

**RSPO PRINCIPLE AND CRITERIA  
PUBLIC SUMMARY REPORT**

- Initial Assessment**
- Annual Surveillance Assessment (4)**
- 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:  Kulim (M) Berhad  Level 16, Menara Komtar, Johor Bahru City Centre,  80000 Johor Bahru, Johor, Malaysia</p>
<p>Certification Unit:  <b>Pasir Panjang Palm Oil Mill</b></p> <p>Location of Certification Unit:  KM 30 Kota Tinggi/ KM 63 Mersing, Jalan Jemaluang,  81900, Kota Tinggi, Johor, Malaysia.</p>
<p>Date of Final Report:  24/4/2021</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, Malaysia		
<b>Palm Oil Mill / Group Manager / Estate (Certification Unit)</b>	Pasir Panjang Palm Oil Mill		
<b>Location / Address</b>	KM 30 Kota Tinggi/ KM 63 Mersing, Jalan Jemaluang, 81900, Kota Tinggi, 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 657192	<b>Date of First Certification</b>	09/03/2017
		<b>Certificate Start Date</b>	09/03/2017
		<b>Certificate Expiry Date</b>	08/03/2022
<b>Scope of Certification</b>	Palm oil and Palm Kernel Production		
<b>Visit Objectives</b>	To conduct a surveillance assessment and look for positive evidence to ensure that elements of the scope of certification and the requirements of the management standard are effectively addressed by the organisation's management system and that the system is demonstrating the ability to support the achievement of statutory, regulatory and contractual requirements and the organisation's specified objectives, as applicable with regard to the scope of the management standard, and to confirm the on-going achievement and applicability of the forward strategic plan and where applicable to identify potential areas for improvement of the management system.		
<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 Choose an item. ; ASA 4) <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"/> <i>Malaysia</i> 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
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<b>3. Other Certifications</b>			
<b>Certificate Number</b>	<b>Standard(s)</b>	<b>Certificate Issued by</b>	<b>Expiry Date</b>
EU-ISCC-Cert-DE119-60206096	ISCC EU	ASG CERT	18/3/2021
A108289	MS 1500 : 2009	JAKIM	31/1/2021
MSPO 696199	MS 2530-4:2013	BSI Services (M) Sdn Bhd	7/3/2024
MSPO 696200	MS 2530-3:2013	BSI Services (M) Sdn Bhd	7/3/2024

<b>4. Location(s) of Mill &amp; Supply Bases</b>			
<b>Name (Mill / Supply Base)</b>	<b>Location</b>	<b>GPS Coordinates</b>	
		<b>Latitude</b>	<b>Longitude</b>
Pasir Panjang Palm Oil Mill	KM 30 Kota Tinggi/ KM 63 Mersing, Jalan Jemaluang, 81900, Kota Tinggi, Johor Darul Takzim.	2° 1' 4.85" N	103° 56' 54.87" E
Pasir Panjang Estate	KM 30 Kota Tinggi/ KM 63 Mersing, Jalan Jemaluang, 81900, Kota Tinggi, Johor Darul Takzim.	2° 0' 34.76" N	103° 57' 15.93" E
Tunjuk Laut Estate	KM 30 Kota Tinggi/ KM 63 Mersing, Jalan Jemaluang, 81900, Kota Tinggi, Johor Darul Takzim.	1° 57' 41.69" N	103° 59' 9.52" E
Bukit Payung Estate	KM 30 Kota Tinggi/ KM 63 Mersing, Jalan Jemaluang, 81900, Kota Tinggi, Johor Darul Takzim.	2° 0' 26.55" N	103° 55' 12.55" E
Siang Estate	KM 3 Tg. Balau / 87 Johor Bahru, Jalan Ladang Siang – Tanjung Balau, 82200, Bandar Penawar, Johor Darul Takzim.	1° 39' 10.15" N	104° 12' 40.23" E
Bukit Kelompok Estate	KM 30 Kota Tinggi/ KM 63 Mersing, Jalan Jemaluang, 81900, Kota Tinggi, Johor Darul Takzim.	2° 0' 24.31" N	103° 59' 54.39" E
Pasir Logok Estate	KM 30 Kota Tinggi/ KM 63 Mersing, Jalan Jemaluang, 81900, Kota Tinggi, Johor Darul Takzim.	2° 1' 53.38" N	104° 2' 20.35" E

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<b>5. Description of Supply Base</b>					
<b>Estate</b>	<b>Total Planted (Mature + Immature) (ha)</b>	<b>HCV (ha)</b>	<b>Infrastructure &amp; Other (ha)</b>	<b>Total Area (ha)</b>	<b>% of Planted</b>
Pasir Panjang Estate	1,447.84	130.91	127.25	1,706.00	84.87
Tunjuk Laut Estate	2,648.79	29.23	189.78	2,867.80	92.36
Bukit Payung Estate	1,920.51	293.65	93.47	2,307.63	83.39
Siang Estate	3,204.69	71.11	167.30	3,443.10	93.08
Bukit Kelompok Estate	2,437.75	41.19	134.86	2,613.80	93.26
Pasir Logok Estate	1,993.51	17.40	86.82	2,097.73	95.25
<b>Total</b>	<b>13,653.09</b>	<b>583.49</b>	<b>799.48</b>	<b>15,036.06</b>	<b>90.86</b>

