceability Procedure (Sustainable Management System); Document Number: SQD/SMS/1.2; Issue No. 1; Rev. No. 5; Dated: 01.08.2020 was established by the Sustainability &amp; Quality Department of Kulim (Malaysia) Berhad.</p> <ul style="list-style-type: none"> <li>a) The procedure covers the traceability of FFB from field until dispatch of CPO an PK from mill.</li> <li>b) The facility has prepared a dedicated records and Forms in relation to RSPO Supply Chain Certification. Training record for key employee including a training plan has also been kept in facility premises.</li> <li>c) Tereh POM has appointed the Mill Manager as the person whom has overall responsibilities and authorities in</li> </ul>	Complied

	<p>to demonstrate awareness of the mill's procedures for the implementation of this standard.</p> <p>d) The mill shall have documented procedures for receiving and processing certified and non-certified FFBs including ensuring no contamination in the IP mill.</p>	<p>implementing and maintaining the supply chain system. Verified the appointment letter dated 21.09.2020 (ref.: SQD/ADMIN/026/20) undersigned by the Head of Plantation Division. The responsibilities were defined in the appointment letter i.e.:</p> <ul style="list-style-type: none"> <li>• To manage, implement and maintain a standard operating procedure to comply with the requirements for traceability system.</li> <li>• Conduct regular inspections of compliance with the established traceability system; and</li> <li>• Maintain the record of sales, delivery or transportation of FFB.</li> </ul> <p>d) Documented procedures for receiving and processing certified and non-certified FFBs including ensuring no contamination in the mill was also stated in the Traceability Procedure.</p>	
<p>3.8.6</p>	<p>Internal Audit</p> <p>1. The mill shall have a written procedure to conduct annual internal audit to determine whether the mill:</p> <p>a. Conforms to the requirements in the RSPO Supply Chain Certification Standard and the RSPO Market Communications and Claims Documents.</p> <p>b. Effectively implements and maintains the standard requirements within its organisation.</p> <p>2. Any non-conformities found as part of the internal audit shall be issued corrective action. The outcomes of the internal audits and all actions taken to correct non-conformities shall be subject to management review at least annually. The mill shall maintain the internal audit records and reports.</p>	<p>1. Internal Audit Procedure; Doc. No: SQD/SMS/5.0; Issue No: 01; Rev. No: 0, Dated 01.07.2018 was available which covers the requirements in the RSPO Supply Chain Certification Standard and the RSPO Market Communications and Claims.</p> <p>The Internal audit has been conducted on 04.10.2020 by Sustainability Quality Department on the RSPO SCCS Requirements. During the audit there were no findings raised related to RSPO SCCS.</p> <p>2. The internal audit has been discussed in the management review conducted on 16.10.2020 at Tereh POM.</p>	<p>Complied</p>
<p>3.8.7</p>	<p>Purchasing and Goods In</p>	<p>i) Daily records are prepared at the entry point at the weighbridge. Daily summary and monthly summary</p>	<p>Complied</p>

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	<ul style="list-style-type: none"> <li>i) The mill shall verify and document the tonnage and sources of certified and the tonnage of non-certified FFBs received.</li> <li>ii) The mill shall inform the CB immediately if there is a projected overproduction of certified tonnage.</li> <li>iii) The mill shall have a mechanism in place for handling non-conforming FFB and/or documents.</li> </ul>	<p>documented for all the certified FFB. Records verified by internal and external audit. Tereh POM mill have system to verify documents at the weighbridge.  When FFB is delivered to the mill from the certified estates, the transporters presents the Delivery Note (DN) and in some cases, estate’s weighbridge tickets to the mill weighbridge clerk in order for the FFB to be received by the mill.</p> <ul style="list-style-type: none"> <li>ii) The traceability procedure mentions that the mill shall inform the CB immediately if there is a projected overproduction of certified tonnage. As for the audited period, there are no projected over production from Tereh POM.</li> <li>iii) The Traceability Procedure also mentions on the procedure to handling non-conforming FFB and/or documents.</li> </ul>	
<p>3.8.8</p>	<p>Sales and Goods Out</p> <p>The supplying mill shall ensure that the following minimum information for RSPO certified products is made available in document form. The 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):</p> <ul style="list-style-type: none"> <li>a) The name and address of the buyer;</li> <li>b) The name and address of the seller;</li> <li>c) The loading or shipment / delivery date;</li> <li>d) The date on which the documents were issued;</li> <li>e) RSPO certificate number;</li> </ul>	<p>Tereh POM ensured the required information is available in document form.</p> <p>Sampled the Sales and Goods Outs for CPO as below;</p> <ul style="list-style-type: none"> <li>• Buyer Address: XXXX</li> <li>• Seller Address: Ladang Tereh Mill, K.B. No 538, 86009 Kluang, Johor.</li> <li>• Delivery Date: 06.11.2020</li> <li>• Document Issue Date; 06.11.2020</li> <li>• Product Description: CSPO (IDENTITY PRESERVED)</li> <li>• The quantity of the products delivered: 42.160 mt</li> <li>• Weighbridge ticket No. C05153</li> <li>• RSPO SCC Number: RSPO 613086</li> </ul>	<p>Complied</p>

	<ul style="list-style-type: none"> <li>f) A description of the product, including the applicable supply chain model (Identity Preserved or Mass Balance or the approved abbreviations);</li> <li>g) The quantity of the products delivered;</li> <li>h) Any related transport documentation;</li> <li>i) A unique identification number.</li> </ul>		
<p>3.8.9</p>	<p><b>Outsourcing Activities</b></p> <ul style="list-style-type: none"> <li>i) The mill shall not outsource its milling activities. In cases where he mill outsources activities to independent third parties (e.g. subcontractors for storage, transport or other outsourced activities), the mill holding the certificate shall ensure that the independent third party complies with relevant requirements of this RSPO Supply Chain Certification</li> <li>ii) The mill shall ensure the following: <ul style="list-style-type: none"> <li>a) The mill has legal ownership of all input material to be included in outsourced processes</li> <li>b) The mill 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 mill to ensure that certification body (CB) has access to the outsourcing contractor or operation if an audit is deemed necessary.</li> <li>c) The mill has a documented control system with explicit procedures for the outsourced process which is communicated to the relevant contractor.</li> <li>d) The mill 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 all information, when this is announced in advance.</li> </ul> </li> </ul>	<p>Outsourcing activities is provided to the transporter, Teo Tuan Kwee Sdn Bhd. The contractor only transports the product to the designated buyer and does not physically handle or process the products. The contract agreement between Kulim (Malaysia) Berhad (Mahamurni Plantations Sdn Bhd) and Teo Tuan Kwee sdn Bhd was available for verification</p> <p>Reference Number: MPSB/G1/6/2/(2020)</p> <p>Date: 15<sup>th</sup> June 2020</p> <p>The contract agreement states the following;</p> <ul style="list-style-type: none"> <li>a) The mill has legal ownership of all CPO products.</li> <li>b) That the certification body (CB) has access to the outsourcing contractor or operation if an audit is deemed necessary.</li> <li>c) The mill has a documented control system with explicit procedures for the outsourced process which is communicated to the relevant contractor.</li> <li>d) Independent third parties engaged are provided relevant access for duly accredited CBs to their respective operations, systems, and all information.</li> </ul>	<p>Complied</p>

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3.8.10	The mill shall record the names and contact details of all contractors used for the physical handling of RSPO certified oil palm products.	The list of contractors and suppliers were listed in the stakeholder list. It is including Biokekal Sdn Bhd, Majoh Engineering Sdn Bhd, etc.	Complied
3.8.11	The mill shall inform its CB in advance prior to conduct of its next audit of the names and contact details of any new contractor used for the physical handling of RSPO certified oil palm products.	Mill already inform CB in advance on the stakeholder list with their contact details prior to the audit.	Complied
3.8.12	<p>Record keeping</p> <p>i) The mill shall maintain accurate, complete, up-to-date and accessible records and reports covering all aspects of this RSPO Supply Chain Certification Standard requirements.</p> <p>ii) Retention times for all records and reports shall be a minimum of two (2) years and shall comply with relevant legal and regulatory requirements and be able to confirm the certified status of raw materials or products held in stock.</p> <p>iii) For Identity Preserved Module, the mill shall record and balance all receipts of RSPO certified FFB and deliveries of RSPO certified CPO and PK on a real-time basis.</p> <p>iv) For Mass Balance Module, the mill:</p> <p>a) 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.</p> <p>b) All volumes of certified CPO and PK that are delivered are deducted from the material accounting system according to conversion ratios stated by RSPO.</p> <p>c) The mill can only deliver Mass Balance sales from a positive stock. Positive stock can include product ordered for delivery within three (3) months. However, a mill is allowed to sell short (i.e. product can be sold before it is in stock.</p>	<p>All the sampled records related to the movements of RSPO certified materials and products were found to be accurate, complete, up-to-date and accessible.</p> <p>As spelt out in the Traceability Procedure (Doc No: SQD/SMS/1.2 dated 01/08/2020), Control of Quality Records Issue No 1, Revision 0 (Doc No: SQD/SMS/5.0 dated 20/09/2019), records are to be maintained minimum of five years. Based on records sampled, the ones dated Jan 2015 were still well maintained as below:</p> <p>Weighbridge ticket dated 30/01/2015, Vehicle: JHD 7658, weight 6.700 field P08/2 from Ladang Enggang, receiving no: R059843.</p> <p>The movement of RSPO certified CPO and PK is recorded on real time basis as sampled below:</p> <ul style="list-style-type: none"> <li>- Daily Production Record (CPO &amp; PK)</li> <li>- Dispatch Book (CPO &amp; PK)</li> <li>- Daily Mill Production report</li> <li>- Sustainable Product Monthly Movements (2018 &amp; 2019)</li> </ul>	Complied



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3.8.13	<p>Extraction Rate</p> <p>The oil extraction rate (OER) and the kernel extraction rate (KER) shall be applied to provide a reliable estimate of the amount of certified CPO and PK from the associated inputs. Mill shall determine and set their own extraction rates based upon past experience, documented and applied it consistently.</p>	<p>Conversion factor of CPO and PK production is depending on the actual OER and KER.</p>	Complied
3.8.14	<p>Extraction rates shall be updated periodically to ensure accuracy against actual performance or industry average if appropriate.</p>	<p>The facility is using the actual extraction rate and therefore updating of rates is not necessary.</p>	Complied
3.8.15	<p>Processing</p> <p>For Identity Preserved Module, the mill shall assure and verify through documented procedures and record keeping that the RSPO certified oil palm product is kept separated from non-certified oil palm products, including during transport and storage to strive for 100% separation.</p>	<p>Based on verification of FFB receipt records, it was confirmed that only certified source of FFB from own plantation were processed. Therefore, there was no mixing of non-certified FFB in production of CPO and PK.</p> <p>Processing and storage records can be traced back to only certified segregated FFB and finish product (CPO and PK) through traceability records such as weighbridge records and FFB dispatch chit. This ensures that 100% segregated materials are reached.</p>	Complied
3.8.16	<p>Registration of Transactions</p> <p>i) Shipping Announcement in the RSPO IT platform shall be carried out by the mills when RSPO certified products are sold as certified to refineries, crushers, and traders not more than three months after dispatch with the dispatch date being the Bill of Lading or the dispatch documentation date.</p> <p>ii) Remove: RSPO certified volumes sold under different scheme or as conventional, or in case of underproduction, loss or damage shall be removed in the RSPO IT platform.</p>	<p>The registration of PalmTrace is carried out by Marketing Dept., Kulim (M) Bhd, Ulu Tiram, Johor. All transaction was registered in the PalmTrace.</p> <p>Based on the announcement summary, all the registrations were found to be in order.</p> <p>Based on the MB accounting, the removal of volumes was done correctly when the products were sold as conventional or other scheme (e.g. ISCC).</p>	Complied
3.8.17	<p>Claims</p>	<p>RSPO trademark was not use. Nonetheless, the facility is aware with the requirements of the RSPO Rules on Market Communications and Claims. Refer to RSPO trademark and license registered under Kulim (M) Berhad (parent company: Johor</p>	Complied

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	The mill shall only make claims regarding the production of RSPO certified oil that are in compliance with the RSPO Rules on Market Communications and Claims.	Corporation) 1-0080-09-100-00 for supply chain model (IP and MB) valid until 22/8/21.	
<b>General corporate communications</b>			
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.	<p>Kulim (M) Berhad have highlighted its RSPO membership and its commitments to the principles of the RSPO in the corporate website as stated below:</p> <p><i>"In the palm oil industry, Kulim is recognized as one of the leading palm oil groups with operations currently spanning over Malaysia and Indonesia.</i></p> <p><i>Kulim was amongst the earliest palm oil producers to be certified to the Roundtable on Sustainable Palm Oil ("RSPO") standard. Our management and growth strategy is fundamentally guided by "Vision 30:30" FFB, which aims to raise fruit yields to 30 tonnes per hectare and palm product extraction rates to 30%, balanced with sustainable development principles"</i></p> <p>Source: <a href="http://www.kulim.com.my/business-type.aspx?p_Id=23&amp;c_Id=45&amp;c=PLANTATION">http://www.kulim.com.my/business-type.aspx?p_Id=23&amp;c_Id=45&amp;c=PLANTATION</a></p>	Complied
4.2	<p>In corporate communications a member is allowed to:</p> <ol style="list-style-type: none"> <li>a. Display its RSPO membership status</li> <li>b. Display the RSPO web address (www.rspo.org)</li> <li>c. State that the member supports the work of the RSPO</li> <li>d. State the member's history with regard to the RSPO.</li> <li>e. Use the RSPO trademark to promote its membership of the RSPO.</li> </ol>	The communication in <a href="http://www.kulim.com.my/business-type.aspx?p_Id=23&amp;c_Id=45&amp;c=PLANTATION">http://www.kulim.com.my/business-type.aspx?p_Id=23&amp;c_Id=45&amp;c=PLANTATION</a> states that Kulim (M) Berhad is RSPO certified.	Complied

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	Additionally, where an RSPO member displays the RSPO trademark in digital format this must be accompanied by the text 'Check our progress at <a href="http://www.rspo.org">www.rspo.org</a> ' where the link must lead to the member's profile page.		
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.	The communication in <a href="http://www.kulim.com.my/business-type.aspx?p_Id=23&amp;c_Id=45&amp;c=PLANTATION">http://www.kulim.com.my/business-type.aspx?p_Id=23&amp;c_Id=45&amp;c=PLANTATION</a> states that Kulim (M) Berhad is RSPO certified.	Complied
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.	The communication in <a href="http://www.kulim.com.my/business-type.aspx?p_Id=23&amp;c_Id=45&amp;c=PLANTATION">http://www.kulim.com.my/business-type.aspx?p_Id=23&amp;c_Id=45&amp;c=PLANTATION</a> states that Kulim (M) Berhad is RSPO certified.	Complied
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.	There was no evidence of logo is being used in the website, official documents etc.	Complied
<b>Business to business communications</b>			
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.	Business to business communication is demonstrated via shipping documentation and invoices to the next supply chain actor or buyer.	Complied
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.	Supply chain model is stated in the shipping documents weighbridge tickets, e.g. "CSPO or CSPK IDENTITY PRESERVED".	Complied
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 customers are aware	Tereh POM is not a distributor or wholesaler category. Thus, this requirement is not applicable.	Not Applicable

	<p>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>		
<b>Business to consumer communication</b>			
6.1	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.	No business to consumer communication on product specific claim made by Tereh POM and only producing crude and unfinished product. This is not applicable for POM.	Not Applicable
6.2	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.	No business to consumer communication on product specific claim made by Tereh POM and only producing crude and unfinished product. This is not applicable for POM.	Not Applicable
6.3	When on-pack claims on RSPO-certified sustainable oil palm products are used, the RSPO trademark and associated identification number must be present.	No business to consumer communication on product specific claim made by Tereh POM and only producing crude and unfinished product. This is not applicable for POM.	Not Applicable
6.4	Business to consumer communication shall not include information about the claimant's RSPO membership status.	No business to consumer communication on product specific claim made by Tereh POM and only producing crude and unfinished product. This is not applicable for POM.	Not Applicable
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 by Tereh POM and only producing crude and unfinished product. This is not applicable for POM.	Not Applicable
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 by Tereh POM and only producing crude and unfinished product. This is not applicable for POM.	Not Applicable

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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 by Tereh POM and only producing crude and unfinished product. This is not applicable for POM.	Not Applicable
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 <a href="http://www.rspo.org">www.rspo.org</a> .	No business to consumer communication on product specific claim made by Tereh POM and only producing crude and unfinished product. This is not applicable for POM.	Not Applicable
<b>MODULE A – IDENTITY PRESERVED &amp; SEGREGATED SPECIFIC RULES</b>			
<b>Certified oil palm content (IP)</b>			
	For IP, 95% or above of the oil palm content must be RSPO IP-certified.	100% of the product is RSPO Certified as it is derived from 100% RSPO Certified FFB.	Complied
	For SG, 95% or above of the oil palm content must be SG, or a combination of SG and IP.	100% of the product is RSPO Certified as it is derived from 100% RSPO Certified FFB. This is not applicable as the mill uses the IP module.	Not Applicable
	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	100% of the product is RSPO Certified as it is derived from 100% RSPO Certified FFB.	Not Applicable

	<p>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.</p>		
<p><b>Labelling and trademark (IP)</b></p>			
	<p>Members are allowed to use the RSPO label in one of the following ways:</p> <ul style="list-style-type: none"> <li>• RSPO trademark which includes the tag 'CERTIFIED' or</li> <li>• 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.</li> </ul>	<p>Kulim (Malaysia) Bhd have obtained the RSPO Trademark License, License No: 1-0080-09-000-00, Date Issue: 26.08.2019; License Validity 23.08.2019 to 22.08.2021. Nonetheless, there were no evidence of use of RSPO trademark logo yet.</p>	<p>Complied</p>
<p><b>Messaging (IP)</b></p>			
	<p>Messaging ALLOWED in storytelling in product-related communications may include some or all of the following elements:</p> <ul style="list-style-type: none"> <li>• The oil palm products contained in this product have been certified to come from RSPO sources. <a href="http://www.rspo.org">www.rspo.org</a></li> <li>• By choosing this product, you are sure it contains RSPO-certified palm oil. For more information: <a href="http://www.rspo.org">www.rspo.org</a></li> <li>• RSPO-certified sustainable oil palm products were kept apart from other oil palm products throughout the supply chain. <a href="http://www.rspo.org">www.rspo.org</a></li> <li>• Certified sustainable oil palm products can be traced back to RSPO-certified mills and plantations. <a href="http://www.rspo.org">www.rspo.org</a></li> <li>• The entire supply chain is monitored by independent, RSPO-accredited auditors. <a href="http://www.rspo.org">www.rspo.org</a></li> </ul>	<p>Kulim (Malaysia) Bhd have obtained the RSPO Trademark License, License No: 1-0080-09-000-00, Date Issue: 26.08.2019; License Validity 23.08.2019 to 22.08.2021. Nonetheless, there were no evidence of use Messaging in the products produced.</p>	<p>Complied</p>

	<ul style="list-style-type: none"> <li>• RSPO-certified sustainable palm oil has been produced to stringent environmental and social criteria. <a href="http://www.rspo.org">www.rspo.org</a></li> <li>• References to (or images of) particular RSPO-certified production units, if the relationship to those units can be shown by company records.</li> </ul>		
<p><b>Principle 4: Respect community and human rights and deliver benefits</b></p>			
<p><b>Criterion 4.1:</b> The unit of Certification respects human rights, which includes respecting the rights of Human Rights Defenders.</p>			
<p>4.1.1</p>	<p><b>(C)</b> A policy to respect human rights, including prohibiting retaliation against Human Rights Defenders (HRD), is documented and communicated to all levels of the workforce, operations, FFB suppliers and local communities and prohibits intimidation and harassment by the unit of certification and contracted services, including contracted security forces.</p> <p>- Critical (Major) compliance -</p>	<p>In Wawasan Estate, The Sustainability Policy (Doc No: YPJP-POLISI-03 Version 3.0 dated 01/10/2020 mention on the supporting of Human Rights Defender and this is signed through the addendum of contract to the contractors.</p> <p>Kulim (Malaysia) Berhad has established People Policy signed by Executive Director on 01/05/2018 and communicated to worker on 26/10/2020 (Tereh POM) and 27/02/2020 (Mutiara Estate). It mentions that Kulim will respect, support and protect international human rights against violence, threats, all forms of retaliation and contribute to the effective elimination of all forms of violations of human rights and fundamental freedoms of individuals and peoples which includes Environmental Human Rights Defenders, Whistle-blowers, complainers and community spokesperson.</p> <p>This is explained to stakeholders through the annual stakeholder meeting (for external) and policy briefing (for internal).</p>	<p>Complied</p>
<p>4.1.2</p>	<p>The unit of certification does not instigate violence or use any form of harassment in their operations.</p> <p>- Minor compliance -</p>	<p>There is no violence or harassment in the operations. This was assured as there were no reports of any instigation of violence or use of any form of harassments in the certification units. Interview with the workers and staffs also indicated that there were no instigation of violence or use of any form of harassments in the operations.</p>	<p>Complied</p>
<p><b>Criterion 4.2:</b> There is a mutually agreed and documented system for dealing with complaints and grievances, which is implemented and accepted by all affected parties</p>			

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4.2.1	<p><b>(C)</b> The mutually agreed system, open to all affected parties, resolves disputes in an effective, timely and appropriate manner, ensuring anonymity of complainants, HRD, community spokespersons and whistleblowers, where requested, without risk of reprisal or intimidation and follows the RSPO policy on respect for HRD.</p> <p>- Critical (Major) compliance -</p>	<p>Wawasan Estate:          Complaint and Grievance Procedure (Doc No: YPJP-SOP-59 version 1.0 dated 05/04/2018). Estate will act 14 days from the date of complaint. No complaint received as todate based on the records and interview with the stakeholders and workers.</p> <p>Kulim (Malaysia) Berhad has established Grievance Procedure (Doc No: SQD/SMS/4.1 dated 01/08/2020). It aims to ensure that KULIM has a documented system for dealing with complaints and grievances that is agreeable to all sides and accepted by all stakeholders. Training was conducted on 26/10/2020 to 26 workers (Tereh POM), 04/09/2020 to workers (Rengam Estate) and 27/02/2020 (Mutiara Estate).</p>	Complied
4.2.2	<p>Procedures are in place to ensure that the system is understood by the affected parties, including by illiterate parties.</p> <p>- Minor compliance -</p>	<p>Wawasan Estate:          Procedure is available and the training for policy has been conducted on 15/10/2020.</p> <p>Kulim (Malaysia) Berhad: The FPIC procedure titled 'Estate Land Encroachment (Doc No: PROP/MP/5 dated 20/10/2014, revision date: 14/08/2019. However, there is no case of land dispute reported.</p>	Complied
4.2.3	<p>The unit of certification keeps parties to a grievance informed of its progress, including against agreed timeframe and the outcome is available and communicated to relevant stakeholders.</p> <p>- Minor compliance -</p>	<p>Wawasan Estate:          Procedure is available and the training for policy has been conducted on 15/10/2020.</p> <p>Kulim (Malaysia) Berhad: The FPIC procedure titled 'Estate Land Encroachment (Doc No: PROP/MP/5 dated 20/10/2014, revision date: 14/08/2019. However, there is no case of land dispute reported.</p>	Complied
4.2.4	<p>The conflict resolution mechanism includes the option of access to independent legal and technical advice, the ability for complainants to</p>	<p>Wawasan Estate:</p>	Complied