*Pasir Panjang – Resurvey of 18.09 ha and declared as HCV*

<b>6. Plantings &amp; Cycle</b>							
<b>Estate</b>	<b>Age (Years)</b>					<b>Mature**</b>	<b>Immature</b>
	<b>0 - 3</b>	<b>4 - 10</b>	<b>11 - 20</b>	<b>21 - 25</b>	<b>26 - 30</b>		
Pasir Panjang Estate	542.94	904.9	0	0	0	904.9	542.94
Tunjuk Laut Estate	0	1,715.48	933.31	0	0	2,648.79	0
Bukit Payung Estate	710.67	1,209.84	0	0	0	1,209.84	710.67
Siang Estate	0	889.79	2,314.90	0	0	3,204.69	0
Bukit Kelompok Estate	0	1,132.23	1,281.72	23.8	0	2,437.75	0
Pasir Logok Estate	146.29	509.78	1,337.44	0	0	1,847.22	146.29
<b>Total (ha)</b>	<b>1,399.90</b>	<b>6,362.02</b>	<b>5,867.37</b>	<b>23.8</b>	<b>0</b>	<b>12,253.19</b>	<b>1,399.90</b>

**Note:**

<b>7. Certified Tonnage of FFB (Own Certified Scope)</b>				
<b>Estate</b>	<b>Tonnage / year</b>			
	<b>Estimated (Mar 20 – Feb 21)</b>	<b>Actual (Nov 2019 – Nov 2020)</b>		<b>Forecast (Mar 21 – Feb 22)</b>
		<i>Previous license period (Nov 19 – Feb 20)</i>	<i>Current license period (Mar – Nov 20)</i>	
Pasir Panjang Estate	19,656	4326.21	15245.39	24,244

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Tunjuk Laut Estate	52,155	14592.56	43765.18	57,654
Bukit Payung Estate	21,168	4319.60	17176.74	25,091
Siang Estate	82,957	19989.33	60005.70	80,057
Bukit Kelompok Estate	56,504	16500.22	45632.22	59,960
Pasir Logok Estate	48,884	15971.98	43433.28	48,690
<b>Total</b>	<b>281,324</b>	<b>300,958.41</b>		<b>295,696</b>

**Note:**

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

Estate	Tonnage / year			
	Estimated (Mar 20 – Feb 21)	Actual (Nov 2019 – Nov 2020)		Forecast (Mar 21 – Feb 22)
	N/A	<i>Previous license period (Nov 19 – Feb 20)</i>	<i>Current license period (Mar – Nov 20)</i>	N/A
Basir Ismail Estate		793.45	1,907.27	
Ulu Tiram Estate		169.92	332.07	
<b>Total</b>		<b>3,202.71</b>		

**Note:**

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

Independent FFB Supplier	Tonnage / year			
	Estimated (Mar 20 – Feb 21)	Actual (Nov 2019 – Nov 2020)		Forecast (Mar 21 – Feb 22)
		<i>Previous license period (Nov 19 – Feb 20)</i>	<i>Current license period (Mar – Nov 20)</i>	
NIL	N/A	NIL		N/A
<b>Total</b>	N/A			N/A

**Note:**

**10. Certified Tonnage**

Mill Capacity: 60 MT/hr	Estimated (Mar 20 – Feb 21)	Actual (Nov 2019 – Nov 2020)		Forecast (Mar 21 – Feb 22)
	FFB	FFB		FFB
<b>SCC Model: IP/MB</b>	281,324.01	<i>Previous license period (Nov 19 – Feb 20)</i>	<i>Current license period (Mar – Nov 20)</i>	295,696

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		76,663.27	227,497.85	
	<b>CPO (OER: 22.89 %)</b>	<b>CPO (OER: 22.27%)</b>		<b>CPO (OER: 22.59 %)</b>
	<b>64,395.06</b>	17,011.95	<b>50,728.44</b>	66,827
		67,740.39		
	<b>PK (KER: 5.20%)</b>	<b>PK (KER: 5.40 %)</b>		<b>PK (KER: 5.3%)</b>
	<b>14,628.85</b>	4,091.86	<b>12,334.32</b>	15,672
<b>TOTAL</b>	<b>N/A</b>	16,426.18		<b>N/A</b>

Note:

<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>	23,221.19	0	0	22,785.33	<b>46,006.52</b>
<b>Previous License period</b>					
<b>CPO (MT)</b>	7,645.69	2,628.09	0	6,501.58	16,775.36

<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>	10,901.07	0	0.27	0	<b>10,901.34</b>
<b>Previous License period</b>					
<b>PK (MT)</b>	2,317.19	0	0	1,641.44	3,958.63

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



## Section 2: Assessment Process

### Certification Body:

BSI Services Malaysia Sdn. Bhd. (ASI Accreditation Number: ASI-ACC-067)  
Suite 29.01 Level 29, The Gardens North Tower,  
Mid Valley City, Lingkaran Syed Putra,  
59200 Kuala Lumpur, Malaysia.  
Tel +60 (3) 9212 9638 Fax +60 (3) 9212 9639  
Representative: Nicholas Cheong ([Nicholas.Cheong@bsigroup.com](mailto:Nicholas.Cheong@bsigroup.com))  
Website: [www.bsigroup.com](http://www.bsigroup.com)

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### 2.1 Assessment Methodology, Programme, Site Visits

The on-site assessment was conducted on **7-9/12/2020** 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 Critical NC close out on-site assessment was conducted on **10/2/2021**. The audit programs are included in Section 2.3.

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 (**RSPO 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.