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	<p>choose individuals or groups to support them and/or act as observers, as well as the option of a third-party mediator.</p> <p>- Minor compliance -</p>	<p>Procedure is available and the training for policy has been conducted on 15/10/2020.</p> <p>Kulim (Malaysia) Berhad: The FPIC procedure titled 'Estate Land Encroachment (Doc No: PROP/MP/5 dated 20/10/2014, revision date: 14/08/2019. However, there is no case of land dispute reported.</p>	
<p><b>Criterion 4.3:</b> The unit of Certification contributes to local sustainable development as agreed by local communities.</p>			
<p>4.3.1</p>	<p>Contributions to community development that are based on the results of consultation with local communities are demonstrated.</p> <p>- Minor compliance -</p>	<p>Wawasan Estate: Since there is no complaint or suggestion from the stakeholders and under Movement Control Order, no social contribution been made.</p> <p>Kulim (Malaysia) Berhad: Tereh POM: SMK Seri Kota Paloh has request contribution to upgrade the laboratory on 21/10/2020 and mill management has donated RM300 (petty cash voucher payment no: 20000079).</p> <p>Rengam Estate: Donation to SK Jubli Intan RM 500 for sports day.</p> <p>Mutiara Estate: Donation to SK Ladang Tereh RM 300 for sports day (Petty cash voucher, payment number: 20000004 dated 13/02/2020).</p>	<p>Complied</p>
<p><b>Criterion 4.4:</b> Use of the land for oil palm does not diminish the legal, customary or user rights of other users without their free, prior and informed consent.</p>			
<p>4.4.1</p>	<p><b>(C)</b> Documents showing legal ownership or lease, or authorised use of customary land authorised by customary landowners through a Free, Prior and Informed Consent (FPIC) process. Documents Related to the history of land tenure and the actual legal or customary use of the land are available.</p> <p>- Critical (Major) compliance -</p>	<p>The land title (No Hakmilik: 41253 Lot 2854) for agriculture purpose for 362.3 Ha sighted for Wawasan Estate.</p> <p>Quit rent No: 04050200412710033 dated 04/06/2020 RM 50,820.00 by Kerajaan Negeri Johor Pentadbiran Tanah Johor. No Native Customary Right (NCR) land is used.</p> <p>Kulim (Malaysia) Berhad:</p>	<p>Complied</p>

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		<p>Tereh POM: No H.S.(D): 6766 PTD 3326 for 1608.0588 Ha for agriculture purpose. Quit rent is fully paid by Tereh Utara Estate since it is in Tereh Utara Estate.</p> <p>Mutiara Estate:                  There are 6 land titles in Mutiara Estate as below:</p> <table border="1"> <thead> <tr> <th>Grant no</th> <th>HSD No</th> <th>PTD No</th> <th>Ha</th> </tr> </thead> <tbody> <tr> <td>PN 74878</td> <td>16398</td> <td>1615</td> <td>404.69</td> </tr> <tr> <td>-</td> <td>16399</td> <td>1617</td> <td>404.69</td> </tr> <tr> <td>PN 74877</td> <td>16400</td> <td>1618</td> <td>404.69</td> </tr> <tr> <td>PN 74939</td> <td>16401</td> <td>1619</td> <td>404.69</td> </tr> <tr> <td>PN 51898</td> <td>17426</td> <td>3337</td> <td>323.75</td> </tr> <tr> <td>PN 37261</td> <td>25325</td> <td>3240</td> <td>607.44</td> </tr> </tbody> </table> <p>Quit rent paid on 02/03/2020 to Pentadbiran Tanah Johor (Resit no: C0477539) amounted RM 356,580.00.</p> <p>Rengam Estate</p> <table border="1"> <thead> <tr> <th></th> <th>No Hak Milik</th> <th>Lot No</th> <th>No Pelan</th> <th>Ha</th> </tr> </thead> <tbody> <tr> <td>1</td> <td>2200</td> <td>2264</td> <td>28363</td> <td>28.935</td> </tr> <tr> <td>2</td> <td>84384</td> <td>1912</td> <td>28171</td> <td>2451.9864</td> </tr> <tr> <td colspan="4" style="text-align: center;">Total</td> <td>2480.9214</td> </tr> </tbody> </table>	Grant no	HSD No	PTD No	Ha	PN 74878	16398	1615	404.69	-	16399	1617	404.69	PN 74877	16400	1618	404.69	PN 74939	16401	1619	404.69	PN 51898	17426	3337	323.75	PN 37261	25325	3240	607.44		No Hak Milik	Lot No	No Pelan	Ha	1	2200	2264	28363	28.935	2	84384	1912	28171	2451.9864	Total				2480.9214
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4.4.2	Copies of documents evidencing agreement-making processes and negotiated agreements detailing the FPIC process are available and include:	<p>Wawasan Estate: The FPIC procedure available namely Prosedur Pengendalian Pertikaian Tanah (Doc No: YPJP-SOP-65 Version 1.0 dated 04/05/2018) will be used if any land dispute arises. So far, no land dispute issue. It is confirmed through interview with the stakeholders and documentation review.</p> <p>Kulim (Malaysia) Berhad: The FPIC procedure titled 'Estate Land Encroachment (Doc No: PROP/MP/5 dated 20/10/2014, revision date: 14/08/2019. However, there is no case of land dispute reported.</p>	Complied
4.4.2a	<p>Evidence that a plan has been developed through consultation and discussion in good faith with all affected groups in the communities, with particular assurance that vulnerable, minorities' and gender groups are consulted, and that information has been provided to all affected groups, including information on the steps that are taken to involve them in decision making.</p> <p>- Minor compliance -</p>	<p>Wawasan Estate: The FPIC procedure available namely Prosedur Pengendalian Pertikaian Tanah (Doc No: YPJP-SOP-65 Version 1.0 dated 04/05/2018) will be used if any land dispute arises. So far, no land dispute issue. It is confirmed through interview with the stakeholders and documentation review.</p> <p>Kulim (Malaysia) Berhad: The FPIC procedure titled 'Estate Land Encroachment (Doc No: PROP/MP/5 dated 20/10/2014, revision date: 14/08/2019. However, there is no case of land dispute reported.</p>	Complied
4.4.2b	<p>Evidence that the unit of certification has respected communities' decisions to give or withhold their consent to the operation at the time that these decisions were taken.</p> <p>- Minor compliance -</p>	<p>Wawasan Estate: The FPIC procedure available namely Prosedur Pengendalian Pertikaian Tanah (Doc No: YPJP-SOP-65 Version 1.0 dated 04/05/2018) will be used if any land dispute arises. So far, no land dispute issue. It is confirmed through interview with the stakeholders and documentation review.</p> <p>Kulim (Malaysia) Berhad: The FPIC procedure titled 'Estate Land Encroachment (Doc No: PROP/MP/5 dated 20/10/2014, revision date: 14/08/2019. However, there is no case of land dispute reported.</p>	Complied
4.4.2c	Evidence that the legal, economic, environmental and social implications of permitting operations on their land have been understood and	Wawasan Estate: The FPIC procedure available namely Prosedur Pengendalian Pertikaian Tanah (Doc No: YPJP-SOP-65 Version 1.0	Complied

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	<p>accepted by affected communities, including the implications for the legal status of their land at the expiry of the unit of certification's title, concession or lease on the land.</p> <p>- Minor compliance -</p>	<p>dated 04/05/2018) will be used if any land dispute arises. So far, no land dispute issue. It is confirmed through interview with the stakeholders and documentation review.</p> <p>Kulim (Malaysia) Berhad: The FPIC procedure titled 'Estate Land Encroachment (Doc No: PROP/MP/5 dated 20/10/2014, revision date: 14/08/2019. However, there is no case of land dispute reported.</p>	
4.4.3	<p><b>(C)</b> Maps of an appropriate scale showing the extent of recognised legal, customary or user rights are developed through participatory mapping involving affected parties (including neighbouring communities where applicable, and relevant authorities).</p> <p>- Critical (Major) compliance -</p>	<p>Wawasan Estate: The FPIC procedure available namely Prosedur Pengendalian Pertikaian Tanah (Doc No: YPJP-SOP-65 Version 1.0 dated 04/05/2018) will be used if any land dispute arises. So far, no land dispute issue. It is confirmed through interview with the stakeholders and documentation review.</p> <p>Kulim (Malaysia) Berhad: The FPIC procedure titled 'Estate Land Encroachment (Doc No: PROP/MP/5 dated 20/10/2014, revision date: 14/08/2019. However, there is no case of land dispute reported.</p>	Complied
4.4.4	<p>All relevant information is available in appropriate forms and languages, including assessments of impacts, proposed benefit sharing, and legal arrangements.</p> <p>- Minor compliance -</p>	<p>Wawasan Estate: The FPIC procedure available namely Prosedur Pengendalian Pertikaian Tanah (Doc No: YPJP-SOP-65 Version 1.0 dated 04/05/2018) will be used if any land dispute arises. So far, no land dispute issue. It is confirmed through interview with the stakeholders and documentation review.</p> <p>Kulim (Malaysia) Berhad: The FPIC procedure titled 'Estate Land Encroachment (Doc No: PROP/MP/5 dated 20/10/2014, revision date: 14/08/2019. However, there is no case of land dispute reported.</p>	Complied
4.4.5	<p><b>(C)</b> Evidence is available to show that communities are represented through institutions or representatives of their own choosing, including by legal counsel if they so choose.</p> <p>- Critical (Major) compliance -</p>	<p>Wawasan Estate: The FPIC procedure available namely Prosedur Pengendalian Pertikaian Tanah (Doc No: YPJP-SOP-65 Version 1.0 dated 04/05/2018) will be used if any land dispute arises. So far, no</p>	Complied

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4.4.6	There is evidence that implementation of agreements negotiated through FPIC is annually reviewed in consultation with affected parties. - Minor compliance -	Wawasan Estate: The FPIC procedure available namely Prosedur Pengendalian Pertikaian Tanah (Doc No: YPJP-SOP-65 Version 1.0 dated 04/05/2018) will be used if any land dispute arises. So far, no land dispute issue. It is confirmed through interview with the stakeholders and documentation review. Kulim (Malaysia) Berhad: The FPIC procedure titled 'Estate Land Encroachment (Doc No: PROP/MP/5 dated 20/10/2014, revision date: 14/08/2019. However, there is no case of land dispute reported.	Complied
<b>Criterion 4.5:</b> No new plantings are established on local peoples' land where it can be demonstrated that there are legal, customary or user rights, without their FPIC. This is dealt with through a documented system that enables these and other stakeholders to express their views through their own representative institutions.			
4.5.1	<b>(C)</b> Documents showing identification and assessment of demonstrable legal, customary and user rights are available. - Critical (Major) compliance -	Wawasan Estate: The FPIC procedure available namely Prosedur Pengendalian Pertikaian Tanah (Doc No: YPJP-SOP-65 Version 1.0 dated 04/05/2018) will be used if any land dispute arises. So far, no land dispute issue. It is confirmed through interview with the stakeholders and documentation review. Kulim (Malaysia) Berhad: The FPIC procedure titled 'Estate Land Encroachment (Doc No: PROP/MP/5 dated 20/10/2014, revision date: 14/08/2019. However, there is no case of land dispute reported.	Complied
4.5.2	<b>(C)</b> FPIC is obtained for all oil palm development through a comprehensive process, including in particular, full respect for their legal and customary rights to the territories, lands and resources via local	Wawasan Estate: The FPIC procedure available namely Prosedur Pengendalian Pertikaian Tanah (Doc No: YPJP-SOP-65 Version 1.0 dated 04/05/2018) will be used if any land dispute arises. So far, no	Complied

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	<p>communities' own representative institutions, with all the relevant information and documents made available, with option of resourced access to independent advice through a documented, long-term and two-way process of consultation and negotiation.</p> <p>- Critical (Major) compliance -</p>	<p>land dispute issue. It is confirmed through interview with the stakeholders and documentation review.</p> <p>Kulim (Malaysia) Berhad: The FPIC procedure titled 'Estate Land Encroachment (Doc No: PROP/MP/5 dated 20/10/2014, revision date: 14/08/2019. However, there is no case of land dispute reported.</p>	
4.5.3	<p>Evidence is available that affected local peoples understand they have the right to say 'no' to operations planned on their lands before and during initial discussions, during the stage of information gathering and associated consultations, during negotiations, and up until an agreement with the unit of certification is signed and ratified by these local peoples. Negotiated agreements are non-coercive and entered into voluntarily and carried out prior to new operations.</p> <p>- Minor compliance -</p>	<p>Wawasan Estate: The FPIC procedure available namely Prosedur Pengendalian Pertikaian Tanah (Doc No: YPJP-SOP-65 Version 1.0 dated 04/05/2018) will be used if any land dispute arises. So far, no land dispute issue. It is confirmed through interview with the stakeholders and documentation review.</p> <p>Kulim (Malaysia) Berhad: The FPIC procedure titled 'Estate Land Encroachment (Doc No: PROP/MP/5 dated 20/10/2014, revision date: 14/08/2019. However, there is no case of land dispute reported.</p>	Complied
4.5.4	<p>To ensure local food and water security, as part of the FPIC process, participatory SEIA and participatory land-use planning with local peoples, the full range of food and water provisioning options are considered. There is transparency of the land allocation process.</p> <p>- Minor compliance -</p>	<p>Wawasan Estate: The FPIC procedure available namely Prosedur Pengendalian Pertikaian Tanah (Doc No: YPJP-SOP-65 Version 1.0 dated 04/05/2018) will be used if any land dispute arises. So far, no land dispute issue. It is confirmed through interview with the stakeholders and documentation review.</p> <p>Kulim (Malaysia) Berhad: The FPIC procedure titled 'Estate Land Encroachment (Doc No: PROP/MP/5 dated 20/10/2014, revision date: 14/08/2019. However, there is no case of land dispute reported.</p>	Complied
4.5.5	<p>Evidence is available that the affected communities and rights holders have had the option to access to information and advice that is independent of the project proponent, concerning the legal, economic, environmental and social implications of the proposed operations on their lands.</p>	<p>Wawasan Estate: The FPIC procedure available namely Prosedur Pengendalian Pertikaian Tanah (Doc No: YPJP-SOP-65 Version 1.0 dated 04/05/2018) will be used if any land dispute arises. So far, no land dispute issue. It is confirmed through interview with the stakeholders and documentation review.</p>	Complied

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	- Minor compliance -	Kulim (Malaysia) Berhad: The FPIC procedure titled 'Estate Land Encroachment (Doc No: PROP/MP/5 dated 20/10/2014, revision date: 14/08/2019. However, there is no case of land dispute reported.	
4.5.6	Evidence is available that the communities (or their representatives) gave consent to the initial planning phases of the operations prior to the issuance of a new concession or land title to the operator. - Minor compliance -	Wawasan Estate: The FPIC procedure available namely Prosedur Pengendalian Pertikaian Tanah (Doc No: YPJP-SOP-65 Version 1.0 dated 04/05/2018) will be used if any land dispute arises. So far, no land dispute issue. It is confirmed through interview with the stakeholders and documentation review.  Kulim (Malaysia) Berhad: The FPIC procedure titled 'Estate Land Encroachment (Doc No: PROP/MP/5 dated 20/10/2014, revision date: 14/08/2019. However, there is no case of land dispute reported.	Complied
4.5.7	New lands are not acquired for plantations and mills after 15 November 2018 as a result of recent (2005 or later) expropriations without consent under the right of eminent domain of the federal and state land acquisition legislations. - Minor compliance -	No new land developed in Wawasan Estate & Kulim (Malaysia) Berhad's estate.	Complied
4.5.8	<b>(C)</b> New lands are not acquired in areas inhabited by communities in voluntary isolation. - Critical (Major) compliance -	No new land developed in Wawasan Estate & Kulim (Malaysia) Berhad's estate.	Complied
<b>Criterion 4.6:</b> 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.			
4.6.1	<b>(C)</b> A mutually agreed procedure for identifying legal, customary or user rights, and a procedure for identifying people entitled to compensation, is in place. - Critical (Major) compliance -	Wawasan Estate: The FPIC procedure available namely Prosedur Pengendalian Pertikaian Tanah (Doc No: YPJP-SOP-65 Version 1.0 dated 04/05/2018) will be used if any land dispute arises. So far, no land dispute issue. It is confirmed through interview with the stakeholders and documentation review.	Complied

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		Kulim (Malaysia) Berhad: The FPIC procedure titled 'Estate Land Encroachment (Doc No: PROP/MP/5 dated 20/10/2014, revision date: 14/08/2019. However, there is no case of land dispute reported.	
4.6.2	<p><b>(C)</b> A mutually agreed procedure for calculating and distributing fair compensation (monetary or otherwise) is established and implemented, monitored and evaluated in a participatory way, and corrective actions taken as a result of this evaluation.</p> <p>- Critical (Major) compliance -</p>	<p>Wawasan Estate: The FPIC procedure available namely Prosedur Pengendalian Pertikaian Tanah (Doc No: YPJP-SOP-65 Version 1.0 dated 04/05/2018) will be used if any land dispute arises. So far, no land dispute issue. It is confirmed through interview with the stakeholders and documentation review.</p> <p>Kulim (Malaysia) Berhad: The FPIC procedure titled 'Estate Land Encroachment (Doc No: PROP/MP/5 dated 20/10/2014, revision date: 14/08/2019. However, there is no case of land dispute reported.</p>	Complied
4.6.3	<p>Evidence is available that equal opportunities are provided to both men and women to hold land titles for scheme small holdings.</p> <p>- Minor compliance -</p>	There is no smallholder scheme.	Not Applicable
4.6.4	<p>The process and outcomes of any negotiated agreements, compensation and payments are documented, with evidence of the participation of affected parties, and made publicly available to them.</p> <p>- Minor compliance -</p>	<p>Wawasan Estate: The FPIC procedure available namely Prosedur Pengendalian Pertikaian Tanah (Doc No: YPJP-SOP-65 Version 1.0 dated 04/05/2018) will be used if any land dispute arises. So far, no land dispute issue. It is confirmed through interview with the stakeholders and documentation review.</p> <p>Kulim (Malaysia) Berhad: The FPIC procedure titled 'Estate Land Encroachment (Doc No: PROP/MP/5 dated 20/10/2014, revision date: 14/08/2019. However, there is no case of land dispute reported.</p>	Complied
<p><b>Criterion 4.7:</b> Where it can be demonstrated that local peoples have legal, customary or user rights, they are compensated for any agreed land acquisitions and relinquishment of rights, subject to their FPIC and negotiated agreements.</p>			



4.7.1	<p><b>(C)</b> A mutually agreed procedure for identifying people entitled to compensation is in place.          - Critical (Major) compliance -</p>	<p>Wawasan Estate: The FPIC procedure available namely Prosedur Pengendalian Pertikaian Tanah (Doc No: YPJP-SOP-65 Version 1.0 dated 04/05/2018) will be used if any land dispute arises. So far, no land dispute issue. It is confirmed through interview with the stakeholders and documentation review.</p> <p>Kulim (Malaysia) Berhad: The FPIC procedure titled 'Estate Land Encroachment (Doc No: PROP/MP/5 dated 20/10/2014, revision date: 14/08/2019. However, there is no case of land dispute reported.</p>	Complied
4.7.2	<p><b>(C)</b> A mutually agreed procedure for calculating and distributing fair and gender-equal compensation (monetary or otherwise) is established and implemented, monitored and evaluated in a participatory way, and corrective actions taken as a result of this evaluation.          - Critical (Major) compliance -</p>	<p>Wawasan Estate: The FPIC procedure available namely Prosedur Pengendalian Pertikaian Tanah (Doc No: YPJP-SOP-65 Version 1.0 dated 04/05/2018) will be used if any land dispute arises. So far, no land dispute issue. It is confirmed through interview with the stakeholders and documentation review.</p> <p>Kulim (Malaysia) Berhad: The FPIC procedure titled 'Estate Land Encroachment (Doc No: PROP/MP/5 dated 20/10/2014, revision date: 14/08/2019. However, there is no case of land dispute reported.</p>	Complied
4.7.3	<p>Communities that have lost access and rights to land for plantation expansion are given opportunities including employment and supply contracts to benefit from plantation development.          - Minor compliance -</p>	<p>Wawasan Estate: The FPIC procedure available namely Prosedur Pengendalian Pertikaian Tanah (Doc No: YPJP-SOP-65 Version 1.0 dated 04/05/2018) will be used if any land dispute arises. So far, no land dispute issue. It is confirmed through interview with the stakeholders and documentation review.</p> <p>Kulim (Malaysia) Berhad: The FPIC procedure titled 'Estate Land Encroachment (Doc No: PROP/MP/5 dated 20/10/2014, revision date: 14/08/2019. However, there is no case of land dispute reported.</p>	Complied

**Criterion 4.8:** 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.

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4.8.1	<p>Where there are or have been disputes, proof of legal acquisition of title and evidence that mutually agreed compensation has been made to all people who held legal, customary, or user rights at the time of acquisition is available and provided to parties to a dispute, and that any compensation was accepted following a documented process of FPIC.</p> <p>- Minor compliance -</p>	<p>Wawasan Estate: The FPIC procedure available namely Prosedur Pengendalian Pertikaian Tanah (Doc No: YPJP-SOP-65 Version 1.0 dated 04/05/2018) will be used if any land dispute arises. So far, no land dispute issue. It is confirmed through interview with the stakeholders and documentation review.</p> <p>Kulim (Malaysia) Berhad: The FPIC procedure titled 'Estate Land Encroachment (Doc No: PROP/MP/5 dated 20/10/2014, revision date: 14/08/2019. However, there is no case of land dispute reported.</p>	Complied
4.8.2	<p><b>(C)</b> Land conflict is not present in the area of the unit of certification. Where land conflict exists, acceptable conflict resolution processes (see Criteria 4.2 and 4.6) are implemented and accepted by the parties involved. In the case of newly acquired plantations, the unit of certification addresses any unresolved conflict through appropriate conflict resolution mechanisms.</p> <p>- Critical (Major) compliance -</p>	<p>Wawasan Estate: The FPIC procedure available namely Prosedur Pengendalian Pertikaian Tanah (Doc No: YPJP-SOP-65 Version 1.0 dated 04/05/2018) will be used if any land dispute arises. So far, no land dispute issue. It is confirmed through interview with the stakeholders and documentation review.</p> <p>Kulim (Malaysia) Berhad: The FPIC procedure titled 'Estate Land Encroachment (Doc No: PROP/MP/5 dated 20/10/2014, revision date: 14/08/2019. However, there is no case of land dispute reported.</p>	Complied
4.8.3	<p>Where there is evidence of acquisition through dispossession or forced abandonment of customary and user rights prior to the current operations and there remain parties with demonstrable customary and land use rights, these claims will be settled using the relevant requirements (Indicators 4.4.2, 4.4.3 and 4.4.4)</p> <p>- Minor compliance -</p>	<p>Wawasan Estate: The FPIC procedure available namely Prosedur Pengendalian Pertikaian Tanah (Doc No: YPJP-SOP-65 Version 1.0 dated 04/05/2018) will be used if any land dispute arises. So far, no land dispute issue. It is confirmed through interview with the stakeholders and documentation review.</p> <p>Kulim (Malaysia) Berhad: The FPIC procedure titled 'Estate Land Encroachment (Doc No: PROP/MP/5 dated 20/10/2014, revision date: 14/08/2019. However, there is no case of land dispute reported.</p>	Complied

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4.8.4	<p>For any conflict or dispute over the land, the extent of the disputed area is mapped out in a participatory way with involvement of affected parties (including neighbouring communities where applicable).</p> <p>- Minor compliance -</p>	<p>Wawasan Estate: The FPIC procedure available namely Prosedur Pengendalian Pertikaian Tanah (Doc No: YPJP-SOP-65 Version 1.0 dated 04/05/2018) will be used if any land dispute arises. So far, no land dispute issue. It is confirmed through interview with the stakeholders and documentation review.</p> <p>Kulim (Malaysia) Berhad: The FPIC procedure titled 'Estate Land Encroachment (Doc No: PROP/MP/5 dated 20/10/2014, revision date: 14/08/2019. However, there is no case of land dispute reported.</p>	Complied
<b>Principle 5: Support smallholder inclusion</b>			
<b>Criterion 5.1:</b> The unit of certification deals fairly and transparently with all smallholders (Independent and Scheme) and other local businesses.			
5.1.1	<p>Current and previous period prices paid for FFB are publicly available and accessible by smallholders.</p> <p>- Minor compliance -</p>	<p>There are no smallholders within the Unit of Certification. Therefore, this indicator is not applicable.</p>	Not Applicable
5.1.2	<p><b>(C)</b> Evidence is available that the unit of certification explains the FFB pricing to smallholders on request from individual smallholders (at least once a year or upon request).</p> <p>- Critical (Major) compliance -</p>	<p>There are no smallholders within the Unit of Certification. Nevertheless, Kulim Plantation have conducted a RSPO/MSPO Briefing, Performance Review &amp; FFB Contract Renewal Year 2020 on 18<sup>th</sup> December 2019 for Rantau Harmoni Sdn Bhd (Wawasan Estate) and FGV Plantations Sdn Bhd (Felda Paloh Estate), the two FFB suppliers within the certification scope not owned by Kulim Plantations. The meeting minutes were available for verification stating the briefing on contract agreement and FFB pricing as part of the meeting.</p>	Complied
5.1.3	<p><b>(C)</b> Fair pricing, calculated as a portion of the international CPO price less costs is provided to smallholders in the supply base and documented.</p> <p>- Critical (Major) compliance -</p>	<p>There are no smallholders within the Unit of Certification. Therefore, this indicator is not applicable.</p>	Not Applicable

5.1.4	<p><b>(C)</b> Evidence is available that all parties, including women and independent representative organisations assisting smallholders where requested, are involved in decision-making processes and understand the contracts. These include those involving finance, loans/credits, and repayments through FFB price reductions for replanting and or other support mechanisms where applicable.</p> <p>- Critical (Major) compliance -</p>	<p>There are no smallholders within the Unit of Certification. Therefore, this indicator is not applicable.</p>	Not Applicable
5.1.5	<p>Contracts are fair, legal and transparent and have an agreed timeframe.</p> <p>- Minor compliance -</p>	<p>There is a total of 10 supply base within the certification unit of Kulim Plantation Berhad, Tereh POM. 8 of the 10 supply base units are under the management of Kulim Plantation Berhad and 2 are from different organisation. The 2 estates are Wawasan Estate and Felda Paloh Estate.</p> <p>Contracts were available for the 2 estates which were not owned by Kulim Plantation Berhad. Verified the contract agreement between Kulim Plantations (M) Sdn Bhd and Rantau Harmoni Sdn Bhd (YPJ Sdn Bhd) dated December 2019. The contracts are fair, legal and transparent. The contract agreement is valid from 01.01.2020 till 31.12.2020.</p>	Complied
5.1.6	<p><b>(C)</b> Agreed payments are made in a timely manner and receipts specifying price, weight, deductions and amount paid are given.</p> <p>- Critical (Major) compliance -</p>	<p>Contract agreement for Wawasan Estate and Tereh POM was sighted. The contract agreement states that <i>"full settlement shall be made on or before 10<sup>th</sup> day of the following month and shall be the sum due in accordance with the agreement."</i></p> <p>Verified payment records for Wawasan Estate to be in accordance with the contract agreement. The sampled Payment records are as below:</p> <ul style="list-style-type: none"> <li>• Kulim Plantations Sdn Bhd; Credit Note: Ref: TPOM0820/03/07; Date: 31.08.2020</li> </ul>	Complied

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		<ul style="list-style-type: none"> <li>Rantau Harmony Sdn Bhd; Tax Invoice; Invoice Number: LWTINVO0001/08/20; Date: 31.08.2020</li> <li>CIMB Bank Statement Account; Account Holder: Rantau Harmony Sdn Bhd; Date: 31.08.2020</li> </ul>	
5.1.7	<p>Weighbridges used for determining payment to smallholders are verified by an independent third party on a regular basis (this can be government).</p> <p>- Minor compliance -</p>	<p>Weighbridge to determine the weight of incoming and outgoing products are calibrated yearly to ensure continues accuracy.</p> <p>Verified the latest weighbridge calibration at Tereh POM as follows:</p> <p><u>Weighbridge 1</u> (80mt)</p> <ul style="list-style-type: none"> <li>Calibrated by: Metrology Corporation Malaysia Sdn Bhd</li> <li>Serial Number: N900110750</li> <li>Date: 12.05.2020</li> </ul> <p><u>Weighbridge 2</u> (60mt)</p> <ul style="list-style-type: none"> <li>Calibrated by: Metrology Corporation Malaysia Sdn Bhd</li> <li>Serial Number: 986124</li> <li>Date: 12.05.2020</li> </ul>	Complied
5.1.8	<p>The unit of certification supports Independent Smallholders with certification, where applicable, ensuring mutual agreements between the unit of certification and the smallholders on who runs the internal control system (ICS), who holds the certificates, and who holds and sells the certified material.</p> <p>- Minor compliance -</p>	<p>There are no smallholders within the Unit of Certification. Therefore, this indicator is not applicable.</p>	Not Applicable
5.1.9	<p><b>(C)</b> The unit of certification has a grievance mechanism for smallholders and all grievances raised are dealt with in a timely manner.</p> <p>- Critical (Major) compliance -</p>	<p>There are no smallholders within the Unit of Certification. Therefore, this indicator is not applicable.</p>	Not Applicable

<b>Criterion 5.2:</b> The unit of certification supports improved livelihoods of smallholders and their inclusion in sustainable palm oil value chains.			
5.2.1	The Company consults with interested smallholders (irrespective of type) within the Unit of Certification, including women or other partners in their supply base, to assess their needs for support to improve their livelihoods and their interest in RSPO certification. - Minor compliance -	There are no smallholders within the Unit of Certification. Therefore, this indicator is not applicable.	Not Applicable
5.2.2	The unit of certification develops and implements smallholder support programme to improve smallholder livelihood and build their capacity to enhance productivity, quality, organisational and managerial competencies, and specific elements of RSPO certification (including the RSPO Independent Smallholder Standard or RISS). - Minor compliance -	There are no smallholders within the Unit of Certification. Therefore, this indicator is not applicable.	Not Applicable
5.2.3	Where applicable, the unit of certification provides support to smallholders to promote legality of FFB production. - Minor compliance -	There are no smallholders within the Unit of Certification. Therefore, this indicator is not applicable.	Not Applicable
5.2.4	<b>(C)</b> Evidence exists that the unit of certification trains Scheme Smallholders on pesticide handling. - Critical (Major) compliance -	There are no smallholders within the Unit of Certification. Therefore, this indicator is not applicable.	Not Applicable
5.2.5	The unit of certification regularly reviews and publicly reports on the progress of the Smallholder support programme. - Minor compliance -	There are no smallholders within the Unit of Certification. Therefore, this indicator is not applicable.	Not Applicable
<b>Principle 6: Respect workers' rights and conditions</b>			
<b>Criterion 6.1:</b> Any form of discrimination is prohibited.			
6.1.1	<b>(C)</b> A publicly available non-discrimination and equal opportunity policy is implemented in such a way to prevent discrimination based on ethnic	In Wawasan Estate, The Sustainability Policy (Doc No: YPJP-POLISI-03 Version 3.0 dated 01/10/2020 mention on the equal opportunity	Complied

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	<p>origin, caste, national origin, religion, disability, gender, sexual orientation, gender identity, union membership, political affiliation or age.</p> <p>- Critical (Major) compliance -</p>	<p>among workers regardless of race, religion, etc. The policy training has been communicated to 15/10/2020.</p> <p>Kulim (Malaysia) Berhad:</p> <p>The Sustainability Policy signed by Managing Director dated 01/10/2020 mentioned that Kulim does not engage in discrimination of race, ethnic, origin, caste, national origin, religion, disability, gender, sexual orientation, gender identity, union membership, political affiliation or age.</p>	
6.1.2	<p><b>(C)</b> Evidence is provided that workers and groups including local communities, women, and migrant workers have not been discriminated against including charging of recruitment fees for foreign workers.</p> <p>- Critical (Major) compliance -</p>	<p>There are no recruitment fees charged to workers based on interview. They came here with free of charge.</p> <p>No discrimination since workers hired based on their capability and qualification.</p>	Complied
6.1.3	<p>The unit of certification demonstrates that recruitment selection, hiring, access to training and promotion are based on skills, capabilities, qualities and medical fitness necessary for the jobs available.</p> <p>- Minor compliance -</p>	<p>The recruitment procedure and selection are based on the qualification and experience.</p> <p>In Wawasan Estate, sighted the sample of job vacancy advertisement for harvester and general worker. The qualification is Malaysian citizen, male or female, age between 18-45 years old and healthy.</p> <p>Kulim (Malaysia) Berhad:</p> <p>Tereh POM: Field worker with basic salary of RM 1,100. Malaysian citizen, 18 years old, healthy and discipline.</p> <p>Rengam Estate:</p> <p>Field worker with basic salary of RM 1,100. Malaysian citizen, 18 years old, healthy and discipline.</p>	Complied
6.1.4	<p>Pregnancy testing is not conducted as a discriminatory measure and is only permissible when it is legally mandated. Alternative equivalent employment is offered for pregnant women.</p> <p>- Minor compliance -</p>	<p>There are no female workers in Wawasan Estate.</p> <p>No female working with chemical in Tereh POM, Rengam Estate, hence no pregnancy test was conducted.</p>	Complied

6.1.5	<p><b>(C)</b> A gender committee is in place specifically to raise awareness, identify and address issues of concern, as well as opportunities and improvements for women.</p> <p>- Critical (Major) compliance -</p>	<p>There are no female workers in Wawasan Estate.</p> <p>Kulim (Malaysia) Berhad has establish the Women on Wards (WOW) as a medium for gender committee to discuss or complaint regarding sexual harassment. Sighted the minute of meeting dated 25/10/2020 (Tereh POM), 28/10/2020 (Rengam Estate) and 12/02/2020 (Mutiara Estate).</p> <p>So far, no complaint regarding sexual harassment and domestic violence reported in all units.</p>	Complied
6.1.6	<p>There is evidence of equal pay for the same work scope.</p> <p>- Minor compliance -</p>	<p>There are no female workers in Wawasan Estate.</p> <p>The pay for female and male workers paid base on the MAPA/NUPW agreement by job category.</p>	Complied
<p><b>Criterion 6.2:</b> Pay and conditions for staff and workers and for contract workers always meet at least legal or industry minimum standards and are sufficient to provide decent living wages (DLW).</p>			
6.2.1	<p><b>(C)</b> Applicable labour laws, union and/or other collective agreements and documentation of pay and conditions are available to the workers in national languages (English or Bahasa Malaysia) and explained to them in language they understand.</p> <p>- Critical (Major) compliance -</p>	<p>All workers have signed employment contracts (for foreigners), and letters of appointment (for locals). Each document contains provisions related to job scope, wages, allowances as per MAPA/NUPW, working hours, contract duration, mutual termination notice, holidays, paid annual leave, medical leave, other benefits, deductions, etc.</p> <p>These documents were prepared in Bahasa Malaysia for Malaysian and Indonesian workers. For Bangladeshi workers, they signed an employment contract in Bahasa Malaysia, as well as an employment contract in English with a Bengali translation. A management official would also explain to them the contents of the same. It was verified during interviews with the workers that they understand the contents of the employment contracts. Among the contracts sampled were:</p> <p>Wawasan Estate:</p>	Complied



		<ul style="list-style-type: none"> <li>• Employee ID: LW00006</li> <li>• Employee ID: LW00016</li> <li>• Employee ID: LW00014</li> <li>• Employee ID: LW00004</li> </ul> <p>Tereh POM:</p> <ul style="list-style-type: none"> <li>• Employee ID: 612289</li> <li>• Employee ID: 612355</li> <li>• Employee ID: 950306</li> <li>• Employee ID: 612321</li> </ul> <p>Rengam Estate:</p> <ul style="list-style-type: none"> <li>• Employee ID: 613024</li> <li>• Employee ID: 613759</li> <li>• Employee ID: 613990</li> <li>• Employee ID: 613951</li> </ul> <p>Mutiara Estate:</p> <ul style="list-style-type: none"> <li>• Employee ID: 607159</li> <li>• Employee ID: 607000</li> <li>• Employee ID: 607063</li> <li>• Employee ID: 607136</li> </ul>	
6.2.2	<p><b>(C)</b> Employment contracts and related documents detailing payments and conditions of employment (e.g. regular working hours, deductions, overtime, sick leave, holiday entitlement, maternity leave, reasons for dismissal, period of notice, etc. in compliance with national legal</p>	<p>Employment contract for workers were available. It was noted that salary deductions were recorded on the workers' pay slips. Statutory deductions such as SOCSO, EPF, EIS can be made without workers' request and the Labour Office's written</p>	Complied

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	<p>requirements) and payroll documents give accurate information on compensation for all work performed. This includes a form of record for work done by family members.</p> <p>- Critical (Major) compliance -</p>	<p>consent. However, other forms of deductions would require the request from the worker (Section 24 Employment Act 1955). Sampled during the audit were the following salary deduction approvals:</p> <ul style="list-style-type: none"> <li>• A general letter dated 29 June 2018 (Ref BHG.PU/9/129/1(21) from JTK Putrajaya to MAPA Executive Director where it was stated that the Labour Office approves salary deductions for all MAPA member towards AIA Personal Accident Group Scheme &amp; Great Eastern Life Assurance (M) Berhad.</li> <li>• Letter from the Johor Labour Office dated 31 March 2019 (Ref TK (NJ) U-23) approving Skim Khairat Keluarga Perbadanan Johor up to a maximum of RM37.50 per person;</li> <li>• Letter from the Johor Labour Office dated 2 May 2019 (Ref TK (NJ) U-23) for payment of medical costs exceeding subsidized rate;</li> <li>• Letter from the Johor Labour Office dated 31 March 2019 (Ref TK (NJ) U-23) for Sports Club and Recreation not exceeding RM10 per month;</li> <li>• A letter from the Labour Office dated 1 Dec 2009 (No PP3/29/053/2009) for mosque fund and community fund not exceeding RM4 per person per month.</li> <li>• For working hours, Ladang Tereh Mill received a letter from the Labour Department, Putrajaya dated 9 July 2019 (Ref BHG.PU/9/134 Jld 22 (14), approving an exemption under Section 60A(4)(a) Employment Act 1955 where the maximum allowable overtime is 130 hours per month.</li> </ul> <p>Among the contracts sampled were: Wawasan Estate:</p>	
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		<ul style="list-style-type: none"> <li>• Employee ID: LW00006</li> <li>• Employee ID: LW00016</li> <li>• Employee ID: LW00014</li> <li>• Employee ID: LW00004</li> </ul> <p>Tereh POM:</p> <ul style="list-style-type: none"> <li>• Employee ID: 612289</li> <li>• Employee ID: 612355</li> <li>• Employee ID: 950306</li> <li>• Employee ID: 612321</li> </ul> <p>Rengam Estate:</p> <ul style="list-style-type: none"> <li>• Employee ID: 613024</li> <li>• Employee ID: 613759</li> <li>• Employee ID: 613990</li> <li>• Employee ID: 613951</li> </ul> <p>Mutiara Estate:</p> <ul style="list-style-type: none"> <li>• Employee ID: 607159</li> <li>• Employee ID: 607000</li> <li>• Employee ID: 607063</li> <li>• Employee ID: 607136</li> </ul>	
6.2.3	<p><b>(C)</b> There is evidence of legal compliance for regular working hours, deductions, overtime, sickness, holiday entitlement, maternity leave, reasons for dismissal, period of notice and other legal labour requirements.</p>	<p>The pay slip samples were complied with the working hours, deductions, overtime and other legal labour requirements.</p>	<p>Complied</p>

	<p>- Critical (Major) compliance -</p>	<p>Among the contracts sampled were:</p> <p>Wawasan Estate:</p> <ul style="list-style-type: none"> <li>• Employee ID: LW00006</li> <li>• Employee ID: LW00016</li> <li>• Employee ID: LW00014</li> <li>• Employee ID: LW00004</li> </ul> <p>Tereh POM:</p> <ul style="list-style-type: none"> <li>• Employee ID: 612289</li> <li>• Employee ID: 612355</li> <li>• Employee ID: 950306</li> <li>• Employee ID: 612321</li> </ul> <p>Rengam Estate:</p> <ul style="list-style-type: none"> <li>• Employee ID: 613024</li> <li>• Employee ID: 613759</li> <li>• Employee ID: 613990</li> <li>• Employee ID: 613951</li> </ul> <p>Mutiara Estate:</p> <ul style="list-style-type: none"> <li>• Employee ID: 607159</li> <li>• Employee ID: 607000</li> <li>• Employee ID: 607063</li> <li>• Employee ID: 607136</li> </ul>	
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<p>6.2.4</p>	<p><b>(C)</b> The unit of certification provides adequate housing, sanitation facilities, water supplies, medical, educational and welfare amenities to national standards or above, where no such public facilities are available or accessible. National laws, or in their absence the ILO Guidance on Workers’ Housing Recommendation No. 115, are used. In the case of acquisitions of non-certified units, a plan is developed detailing the upgrade of infrastructure. A reasonable time (5years) is allowed to upgrade the infrastructure.</p> <p>- Critical (Major) compliance -</p>	<p>Based on interviews, observations and visit made to the linesites, there is evidence that all workers of the Tereh Complex are being provided with adequate housing, water supplies, medical and welfare amenities in accordance with the requirements of the Workers’ Minimum Standard of Housing Act 1990.</p> <p>Each house has 3 rooms with a maximum capacity of 6 occupants per house. The linesites are generally well-kept in terms of rubbish disposal, grass height and cleanliness of peripheral drains. Workers are also provided with facilities such as football fields, volleyball/takraw/netball court, futsal court, children’s playground, sundry shops, a mosque, community hall, clinics and kindergarten.</p> <p>The Company also engages Employee Relation Executives for each of the mosque within the Tereh Complex. This person is also a fulltime Imam who leads prayers and religious activities at the mosque and provides religious counselling services to workers too.</p> <p>The clinics are manned by either a Health Assistant or a Medical Assistant. Medical care is provided for the workers and their dependents. Once a month, a nurse from Klinik Kesihatan Paloh would come to check on the health of pregnant women and children. The Visiting Medical Officer visits the clinics on a fortnightly basis as required under Section 19(3) of the Workers’ Minimum Standard of Housing Act 1990.</p>	<p>Complied</p>
<p>6.2.5</p>	<p>The unit of certification makes efforts to improve workers' access to adequate, sufficient and affordable food.</p> <p>- Minor compliance -</p>	<p>There is evidence of efforts made to monitor and improve workers’ access to adequate, sufficient and affordable food within the Tereh Complex. Visit was made to the grocery at Wawasan Estate (quarters inside FGV Paloh Estate), sundry shop at Ladang Tereh Mill, and the Mill canteen, Rengam Estate where it was noted that</p>	<p>Complied</p>

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		<p>the prices are adequately displayed, and that the items sold are within its validity period. Interview with workers from all Estates and Mill also confirmed that the prices sold at the sundry shops and eateries are reasonable.</p>	
<p>6.2.6</p>	<p>A DLW is paid to all workers, including piece rate/quotas, for whom the calculation is based on achievable quotas during regular work hours.</p> <p><b>PROCEDURAL NOTE:</b> STATEMENT FROM THE RSPO STANDARDS STANDING COMMITTEE REGARDING INDICATOR 6.2.6 ON DECENT LIVING WAGE</p> <p>With reference to procedural note of indicator 6.2.6, the RSPO has published a guidance on the DLW calculation in June 2019. The RSPO Secretariat will endeavour to carry out DLW country benchmarks for palm oil producing countries in which RSPO members operate and for which no Global Living Wage Coalition (GLWC) benchmarks exist (As of September 2019, GLWC has developed national benchmarks in Bangladesh, Belize, Brazil, China, Colombia, Costa Rica, Dominican Republic, Ecuador, Ethiopia, Ghana, Guatemala, India, Kenya, Malawi, Mexico, Nicaragua, Pakistan, South Africa, Sri Lanka, Uganda and Vietnam These benchmarks are developed based on banana, coffee, floriculture, textile, manufacturing, seafood processing and tea industry. The RSPO is in the process of commissioning benchmarks for Malaysia and Indonesia for the palm oil sector and will develop methods to calculate and/or define DLW applicability for all palm oil producing countries in which RSPO members operate).</p> <p><i>Where a GLWC living wage standard (benchmark), or one that fulfils the basic requirements of the RSPO-endorsed living wage methodology, has been established in the country or region of operation, the same should be used as benchmarks.</i></p> <p>In the absence of such benchmarks, the RSPO will collaborate with the GLWC and/or local experts on developing oil palm industry benchmarks (Benchmark in this context may include other approaches and/or methods to calculate the applicability of DLW in the country or region in accordance to the RSPO endorsed method for determining a DLW. Local applicability for benchmarks is important and it may differ based on the needs of each locality or country). These benchmarks will be developed in collaboration and consultation with relevant stakeholders such as palm oil industry members, workers’ union, authorities and/or relevant organisations.</p> <p><i>For countries where no living wage standard is established, until such time that an RSPO endorsed benchmark for the country is in place, national minimum wages shall be paid to all workers. In addition to the payment of minimum wages, the Unit of Certification (UoC) shall conduct an assessment of the prevailing wages and in-kind benefits provided to</i></p>	<p>Prevailing wages per head for each management units are as below:</p> <ol style="list-style-type: none"> <li>1. Tereh Pom are RM 2504.13 (average) and RM 3339.09 for Tereh POM.</li> <li>2. Wawasan Estate: RM 2099.81 (only 9 foreign workers in Wawasan Estate).</li> <li>3. Rengam Estate: RM 1514.69</li> <li>4. Mutiara Estate: RM 1295.73</li> </ol>	<p>Complied</p>

	<p><i>workers in the Unit of Certification aligned with the RSPO Guidance for Implementing a Decent Living Wage</i> (RSPO Guidance for Implementing a Decent Living Wage. The RSPO will also develop further guidance and tools to calculate DLW in line with the RSPO endorsed methodology which may include independent studies by local experts in their respective region or country).</p> <p>Once these benchmarks are available, this procedural note is no longer applicable. UoC shall have an implementation plan towards the payment of a DLW with specific targets, and a phased implementation process including:</p> <ul style="list-style-type: none"> <li>• Updated assessment on prevailing wages and in-kind benefits</li> <li>• There is annual progress on the implementation of living wages</li> <li>• Where a minimum wage, based on equivalent of baskets of goods, is stipulated in Collective Bargaining Agreements (CBAs), this should be used as the foundation for the gradual implementation of the living wage payment</li> <li>• The UoC may choose to implement the living wage payment in a specific section as a pilot project; the pilot will then be evaluated and adapted before eventual scale up of the living wage implementation.</li> </ul> <p>- Minor compliance -</p>		
6.2.7	<p>Permanent, full-time employment is used for all core work performed by the unit of certification. Casual, temporary and day labour is limited to jobs that are temporary or seasonal.</p> <p>- Minor compliance -</p>	<p>Only permanent workers used by Estates. No casual or temporary workers.</p>	<p>Complied</p>
<p><b>Criterion 6.3:</b> The unit of Certification 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.</p>			
6.3.1	<p><b>(C)</b> A published statement recognising freedom of association and right to collective bargaining in national languages (English and/or Bahasa Malaysia) is available and is explained to all workers, in language that they understand, and is demonstrably implemented.</p> <p>- Critical (Major) compliance -</p>	<p>A published statement on freedom of association is available and displayed at the main notice boards within the Tereh Complex. Also sighted were:</p> <ul style="list-style-type: none"> <li>- Paragraph 2 of the Employees’ Guide Book which confirms and respects workers’ rights to join a union recognized by the Kulim (Malaysia) Berhad.</li> <li>- Kulim (Malaysia) Berhad’s Core Labour Standards on Rights of Employees states that Kulim recognises and respects the rights of</li> </ul>	<p>Complied</p>