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Structured worker interviews with male and female workers and staff were held in private at the workplace in the mill and the estates. Fieldworkers were interviewed informally in small groups in the field. In addition, the wives of workers and staff were interviewed in informal group meetings at their housing. Separate visits were made to each of the local communities to meet with the village head and residents. Company officials were not present at any of the internal or external stakeholder interviews. A list of Stakeholders contacted is included as Section 3.5.

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**

Assessment Program					
Name (Mill / Supply Base)	Year 1 (Certification)	Year 2 (ASA 1)	Year 3 (ASA 2)	Year 4 (ASA 3)	Year 5 (ASA 4)
Pasir Panjang Palm Oil Mill	√	√	√	√	√
Pasir Panjang Estate		√		√	
Tunjuk Laut Estate	√			√	
Bukit Payung Estate	√				√
Siang Estate		√			√
Bukit Kelompok Estate			√		
Pasir Logok Estate			√		

**Tentative Date of Next Visit: October 3, 2021 - October 7, 2021**

**Total No. of Mandays: 9 man days**

**2.2 BSI Assessment Team:**

Team Member Name	Role <i>(Team Leader or Team member)</i>	Qualifications <i>(Short description of the team members)</i>
Mohamed Hidhir Zainal Abidin	Team Leader	He holds Bachelor Degree in Chemical Engineering, graduated from National University of Malaysia on 2006. He has 7 years working

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		experience in palm oil industry specifically on palm oil milling for 5 years. He also has the experiences as auditor for several standards including ISO 9001, ISO 140001, OHSAS 18001, MSPO and RSPO in his previous certification body. He completed the ISO 9001 Lead Auditor Course, ISO 14001 Lead Auditor Course and OHSAS 18001 Lead Auditor Course in 2012, Endorsed RSPO P&C Lead Auditor Course in 2013, MSPO Awareness Training in 2014 and Endorsed RSPO SCCS Lead Auditor Course in 2015. He had been involved in RSPO auditing since May 2012 in more than various companies in Malaysia. During this assessment, he assessed on the aspects of legal, mill best practices, safety and health, environmental and workers and stakeholders consultation.
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, environmental, HCV and GHG. He is fluent in both verbal/written in Bahasa Malaysia and English.
Rahayu Zulkifli	Team Member	Holds a Degree in LLB (Hon), she was a practicing lawyer before joining WWF-Malaysia and RSPO as a Dispute Settlement Facility Manager. She is now working as a freelance RSPO auditor. In this assessment, the focus element includes social aspects, legal requirements, employees welfare and stakeholders consultations. She is able to communicate in Bahasa Malaysia and English.

**Accompanying Persons:** N/A

**2.3 Assessment Plan**

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

PRELIMINARY AGENDA					
Date	Time	Subjects	MH	RZ	AB
Sunday 6/12/2020	PM	Audit travel to Johor Bahru. Check in at Holiday Villa, Johor Baru	√	√	√

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PRELIMINARY AGENDA					
Date	Time	Subjects	MH	RZ	AB
Monday 7/12/2020  <b>Pasir Panjang POM</b>	0730	Audit Team travelling to Pasir Panjang POM			
	8.30 – 12.00	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> <b>Pasir Panjang 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.	√	√	√
	0830 - 1230	RSPO Supply chain requirements for mill <ul style="list-style-type: none"> <li>- Identity Preserved Module</li> <li>- Internal Audit</li> <li>- Outsourcing activities</li> <li>- Purchasing and Goods In</li> <li>- Sales and Goods Out</li> <li>- Outsourcing Activities</li> <li>- Record keeping</li> <li>- Extraction Rate</li> <li>- Processing</li> <li>- Registration of transaction</li> <li>- Claims</li> </ul>	√	-	-
	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>Pasir Panjang POM:</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 (end of day 1)	√	√	√	
Tuesday 8/12/2020  <b>Siang Estate</b>	0730	Audit Team travelling to Siang Estate	√	√	√
	08.30 – 13.00	<b>Siang 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	√	√	√

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Date	Time	Subjects	MH	RZ	AB
	14.00 – 16.30	<b>Siang 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 (end of day 2)	√	√	√
Wednesday 9/12/2020	0730	Audit team travel to Kemedak Estate	√	√	√
<b>Bkt Payung Estate</b>	0830 - 1230	<b>Bkt Payung 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>Bkt Payung 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	√	√	√
	Thursday 10/12/2020	AM	Audit team travel back to Kuala Lumpur	√	√

Major NC close out verification

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<b>Wednesday</b> <b>10/2/2021</b>  0730 AM  08.30 – 09.00	Travelling to Siang Estate  Opening Meeting: <ul style="list-style-type: none"> <li>• Opening Presentation by Audit team leader.</li> <li>• Briefing on site verification plan</li> </ul>	√
09.00 – 12.30	Siang Estate - Verification on previous Major NC. Site observation ,workers interview (individual and group session) if necessary Document review – implemented evidence  Closing meeting – conclusion and recommendation	√
12.30 – 14.00	Travel back to KL	√

### 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/JohorCorporation">https://rspo.org/members/310/JohorCorporation</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</li> </ul>	As of to date there are no new plantings that replace primary forest under Johor Corporation.	Yes

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in accordance with RSPO P&C criterion 7.3.		
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 1st 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. <i>Note:</i> <i>The RSPO RaCP tracker shall be checked to confirm for any land conflicts/Liabilities <a href="https://www.rspo.org/certification/remediation-and-compensation/racp-tracker">https://www.rspo.org/certification/remediation-and-compensation/racp-tracker</a>. The progress on the Liabilities shall be verified and reported.</i> <i>Please refer to BSI-RSPO Secretariat approval.</i>	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 out growers under this certification unit.	N/A



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#### 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 1 Critical; 0 Minor nonconformities and 0 Opportunity For Improvement raised. The *Pasir Panjang POM* 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 Actions for the Critical Nonconformity(ies) has been verified for its effectiveness and closed accordingly. The below is the summary of the non-conformity raised during this assessment.