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		<p>employees to form and/or join trade unions of their choice which are given due recognition by KULIM.</p> <p>Trainings were also held during morning muster it was reiterated to the workers that they are free to join any union recognized by Kulim (Malaysia) Berhad. It was communicated on 26/10/2020 at Tereh POM, 04/09/2020 at Rengam Estate and 09/06/2020 at Mutiara Estate.</p>	
6.3.2	<p>Minutes of meetings between the unit of certification with trade unions or workers representatives, who are freely elected, are documented in national languages (English and/or Bahasa Malaysia) and made available upon request.</p> <p>- Minor compliance -</p>	<p>Only 9 workers in Wawasan Estate and none of them join NUPW.</p> <p>In Tereh POM, NUPW minute of meeting sighted dated 05/07/2020 attended by 11 workers. No complaint raised. Only discussion regarding COVID 19 and operation were raised.</p> <p>In Rengam Estate, sighted the NUPW minute of meeting dated 21/10/2020. Discussion made on the house allowance eligibility for workers.</p> <p>In Mutiara Estate, sighted the NUPW minute of meeting dated 14/09/2020. The discussion was on the elephant encroachment in estate and it is reported to PERHILITAN. Also, some foreign workers didn't understand Malay language in Kash Kad system.</p>	Complied
6.3.3	<p>Management does not interfere with the formation or operation of registered unions/ labour organisations or associations, or other freely elected representatives for all workers including migrant and contract workers.</p> <p>- Minor compliance -</p>	<p>Based on the interview conducted to workers, there is no interference from management if worker want to join union or NUPW. This is confirmed through stakeholder and worker's interview.</p>	Complied
<b>Criterion 6.4: Children are not employed or exploited.</b>			
6.4.1	<p>A formal policy for the protection of children, including prohibition of child labour and remediation is in place, and included into service contracts and supplier agreements.</p>	<p>The Sustainability Policy (YPJP-Polisi-03 Version 3.0 dated 01/10/2020) mentioned its commitment to disallowing the child labour or forced labour. It is communicated on 15/10/2020</p>	Complied



	- Minor compliance -	(Wawasan Estate), 26/10/2020 (Tereh POM), 04/09/2020 (Rengam Estate) and 05/02/2020 (Mutiara Estate).	
6.4.2	<p><b>(C)</b> There is evidence that minimum age requirements are met. Personnel files show that all workers are above the national minimum age or above company policy minimum age, whichever is higher. There is a documented age screening verification procedure.</p> <p>- Critical (Major) compliance -</p>	<p>Documentary evidence is available that minimum age requirements are met. This is based on workers' check roll list and copies of their passport/NRIC details. Based on these documents, all workers were 18 years old and above as of the date they were employed by the Mill and Estates within the Tereh Complex.</p> <p>The age screening procedure also mentioned in the recruitment procedure for locals and foreign workers.</p>	Complied
6.4.3	<p><b>(C)</b> Young persons may be employed only for non- hazardous work, with protective restrictions in place for that work.</p> <p>- Critical (Major) compliance -</p>	There is no young person employed in Tereh POM and its supply bases.	Complied
6.4.4	<p>The unit of certification demonstrates communication about its 'no child labour' policy and the negative effects of child labour and promotes child protection to supervisors and other key staff, smallholders, FFB suppliers and communities where workers live.</p> <p>- Minor compliance -</p>	<p>The Sustainability Policy (YPJP-Polisi-03 Version 3.0 dated 01/10/2020) mentioned its commitment to disallowing the child labour or forced labour. It is communicated on 15/10/2020 (Wawasan Estate), 26/10/2020 (Tereh POM), 04/09/2020 (Rengam Estate) and 05/02/2020 (Mutiara Estate).</p> <p>It is also communicated through the stakeholder meeting. No outside FFB suppliers in Tereh POM.</p>	Complied
<b>Criterion 6.5:</b> There is no harassment or abuse in the workplace, and reproductive rights are protected.			
6.5.1	<p><b>(C)</b> A policy to prevent sexual and all other forms of harassment and violence is implemented and communicated to all levels of the workforce.</p> <p>- Critical (Major) compliance -</p>	<p>All units within the Tereh Complex subscribe to Sexual Harassment Policy dated 1 May 2018 signed by Executive Director. This Policy has been communicated to all levels of workforce during the women's group meeting (WoW meetings) and stakeholder's meeting.</p> <p>Interviews conducted with female employees also confirmed that the Sexual harassment Policy is being implemented. They also confirmed their understanding of the Company's Sexual Harassment Policy and the grievance channel involved, if necessary. They also</p>	Complied

		confirmed that they have not encountered any incidence of sexual harassment before.	
6.5.2	<p><b>(C)</b> A policy to protect the reproductive rights of all, especially of women, is implemented and communicated to all levels of the workforce.</p> <p>- Critical (Major) compliance -</p>	<p>The Sustainability Policy (YPJP-Polisi-03 Version 3.0 dated 01/10/2020) mentioned its commitment to for reproductive rights. It is communicated on 15/10/2020.</p> <p>All units within the Tereh Complex subscribe to Kulim (Malaysia) Berhad’s Core Labour Standard dated 1 May 2018 signed by Executive Director. This Standard specifies that the Company recognizes the rights of employees to reproduction and reproductive health, including the right to make decision on reproduction. Based on interviews with the workers, there is evidence that this Standard is being implemented where female workers are entitled to 60 days paid maternity leave, and pregnant women are given light work to do.</p>	Complied
6.5.3	<p>Management has assessed the needs of new mothers, in consultation with the new mothers, and actions are taken to address the needs that have been identified.</p> <p>- Minor compliance -</p>	No female workers at Wawasan Estate and no new mother’s in Tereh POM, Rengam Estate and Mutiara Estate.	Complied
6.5.4	<p>A grievance mechanism, which respects anonymity and protects complainants where requested, is established, implemented and communicated to all levels of the workforce.</p> <p>- Minor compliance -</p>	<p>The grievance mechanism for sexual harassment was available under the Grievance and Complaint procedure, however no female workers in Wawasan Estate.</p> <p>This Policy has been communicated to all levels of workforce during the women’s group meeting (WoW meetings) and stakeholder’s meeting.</p>	Complied
<b>Criterion 6.6:</b> No forms of forced or trafficked labour are used.			
6.6.1	<p><b>(C)</b> All workers have entered into employment voluntarily and the following are prohibited:</p> <ul style="list-style-type: none"> <li>Retention of identity documents or passports (except for administration purposes including legalisation and renewal processes)</li> </ul>	<p>There is no recruitment fee charge from agent to foreign workers. The charge is only for Kulim (RM 400/head).</p> <p>Passport was kept by the management voluntarily. There is agreement letter signed by worker and employer on the</p>	Complied

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	<ul style="list-style-type: none"> <li>• Charging the workers for recruitment fees.</li> <li>• Contract substitution</li> <li>• Involuntary overtime</li> <li>• Lack of freedom of workers to resign</li> <li>• Penalty for termination of employment</li> <li>• Debt bondage</li> <li>• Withholding of wages</li> </ul> <p>- Critical (Major) compliance -</p>	<p>safekeeping passport at office. If the workers want to obtain the passport for own usage, they can anytime request for it.</p> <p>There is no contract substitution as the employment contract signed between Sime Darby and embassy of Indonesia and India was same with the employment contract signed between worker and estate/mill.</p> <p>Based on the workers interview, the overtime was given voluntarily if any work offered.</p> <p>The termination of service stated that in probation period is 1 week from the date of joined and after confirmation the notice period is 1 month.</p>	
6.6.2	<p><b>(C)</b> Where temporary or migrant workers are employed, a specific labour policy and/or procedure are established and implemented.</p> <p>- Critical (Major) compliance -</p>	<p>The specific labour policy is incorporated under Sustainability Policy and Code of Business Ethic. Also, there is SOP for Foreign Worker Recruitment.</p>	Complied
<p><b>Criterion 6.7:</b> The unit of certification ensures that the working environment under its control is safe and without undue risk to health.</p>			
6.7.1	<p><b>(C)</b> The responsible person(s) for H&amp;S is identified. There are records of regular meetings between the responsible person(s) and workers. Concerns of all parties about health, safety and welfare are discussed at these meetings, and any issues raised are recorded.</p> <p>- Critical (Major) compliance -</p>	<p><u>Tereh POM</u> The Mill Manager have been appointed as the Chairman for Safety and Health Committee in the mill as stated in the appointment letter dated 21<sup>st</sup> September 2020 undersigned by the Chairman, Safety and Health Main Committee. OSHA Safety meetings were conducted at an interval of 3 months at the mill to address all Osh related issues. Sighted the meeting minutes dated 20.09.2020 (OSHA 03/2020), 28.06.2020 (OSHA 2/2020) and 19.01.2020 (OSHA 1/2020).</p> <p><u>Rengam Estate</u> The Acting Manager was appointed as the Chairman for Safety and Health Committee at the estate as stated in the appointment letter</p>	Complied

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		<p>dated 21.09.2020 undersigned by the Chairman, Safety and Health Main Committee Kulim (M) Berhad. OSHA safety meetings were conducted at an interval of 3 months at the estate to address all OSH related issues. Sighted the meeting minutes dated 15.10.2020 (03/2020), 15.07.2020 (02/2020), 12.03.2020 (01/2020).</p> <p><u>Mutiara Estae</u> The Manager was appointed as the Chairman for Safety and Health Committee at the estate as stated in the appointment letter dated 22.09.2019 undersigned by the Chairman, Safety and Health Main Committee Kulim (M) Berhad. OSHA safety meetings were conducted at an interval of 3 months at the estate to address all the OSH related issues. Sighted the meeting minutes dated 14.09.2020 (03.2020), 14.07.2020 (02/2020), 16.03.2020 (01/2020)</p> <p><u>Wawasan Estate</u> En. Zaharudin Bin Haron was appointed to be the Chairman of OSH Committee for Wawasan Estate as per the appointment letter undersigned by the General Manager (Operations) dated 01.01.2020. The management has appointed Safety Committee Members consists of OSH Coordinator, Secretary, representatives from Employer and representatives from Employee as per appointment letter by the Estate Manager.</p> <p>The management conducted regular OSH Committee Meetings on. The meeting discussed issues on Workplace Accident Statistics, Changes in OSH Committee Members, Safe Operating Procedures, Worksite Inspection, Chemical and Scheduled Waste Handling, Trainings and ERT. Sighted the latest OSH Meeting Minutes dated 11.06.2020 (02/2020) and 20.02.2020 (01/2020).</p>	
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<p>6.7.2</p>	<p>Accident and emergency procedures are in place and instructions are clearly understood by all workers. Accident procedures are available in national languages (English and/or Bahasa Malaysia) and explained in the language understandable to the workforce. Assigned operatives trained in first aid are present in both field and other operations, and first aid equipment is available at worksites. Records of all accidents are kept and periodically reviewed.</p> <p>- Minor compliance -</p>	<p><u>Tereh POM</u>  Emergency procedures were available and sighted at the Mill Office, Boiler Station and Workshop. Emergency Plans were available for identified incidences such as Fire, Accident and Evacuation. Emergency Response Team was formed in the mill to counter any unwanted emergencies. The appointment letter for the ERT members were sighted dated 20.01.2020.</p> <p>First Aid Kit Improvement Plan 2020 was available to ensure that the first aid kits are monitored on a monthly basis, ensure availability of items in the first aid kits required in regulation and ensure all items expiry dates are monitored.</p> <p>Accidents records were maintained at the mill and recorded in the Monthly Accident, Injury &amp; Death Report. There were no accidents reported at the mill for the year 2019. The JKPP 8 form has been reported to JKPP and was available for verification. For the year 2020 to date, there were 2 accident cases reported. The JKPP 6 form have been submitted accordingly and available for verification.</p> <p><u>Rengam Estate</u>  Emergency Procedures and Safe Working Procedures were available at the office, workshop and chemical stores. Emergency Plans were available for identified incidences such as Fire, Accident, Chemical Spillage and Evacuation. Emergency Response Team was formed in the estate to counter any unwanted emergencies. The most recent ERP and CPR training was conducted on 20.10.2020. Fire Drill and Use of Fire Extinguisher training was conducted on 20.10.2020.</p> <p>First Aid Kits were available at all sampled work units such as Spraying Gang, Manuring Gang, Workshop and Chemical Store. The first aid kits were well equipped with first aid items as stated in the</p>	<p>Complied</p>
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		<p>list. All items were seen to be replenished at monitored regularly as per the monitoring checklist. The First Aid Kit holders were aware on how to use the items in case of an emergency. First Aid Training was conducted on 23.10.2020 for the relevant first aid kit holders.</p> <p>Accident records were maintained and updated on a monthly basis at the estate. There was a total of 5 cases reported for the year 2019. The JKKP 6 Form was submitted to JKKP. The summary of accident incidences for 2019 were reported in the JKKP 8 Form and submitted to JKKP in January 2020. There were 7 cases reported for the year 2020. The necessary JKKP 6 Form was submitted to JKKP accordingly and verified during the audit.</p> <p><u>Mutiara Estate</u> Emergency Procedures and Safe Working Procedures were available at the office, workshop and chemical stores. Emergency Plans were available for identified incidences such as Fire, Accident, Chemical Spillage and Evacuation. Emergency Response Team was formed in the estate to counter any unwanted emergencies.</p> <p>First Aid Kits were available at all sampled work units such as Spraying Gang, Harvesting Gang, Workshop and Chemical Store. The first aid kits were well equipped with first aid items as stated in the list. All items were seen to be replenished at monitored regularly as per the monitoring checklist. The First Aid Kit holders were aware on how to use the items in case of an emergency.</p> <p>Accident records were maintained and updated on a monthly basis at the estate. There was a total of 25 cases reported for the year 2019. The JKKP 6 Form for 1 case ( More than 5 days lost) was submitted to JKKP. The summary of accident incidences for 2019 were reported in the JKKP 8 Form and submitted to JKKP in January</p>	
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		<p>2020. There were 6 cases reported for the year 2020. The necessary JKPP 6 Form was submitted to JKPP accordingly and verified during the audit.</p> <p><u>Wawasan Estate</u>          Accident and emergency procedures were available and sighted at the Office. There is a formation of ER Team &amp; ER Plan for all the identified incidences (Accident, Fire, Poisoning &amp; Evacuation). The ERP Team was appointed, and the organizational chart was displayed at the notice board together with the emergency contacts. First Aid kit was available at the harvesting operation during the site visit. The items were well replenished and were in accordance with the label provided. The First Aid Kit holder was well aware on the usage of the first aid items.</p> <p>There were no accident cases reported in Wawasan Estate for the year 2019 and 2020 as of to date. The JKPP 8 form has been submitted to JKPP in 19 January 2020 with the document available for verification.</p>	
6.7.3	<p><b>(C)</b> Workers use appropriate personal protective equipment (PPE), which is provided free of charge to all workers at the place of work to cover all potentially hazardous operations, such as pesticide application, machine operations, land preparation, and harvesting. Sanitation facilities for those applying pesticides are available, so that workers can change out of PPE, wash and put on their personal clothing.</p> <p>- Critical (Major) compliance -</p>	<p>All workers have been provided with appropriate personal protective equipment (PPE), which is provided by the management free of charge. During the field visit to the Spraying Gang and Manuring Gang and visit to the stores of the respective estates and mill, it was sighted that all required PPEs were worn by the personals.</p> <p>The estates have well maintained facilities for the workers to sanitise themselves prior to returning home from work. The showers were all in good working condition. Interview with workers indicated that they were all well aware that they have to sanitise themselves</p>	Complied

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		before returning home due to the hazard that the chemical residues could cause.																																													
6.7.4	<p>All workers are provided with medical care and covered by accident insurance. Costs incurred from work- related incidents leading to injury or sickness are covered in accordance with Malaysian law.</p> <p>- Minor compliance -</p>	<p>Medical care is provided to all the employees by the organization. Local workers and foreign workers were covered under SOCSO scheme. Sighted the contribution form (8A) for August 2020, September 2020 and October 2020 for the mill and all sampled estate as below.</p> <table border="1" data-bbox="1137 608 1928 1375"> <thead> <tr> <th>Operating Units</th> <th>Month</th> <th>Total Workers</th> <th>Amount (RM)</th> </tr> </thead> <tbody> <tr> <td rowspan="3">Tereh POM</td> <td>Aug 2020</td> <td>149</td> <td>6921.00</td> </tr> <tr> <td>Sept 2020</td> <td>150</td> <td>7051.00</td> </tr> <tr> <td>Sept 2020</td> <td>152</td> <td>6927.70</td> </tr> <tr> <td rowspan="3">Wawasan Estate</td> <td>Aug 2020</td> <td>10</td> <td>321.20</td> </tr> <tr> <td>Sept 2020</td> <td>10</td> <td>255.20</td> </tr> <tr> <td>Oct 2020</td> <td>9</td> <td>276.90</td> </tr> <tr> <td rowspan="3">Mutiara Estate</td> <td>Aug 2020</td> <td>215</td> <td>7179.50</td> </tr> <tr> <td>Sept 2020</td> <td>219</td> <td>7440.00</td> </tr> <tr> <td>Oct 2020</td> <td>212</td> <td>6541.00</td> </tr> <tr> <td rowspan="3">Renggam Estate</td> <td>Aug 2020</td> <td>179</td> <td>6575.10</td> </tr> <tr> <td>Sept 2020</td> <td>178</td> <td>6523.10</td> </tr> <tr> <td>Oct 2020</td> <td>178</td> <td>6150.30</td> </tr> </tbody> </table>	Operating Units	Month	Total Workers	Amount (RM)	Tereh POM	Aug 2020	149	6921.00	Sept 2020	150	7051.00	Sept 2020	152	6927.70	Wawasan Estate	Aug 2020	10	321.20	Sept 2020	10	255.20	Oct 2020	9	276.90	Mutiara Estate	Aug 2020	215	7179.50	Sept 2020	219	7440.00	Oct 2020	212	6541.00	Renggam Estate	Aug 2020	179	6575.10	Sept 2020	178	6523.10	Oct 2020	178	6150.30	Complied
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6.7.5	Occupational injuries are recorded using Lost Time Accident (LTA) metrics. - Minor compliance -	Occupational Injuries were recorded using the Lost Time Accident metrics as below: <table border="1" data-bbox="1137 443 1928 686"> <thead> <tr> <th>Operating Unit</th> <th>2020</th> <th>2019</th> </tr> </thead> <tbody> <tr> <td>Tereh POM</td> <td>2 cases (28 Days)</td> <td>Nil</td> </tr> <tr> <td>Wawasan Estate</td> <td>Nil</td> <td>Nil</td> </tr> <tr> <td>Mutiara Estate</td> <td>6 cases (12 Days)</td> <td>25 Cases (54 Days)</td> </tr> <tr> <td>Renggam Estate</td> <td>8 cases (17 Days)</td> <td>5 Cases (54 Days)</td> </tr> </tbody> </table>	Operating Unit	2020	2019	Tereh POM	2 cases (28 Days)	Nil	Wawasan Estate	Nil	Nil	Mutiara Estate	6 cases (12 Days)	25 Cases (54 Days)	Renggam Estate	8 cases (17 Days)	5 Cases (54 Days)	Complied
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<b>Principle 7: Protect, conserve and enhance ecosystems and the environment</b>																		
<b>Criterion 7.1:</b> Pests, diseases, weeds and invasive introduced species are effectively managed using appropriate Integrated Pest Management (IPM) techniques.																		
7.1.1	<b>(C)</b> IPM plans are implemented and monitored to ensure effective pest control. - Critical (Major) compliance -	Renggam Estate i) Monitoring of Beneficial Plant upkeep and maintenance  <u>Mutiara Estate</u> i) Monitoring of Beneficial Plant upkeep and maintenance ii) Increase barn owl box ratio in the estate. training  Wawasan Estate i) Regular Barn Owl Census, Increase Barn owl Boxes in the estate, Regular Maintenance of Barn Owl Boxes. ii) Increase planting of Tunera in Estate.	Complied															
7.1.2	Species referenced in the Global Invasive Species Database and CABI.org are not to be used in managed areas, unless plans to prevent and monitor their spread are implemented. - Minor compliance -	Species referenced in the Global Invasive Species Database and CABI.org are not used in the estates.	Complied															

7.1.3	<p>There is no use of fire for pest control unless in exceptional circumstances such as plantation sanitation, i.e. where no other effective methods exist, and with prior approval of government authorities.</p> <p>- Minor compliance -</p>	<p>There is no use of fire for pest control in the estates.</p>	<p>Complied</p>						
<p><b>Criterion 7.2:</b> Pesticides are used in ways that do not endanger health of workers, families, communities or the environment.</p>									
7.2.1	<p><b>(C)</b> Justification of all pesticides used is demonstrated. Selective products and application methods that are specific to the target pest, weed or disease are prioritised.</p> <p>- Critical (Major) compliance -</p>	<p>Kulim Plantation Berhad  The written justification of all agrochemicals is available in the Kulim Malaysia Berhad Agricultural Manual; Justification of chemical use; Table H01-2 till Table H01-6. The table states the Weed Situation, Active Ingredient, Chemical Brand Name, Product Rate/Ha and CKS Dossage/18L</p> <p>Wawasan Estate  The written justification of all agrochemical is available in the Operational Procedure, Weeding (<i>Kadar Racun Rumpai Yang Disyorkan</i>); procedure Number: YPJP-UPK-WED-01; Review Date: 01.01.2018. The operational procedure states the application rate for the pesticides used for target pest, weed and diseases.</p>	<p>Complied</p>						
7.2.2	<p><b>(C)</b> Records of pesticides use (including active ingredients used and their LD50, area treated, amount of active ingredients applied per ha and number of applications) are provided.</p> <p>- Critical (Major) compliance -</p>	<p>Records of Chemical Usage was monitored on a monthly basis and available in the "Agrochemical Usage January to December 2020". The to date ai/ha as of October 2020 are as below:</p> <table border="1" data-bbox="1137 1198 1930 1378"> <thead> <tr> <th data-bbox="1137 1198 1532 1262">Estate</th> <th data-bbox="1538 1198 1930 1262">Ai/ha</th> </tr> </thead> <tbody> <tr> <td data-bbox="1137 1267 1532 1331">Wawasan Estate</td> <td data-bbox="1538 1267 1930 1331">0.2192</td> </tr> <tr> <td data-bbox="1137 1335 1532 1385">Rengam Estate</td> <td data-bbox="1538 1335 1930 1385">0.1298</td> </tr> </tbody> </table>	Estate	Ai/ha	Wawasan Estate	0.2192	Rengam Estate	0.1298	<p>Complied</p>
Estate	Ai/ha								
Wawasan Estate	0.2192								
Rengam Estate	0.1298								

		Mutiara Estate	0.0291	
7.2.3	<p><b>(C)</b> Any use of pesticides is minimised as part of a plan, eliminated where possible, in accordance with IPM plans.</p> <p>- Critical (Major) compliance -</p>	<p>The estates have implemented a Continuous Improvement Plan where they have stated the intention to reduce the usage of chemical through implementation of Integrated Pest Management Plan.</p> <p>Sighted during the site visit at all the estates, the establishment of beneficial plants along the estate roads and immature areas as well as barn owl boxes placed at strategic areas.</p> <p><u>Wawasan Estate &amp; Rengam Estate</u></p> <p>Paraquat was eliminated. In its place, alternatives such as Glyphosate is used instead. Monocrotophos was eliminated and in its place Acephate is used.</p> <p><u>Mutiara Estate</u></p> <p>Paraquat was eliminated. In its place, alternatives such as Glyphosate is used instead. Monocrotophos was purchased in 2018 for the use of trunk injection to combat bagworm infestations. The management have stated in the continuous improvement plan to <i>"continuously use the chemical until balance is zero. To implement use of chemical Class III (Altacor/Adonis) onwards.</i> The last trunk injection was conducted in February 2020. The management intends to finish the current stock of Class 1B chemicals before substituting to less hazardous chemicals. The management have also increased the planting of beneficial plants at the bagworm prone areas.</p>		Complied
7.2.4	<p>There is no prophylactic use of pesticides, unless in exceptional circumstances, as identified in national best practice guidelines.</p>	<p>There is no prophylactic use of pesticides in all estates visited.</p>		Complied

	- Minor compliance -		
7.2.5	<p>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, unless in exceptional circumstances, as validated by a due diligence process, or when authorised by government authorities for pest outbreaks.</p> <p>The due diligence refers to:</p> <ol style="list-style-type: none"> <li>Judgment of the threat and verify why this is a major threat</li> <li>Why there is no other alternative which can be used</li> <li>Which process was applied to verify why there is no other less hazardous alternative</li> <li>What is the process to limit the negative impacts of the application</li> <li>Estimation of the timescale of the application and steps taken to limit application to the specific outbreak.</li> </ol> <p>- Minor compliance -</p>	<p><u>Wawasan Estate &amp; Rengam Estate</u></p> <p>Sighted in the Chemical Registers of each estate that only class II, III &amp; IV chemicals were used at all the estates visited. During the site visit to the chemical store it was justified that there were only class II, III and IV chemicals being used. Paraquat was eliminated. In its place, alternatives such as Glyphosate was used instead. Monocrotophos was eliminated and in its place, Acephate is used.</p> <p><u>Mutiara Estate</u></p> <p>Paraquat was eliminated. In its place, alternatives such as Glyphosate is used instead. Monocrotophos was purchased in 2018 for the use of trunk injection to combat bagworm infestations. The management have stated in the continuous improvement plan to “<i>continuously use the chemical until balance is zero. To implement use of chemical Class III (Altacor/Adonis) onwards.</i> The last trunk injection was conducted in February 2020. The management intends to finish the current stock of Class 1B chemicals before substituting to less hazardous chemicals. The management have also increased the planting of beneficial plants at the bagworm prone areas.</p>	Complied
7.2.6	<p><b>(C)</b> Pesticides are only handled, used or applied by persons who have completed the necessary training and are always applied in accordance with the product label. All precautions attached to the products are properly observed, applied, and understood by workers (see Criteria 3.6). Personnel applying pesticides must show evidence of regular updates on the knowledge about the activity they carry out.</p> <p>- Critical (Major) compliance -</p>	<p>Pesticide operators are 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. This was noted during the interview with workers in the estate and mill.</p> <p>Sampled the training conducted for pesticide handlers as below: -</p>	Complied

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		Operating Unit	Training	Date	
		Rengam Estate	Chemical Handling	05.03.2020	
			Chemical Handling (External Trainer)	26.02.2020	
			Safe Work at Chemical Store Training	04.08.2020	
			Triple Rinsing Training	07.01.2020	
		Mutiarra Estate	Chemical Handling & Premix Training	11.08.2020	
			Chemical Store Training	11.08.2020	
			Triple Rinse and Soak Away Sumo Training	22.06.2020	
7.2.7	<b>(C)</b> Storage of all pesticides is in accordance with recognised best practices. - Critical (Major) compliance -	Pesticides were found stored in the mill and all estate's Chemical Store in accordance with the Occupational Safety and Health Act 1994 (Act 514) and Pesticides Act 1974 (Act 149) and their Regulations. The stores were at all times locked and at the time of visit the store keeper was seen to unlock the pad-lock to open entrance door for auditor to inspect the store. At the entrance door, signage requiring donning of PPE were visibly posted. The Chemical Store signage with required Hazard Symbols were available at the entrance. The facility ventilation fan was found working with adequate ventilation available, up-to-date chemical register, trade and generic names, and their Safety Data Sheet were available.			Complied
7.2.8	All pesticide containers are triple rinsed and punctured before being disposed of and/or handled responsibly if used for other purposes.	<u>Wawasan Estate</u>			Complied

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	<p>- Minor compliance -</p>	<p>Payamunis Estate of YPJ Plantations are appointed to provide the resources for spraying activities in the estate such as Sprayers and Chemicals. Therefore, Wawasan Estate does not generate used pesticide containers as the sister's estate is accountable to provide the chemicals and dispose the used chemical drums responsibly. Wawasan Estate monitors the disposal of contaminated chemicals that are used in their estate. Latest disposal of Contaminated Chemical Containers by Payamunis Estate are as follows:</p> <ul style="list-style-type: none"> <li>Disposed to Kualiti Alam Sdn. Bhd; Consignment Note: 20201020093ZMSNX; Date 20.10.2020; Waste: SW409 (Contaminated Containers) : 0.072mt.</li> </ul> <p>Mutiara Estate</p> <p>Mutiara Estate generates chemical waste under recyclable waste and schedule waste. Class 1B Chemical Containers (4 Litres) are disposed as schedule waste while all other chemical container are triple rinsed, punctured and disposed as recyclable waste. The details of disposal are as below:</p> <ul style="list-style-type: none"> <li>Recyclable waste; Plastic Pesticide Containers; 1litre Container: 30 pcs, 20 Litre Container: 10 Pcs, 500g container: 221 pcs; 10kg container: 306 pcs, Miracle 500mt Container: 53 pcs; Disposed to G-Planter Sdn. Bhd on 27.10.2020.</li> <li>Scheduled Waste (SW 409); Quantity: 0.026mt disposed to Kualiti Alam Sdn. Bhd on 29.10.2020. Consignment Note Number: 2020102909RSBPNF.</li> </ul>	
7.2.9	<p><b>(C)</b> Aerial spraying of pesticides is prohibited, unless in exceptional circumstances where no other viable alternatives are available. This requires prior government authority approval. All relevant information is</p>	<p>No aerial spraying for pesticide were done in all the estates.</p>	<p>Complied</p>

	<p>provided to affected local communities at least 48 hours prior to application of aerial spraying.          - Critical (Major) compliance -</p>		
7.2.10	<p><b>(C)</b> Specific annual medical surveillance for pesticide operators, and documented action to treat related health conditions, is demonstrated.          - Critical (Major) compliance -</p>	<p><b>Rengam Estate</b>          Medical Surveillance was conducted for 2 workers exposed to chemical as per CHRA recommendation. The 2 workers were identified as Fogging Operators. Biological Monitoring was conducted to test on serum cholinesterase in the samples. The results indicated that the workers had no traces of chemical in the samples and were fit to work.</p> <p><b>Mutiara Estate</b>          Medical Surveillance was conducted on 27<sup>th</sup> Sept 2020 for 80 workers exposed to chemicals in the estate. The results have yet to be received by the estate during the audit. Previously, a total of 61 workers involved with chemical handling, manuring and exposure to fumes were sent for medical surveillance on 02.07.2019 with all workers producing normal results and deemed fit to work.</p> <p><b>Wawasan Estate</b>          Payamunis Estate (Sister Estate) of YPJ Plantations Sdn Bhd is appointed to provide the resources for spraying activities in Wawasan Estate such as Labour and Chemicals. Nevertheless, Wawasan Estate monitors the specific annual medical surveillance conducted for the estate's workers that handle chemical in Wawasan Estate. The latest Medical Surveillance for Payamunis Estate sprayers was conducted on 10.07.2020 for 5 workers exposed to chemicals at Klinik Moiz Sdn. Bhd. The Medical Surveillance was conducted to ensure that the health and safety of</p>	Complied

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		the workers were optimized, and workplace safety are in accordance to DOSH Regulations. From the results, none were tested with traces of serum cholinesterase and all were fit to work.					
7.2.11	<p><b>(C)</b> No work with pesticides is undertaken by persons under the age of 18, pregnant or breastfeeding women or other people that have medical restrictions and they are offered alternative equivalent work.</p> <p>- Critical (Major) compliance -</p>	<p>All estates visited have prohibited woman workers who are confirmed pregnant or breast-feeding to handle chemicals as per Internal Memo verified in the estates.</p> <p>For Kulim (Malaysia) Berhad, the SOP for Agrochemical Management under Sustainable Management System; Doc Number: SQD/SMS/6.1; Doc Date: 01.08.2020 (Issue 01) states <i>"No work with pesticides is undertaken by persons under the age of 18, pregnant or breastfeeding women or other people that have medical restrictions and they are offered alternative equivalent work."</i></p> <p>For Wawasan Estate, the memo from Payamunis Estate dated 1<sup>st</sup> January 2020 was available for verification, stating the estates commitment to ensure no female workers who are confirmed pregnant or breast feeding from handling chemicals. Nevertheless, during the field visit, it was confirmed that there were no female workers involved in chemical handling works.</p>	Complied				
<p><b>Criterion 7.3:</b> Waste is reduced, recycled, reused and disposed of in an environmentally and socially responsible manner.</p>							
7.3.1	<p>A waste management plan which includes reduction, recycling, reusing, and disposal based on toxicity and hazardous characteristics, is documented and implemented.</p> <p>- Minor compliance -</p>	<p>Tereh Mill and all the 3 estates had identified all wastes and sources of pollution. The Waste Management Action Plan 2020 were established to mitigate and control the identified wastes and source of pollution. The common significant environmental receptors for the estates and mill operations among others as summarized below;</p> <table border="1" data-bbox="1137 1311 1921 1359"> <thead> <tr> <th>Receptor</th> <th>Sources</th> </tr> </thead> <tbody> <tr> <td> </td> <td> </td> </tr> </tbody> </table>	Receptor	Sources			Complied
Receptor	Sources						



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1	Air	Sources from boiler stack (smoke and particulate), vehicle & generator (smoke and gases), anaerobic processes (ETP, EFB dumping)-GHG
2	Water	Cleaning water/run-off/process station waters (hydro-cyclone /sterilizer condensate/clarification waste) & boiler quenching water and blow down
3	Land	Scheduled waste, clinical waste, Industrial waste, domestic waste and industrial/process waste.

All waste and pollution are identified and documented in the Waste Management Plan and Pollution Prevention Plan Financial Year 2020 renewed in Aug 2020. The waste generated from the mill/estates operations as shown below:

	Type of waste	Details
1	Scheduled waste	Spent IPA, hexane, filter, lubricants, hydraulic oil, grease, used batteries
2	Domestic waste	rubbish from the mill/estate complex and employees' quarters
3	Industrial waste	Fiber, palm kernel shell, boiler ash, scrap iron
4	Sewage	Sewage from housing/office complex

The pollution identified from the mill/estates activities:

	Type of waste	Details
1	Black smoke	Emission from Boilers/vehicles/engines

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		2	Odor & gases	Activities from the effluent treatment	
		3	Leakage of lubricant	Storage & vehicle maintenance	
7.3.2	<p>Proper disposal of waste material, according to procedures that are fully understood by workers and managers, is demonstrated.</p> <p>- Minor compliance -</p>	<p>In Tereh POM and the estates in the CU, procedure SPO/W1/06-10– Scheduled Wastes (Hazardous Waste) Management and YPJP SOP - 56 &amp; 57 has been established.</p> <p>a) Management and disposal of waste water 2020 has been established compiled by Assistant Engineer/Assistants/Staff.</p> <p>b) Waste Management Plan 2020 has been established prepared by SQD and verified by the Assistant Engineer/Assistants/Manager.</p> <p>c) Waste Management Plan 2020 has been established in Jan 2020. The management Plan for 2020 has yet to be finalized the source and disposal method of scheduled waste, domestic waste and industrial waste.</p> <p>d) Based on Environmental Impact Evaluation improper disposal of clinical items will be impact on community, depletion of natural resources and land contamination.</p> <p>e) Interview with staffs and workers i.e. storekeepers and chemical mixer were trained and they had understood the hazards involved and how the chemicals should be used and disposed in a safe manner.</p> <p>f) Among the identified wastes include empty chemical containers including pesticides containers. Empty pesticides containers were washed at washing station prior to disposal. Disposals were carried out in compliance with relevant regulation of scheduled waste. Inventory and consignment documents verified for confirmation of proper management and disposal. The CU scheduled waste is disposed to Kualiti Alam Sdn Bhd registered with DOE.</p>			Complied

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Mill	Date	SW 305	SW 409	SW 410	SW 404	SW 307	SW 408
TPOM	11/8/20	2.00	0.106	0.231	-	-	-
TPOM	14/10/20	-	-	-	0.001	-	-
Estate	Date	SW 102	SW 408	SW 410	SW 409	SW 307	SW 404
WE	Managed by Ladang YPJ Payamunis						
RE	08/9/20	0.20	0.026	0.02	0.005	0.07	-
RE	02/10/20	-	-	-	-	-	.004
ME	29/10/20	0.02	0.007	0.002	0.026	0.04	-
ME	16/10/20	-	-	-	-	-	.002

The CU scheduled waste is disposed to the following vendors registered with DOE.

Estate	Date	SW Buyers/Vendor
Wawasan	-	Managed by Ldg YPJ Payamunis
Mutiara	30/4/2021	Kualiti Alam Sdn Bhd
Rengam	30/4/2021	Kualiti Alam Sdn Bhd
TPOM	30/4/2021	Kualiti Alam Sdn Bhd

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Empty containers for class 1B (*Ldg Mutiara*) are disposed as scheduled waste SW409. Empty containers for the estates were dispatched to licensed buyer G -Planter upon triple rinsing and pierced. Sighted the following transaction.

Estate	Date	Type container	Quantity
Rengam	02/11/20	20 L	63
Rengam	02/11/20	4 L	124
Rengam	02/11/20	10kg	190
Mutiara	27/10/20	20 L	10
Mutiara	27/10/20	1 L	30
Mutiara	27/10/20	10 kg	306
Mutiara	27/10/20	500 ml	53

Domestic waste for the operating units in CU was disposed as follows;

Estate	Landfill site	Remarks
Rengam	P00 Blk 2	Collection 2/3 x week
Mutiara	P16 Block 3	Collection 2/3 x week
Wawasan	Managed by FGV Paloh	Collection 2/3 x week
Tereh POM	TSE - P04/ Blk 3	Collection 2/3 x week

		All landfill sites except for site of Wawasan Estate ( <i>managed by FGV Ldg Paloh</i> ) were visited and verified for compliance.	
7.3.3	The unit of certification does not use open fire for waste disposal. - Minor compliance -	<p>KMB practices of “Zero open burning” is enforced and elaborated in the Sustainability Policy.</p> <p>a) The operating units adhered to the policy of “Zero open burning” for any replanting. From field visits and interviews with the workers there is no open burning being practiced in the estates. All the estates had replanting program spanned over the forthcoming years as shown in 3.1.2.</p> <p>b) YPJ Plantation Sdn Bhd had a similar SOP titled YPJP-PLT-REP-02 reviewed in Jan 2018.</p> <p>c) In the replants visited during the audit in the estates, it was evident that all palms were felled, shredded, windrowed and left to decompose.</p> <p>d) There was no evidence that fire had been used to prepare land for replanting in the estate No fire was used for waste disposal.</p>	Complied
<b>Criterion 7.4:</b> Practices maintain soil fertility at, or where possible improve soil fertility to, a level that ensures optimal and sustained yield.			
7.4.1	Good agriculture practices, as contained in SOPs, are followed to manage soil fertility to optimise yield and minimise environmental impacts. - Minor compliance -	<p>The Certification Unit continued to use and implement SOP for each of the processes. Brief version of the SOP was displayed at the appropriate locations. Copies of the documented SOP were presented to the audit team. It was observed that activities being implemented which involved safety, health, environmental, quality, employees, etc. had followed the established SOP.</p> <p>i. KMB Agriculture Manual 1998            ii. Sustainability Management System SOP - 2007            iii. Quality Manual Jan 2018            iv. Integrated Management Manual Jan 2018.            v. Working Instruction ref SPO/W1 Jan 2018</p>	Complied

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		<ul style="list-style-type: none"> <li>vi. Safety Standard Operating Procedures (SSOP) dated 25/02/2015,</li> <li>vii. Pictorial Safety Standards and Security Guidelines (PSS).</li> <li>viii. Laboratory Process Control Manual</li> <li>ix. Security Guidelines</li> <li>x. YPJ Agricultural manual ref YPJP-NSR-NMP-01 to YPJP-COL-EVA-02</li> </ul> <p>All the estates and mill operations were guided through the manuals and SOP.</p> <ul style="list-style-type: none"> <li>a) The procedures as documented in the KMB Agriculture Manual were disseminated to the staff/workers through morning briefings and training.</li> <li>b) The Manuals are kept in the main office for references of employees particularly for the supervisory personnel.</li> <li>c) The documents included all operations in the estates from seedlings in nursery to planting of young palms and plantation upkeep to mill FFB receipt, grading, processing, quality analysis and security.</li> <li>d) Site inspection and interview with workers confirmed that the SOP had been implemented and they understood the requirements of the SOP, the bottom-line of which is Good Agricultural Practice and the care for their safety and health and the environment.</li> </ul>	
7.4.2	<p>Periodic tissue and soil sampling is carried out by Companies to monitor and manage changes in soil fertility and plant health.</p> <p>- Minor compliance -</p>	<p>The internal Agronomist from Agronomy Advisory and Services Department visited estates to perform foliar sampling prior to the fertilizer recommendation for the forthcoming year.</p> <ul style="list-style-type: none"> <li>a) Leaf and soil nutrient analysis are a common methodology used in the diagnosis of fertilizer requirements in oil palms.</li> <li>b) Foliar analysis reports were then issued to the estates for the</li> </ul>	Complied

program establishment and application. This includes the order of fertilizer and workforce/machine planning.

- c) For all 3 estates Agronomic assessment and fertilizer recommendation was conducted by Agricultural Agronomic Services Dept to formulate the FY2020 manuring programme and to suggest relevant agronomic practices for oil palm yield and growth improvement. Annual foliar sampling for Ash, N, P, K, Mg, Ca & B had been were carried out in all estates. The latest being:

	Estate	Report Date	Report No
1	Mutiara	29/5/19	06/14-0623
2	Wawasan	30/7/2020	Realstrong 2021
3	Rengam	18/6/2020	RGM/0426-435

- d) Soil sampling was carried out accordingly and analysis is made yearly on different fields. The soil analysis provided the indication of soil health and monitors the changes in the organic carbon and total nitrogen.
- e) Soil analysis for PH, Org C, Total N, Total P, Avail P, Exchange K, Exchange Ca & Exchange Mg was carried out on a year cycle basis with the recent carried out as follows:

	Estate	Report No	Report Date
1	Mutiara	0141-0144	21/5/2019
2	Wawasan	LE/1175	26/8/2020

		<table border="1"> <tr> <td>3</td> <td>Rengam</td> <td>0069-0072</td> <td>12/5/2020</td> </tr> </table> <p>All foliar and soil sampling &amp; analysis was conducted by <i>Ulu Tiram Central Laboratory</i> except for YPJP Ladang Wawasan. Soil analysis is made yearly on different fields for KMB estates, YPJP made on a 5-year cycle for the soil analysis.</p>	3	Rengam	0069-0072	12/5/2020																						
3	Rengam	0069-0072	12/5/2020																									
7.4.3	<p>A nutrient recycling strategy is in place, which includes the recycling of Empty Fruit Bunches (EFB), Palm Oil Mill Effluent (POME), palm residues and optimal use of inorganic fertilisers.</p> <p>- Minor compliance -</p>	<p>The following practices are applied in the estates in relation to the nutrient recycling strategy;</p> <p>a) EFB application in designated fields at dosage of 50 mt/ha applied in inter rows subject to Agronomist recommendations.</p> <p>b) Cut frond are stacked in between the palms rows left to decompose.</p> <p>c) Bio compost application in selected fields at rate of 7mt/ha</p> <p>d) POME utilization using tractor tanker and furrow system at 17mt/ha or 125kg/palm at the host estate of Tereh Mill.</p> <table border="1"> <thead> <tr> <th></th> <th>Estate</th> <th>Field no</th> <th>Ha</th> <th>Mt</th> </tr> </thead> <tbody> <tr> <td>1</td> <td>Mutiara</td> <td>P00</td> <td>81.46</td> <td>570</td> </tr> <tr> <td>2</td> <td>Mutiara</td> <td>P03</td> <td>50.39</td> <td>353</td> </tr> <tr> <td>3</td> <td>Rengam</td> <td>P03/1</td> <td>210.13</td> <td>10506</td> </tr> <tr> <td>4</td> <td>Rengam</td> <td>P04/1</td> <td>96.46</td> <td>4823</td> </tr> </tbody> </table>		Estate	Field no	Ha	Mt	1	Mutiara	P00	81.46	570	2	Mutiara	P03	50.39	353	3	Rengam	P03/1	210.13	10506	4	Rengam	P04/1	96.46	4823	Complied
	Estate	Field no	Ha	Mt																								
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3	Rengam	P03/1	210.13	10506																								
4	Rengam	P04/1	96.46	4823																								
7.4.4	<p>Records of fertiliser inputs are maintained.</p> <p>- Minor compliance -</p>	<p>Fertilizer application program was monitored using records i.e. program sheets, bin cards, field cost book, Fertilizer Application monitoring forms, etc.</p> <p>a) Records of programs and applications of fertilizers were reviewed by the auditors.</p>	Complied																									



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- b) Review of the records revealed that the actual fertilizers applied in 2019/20 was in line with the program.  
 c) the following fertilizers were applied in the estates on recommendation by the Agronomist among others;

	Fertiizer	Kg/palm	application month
1	A chloride	1.50-1.75	Jan - Feb
2	MOP	1.50-2.25	Jan - Feb
3	HGFB	0.10	July - Aug
4	KKS44B	2.50	June-July
5	A Sulphate	2.50	May
6	Kieserite	1.75	June-Aug
7	BRP	2.00	June/July
8	GML	2.00	Aug
9	Mix2 +B	2.25	Nov
10	K -Neutralizer	9-14	Mac - Sept

K-Neutilizer is used in Ldg Wawasan of YPJ Plantations.