Non-conformity			
<b>NCR Ref #</b>	<b>1998993-202012-M1</b>	<b>Clause &amp; Category (Critical / Minor)</b>	<b>6.2.4 (critical)</b>
<b>Date Issued</b>	<b>9/12/2020</b>	<b>Due Date</b>	<b>8/3/2021</b>
<b>Closed (Yes / No)</b>	<b>Yes</b>	<b>Date of nonconformity Closure</b>	<b>10/2/2021</b>
<b>Statement of Nonconformity:</b>	Housing conditions at Siang Estate are not in accordance with the requirements of the Employees' Minimum Standard of Housing, Accommodation and Amenities Act 1990.		
<b>Requirement Reference:</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.		
<b>Objective Evidence:</b>	<p>At Siang Division housing area, the following were observed:</p> <ol style="list-style-type: none"> <li>1. The area surrounding the workers' housing was not maintained in a clean and sanitary condition. At the back of House No. 7 (Block F), construction waste and debris such as broken doors, metal poles, exposed and rusty nails, discarded furniture, BRC wire, and scheduled waste (fluorescent tubes), etc, were kept in a disorderly and perilous manner.</li> <li>2. The perimeter drain between Blocks F and G was not in a good state of repair, not clear of debris to permit free flow.</li> </ol> <p>At Balau Division, the following were observed:</p> <ol style="list-style-type: none"> <li>3. An old and discarded motorbike with visible oil spill was left next to House No 13.</li> </ol> <p>The weekly housing inspection has not been conducted in an effective manner as it has failed to identify and record all the above.</p> <p>This is not in accordance with Section 23 (1) and (2) of the Employees' Minimum Standard of Housing, Accommodation and Amenities Act 1990.</p>		
<b>Corrections:</b>	Siang Division Housekeeping of all construction waste been carried out as follows		

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	<p>1) The construction waste surrounding area of the workers' housing No. 7 (Block F) has been sort and removed on 09.12.2020.</p> <p>2) All Schedule waste such as fluorescent tubes been kept at respective SW storage of the estate – fluorescent tubes stored under code SW110.</p> <p>3) All perimeter drains is under progress for new construction, thus for the times being all drains will be assured free from debris as to permit free flow</p> <p>Balau Division</p> <p>a) The owner of an old and discarded motorbike (Azanian) has been taken out the motorbike on 09/12/2020 for repair.</p> <p>b) The Oil spillage effect has been cleaned using sand and has been put in schedule waste storage (SW408).</p> <p>c) All residents has been trained on how to handle cases of oil spillage from their vehicle (if any) which should using drip tray in order to trap the oil spillage.</p> <p>d) Retraining to EHA regarding line site inspection has been done on 10/12/2020</p>
<b>Root Cause Analysis:</b>	<p>1) Ineffective of line site inspection and reporting by EHA and no proper storage for construction and repair material.</p> <p>2) Lack of knowledge of schedule waste management by Carpenter</p> <p>3) Inadequate of awareness or briefing regarding rules and regulation at line site to all workers by management</p>
<b>Corrective Actions:</b>	<p>Siang Division</p> <p>a) Re-training to EHA on effectiveness of the housing weekly inspection and report has been done on 10/12/2020.</p> <p>b) Carpenter store will be built as to accommodate relevant carpenter items. Work is in progress, expected completion in February 2021.</p> <p>c) To carry out Construction Site Safety Supervision and Waste Management training as to provide guide for internal construction work management at OU.</p> <p>d) To include monitoring mechanism for safe construction work and Schedule Waste Management in EHA inspection checklist.</p> <p>e) Assistant Manager who in-charge the line site will do physical check once the EHA submitting his weekly housing inspection report.</p> <p>d) Re-training to EHA on effectiveness of the housing weekly inspection and report has been done on 10/12/2020.</p> <p>e) Assistant Manager who in-charge the line site will do physical check once the EHA submitting his weekly housing inspection report.</p> <p>Balau Division</p> <p>a) Training to all workers regarding rules and regulation at line site shall be conducted to all workers.</p> <p>b) To include monitoring mechanism for Schedule Waste Management in EHA inspection checklist.</p> <p>c) Assistant Manager who in-charge the line site will do physical check once the EHA submitting his weekly housing inspection report</p>
<b>Assessment Conclusion:</b>	Major NC close out verification:

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	<p>Verified during site visit at Siang Estate, perimeter drain between block F &amp; G was repaired. Repair works for other line site blocks are still in progress and to be completed in Q3 of 2021. Backyard of house no.7 (block F) has been cleared and all construction materials moved to the new construction store which was completely built in December 2020.</p> <p>Records of implementation were verified as the following;</p> <p>i) Inventory @ 5th Schedule of scheduled waste for SW 410 and SW110 dated February 2021</p> <p>ii) Progress plan for house repair work for 2021 and related budget allocation.</p> <p>iii) Training records (line site inspection to EHA - 10/12/20, briefing to workers on line site/house rules - 13/12/20, scheduled waste training for PIC (EHA &amp; carpenter) - 10/12/20)</p> <p>iv) Site safety supervisor training by Kulim Safety - 7/2/21</p> <p>v) Line site inspection report for January 2021</p> <p>Based on site observation and records verification, it was found that corrective action plan have been effectively implemented. Thus, the previous major was closed on 10/2/21. Continuous implementation will be further verified in the next annual surveillance assessment.</p>
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Opportunity for Improvements	
OFI #	Description
OFI 1	Nil

Positive Findings	
PF #	Description
PF 1	Good and positive feedback given by internal and external stakeholders.

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

Summary of Total Number of Nonconformity			
Nonconformity			
NCR Ref #	1849204-201911-M1	Clause & Category (Major / Minor)	Indicator 2.1.1 Major
Date Issued	14/11/2019	Due Date	11/02/2020
Closed (Yes / No)	Yes	Date of nonconformity Closure	20/01/2020
Statement of Nonconformity:	Compliance with the Employees' Social Security Act 1969 was not effectively demonstrated.		

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<b>Requirement Reference:</b>	Evidence of compliance with relevant legal requirements shall be available.
<b>Objective Evidence:</b>	<p>The following five workers employed by Perniagaan Sri Mahtai who work at Fields P12 and P13 at Pasir Panjang Estate are not insured for SOCSO Employment Injury Scheme. The said workers are:</p> <ol style="list-style-type: none"> <li>1. Worker Passport No. C 2182448: PLKS No PE7333118 issued 20 March 2019 valid until 5 June 2020.</li> <li>2. Worker Passport No. B 4064820: PLKS No PE8016646 issued on 30 May 2019 valid until 13 July 2020.</li> <li>3. Worker Passport No. C 2182454: PLKS NO PE7333121 issued on 20 March 2019 to 5 June 2020.</li> <li>4. Worker Passport No. B 2111332: PLKS No PE6701620 issued on 11 Jan 2019 valid until 16 Jan 2020.</li> <li>5. Worker Passport No. B 9251517: PLKS No. PE 7434101 issued on 28 March 2019 until 18 June 2020.</li> </ol>
<b>Corrections:</b>	<p>Estate' management had organized briefing session on 14 November 2019 to the contractor on the requirement of SOCSO EIS and had immediately assist Perniagaan Sri Mahtai in registering their workers for SOCSO Employment Injury Scheme. The said workers had been insured for SOCSO Employment Injury Scheme on 14.11.2019.</p> <p>Official reminder had been given to the contractor on the issue on 15.11.2019.</p>
<b>Root Cause Analysis:</b>	The Contractor had earlier advised verbally on the requirement for their workers to be registered under the SOCSO Employment injury Scheme (EIS). Perniagaan Seri Mahtai had earlier insured their workers with Tune Protect Malaysia Insurance coverage– expiry June 2020, with the understanding that SOCSO EIS mandatory requirement will only effected from 1 January 2020. OU acknowledged that there' no proper monitoring and follow-through upon the understanding of this requirement on the said contractor.
<b>Corrective Actions:</b>	Monthly monitoring on SOCSO EIS contribution will be done through The contractor workers' pay-slip and the Monthly FW Checklist
<b>Assessment Conclusion:</b>	Sample checked for Vetri Vinot Enterprise workers, no issue with EIS and SOCSO contribution noted. Based on the verification evidences, continuous implementation was observed thus the previous major NC is remained closed.

<b>Summary of Total Number of Nonconformity</b>			
<b>Nonconformity</b>			
<b>NCR Ref #</b>	1849204-201911-M2	<b>Clause &amp; Category (Major / Minor)</b>	Indicator 4.1.2 Major
<b>Date Issued</b>	14/11/2019	<b>Due Date</b>	11/02/2020
<b>Closed (Yes / No)</b>	Yes	<b>Date of nonconformity Closure</b>	20/01/2020
<b>Statement of Nonconformity:</b>	There is no mechanism to check consistent implementation of procedures put in place.		
<b>Requirement Reference:</b>	A mechanism to check consistent implementation of procedures shall be in place.		