**Criterion 7.5:** Practices minimise and control erosion and degradation of soils.

7.5.1	<p><b>(C)</b> Maps identifying marginal and fragile soils, including steep terrain, are available.                  - Critical (Major) compliance -</p>	<p>Description of the soil characteristics such as texture, depth, drainage, parent material and key aspect for management was available. The soil series in the estates were classified as follows:</p> <table border="1" data-bbox="1160 1348 1904 1396"> <tr> <td></td> <td></td> <td>Wawasan</td> <td>Mutiara</td> <td>Rengam</td> </tr> </table>			Wawasan	Mutiara	Rengam	Complied
		Wawasan	Mutiara	Rengam				

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1	Rengam	0	1.01	57.51
2	Batu Lapan	9.98	0.82	0
3	Durian	0	0	0.57
4	Jelutong	0	0	0
5	Lintang	0	10.13	0
6	Pdg Besar	0	0	0
7	Chempaka	0	5.18	0
8	Rengam T Tak	2.25	12.66	14.46
9	Lating	52.11	8.30	0
10	Tebuk	13.83	10.42	0
11	Pelepah	0	0	1.12
12	Tawar	0	18.95	0
13	Rasau	0	11.03	0
14	Holyrood	0	11.61	0
15	Tepus	2.27	0	12.25
16	Serdang	19.55	0	0
17	Telemong	0	3.06	0
18	Baling	0	0	14.09
19	Gong Chenak	0	2.03	0
20	Peat shallow	0	0.22	0

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		21	Local all/other	0	4.58	0																										
		TOTAL		100.00	100.00	100.00																										
7.5.2	<p>No replanting on steep slopes (above 25 degrees) unless approved by state governments. In case of replanting is permitted, no replanting in contiguous area of steep terrain (greater than 25 degrees) larger than 25 Ha within the Unit of Certification.</p> <p>- Minor compliance -</p>	<p>Like all KMB Estates, the estates visited in CU continued to have a management strategy for planting on slopes in order to minimize and control erosion and degradation of soils. The plantings on slopes between 9 and 25 degrees was guided by:</p> <ul style="list-style-type: none"> <li>a) Slope &amp; River Protection Policy in Section A17 KMB Manual</li> <li>b) Buffer Zone &amp; 25-degree slope in Section A07 KMB Manual</li> <li>c) Land Preparation for Terracing in Section A08 KMB Manual.</li> <li>d) YPJ Plantation Sdn Bhd had a similar SOP titled YPJP-PLT-REP-02 reviewed in Jan 2018.</li> </ul> <p>It was observed that practices to minimize and control erosion and degradation of soils were in place through proper stacking of fronds, EFB application, avoidance of blanket spraying, construction terraces, road maintenance and maintenance of soft vegetation in the interlines. Cover crops were planted in the replants and in certain mature areas. The cover crop <i>mucuna bracteata</i> had been planted along crucial slopes by management. Large areas with <i>neprolepis biserrata</i> in the inter rows were sighted during the visit. The slope maps were provided by the AASD (Agronomy Advisory Service Dept) with details as follows:</p> <table border="1" data-bbox="1153 1193 1921 1396"> <thead> <tr> <th>No</th> <th>Topography</th> <th>Wawasan</th> <th>Mutiara</th> <th>Rengam</th> </tr> </thead> <tbody> <tr> <td>1</td> <td>0-2</td> <td>54.38</td> <td>14.39</td> <td>12.25</td> </tr> <tr> <td>2</td> <td>2-6</td> <td>13.83</td> <td>71.12</td> <td>53.74</td> </tr> <tr> <td>3</td> <td>6-12</td> <td>31.79</td> <td>14.49</td> <td>31.89</td> </tr> <tr> <td>4</td> <td>12-20</td> <td>0</td> <td>0</td> <td>2.12</td> </tr> </tbody> </table>					No	Topography	Wawasan	Mutiara	Rengam	1	0-2	54.38	14.39	12.25	2	2-6	13.83	71.12	53.74	3	6-12	31.79	14.49	31.89	4	12-20	0	0	2.12	Complied
No	Topography	Wawasan	Mutiara	Rengam																												
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		<table border="1"> <tr> <td>5</td> <td>20-25</td> <td>0</td> <td>0</td> <td>0</td> </tr> <tr> <td>6</td> <td>&gt;25</td> <td>0</td> <td>0</td> <td>0</td> </tr> <tr> <td></td> <td>Total</td> <td>100%</td> <td>100%</td> <td>100%</td> </tr> </table>	5	20-25	0	0	0	6	>25	0	0	0		Total	100%	100%	100%	
5	20-25	0	0	0														
6	>25	0	0	0														
	Total	100%	100%	100%														
7.5.3	There is no new planting of oil palm on steep terrain. - Minor compliance -	<p>This compliance being addressed in the Sustainable Policy - "Slope and River Protection" signed by the Executive Director dated May 2018 stating the following among others;</p> <p><i>"Slope of &gt;25 degree to be excluded from any new plantation development and replanting program. For slope &lt;25 degree the existing crop all vegetative shall be maintained accordingly"</i>.</p> <p>YPJ Plantation Sdn Bhd had a similar SOP titled YPJP-PLT-REP-02 reviewed in Jan 2018.</p>	Complied															
<b>Criterion 7.6:</b> Soil surveys and topographic information are used for site planning in the establishment of new plantings, and the results are incorporated into plans and operations.																		
7.6.1	<b>(C)</b> To demonstrate the long-term suitability of land for palm oil cultivation, soil maps or soil surveys identifying marginal and fragile soils, including steep terrain, are taken into account in plans and operations. - Critical (Major) compliance -	Soil surveys are made and available in a soil map for all the estates. Topographic contour map are also available which are both used to manage the drainage and road works in the estates. All estates in the CU had no new planting for the current year and also for the forthcoming 5 years operations.	Complied															
7.6.2	Extensive planting on marginal and fragile soils, is avoided, or, if necessary, done in accordance with the soil management plan for best practices. - Minor compliance -	KMB Group had no planting on areas of more than 25 degree. Plantings on steep slope are either avoided or minimized.	Complied															
7.6.3	Soil surveys and topographic information guide the planning of drainage and irrigation systems, roads and other infrastructure.	Soil surveys are made and available in a soil map at all estates. Topographic contour map are also available which are both used to	Complied															

	- Minor compliance -	manage the drainage and road works in the estates. Details as per 7.5.1 and 7.5.2.	
<b>Criterion 7.7:</b> No new planting on peat, regardless of depth after 15 November 2018 and all peatlands are managed responsibly.			
7.7.1	<b>(C)</b> There is no new planting on peat regardless of depth after 15 November 2018 in existing and new development areas. - Critical (Major) compliance -	There is no new planting within the Tereh Certification Unit.	Not Applicable
7.7.2	Areas of peat within the managed areas are inventoried, documented and reported (effective from 15 November 2018) to RSPO Secretariat. <b>PROCEDURAL NOTE:</b> Maps and other documentation of peat soils are provided, prepared and shared in line with RSPO Peatland Working Group (PLWG) audit guidance (see Procedural Note for 7.7.5 below). - Minor compliance -	There is peat soil (category of shallow peat) total of 5.4 ha (0.22%) of total planted field no P00/Block 3D situated in Ladang Mutiara. Inventory for areas of peat within the Tereh Complex are documented and reported to RSPO Secretariat.	Complied
7.7.3	<b>(C)</b> Subsidence of peat is monitored, documented and minimised. - Critical (Major) compliance -	Peat subsidence monitoring / reading are taken quarterly and recorded. There are no changes in the subsidence level as reported and recorded.	Complied
7.7.4	<b>(C)</b> A documented water and ground cover management programme is in place. - Critical (Major) compliance -	There is peat soil (category of shallow peat) total of 5.4 ha (0.22%) of total planted field no P00/Block 3D situated in Ladang Mutiara. There is general guidelines for peat subsidence monitoring in the KMB ARM ref A18 - Water Management Plan in Peat Area and A19 Monitoring subsidence in Peat Soil. Among others showing the following; a) Subsidence of peat surface. b) The rate of peat subsidence gives indirect indication of generous gas emissions. c) Method to install peat subsidence pole and monitor peat subsidence.	Complied
7.7.5	<b>(C)</b> For plantations planted on peat, drainability assessments are conducted following the RSPO Drainability Assessment Procedure, or	There is peat soil (category of shallow peat) total of 5.4 ha (0.22%) of total planted field no P00/Block 3D situated in Ladang Mutiara.	Complied

	<p>other RSPO recognised methods, at least five years prior to replanting. The assessment result is used to set the timeframe for future replanting, as well as for phasing out of oil palm cultivation at least 40 years, or two cycles, whichever is greater, before reaching the natural gravity drainability limit for peat. When oil palm is phased out, it is replaced with crops suitable for a higher water table (paludiculture) or rehabilitated with natural vegetation.</p> <p>This is subject to transitional (5 years: 2019 to 2024) arrangement stated in the Drainability Assessment Procedure.</p> <p>Within 12 months initial implementation period, company could submit other alternate methodologies to be considered by RSPO for recognition.</p> <p>- Critical (Major) compliance -</p>	<p>There is general guidelines for peat subsidence monitoring in the KMB ARM ref A18 - Water Management Plan in Peat Area and A19 Monitoring subsidence in Peat Soil. Among others showing the following;</p> <ul style="list-style-type: none"> <li>a) Subsidence of peat surface.</li> <li>b) The rate of peat subsidence gives indirect indication of generous gas emissions.</li> <li>c) Method to install peat subsidence pole and monitor peat subsidence.</li> <li>d) Water management in peat soil.</li> <li>e) The OP planted in this field is 2000</li> </ul>	
7.7.6	<p><b>(C)</b> All existing plantings on peat are managed according to the 'RSPO Manual on Best Management Practices (BMPs) for existing oil palm cultivation on peat', version 2 (2019) and associated audit guidance.</p> <p>- Critical (Major) compliance -</p>	<p>There is peat soil (category of shallow peat) total of 5.4 ha (0.22%) of total planted field no P00/Block 3D situated in Ladang Mutiara. There is general guidelines for peat subsidence monitoring in the KMB ARM ref A18 - Water Management Plan in Peat Area and A19 Monitoring subsidence in Peat Soil. Among others showing the following;</p> <ul style="list-style-type: none"> <li>a) Subsidence of peat surface.</li> <li>b) The rate of peat subsidence gives indirect indication of generous gas emissions.</li> <li>c) Method to install peat subsidence pole and monitor peat subsidence.</li> <li>d) Water management in peat soil.</li> <li>e) The OP planted in this field is 2000.</li> </ul>	Complied
7.7.7	<p><b>(C)</b> All areas of unplanted and set-aside peatlands in the managed area (regardless of depth) are protected as "peatland conservation areas"; new drainage, road building and power lines by the unit of certification on peat soils is prohibited; peatlands are managed in accordance with the 'RSPO BMPs for Management and Rehabilitation of Natural Vegetation</p>	<p>There is peat soil (category of shallow peat) total of 5.4 ha (0.22%) of total planted field no P00/Block 3D situated in Ladang Mutiara. There is general guidelines for peat subsidence monitoring in the KMB ARM ref A18 - Water Management Plan in Peat Area and A19 Monitoring subsidence in Peat Soil. Among others showing the following;</p>	Complied

	<p>Associated with Oil Palm Cultivation on Peat', version 2 (2019) and associated audit guidance. - Critical (Major) compliance -</p>	<p>f) Subsidence of peat surface. g) The rate of peat subsidence gives indirect indication of generous gas emissions. h) Method to install peat subsidence pole and monitor peat subsidence. i) Water management in peat soil. j) The OP planted in this field is 20. k) Also observed there was no new drainage, road building and power lines by the estate peat soils at the peat soil field.</p>									
<b>Criterion 7.8:</b> Practices maintain the quality and availability of surface and groundwater.											
7.8.1	<p>A water management plan is in place and implemented to promote more efficient use and continued availability of water sources and to avoid negative impacts on other users in the catchment. The plan addresses the following:</p> <p>a) The unit of certification does not restrict access to clean water or contribute to pollution of water used by communities. b) Workers have adequate access to clean water. - Minor compliance -</p>	<p>The mill water management plan has been established with the recent review made on respectively by the OU. Among others the plan therein has emphasized;</p> <p>a) rain water harvesting for cleaning purposes, b) water from the reservoir/catchment for the mill operations c) continual training for workers on water efficiency consumption, d) desilting of water reservoir to retain the reservoir optimal capacity. e) The action plan in event of draught/water pollution and</p> <p>The estates similarly possessed the following water management plan. Among others containing the following initiatives.</p> <table border="1" data-bbox="1137 1157 1919 1351"> <thead> <tr> <th>Source</th> <th>Activity</th> <th>Threat</th> <th>Action Plan</th> </tr> </thead> <tbody> <tr> <td>Reservoir/ pond/</td> <td>Chemical mixing</td> <td>Pollution Draught Wastage</td> <td>Enforcement of buffer zone as non-spraying activities.</td> </tr> </tbody> </table>	Source	Activity	Threat	Action Plan	Reservoir/ pond/	Chemical mixing	Pollution Draught Wastage	Enforcement of buffer zone as non-spraying activities.	Complied
Source	Activity	Threat	Action Plan								
Reservoir/ pond/	Chemical mixing	Pollution Draught Wastage	Enforcement of buffer zone as non-spraying activities.								

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		SAJ/ Rain	General Upkeep	Pollution Draught Wastage	Follow WI & SOP to avoid water pollution. Follow SW SOP to avoid pollution caused from SW.	
			Line site	Pollution Draught Wastage	Every house is supplied with containers. To schedule water supply to avoid wastage. Awareness on water usage efficiency. Outsource from neighboring estates.	
			Drain upkeep	Interrupt ion water flow at drainage system.	Periodic desilting Building of sand bags at specific points to contain water (weirs)	
				Water pollution	Prohibit workers from activities at water source Drinking water analysis. Monitor condition of septic tank Adhere SW management procedure to avoid pollution caused by SW.	



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Water Management Plan review date was sighted and verified with records as follows;

Estate/Mill	Review date	Issues
Mutiara	Aug 2020	Nil
Rengam	Aug 2020	Nil
Wawasan	June 2020	Nil
Tereh POM	Aug 2020	Nil

The Mill Identification & Management of Waste Water 2020 among others as summarized below;

Location	Waste water produced	Treatment/containment	Reuse/recycle/disposal method
Processing stations	Clarification condensate Sterilizer condensate Hydro cyclone condensate Mill floor cleaning water	Oil recovery/ETP	Recover into system
Boiler	Blow down, cleaning water	Sludge pit, ETP	Monsoon drain
Process ramp	Rainfall runoff	Sedimentation trap	Monsoon drain

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Engine room	Steam condensate, turbine cooling water	Monsoon drain, recycled tank	Monsoon drain
Lab	Cleaning water	Process drain	Monsoon drain
Wash room	Toilet water, cleaning water	Septic tank	Collected by licensed contractor.

The mill collected water samples for the domestic water consumption collected by SPAN twice a year and the mill own sampling made on monthly basis. All results were sighted and verified and sample shown below. All parameters are within the limits under Raw Water Quality Standard MOH 2010.

<i>Tereh Mill - 12/5/2020</i>						
	Parameter	unit	Result	Regn raw water	Std drinking water	Results
1	PH	-	5.9	5.5-9.0	6.5-9.0	7.1
2	Turbidity	-	692	1000	5	1.1
3	Aluminium	NTU	4.80	-	0.2	<0.2
4	Chlorine	mg/L	-	-	0.2-5	1.5

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		<table border="1"> <tr> <td>5</td> <td>Coli form</td> <td>mg/L</td> <td>450</td> <td>5000</td> <td>nil</td> <td>ND&lt;10</td> </tr> <tr> <td>6</td> <td>E coli</td> <td>MPN/</td> <td>360</td> <td>5000</td> <td>nil</td> <td>ND&lt;10</td> </tr> </table>	5	Coli form	mg/L	450	5000	nil	ND<10	6	E coli	MPN/	360	5000	nil	ND<10	
5	Coli form	mg/L	450	5000	nil	ND<10											
6	E coli	MPN/	360	5000	nil	ND<10											
7.8.2	<p><b>(C)</b> Water courses and wetlands are protected, including maintaining and restoring appropriate riparian and other buffer zones in line with 'RSPO Manual on BMPs for the management and rehabilitation of riparian reserves' (April 2017) or applicable National legislation or specific environmental permit. Smallholders may replant existing planted areas provided there is no evidence of environmental deterioration having occurred during the previous cycle.</p>	<p>Protection of water courses and wetlands, including maintaining and restoring appropriate riparian buffer zones has been verified at the 3 Estates and mill catchment. Riparian buffer zones have been identified and demarcated. No chemicals and fertilizer application observed been used in their maintenance. In certain areas Guatemala grass / Vertivar sp were planted along the river banks. Guidelines of the width of the rivers and natural courses to be</p>	Complied														

<i>Mutiara Estate 12/5/2020</i>						
	Parameter	unit	result	Regn raw water	Std drinking water	Results
1	PH	-	5.6	5.5-9.0	6.5-9.0	7.1
2	Turbidity	-	284	1000	5	1.2
3	Aluminium	NTU	4.26	-	0.2	<0.2
4	Chlorine	mg/L	-	-	0.2-5	1.3
5	Coli form	mg/L	420	5000	nil	ND<10
6	E coli	MPN/	110	5000	nil	ND<10

	<p>- Critical (Major) compliance -</p>	<p>protected have been illustrated in the SOP revised dated 01/11/2018. The buffer zones established are as follows:</p> <table border="1" data-bbox="1205 459 1796 662"> <thead> <tr> <th></th> <th>River width</th> <th>Buffer zone</th> </tr> </thead> <tbody> <tr> <td>1</td> <td>&gt;40 meters</td> <td>50 meters</td> </tr> <tr> <td>2</td> <td>20 - 40 meters</td> <td>40 meters</td> </tr> <tr> <td>3</td> <td>10 - 20 meters</td> <td>20 meters</td> </tr> <tr> <td>4</td> <td>5 - 10 meters</td> <td>10 meters</td> </tr> <tr> <td>5</td> <td>&lt; 5 meters</td> <td>5 meters</td> </tr> </tbody> </table> <p>Buffer zones were protected. Areas visited for the estates as tabled below;</p> <table border="1" data-bbox="1205 813 1796 1045"> <thead> <tr> <th></th> <th>Estates</th> <th>Location</th> <th>Field no</th> </tr> </thead> <tbody> <tr> <td>1</td> <td>Wawasan</td> <td>Sg Sembrong</td> <td>P11 Block 3</td> </tr> <tr> <td>2</td> <td>Rengam</td> <td>Anak Sg Renggam</td> <td>P03</td> </tr> <tr> <td>3</td> <td>Mutiara</td> <td>Sg Chales</td> <td>PR18</td> </tr> </tbody> </table> <p>Water samples from the intake point are taken for phosphate and nitrate analysis for detection of fertilizer application effect to the water courses. Extracted record of the estates with details below;</p> <table border="1" data-bbox="1160 1204 1841 1382"> <thead> <tr> <th colspan="6">Mutiara Estate 20/10/20</th> </tr> <tr> <th></th> <th>Parameter</th> <th>unit</th> <th>Pt A</th> <th>Pt B</th> <th>Limit</th> </tr> </thead> <tbody> <tr> <td>1</td> <td>Phosphate</td> <td>mg PO4/L</td> <td>&lt;0.2 0</td> <td>&lt;0.2 0</td> <td>0.20</td> </tr> </tbody> </table>		River width	Buffer zone	1	>40 meters	50 meters	2	20 - 40 meters	40 meters	3	10 - 20 meters	20 meters	4	5 - 10 meters	10 meters	5	< 5 meters	5 meters		Estates	Location	Field no	1	Wawasan	Sg Sembrong	P11 Block 3	2	Rengam	Anak Sg Renggam	P03	3	Mutiara	Sg Chales	PR18	Mutiara Estate 20/10/20							Parameter	unit	Pt A	Pt B	Limit	1	Phosphate	mg PO4/L	<0.2 0	<0.2 0	0.20
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2	N Nitrogen	mg NO3N/L	2.28	0.34	7.00
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Rengam Estate 13/10/20					
	Parameter	unit	Pt A	Pt B	Limit
1	Phosphate	mg PO4/L	0.20	0.18	0.20
2	N Nitrogen	mg NO3N/L	4.49	1.69	7.00

Wawasan Estate 10/9/20					
	Parameter	unit	Pt A	Pt B	Limit
1	Phosphate	mg PO4/L	0.46	0.29	0.20
2	N Nitrogen	mg NO3N/L	0.81	0.89	7.00

The limit for phosphate and nitrate is 0.2 ppm and 7 ppm respectively. Variations and action plan were discussed during the quarterly Mesyuarat Alam Sekitar, sighted YPJP minutes of meeting dated 28/9/2020. Prevention is made especially during the manuring activities. KMB reviewed the environmental performances during the monthly EPMC Environmental Performance Monitoring Committee. Sighted minutes of meeting TPOM dated 06/10/20 among others discussing the following;

- a) Effluent treatment and performance
- b) Scheduled wastes and others waste management
- c) Clean air monitoring
- d) Environmental Programs.

		<p>The mill made a monthly water samples at 3 points in the mill complex i.e canteen, catchment pond and concrete bridge for detection of quality level and contamination. Results for the samples taken on 17/9/2020 as shown below. No major issues were noted/recorded.</p> <table border="1" data-bbox="1205 587 1870 917"> <thead> <tr> <th colspan="7">Tereh Mill upstream/downstream 17/9/2020</th> </tr> <tr> <th></th> <th>Parameter</th> <th>BOD</th> <th>COD</th> <th>PH</th> <th>E-coli</th> <th>TDS</th> </tr> </thead> <tbody> <tr> <td></td> <td>Limit</td> <td>0</td> <td>0</td> <td>6.5-9.0</td> <td>0</td> <td>1000</td> </tr> <tr> <td>1</td> <td>Point A</td> <td>&lt;6</td> <td>&lt;3</td> <td>8.5</td> <td>ND</td> <td>344</td> </tr> <tr> <td>2</td> <td>Point B</td> <td>&lt;6</td> <td>&lt;3</td> <td>4.3</td> <td>-</td> <td>&lt;80</td> </tr> <tr> <td>3</td> <td>Point 3</td> <td>&lt;6</td> <td>&lt;3</td> <td>5.3</td> <td>-</td> <td>100</td> </tr> </tbody> </table>	Tereh Mill upstream/downstream 17/9/2020								Parameter	BOD	COD	PH	E-coli	TDS		Limit	0	0	6.5-9.0	0	1000	1	Point A	<6	<3	8.5	ND	344	2	Point B	<6	<3	4.3	-	<80	3	Point 3	<6	<3	5.3	-	100	
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<p>7.8.3</p>	<p>Mill effluent is treated to be in compliance with national regulations. Discharge quality of mill effluent, especially Biochemical Oxygen Demand (BOD), is regularly monitored.                      - Minor compliance -</p>	<p>The effluent treatment plant was made in accordance and interview with operator in charge revealed that the operation was in accordance with standard operation procedure and legal requirements.</p> <ul style="list-style-type: none"> <li>a) No over flow was observed, and flow meter reading was recorded daily. The mill monitoring the effluent and submits to DOE through '<i>Borang Penyata Suku Tahunan</i>'.</li> <li>b) Tereh Palm DOE license no 004685 was for land application requirement of which is BOD less than 2500 mg/l.</li> <li>c) The results from final discharge were compliance within parameter limit. Record was sighted and verified.</li> </ul> <table border="1" data-bbox="1214 1311 1881 1375"> <thead> <tr> <th>Sample date</th> <th>Std</th> <th>05/7/20</th> <th>09/8/20</th> <th>06/9/20</th> </tr> </thead> <tbody> <tr> <td>PH</td> <td>-</td> <td>8.10</td> <td>7.90</td> <td>8.10</td> </tr> </tbody> </table>	Sample date	Std	05/7/20	09/8/20	06/9/20	PH	-	8.10	7.90	8.10	<p>Complied</p>																																
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7.8.4	<p>Mill water use per tonne of FFB is monitored and recorded.                      - Minor compliance -</p>	<p>The mill processing water are obtained from the water catchment adjacent to the mill complex. The water usage monitoring is made on a monthly basis with the latest recording (water usage per mt in 2020 of fresh fruit bunches (FFB) below;</p> <table border="1"> <thead> <tr> <th>No</th> <th>Month</th> <th>Water</th> <th>FFB /mt</th> <th>Water /FFB</th> </tr> </thead> <tbody> <tr> <td>1</td> <td>Jan</td> <td>27530</td> <td>18361</td> <td>1.50</td> </tr> <tr> <td>2</td> <td>Feb</td> <td>31026</td> <td>22635</td> <td>1.37</td> </tr> <tr> <td>3</td> <td>Mac</td> <td>32626</td> <td>22988</td> <td>1.42</td> </tr> <tr> <td>4</td> <td>Apr</td> <td>36637</td> <td>32158</td> <td>1.14</td> </tr> <tr> <td>5</td> <td>May</td> <td>39130</td> <td>31387</td> <td>1.25</td> </tr> <tr> <td>6</td> <td>June</td> <td>41719</td> <td>38522</td> <td>1.08</td> </tr> <tr> <td>7</td> <td>July</td> <td>42930</td> <td>37485</td> <td>1.15</td> </tr> <tr> <td>8</td> <td>Aug</td> <td>42520</td> <td>33668</td> <td>1.26</td> </tr> <tr> <td>9</td> <td>Sept</td> <td>44793</td> <td>34539</td> <td>1.30</td> </tr> <tr> <td>10</td> <td>Oct</td> <td>41969</td> <td>29988</td> <td>1.40</td> </tr> </tbody> </table>	No	Month	Water	FFB /mt	Water /FFB	1	Jan	27530	18361	1.50	2	Feb	31026	22635	1.37	3	Mac	32626	22988	1.42	4	Apr	36637	32158	1.14	5	May	39130	31387	1.25	6	June	41719	38522	1.08	7	July	42930	37485	1.15	8	Aug	42520	33668	1.26	9	Sept	44793	34539	1.30	10	Oct	41969	29988	1.40	Complied
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		<p>There were variations of performance. Probable factors are linked to rainy days, significant boiler water rinsing/discharging for maintenance etc.</p>																	
<b>Criterion 7.9:</b> Efficiency of fossil fuel use and the use of renewable energy is optimised																			
7.9.1	<p>A plan for efficiency of the use of fossil fuels and to optimise renewable energy is implemented, monitored and documented.          - Minor compliance -</p>	<p>A plan for improving the efficiency of the use of fossil fuels is in place and has been incorporated into the Environmental Aspect and Impact activities report for 2020. The document was reviewed/updated on Jan 2020. The Environment Management Plan for efficiency of fossil fuel usage are detailed below:</p> <table border="1" data-bbox="1137 783 1921 1321"> <thead> <tr> <th>No</th> <th>Target</th> <th>Objective</th> <th>Action plan</th> </tr> </thead> <tbody> <tr> <td>1</td> <td>Backhoe tractor/ Machines</td> <td>To reduce fossil fuel (diesel) consumption from company-owned vehicles and fuel using mobile equipment</td> <td>To ensure the vehicle engine is turn off during idle time To record vehicle activity which consume fuel</td> </tr> <tr> <td>2</td> <td>Van / Supervisory vehicle</td> <td>To reduce fossil fuel (diesel) consumption from company-owned vehicles and fuel using mobile equipment</td> <td>To record vehicle activity in order to eliminate waste activity which consume fuel. To turn off vehicle engine during idle time.</td> </tr> <tr> <td>3</td> <td>Electrical supply</td> <td>To reduce reliance on gen-sets for power supply</td> <td>Utilization of TNB sources</td> </tr> </tbody> </table>	No	Target	Objective	Action plan	1	Backhoe tractor/ Machines	To reduce fossil fuel (diesel) consumption from company-owned vehicles and fuel using mobile equipment	To ensure the vehicle engine is turn off during idle time To record vehicle activity which consume fuel	2	Van / Supervisory vehicle	To reduce fossil fuel (diesel) consumption from company-owned vehicles and fuel using mobile equipment	To record vehicle activity in order to eliminate waste activity which consume fuel. To turn off vehicle engine during idle time.	3	Electrical supply	To reduce reliance on gen-sets for power supply	Utilization of TNB sources	Complied
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The utilization of fossil fuel in 2020 is being monitored with records shown below:

	<i>Wawasan 2020</i>			<i>Rengam Estate 2020</i>		
Mth	FFB mt	Diesel	Diesel/FFB	FFB mt	Diesel	Diesel/FFB
Jan	395	694	1.76	1977	1720	0.87
Feb	403	623	1.55	2370	2480	1.05
Mac	398	571	1.44	2239	2032	0.91
Apr	491	572	1.16	3219	2130	0.66
May	511	644	1.26	2835	2028	0.72
June	635	963	1.52	4015	2337	0.58
July	528	911	1.73	4224	1435	0.34
Aug	551	910	1.65	3442	2859	0.83
Sept	447	798	1.78	3450	2136	0.62
Oct	543	904	1.67	3130	1000	0.32

	<i>Mutiara Estate 2020</i>			<i>Terah POM 2020</i>		
Mth	FFB mt	Diesel	Diesel/FFB	FFB mt	Diesel	Diesel/FFB
Jan	1839	20191	10.98	18361	26391	1.44
Feb	1849	19530	10.56	22635	20780	0.92
Mac	2280	22119	9.70	22988	21495	0.94
Apr	2885	20307	7.04	32158	14815	0.46
May	2973	19992	6.72	31387	17423	0.56

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June	3502	26206	7.48	38522	12979	0.34
July	3356	21979	6.55	37485	15314	0.41
Aug	3133	23316	7.44	33668	20895	0.62
Sept	3225	23424	7.26	34539	14896	0.43
Oct	2335	22801	9.76	29988	32047	1.07

The estates and mill record and monitor the diesel utilization over the running hours of gen-set and other vehicles running.

Performance variation in view of several factors i.e.

- a) Infrastructure of estates,
- b) Community size / no of gen-sets,
- c) No. of vehicles / age of machine.
- d) Weather interference / crop production volume

There is no opportunity for the estates to capitalize the utilisation of fibre/shell produced from the mill as part of their energy production in replacement of fossil fuel with the current technology limitation.

A plan for improving the efficiency of the use of fossil fuels is in place incorporated into the Environmental Aspect and Impact activities report for 2020 identified in the following

- a) Environmental Aspect Identification Summary FY 2020 reviewed accordingly.
- b) Environmental Impact Evaluation Summary FY 2020 reviewed accordingly.

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		Renewable energy usage & diesel consumption 2019/20 was established and monitored by monthly basis. Among others effort to reduce diesel usage includes the following; a) By maintenance of the boiler & machinery to ensure at optimum level, b) to monitor diesel usage, provide training to workers regarding reduce fuel and diesel usage for boiler.	
<b>Criterion 7.10:</b> Plans to reduce pollution and emissions, including greenhouse gases (GHG), are developed, implemented and monitored and new developments are designed to minimise GHG emissions.			
7.10.1	<b>(C)</b> GHG emissions are identified and assessed for the unit of certification. Plans to reduce or minimise them are implemented, monitored through the Palm GHG calculator and publicly reported. - Critical (Major) compliance -	Tereh Mill and the 3 Estates had identified emission of greenhouse gas (GHG) from their operations such as emission from their farm tractor and gen set operation. a) The management from both estates and mill had planned to reduce emission by daily inspection and monitoring for their farm tractor and gen set to prevent any leakage and problem that could adverse impact the environment. b) Fuel Consumption, Peat Oxidation, POME and reported in the Palm GHG Summary Report.	Complied
7.10.2	<b>(C)</b> Starting 2014, the carbon stock of the proposed development area and major potential sources of emissions that may result directly from the development are estimated and a plan to minimise them prepared and implemented (following the RSPO GHG Assessment Procedure for New Development). - Critical (Major) compliance -	The CU has calculated the GHG using RSPO Palm GHG calculator and the calculation option used is Option 1. The CU records NIL new development within the certified area. There is no new planting in all the 3 estates audited.	Complied
7.10.3	<b>(C)</b> Other significant pollutants are identified and plans to reduce or minimise them implemented and monitored. - Critical (Major) compliance -	An assessment of all polluting activities has been conducted and monitored. This included the gaseous emissions, particulate / soot emissions and effluent. The CU has continued to maintain its environmental aspects/impacts register associated with their activities. Environmental aspect and impact (EAI) records i.e. which covers estates and mill activities / operation. 'Pollution	Complied

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Identification Environmental Improvement Action Plan' is used to identify the waste products and sources of pollution, was in place and is reviewed accordingly. Among others the significant environmental receptors for the estates and mill operations were:

Environmental Receptors	Source
Air	Air emissions –from boiler stack (smoke & particulate), vehicle & generator (smoke and gases). GHG emission from anaerobic processes (ETP, EFB dumping).
Water	Water discharges – Cleaning water/run-off/process station waters (hydro cyclone/sterilizer condensate/clarification waste) & boiler quenching water and blow down
land	Land – Scheduled waste, domestic waste and industrial / process waste. Clinical wastes – generated from clinics.

Tereh Mill has conducted boiler stack sampling for each of the boiler stack. Results were within the acceptable limit. The mill was also equipped with a Continuous Emission Monitoring System (CEMS). The audit team has verified the condition of the CEMS during the audit. The system was found to be in functional condition.

Data from the stack is connected online to DOE's office. Boiler smoke emission data are within the DOE limit. An assessment of identified polluting activities is being conducted and monitored,

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		<p>inclusive of gaseous emissions, particulate / soot emissions and effluent. "Pollution prevention plan and waste management action plan" – is used to identify the waste products and sources of pollution – is in place and is being reviewed and implemented accordingly. Among others actions taken by the CU were:</p> <ul style="list-style-type: none"> <li>a) Scheduled wastes – disposed through Kualiti Alam Sdn Bhd.</li> <li>b) Domestic wastes are disposed to respective landfill area located in the estates. The designated areas are located far from housing complexes and waterways.</li> <li>c) Full compliance to zero burning practices.</li> <li>d) Installation of ESP in Tereh Mill commissioned in July 2020.</li> </ul>	
<b>Criterion 7.11:</b> Fire is not used for preparing land and is prevented in the managed area			
7.11.1	<p><b>(C)</b> Land for new planting or replanting is not prepared by burning. - Critical (Major) compliance -</p>	<p>There was no land preparation of existence or new planting in KMB Estates by burning ever since the management practiced zero burning as per the policy in:</p> <ul style="list-style-type: none"> <li>a) KMB Agricultural Manual A 08 Under felling/clearing &amp; land preparation</li> <li>b) Sustainable Policy</li> </ul> <p>KMB has a policy of no open burning. As advocated, the estates practiced zero burning. In the replants visited during the audit in the Estates, it was evident that all palms were felled, shredded, windrow-ed and left to decompose. There was no evidence that fire had been used to prepare land for replanting in the estate No fire was used for waste disposal.</p>	Complied

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7.11.2	The unit of certification establishes fire prevention and control measures for the areas directly managed by the unit of certification. - Minor compliance -	There is no fire used in preparation of existence or new planting in KMB and YPJ Estates. There is a fire ERP team established by all the estates and mill.	Complied
7.11.3	The unit of certification engages with adjacent stakeholders on fire prevention and control measures. - Minor compliance -	KMB engaged smallholders on the fire prevention and control measures. This was mentioned in the stakeholder meeting of respective units under item no 4 elaborating the following; a. <i>Memelihara dan memulihara kepelbagaian biologi</i> b. <i>Pihak berkepentingan boleh melaporkan kepada KMB</i> c. <i>Jika berlaku kebakaran di persempadanan kawasan ladang/kilang</i> d. <i>Pihak ladang/kilang /pekebun kecil berhampiran juga boleh mendapatkan bantuan daripada KMB jika berlaku di kawasan mereka.</i>	Complied
<b>Criterion 7.12:</b> Land clearing does not cause deforestation or damage any area required to protect or enhance High Conservation Values (HCVs) or High Carbon Stock (HCS) forest. HCVs and HCS forests in the managed area are identified and protected or enhanced.			
7.12.1	<b>(C)</b> Land clearing since November 2005 has not damaged primary forest or any area required to protect or enhance HCVs. Land clearing since 15 November 2018 has not damaged HCVs or HCS forests.  A historic Land Use Change Analysis (LUCA) is conducted prior to any new land clearing, in accordance with the RSPO LUCA guidance document. - Critical (Major) compliance -	The audit findings have confirmed that there is no new planting (refer 7.3.1 to 7.4.2) affecting present HCV and primary forest. There was no land clearing activities made nor had damaged any forest to protect or enhance the HCV.	Complied
7.12.2	<b>(C)</b> HCVs, HCS forests and other conservation areas are identified as follows: a) For existing plantations with an HCV assessment conducted by an RSPO-approved assessor and no new land clearing after 15 November 2018, the current HCV assessment of those plantations remains valid. b) Any new land clearing (in existing plantations or new plantings) after 15 November 2018 is preceded by an HCV-HCS assessment, using the	The last assessment conducted was in January 2008 with revision made on Feb 2013. The assessment was conducted by A.J.F.M Dekker. Similarly YPJP possessed a report titled <i>Penilaian Biodiversiti Ladang Wawasan</i> dated 23/12/2013. The assessment was a Rapid Biodiversity Assessment. The report has identified the list of natural habitats that is possible present in the operating units. The report details the findings of a rapid appraisal of the biodiversity	Complied

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	<p>HCSA Toolkit and the HCV-HCSA Assessment Manual. This will include stakeholder consultation and take into account wider landscape-level considerations.</p> <p><b>PROCEDURAL NOTE:</b> Requirement is further clarified under the Interpretation of Indicator 7.12.2 and Annex 5 (approved by BOG on 12 June 2019). - Critical (Major) compliance -</p>	<p>in the estates and addresses the RSPO P&amp;C relevant to biodiversity conservation and HCV. Therein being provided details relating to the following;</p> <ul style="list-style-type: none"> <li>a) General biodiversity issues</li> <li>b) Watercourses and drainage</li> <li>c) Habitats natural and man-made</li> <li>d) Wildlife</li> <li>e) Ponds and reservoirs</li> <li>f) Wetlands /watercourses</li> <li>g) Legal aspects</li> <li>h) Immediate and long term effect.</li> </ul> <p>In all the estates within the <i>Tereh Complex Supply Base</i> there is HCV habitat within and outside the estates as presented below. There was no primary forest habitats present at any of the estates. There is also no wildlife neither reported nor observed by the employees. The estates within contains pockets of semi-natural vegetation. Other observation as recorded below;</p> <table border="1" data-bbox="1137 1005 1899 1327"> <thead> <tr> <th rowspan="2"></th> <th rowspan="2">Estate</th> <th colspan="2">Natural habitat</th> <th rowspan="2">Water bodies</th> </tr> <tr> <th>Within</th> <th>At boundary</th> </tr> </thead> <tbody> <tr> <td>1</td> <td>Rengam</td> <td>Secondary forest</td> <td>none</td> <td>1</td> </tr> <tr> <td>2</td> <td>Mutiara</td> <td>Unsuccessfully planted swampy grassland</td> <td>Riparian, mostly degraded, clear swampy forest.</td> <td>3</td> </tr> <tr> <td>3</td> <td>Wawasan</td> <td>Forest Pocket</td> <td>Sungai Sembrong</td> <td></td> </tr> </tbody> </table>		Estate	Natural habitat		Water bodies	Within	At boundary	1	Rengam	Secondary forest	none	1	2	Mutiara	Unsuccessfully planted swampy grassland	Riparian, mostly degraded, clear swampy forest.	3	3	Wawasan	Forest Pocket	Sungai Sembrong		
	Estate	Natural habitat			Water bodies																				
		Within	At boundary																						
1	Rengam	Secondary forest	none	1																					
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3	Wawasan	Forest Pocket	Sungai Sembrong																						

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	Estate	Wildlife species	
		Within	At boundary
1	Rengam	Silver leaf monkey, kingfishers	Long tailed macaque
2	Mutiara	Black shouldered kite, kingfishers, purple heron, long tailed macaque,	stock billed kingfishers, elephant, leopard, long tailed macaque, silver leafed monkey, tapir pangolin.
3	Wawasan	Wild boar, long tailed macaque, blue throated bee eater, monitor lizard	None

The audit findings have confirmed that there is no new planting (refer 7.3.1 to 7.4.2) affecting present HCV and primary forest  
Hence the current HCV assessment of the estates remains valid.

The recent HCV assessment methodology is through site observation, interviews, stakeholders consultation and desktop review on available secondary data. The assessment among others covers the following areas;

- a) Overview of HCV assessment.
- b) Description of assessment areas.
- c) Finding and discussion
- d) - landscape context
- e) - HCV criteria and application to agriculture
- f)HCV monitoring and management



		<p>In summary the areas covered within the CU landholdings the HCV areas presence as summarized in 7.12.2 above.</p> <table border="1" data-bbox="1149 448 1872 687"> <thead> <tr> <th></th> <th>Estate</th> <th>HCV area</th> <th>Area</th> <th></th> </tr> </thead> <tbody> <tr> <td>1</td> <td>Wawasan</td> <td>P 99/2 Forest Pocket</td> <td>0.39</td> <td>HCV 4</td> </tr> <tr> <td>2</td> <td>Rengam</td> <td>P17/2, P14/2, Secondary Forest</td> <td>13.53</td> <td>HCV 4</td> </tr> <tr> <td>3</td> <td>Mutiara</td> <td>Planted swampy grassland</td> <td>Shown in estate map</td> <td>HCV 4</td> </tr> </tbody> </table>		Estate	HCV area	Area		1	Wawasan	P 99/2 Forest Pocket	0.39	HCV 4	2	Rengam	P17/2, P14/2, Secondary Forest	13.53	HCV 4	3	Mutiara	Planted swampy grassland	Shown in estate map	HCV 4	
	Estate	HCV area	Area																				
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2	Rengam	P17/2, P14/2, Secondary Forest	13.53	HCV 4																			
3	Mutiara	Planted swampy grassland	Shown in estate map	HCV 4																			
7.12.3	<i>Indicator is not applicable in Malaysia context</i>	Not Applicable		Not Applicable																			
7.12.4	<p><b>(C)</b> Where HCVs, HCS forests after 15 November 2018, peatland and other conservation areas have been identified, they are protected and/or enhanced. An integrated management plan to protect and/or enhance HCVs, HCS forests, peatland and other conservation areas is developed, implemented and adapted where necessary, and contains monitoring requirements. The integrated management plan is reviewed at least once every five years. The integrated management plan is developed in consultation with relevant stakeholders and includes the directly managed area and any relevant wider landscape level considerations (where these are identified).</p> <p>- Critical (Major) compliance -</p>	<p>The audit findings have confirmed that there is no new HCVs, HCS forests peatland and other conservation areas been identified after 15 Nov 2018 in CU estates (refer 7.3.1 to 7.4.2).</p> <p>The recent HCV assessment methodology is through site observation, interviews, stakeholders consultation and desktop review on available secondary data. The assessment among others covers the following areas;</p> <ul style="list-style-type: none"> <li>- Overview of HCV assessment.</li> <li>- Description of assessment areas.</li> <li>- Finding and discussion</li> <li>- landscape context</li> <li>- HCV criteria and application to agriculture</li> <li>- HCV monitoring and management</li> </ul> <p>In summary the areas covered within the CU landholdings the HCV areas presence as summarized in 7.12.2 above.</p>		Complied																			

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		<p>Monitoring of these areas are made through the daily field supervision by the field staff and executives. There were also visits by the PI/GM and also personnel from the SQD unit.</p> <p>Sighting of RTE are made and recorded during the AP rounds in the estates if any. Highlights if any are discussed during the management review or management meetings subject to the urgency of the situation.</p>	
7.12.5	<p>Where rights of local communities have been identified in HCV areas, HCS forest after 15 November 2018, peat land and other conservation areas, there is no reduction of these rights without evidence of a negotiated agreement, obtained through FPIC, encouraging their involvement in the maintenance and management of these conservation areas.</p> <p>- Minor compliance -</p>	<p>There was no rights of local communities been identified in HCV areas, HCS forest after 15 November 2018, peat land and other conservation areas. The HCV Assessment report indicated that there is no threatened or endangered (RTE) species, or HCVs, are present or are affected by plantation or mill operations.</p> <p>There is only common bird, presence of wild boar and monkeys occasionally sighted. The appropriate measures that are expected to maintain and/or enhance them were implemented through an action plan reviewed in Jan 2020.</p>	Complied
7.12.6	<p>All rare, threatened or endangered (RTE) species are protected, whether or not they are identified in an HCV assessment. A programme to regularly educate the workforce about the status of RTE species is in place. Appropriate disciplinary measures are taken and documented in accordance with company rules and national law if any individual working for the company is found to capture, harm, collect, trade, possess or kill these species.</p> <p>- Minor compliance -</p>	<p>There is no RTE found the entire Tereh Complex as recorded, with exception of wild elephants in Sg Tawing (<i>Bukit Cucuk and Labis Forest</i>) during the present 2018 and the palm trees damages left by the intrusion. As a standard practice where there is no other sighted RTE, animal sighting is continued at all the estates especially at the boundary areas. Current assessment revealed the presence of the following bird's species within the Tereh complex.</p> <ul style="list-style-type: none"> <li>a) <i>Purple swam phen</i></li> <li>b) <i>Little egret</i></li> </ul> <p>The assessment as according to the Rapid Biodiversity Assessment by A.J.F.M Dekker dated 2008, identified;</p> <ul style="list-style-type: none"> <li>a) that there is potential Asian Elephant.</li> <li>b) That the Silvered Leaf Monkeys are still able to be sighted within the estates. This is currently rare as land outside of</li> </ul>	Complied

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		<p>the boundary are already been developed by smallholder oil palm.</p> <p>Records of RTE sighting was checked and verified for each estate. Summary of record of animal sightings spotting wild boars, monkeys and squirrels among others.</p> <p>The management conducted a regular patrol of HCV areas, access and boundary of estates. Signage, such as "No Hunting", "No Fishing", "Buffer Zone" were available. No use of chemicals observed been applied in the buffer zone as prohibited</p>	
7.12.7	<p>The status of HCVs, HCS forests after 15 November 2018, other natural ecosystems, peatland conservation areas and RTE species is monitored. Outcomes of this monitoring are fed back into the management plan.</p> <p>- Minor compliance -</p>	<p>The audit findings have confirmed that there is no new HCVs, HCS forests peatland and other conservation areas been identified after 15 Nov 2018 in the 3 estates (refer 7.3.1 to 7.4.2). Monitoring of these areas are made through the daily field supervision by the field staff and executives. There were also visits by the PI/GM and also personnel from the SQD Unit. Sighting of RTE are made and recorded during the AP rounds in the estates if any.</p>	Complied
7.12.8	<p><b>(C)</b> Where there has been land clearing without prior HCV assessment since November 2005, or without prior HCV-HCSA assessment since 15 November 2018, the Remediation and Compensation Procedure (RaCP) applies.</p> <p>- Critical (Major) compliance -</p>	<p>The audit findings have confirmed that there is no new land clearing affecting areas of HCVs, HCS forests peatland and other conservation areas.</p>	Complied

**Appendix B: Approved Time Bound Plan**

**Time Bound Plan for 100% Own Certified FFB**

Project	Estate	Plan
Indonesia	PT RAJ	2021
	PT TPR	
Kulim Estate	Bukit Layang Estate	April 2020
Trader	Eng Lee Heng	May 2020

List of Estate Manage by KULIM			
Mill Base	Kulim/ Jcorp Estate	Estate	Status
Tereh Mill	Kulim Estate	TEREH UTARA	Certified RSPO in Jan 2009
		TEREH SELATAN	
		SELAI	
		ENGGANG	
		MUTIARA	
		SG. SEMBRONG	
		SG. TAWING	
Sedenak Mill		SEDENAK	
		RENGAM	
		BASIR ISMAIL	
		ULU TIRAM	
Sindora Mill		KUALA KABONG	
		REM / PASAK	
		SINDORA	
Palong Mill		SUNGAI PAPAN	
		SEPANG LOI	
		UMAC	
		LABIS BAHRU	
		MUNGKA	
		KEMEDAK	
		PALONG	
Pasir Panjang Mill	Kulim Estate	PASIR PANJANG	Certified RSPO in March 2017
		SIANG	
	Jcorp Estate	BUKIT KELOMPOK	
		TUNJUK LAUT	
		PASIR LOGOK	
	BUKIT PAYUNG		

**Appendix C: GHG Reporting Executive Summary**

The GHG emissions that were produced in **2019** for **Tereh POM** and supply base was calculated using the PalmGHG Calculator version 4. 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 **2019** for Tereh POM and supply base are as following:

Emission per product	tCO <sub>2</sub> e/tProduct
CPO	1.27
PKO	0.00

Extraction	%
OER	21.65
KER	5.42

Production	t/yr
FFB Process	351,753.11
CPO Produced	76142.11
PKO Produced	19060.73

Land Use	Ha
OP Planted Area	16,585.33
OP Planted on peat	1366.44
Conservation (forested)	50.45
Conservation (non-forested)	192.64
<b>Total</b>	<b>18,194.86</b>

**Summary of Field Emission and Sink**

	Own Crop*		Group		3 <sup>rd</sup> Party		Total	
	tCO <sub>2</sub> e	tCO <sub>2</sub> e / FFB	tCO <sub>2</sub> e	tCO <sub>2</sub> e / FFB	tCO <sub>2</sub> e	tCO <sub>2</sub> e / FFB	tCO <sub>2</sub> e	tCO <sub>2</sub> e / FFB
<b>Emission</b>								
Land Conversion	159284.94	0.49	3010.71	0.60	6600.35	0.00	168896.00	0.48
CO <sub>2</sub> Emission from fertilizer	13693.19	0.04	227.68	0.05	614.49	0.00	14535.36	0.04
NO <sub>2</sub> Emission	0.00	0.00	633.14	0.13	0.00	0.00	633.14	0.00
Fuel Consumption	10939.59	0.66	200.18	0.04	720.42	0.14	11860.19	0.03
Peat Oxidation	5481.87	0.33	27.33	0.01	87.80	0.00	5597.00	0.02
<b>Sink</b>								
Crop Sequestration	-150515.55	-0.47	-2853.76	-0.57	-6256.26	0.00	-159625.56	-0.45
Conservation Sequestration	-458.81	-0.00	0.00	0.00	0.00	0.00	-458.81	0.00
<b>Total</b>	<b>38425.23</b>	<b>0.12</b>	<b>5355.85</b>	<b>1.06</b>	<b>1766.8</b>	<b>0.00</b>	<b>45547.88</b>	<b>0.13</b>

*\*Note: Includes both estates and smallholders*

**Summary of Mill Emission and Credit**

	tCO <sub>2</sub> e	tCO <sub>2</sub> e/tFFB
<b>Emission</b>		
POME	86601.88	0.25
Fuel Consumption	771.95	0.00
Grid Electricity Utilization	0.00	0.00
<b>Credit</b>		
Export of Grid Electricity	0.00	0.00
Sales of PKS	-11973.13	-0.03
Sales of EFB	0.00	0.00
<b>Total</b>	<b>75400.69</b>	<b>0.22</b>

**Summary of Kernel Crusher Emission and Credit (if applicable)**

Emissions	tCO <sub>2</sub> e
PK from own mill	0.00
PK from other source	0.00
Fuel Consumptions	0.00
<b>Total Crusher emissions</b>	<b>0.00</b>

\*This mill has no kernel crusher operation.