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<p><b>Objective Evidence:</b></p>	<p>1. The Pasir Panjang Mill Manager had issued a memorandum dated 27 Feb 2019 to all workers and staff informing, among other things, that workers must take at least a 30-minute break and a 1-hour lunch break which must be printed on the punch card. However, this procedure was not implemented as evidenced from punch cards for 1 -2 Aug 2019 for the following workers:</p>																																									
	<table border="1"> <thead> <tr> <th>Worker No</th> <th>Time In 1 Aug</th> <th>Time Out 1 Aug</th> <th>Time In 2 Aug</th> <th>Time Out 2 Aug</th> <th>Remarks</th> </tr> </thead> <tbody> <tr> <td>640133</td> <td>16.32</td> <td>19.00</td> <td>20.35</td> <td>06.03</td> <td>No record of break between 20.35 to 06.03</td> </tr> <tr> <td>640132</td> <td>15.50</td> <td>20.52</td> <td>22.29</td> <td>07.32</td> <td>No record of break between 22.29 to 07.32</td> </tr> <tr> <td>640154</td> <td>16.18</td> <td>20.10</td> <td>21.36</td> <td>06.00</td> <td>No record of break between 21.36 to 06.00</td> </tr> <tr> <td>640150</td> <td>16.18</td> <td>19.04</td> <td>20.40</td> <td>08.02</td> <td>No record of break between 20.40 to 08.02</td> </tr> <tr> <td>640043</td> <td>07.46</td> <td>17.45</td> <td></td> <td>-</td> <td>No record of break between 07.46 to 17.45</td> </tr> <tr> <td>640114</td> <td>16.42</td> <td>21.27</td> <td>22.57</td> <td>06.00</td> <td>No record of break between 22.57 to 06.00</td> </tr> </tbody> </table>	Worker No	Time In 1 Aug	Time Out 1 Aug	Time In 2 Aug	Time Out 2 Aug	Remarks	640133	16.32	19.00	20.35	06.03	No record of break between 20.35 to 06.03	640132	15.50	20.52	22.29	07.32	No record of break between 22.29 to 07.32	640154	16.18	20.10	21.36	06.00	No record of break between 21.36 to 06.00	640150	16.18	19.04	20.40	08.02	No record of break between 20.40 to 08.02	640043	07.46	17.45		-	No record of break between 07.46 to 17.45	640114	16.42	21.27	22.57	06.00
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640150	16.18	19.04	20.40	08.02	No record of break between 20.40 to 08.02																																					
640043	07.46	17.45		-	No record of break between 07.46 to 17.45																																					
640114	16.42	21.27	22.57	06.00	No record of break between 22.57 to 06.00																																					
<p><b>Corrections:</b></p>	<p>2. Morning muster briefing was given at Tunjuk Laut Estate on 7 June 2019 prohibiting workers from putting up plywood on house windows. There is no evidence that any action has been taken to ensure implementation of the procedure because House No. F8 at Tunjuk Laut Estate linesite had plywood affixed to all its back and side windows, as well as top of the front door.</p> <p>1) The mill has immediately briefed the respective HOD and workers involved about the need to sign-in the check-out and check-in form at any time they go out and back for break and meal time. 2) Affixed Plywood on windows and top of front door of house had been removed and proper repairs done on the said unit.</p>																																									
<p><b>Root Cause Analysis:</b></p>	<p>1) The allocation of rest time and meal break were actually provided to all night shift workers and there' dedicated room provided but not being recorded/documentd properly.</p>																																									

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	2) OU reckoned that there' no proper monitoring on the implementation of the matter after the directive briefing, however the said unit repair' need been recorded in the linesite census record book.
<b>Corrective Actions:</b>	1) Mill has implemented check-out and check-in form for worker to sign in/out whenever they go for break and meal break. 2) The linesite Inspection Checklist to be improvised providing the column for Estate' Acton Plan for the following linesite conditions: - Linesite Unit need repairs/replacement - Linesite Unit with modification/extension done.
<b>Assessment Conclusion:</b>	Verified the implementation of check-out and check-in form for worker to sign in/out whenever they go for break and meal break for October and November 2020. The mill supervisor (operation) and foreman (maintenance) in charge to monitor movement of their sub-ordinate to ensure effective implementation of the monitoring system. Verified the used new checklist for October and November inspection. Based on site visit carried out at estate's line site, it was confirmed that no plywood affixed as reported during last surveillance audit. No recurrence of issue observed, thus the previous major NC is remained closed.

<b>Summary of Total Number of Nonconformity</b>			
<b>Nonconformity</b>			
<b>NCR Ref #</b>	1849204-201911-M3	<b>Clause &amp; Category (Major / Minor)</b>	Indicator 6.5.3 Major
<b>Date Issued</b>	14/11/2019	<b>Due Date</b>	11/02/2020
<b>Closed (Yes / No)</b>	Yes	<b>Date of nonconformity Closure</b>	20/01/2020
<b>Statement of Nonconformity:</b>	Houses at the Tunjuk Laut 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, in accordance with Workers' Minimum Standard of Housing and Amenities Act 1990 (Act 446) or above, where no such public facilities are available or accessible		
<b>Objective Evidence:</b>	Houses at the Tunjuk Laut Estate linesite are in poor state of repair as evidenced during audit, and supported by a census carried out by the Estate dated 1 June 2019. a. House No. I8: front door peeling off, flimsy and rotting due to wear and tear. b. House No. I7: 7 missing window panes, 1 broken window pane. c. House No. I3: 8 missing window panes. d. House No. F8: 7 missing window panes. 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 dependants 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>	The remaining 30% of labour houses including houses number I8, I7, I3 and F8 had been repaired and completed on 25.11.2019. Pictures is as per attached. I8: new front door was installed. I7: 7 missing window panes and 1 broken window pane had been replaced with the new ones.		

	I3: 8 missing window panes had been replaced with the new ones. F8: 7 missing window panes had been replaced with the new ones.
<b>Root Cause Analysis:</b>	The census on linesite condition was carried out between June – July 2019 and based on that survey, budget for the repairs been put up and it involves quite a big sum. Due to that the repair works been conducted in staggered period and the said unit is in the list that need major repairs. During the audit estate had completed mostly about 70% of the repairs work and having another 30 % to be completed.
<b>Corrective Actions:</b>	The linesite Inspection Checklist to be improvised providing the column for Estate' Acton Plan for the following linesite conditions: -Linesite Unit need repairs/replacement -Linesite Unit with modification/ extension done. HCMD to arrange briefing on the requirement of "Akta Standard-standard Minimum Perumahan Dan Kemudahan Pekerja" to respective OU to ensure standard understanding of the act.
<b>Assessment Conclusion:</b>	Continuous implementation was not effectively addressed and raised under new indicator 6.2.4 under RSPO P&C MYNI 2019.

<b>Summary of Total Number of Nonconformity</b>			
<b>Nonconformity</b>			
<b>NCR Ref #</b>	1849204-201911-N1	<b>Clause &amp; Category (Major / Minor)</b>	Indicator 4.7.5 Minor
<b>Date Issued</b>	14/11/2019	<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>	The accident procedures had not clearly identified nor updated and implemented accident investigations for LTI less than 5 days.		
<b>Requirement Reference:</b>	Accident and emergency procedures shall exist and instructions shall be clearly understood by all workers. Accident procedures shall be available in the appropriate language of the workforce. Assigned operatives trained in First Aid should be present in both field and other operations, and first aid equipment shall be available at worksites. Records of all accidents shall be kept and periodically reviewed.		
<b>Objective Evidence:</b>	No records of accident investigation for LTI less than 5 days being investigated and recorded.		
<b>Corrections:</b>	KSTS had conducted training on accident investigation & procedure according to OSH Act 1994, on 24/11/2019 to guide the estate management of the related matter. KSTS to guide Tunjuk Laut in improving the reporting of the cases for immediate coming report.		
<b>Root Cause Analysis:</b>	The estate' normal practice, accident report and investigation is done for cases with more than 4 days MC only and submitted to JKPP within 7 days.		
<b>Corrective Actions:</b>	KSTS (Kulim Safety and Training Servces) had established the SOP "PROSEDUR KERJA SELAMAT – PROSEDUR SIASATAN KEMALANGAN" in accordance to OSH Act 1994. The SOP will be communicated to all Operating Unit and KSTS will ensure the standardization of understanding related to all accidents (major, minor, near miss, dangerous occurrence, occupational poisoning/disease) should be in accordance to requirement of OSH Act 1994.		

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<b>Assessment Conclusion:</b>	<p>KMB - KSTS has established a revised SOP namely "PROSEDUR KERJA SELAMAT – PROSEDUR SIASATAN KEMALANGAN" to take effect on 02/01/2020. This is in accordance to the OSH Act 1994. Among others changes have be made to include:</p> <p>Item 11.0 Accident Procedure</p> <ul style="list-style-type: none"> <li>a) Criteria of Major accident             <ul style="list-style-type: none"> <li>- LTI of more than 4 days</li> <li>- criteria of accident during working hours</li> <li>- fatality occurrence during working hours</li> </ul> </li> <li>b) Criteria of minor accident             <ul style="list-style-type: none"> <li>- LTI of lees than 3 days</li> <li>- accident occurring working hours</li> </ul> </li> <li>c) Occupational diseases             <ul style="list-style-type: none"> <li>Disease certified from the Government Hospital or an OHD</li> </ul> </li> <li>d) Other disease             <ul style="list-style-type: none"> <li>- Disease verified by Hospital Attendant e.g headache, fever</li> </ul> </li> </ul> <p>A flow chart has also being established to address detailed action to be taken in event of accident incidences among others stating to include accident investigation be made for also cases of 3 days and below. Incidences of 4 days and above are investigated with submission of DOSH JKPP 6 within a period of 7 days. Cases with fatality are investigated with submission of JKPP 6 to DOSH within 24 hours.</p> <p>The SOP has been communicated to all Operating Unit (All mill offices and All estates office) for standardization of understanding related to all accidents (major, minor, near miss, dangerous occurrence, occupational poisoning/disease) via email dated 10/01/2020 from En Muhammad Zaki Zulkifly -Safety Officer HQ/19/SHO/00/02523). All documents were sighted and verified Hence the NCR ref 1849204-201911-N1 raised is therefore is closed on 9/12/20 and concluded upon verification and acceptance of the above Corrective Action.</p>
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Opportunity for Improvement	
OFI#	Description
OFI 1	Nil

**3.4.2 Summary of the Nonconformities and Status**

CAR Ref.	Category (Major / Minor)	P&C Indicator	Issued Date	Status & Date (Closure)
1397865M1	2.1.1	Major	25/10/2016	Closed out on 09/01/2017
1397865M2	6.9.2	Major	25/10/2016	Closed out on 09/01/2017
1397865M3	5.1.1	Major	25/10/2016	Closed out on 23/12/2016
1397865N1	5.3.3	Minor	25/10/2016	Closed out on 16/11/2017



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1555463-201709-M1	6.5.1	Major	3/12/2018	Closed out on 31/01/2018
1718450-201810-M1	RSPO Certification System Document (dated June 2017) 4.5.4	Major	06/12/2018	Closed out on 04/03/2019
1718450-201810-M2	RSPO Certification System Document (dated June 2017) 4.5.4	Major	06/12/2018	Closed out on 04/03/2019
1718450-201810-M3	4.7.2	Major	06/12/2018	Closed out on 04/03/2019
1718450-201810-M4	6.5.2	Major	06/12/2018	Closed out on 04/03/2019
1718450-201810-M5	4.1.1	Major	06/12/2018	Closed out on 04/03/2019
1718450-201810-M6	RSPO SCCS 5.3.1	Major	06/12/2018	Closed out on 04/03/2019
1718450-201810-M7	4.4.2	Major	06/12/2018	Closed out on 04/03/2019
1718450-201810-M8	5.3.2	Major	06/12/2018	Closed out on 04/03/2019
1718450-201810-M9	5.2.2	Major	06/12/2018	Closed out on 04/03/2019
1718450-201810-N1	4.7.3	Minor	06/12/2018	Closed out on 14/11/2019
1718450-201810-N2	6.5.3	Minor	06/12/2018	Escalated to major based RSPO Certification System requirement.
1718450-201810-N3	6.12.2	Minor	06/12/2018	Closed out on 14/11/2019
1718450-201810-N4	4.1.2	Minor	06/12/2018	Escalated to major based RSPO Certification System requirement.
1849204-201911-M1	2.1.1	Major	14/11/2019	Closed out on 21/1/20
1849204-201911-M2	4.1.2	Major	14/11/2019	Closed out on 21/1/20
1849204-201911-M3	6.5.3	Major	14/11/2019	Closed out on 21/1/20
1849204-201911-N1	4.7.5	Minor	14/11/2019	Closed out on 9/12/20
1998993-202012-M1	6.2.4	Critical	9/12/2020	Closed out on 10/2/21