<b>Palm Oil Mill Effluent (POME) Treatment:</b>	
Divert to Compost (%)	34
Divert to anaerobic diversion (%)	66

<b>POME Diverted to Anaerobic Digestion:</b>	
Divert to anaerobic pond (%)	100.00
Divert to methane captured (flaring) (%)	0.00
Divert to methane captured (energy generation) (%)	0.00

**Appendix D: Supply Chain Declaration**

<b>A. Monthly Records of Certified and Uncertified FFB Received since the last audit</b>				
<b>No.</b>	<b>Month - Year</b>	<b>Volume of FFB from certified supply bases (mt)</b>	<b>Volume of FFB from uncertified supply bases (mt)</b>	<b>Total FFB/Month (mt)</b>
1	October 2019	29,742.35	-	29,742.35
2	November 2019	24,755.75	-	24,755.75
3	December 2019	21,677.78	-	21,677.78
4	January 2020	18,361.29	-	18,361.29
5	February 2020	22,635.14	-	22,635.14
6	March 2020	22,988.53	-	22,988.53
7	April 2020	32,158.72	-	32,158.72
8	May 2020	31,387.15	-	31,387.15
9	June 2020	38,522.62	-	38,522.62
10	July 2020	37,485.12	-	37,485.12
11	August 2020	33,668.92	-	33,668.92
12	September 2020	34,539.88	-	34,539.88
13	October 2020	29,988.10	-	29,988.10
	Total	377,911.35		377,911.35

<b>B. Monthly Records of Certified CPO &amp; PK since the last audit</b>			
<b>No.</b>	<b>Month - Year</b>	<b>Certified CPO (mt)</b>	<b>Certified PK (mt)</b>
1	October 2019	6442.42	1624.43
2	November 2019	5309.89	1333.57
3	December 2019	4,559.69	1,150.52
4	January 2020	3,949.01	964.04
5	February 2020	4,811.91	1,208.31
6	March 2020	4,928.89	1,254.09
7	April 2020	6,937.50	1,765.80
8	May 2020	6,439.19	1,646.24
9	June 2020	7,772.96	2,025.34
10	July 2020	7,595.26	2,102.66
11	August 2020	7,019.09	1,832.27
12	September 2020	7,153.92	2,073.46

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13	October 2020	6509.53	1761.87
	Total	79429.26	20742.6

C. Records of Certified CPO & PK Sold under PalmTrace since the last audit				
No.	Buyers Name	Palmtrace Trading License Number	Certified CPO Sold (mt)	Certified PK Sold (mt)
1	XXX	TR-38caab10-6a5a TR-75bb0d31-819e TR-d3a76ee0-c029 TR-aab43453-dbf7 TR-ec92f4e4-f245 TR-4a63f9ee-5315 TR-6eb49168-9b78 TR-5209c336-404b TR-dc7e6bd5-c1dc TR-88b44094-5283 TR-7904ca95-ae17 TR-cfd4a4d8-bef3 TR-9a4ad14d-a8a5 TR-34a7f8d4-96c4 TR-1249134f-2d0e TR-de7ed96a-289c TR-d2933881-e87f TR-646077a7-1848 TR-4770d6e0-8d18 TR-f3866fa7-9e9c TR-10720b4e-b08e TR-922a9fcd-c0e1 TR-34fb6990-bef1 TR-cd61c5e9-0111 TR-d5a5ece4-f08d TR-4e90cd34-4286 TR-1359053f-a9c8 TR-1c36f906-c779 TR-9f495c06-3be9 TR-e7af1f73-12c5 TR-c711f48a-8853 TR-1efd44a3-81af TR-da890fb9-cb4f TR-f39da617-a0cb TR-2fe32021-105c TR-f6950dc7-e22b TR-af321156-fe0c TR-aa7a7fa7-364f TR-8caf9102-0e0a TR-c0388a79-e347 TR-6e9d326b-5ec2 TR-b3be2c31-cbd7 TR-c40693d6-c606	70,102.79	



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		TR-7163e1d4-519a TR-e581daf9-d832 TR-c63f19b6-e0e1 TR-6ba2bfda-fae7 TR-734ae18e-c2db TR-57c1d21c-7809 TR-ca04b8ae-231c TR-b7e51bd8-ac28 TR-e6af7934-1735 TR-68e8e2ab-89c0 TR-dc015195-106e TR-fbd8f95f-26fb TR-cea6b261-eb90 TR-0593c053-7eb2 TR-0367bb5c-cfa5 TR-5f9a0d0f-6ca8 TR-84a7c618-b324 TR-b07437d1-f52a TR-f4b2e37f-eff6 TR-f1a7763a-cd29 TR-bfe34c34-cdfe		
2	XXX	TR-459e65b6-d828 TR-38caab10-6a5a TR-75bb0d31-819e TR-8ef19f65-8469 TR-0702f918-e072 TR-e75da44a-5687 TR-50600fb8-3193 TR-dc2d89ba-8f23 TR-5f14b90f-567d TR-d3a76ee0-c029 TR-aab43453-dbf7 TR-ec92f4e4-f245		18,371.28
			70,102.79	18,371.28

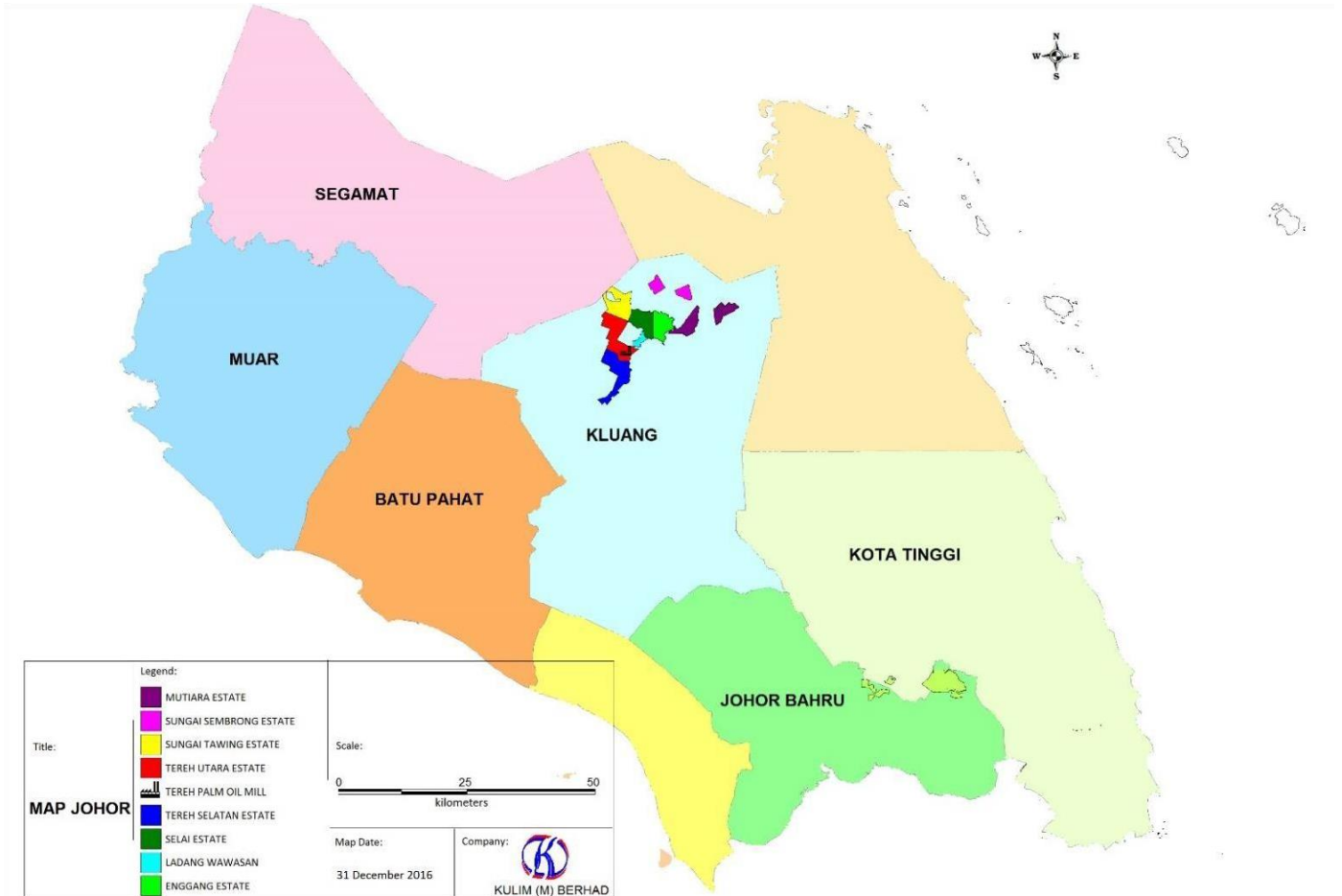
<b>D. Records of CPO &amp; PK Sold under other schemes since the last audit (if any)</b>				
<b>No.</b>	<b>Buyers Name</b>	<b>Scheme Name</b>	<b>CPO Sold (mt)</b>	<b>PK Sold (mt)</b>
NIL				

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<b>E. Records of CPO &amp; PK Sold as conventional since the last audit (if any)</b>			
<b>No.</b>	<b>Buyers Name</b>	<b>CPO Sold (mt)</b>	<b>PK Sold (mt)</b>
1	October 2019	-	-
2	November 2019	347.19	610.85
3	December 2019	492.89	496.77
4	January 2020	88.18	320.82
5	February 2020	162.21	169.03
6	March 2020	-	-
7	April 2020	-	47.02
8	May 2020	-	-
9	June 2020	2,484.84	-
10	July 2020	3,180.85	-
11	August 2020	1,541.18	-
12	September 2020	-	-
13	October 2020	668.41	-
	Total	8965.75	1644.49

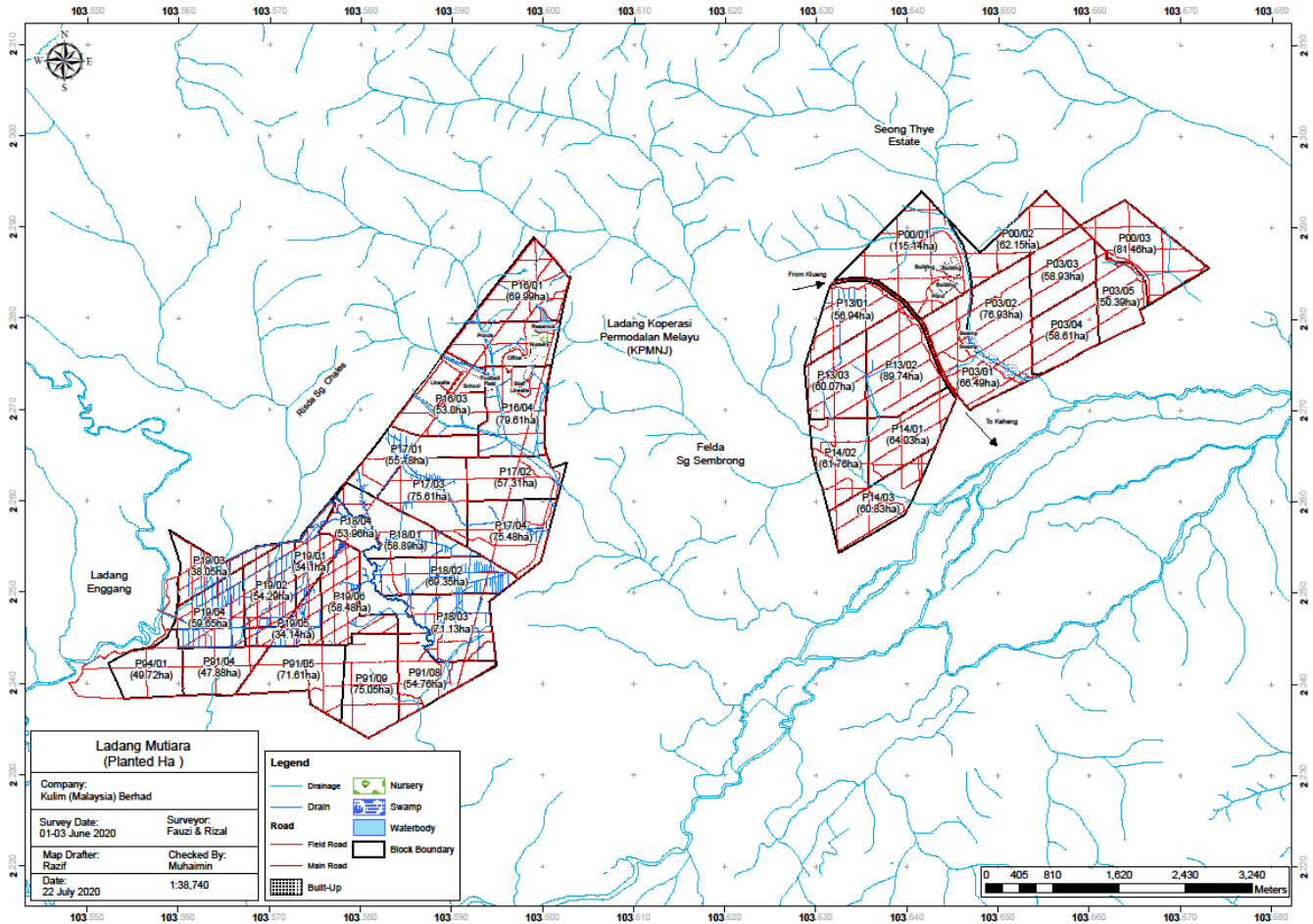
<b>F. Records of Certified CPO Sold under RSPO Credits since the last audit (if any)</b>			
<b>No.</b>	<b>Buyers Name</b>	<b>PalmTrace Trading License Number</b>	<b>RSPO Credits of Certified CPO Sold (mt)</b>
		Nil	

**Appendix E: Location Map of Certification Unit and Supply bases**

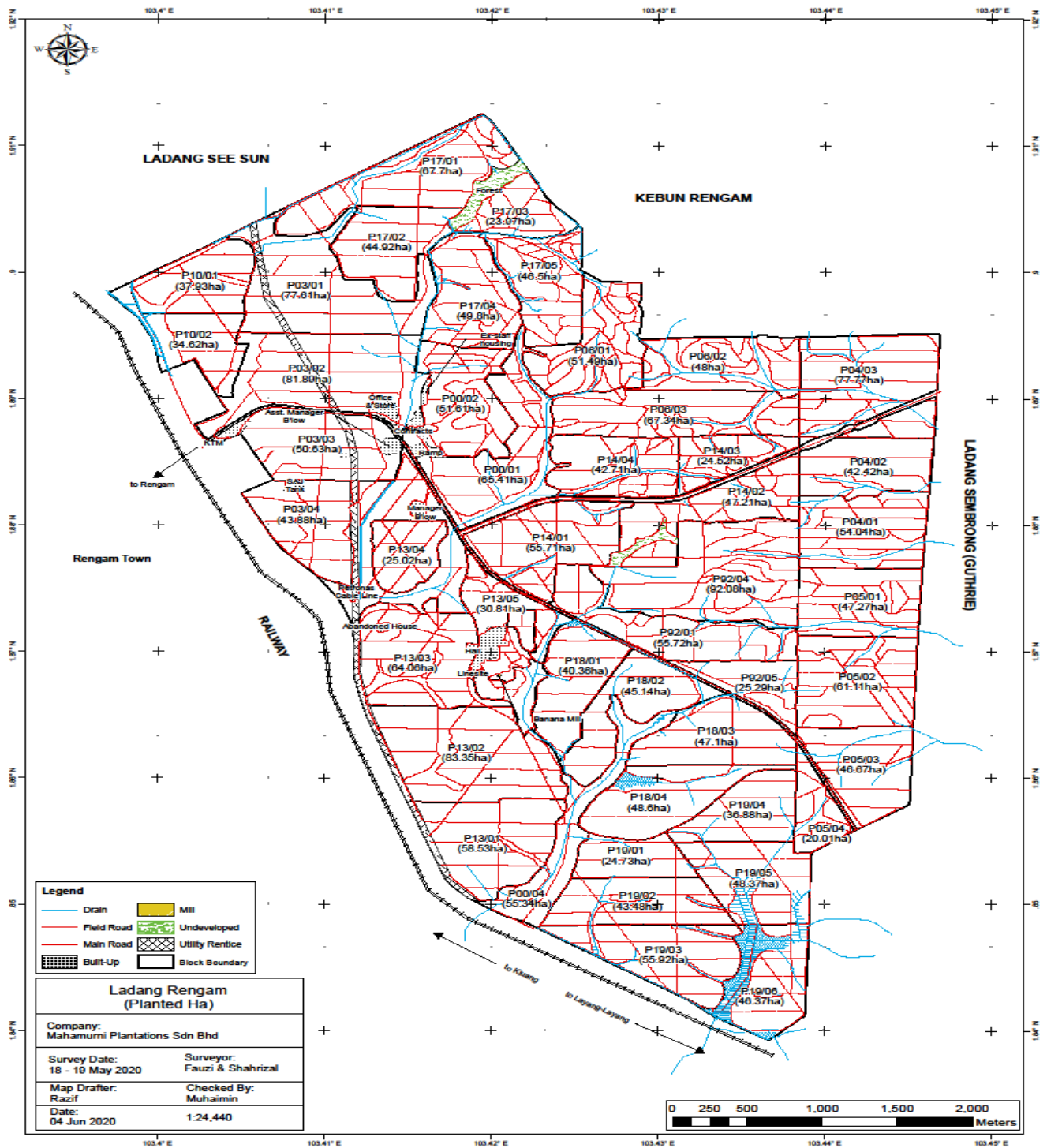


**Appendix F: Estate Field Map**

**Mutiara Estate Field Map**

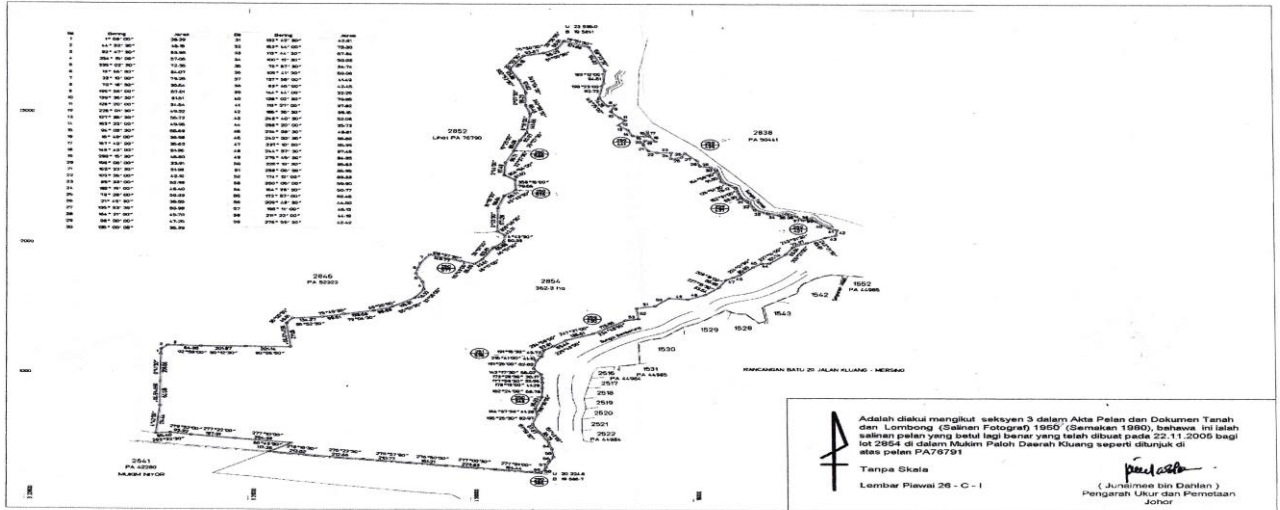


**Rengam Estate Field Map**



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**Wawasan Estate Field Map**



Adalah diekui mengikut seksyen 3 dalam Akta Pelan dan Dokumen Tanah dan Lombong (Salinan Fotograf) 1960 (Semakan 1980), bahawa ini ialah salinan pelan yang betul lagi benar yang telah dibuat pada 22.11.2005 bagi lot 2854 di dalam Mukim Paloh Daerah Klung seperti ditunjuk di atas pelan PA76791

Tempa Skala  
Lembar Pelawat 26 - C - 1

(Junimes bin Dablan)  
Pengerah Ukur dan Pemetaan  
Johor

**Appendix G: List of Smallholder Sampled**

Not Applicable

**Appendix H: 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
KMB	Kulim (M) Berhad
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
YPJP	Yayasan Pelajaran Johor Plantation