### 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 Pasir Panjang POM 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.

<b>List of Stakeholders contacted</b>	
<b>Internal Stakeholders</b> Field workers Mill Operators Union representative (NUPW) Gender Committee (WOW) Workers representative (by nationalities) Medical Assistant	<b>Union/Contractors</b> Tek Lee Construction SOKO SK Enterprise Tiong Lim Enterprise Sundry shop (Bkt Payung Estate) Canteen Ladang Balau Sungai Rezeki Sdn Bhd
<b>Government Departments</b> SMK Bandar Penawar	<b>NGO and others</b> -

<b>IS #</b>	<b>RZ Description</b>
<b>1</b>	<b>Feedbacks:</b> Replanting contractor informed that there has been no replanting activities in 2020. However, when the contractor was engaged to carry out replanting activities, there were no issues with the contract, payment and execution of the works. Invited to attend stakeholder meetings and duly briefed on Kulim (Malaysia) Berhad’s policies and grievance procedures. Good business relationship between the contractor and estates within the Kulim Plantation group.
	<b>Management Responses:</b> Noted the stakeholder’s comments.
	<b>Audit Team Findings:</b> No further issue.
<b>2</b>	<b>Feedbacks:</b> FFB transporters (from ramp to Pasir Panjang Mill), CPO transporters (from Pasir Panjang Mill to refineries) confirmed they have signed respective contracts with Kulim (Malaysia) Berhad and confirmed their understanding of the salient points in the contracts. Payment terms are clear, terms of contract are fair, and all payments are received within 30 days of original invoice. They are invited to attend stakeholder

	<p>meetings and duly briefed on Kulim (Malaysia) Berhad’s policies and grievance procedures. Aware of policies related to anti-bribery, no child labour, no forced and trafficked labour. Good business relationship between the contractor and estates within the Kulim Plantation group.</p> <p><b>Management Responses:</b> Noted the stakeholders’ comments.</p> <p><b>Audit Team Findings:</b> Sighted the contracts entered into with the transporters, which are valid and still current. Sighted also payment vouchers which showed payments made as stated by the transporters. No further issue.</p>
<p><b>3</b></p>	<p><b>Feedbacks:</b> Manpower contractor who supplies harvesters to Siang Estate have been supplying manpower to the estate for four years already. Provides work tools and PPEs to the harvesters e.g. long pole, sickle, and for newly-arrived workers, mattress, cooking gas, rice, cooking stove, etc. Upon workers’ written requests, the contractor keeps their passport in the office for safekeeping. These passports are returned to the workers upon request. So far there has been no issue with freedom of movement because the workers keep their own individual immigration card. They signed contracts with their workers, and copies of monthly pay slips for each worker are extended to Siang Estate for monitoring contractor’s compliance with Employment Act, SOCSO Act, EIS, Minimum Wages Order, etc. Contractor are invited to attend stakeholder meetings and duly briefed on Kulim (Malaysia) Berhad’s policies and grievance procedures. Aware of policies related to anti-bribery, no child labour, no forced and trafficked labour. Good business relationship between the contractor and estates within the Kulim Plantation group.</p> <p><b>Management Responses:</b> Noted the stakeholder’s comments.</p> <p><b>Audit Team Findings:</b> Reviewed and verified the contracts signed between company and contractor, and between contractor and its workers. Also reviewed were the payslips for Sept, Oct, Nov 2020 for contractors’ workers. It was verified that the salary payments are in accordance with the Employment Act, SOCSO Act, EIS, Minimum Wages Order.</p>
<p><b>4</b></p>	<p><b>Feedbacks:</b> Supplier and fabrication contractor also confirmed that business relationship with the estates and mill under Kulim (Malaysia) Berhad have been good. Payments are received within 30 days of original invoice. They were also invited to attend stakeholder meetings and were duly briefed on Kulim (Malaysia) Berhad’s policies and grievance procedures. Aware of policies related to anti-bribery, no child labour, no forced and trafficked labour.</p> <p><b>Management Responses:</b> Noted the stakeholders’ comments.</p> <p><b>Audit Team Findings:</b> No further issue.</p>
<p><b>5</b></p>	<p><b>Feedbacks:</b> Teacher from SMK Bandar Penawar, which is a co-ed secondary school where students from Ladang Siang go to. Due to the Covid-19 pandemic, there was only about 3 months of classes in 2020 and not many activities. Siang Estate has donated school uniforms to the students before. Relationship between the school and Siang Estate has always been good.</p>

	<p><b>Management Responses:</b> Noted the stakeholders' comments.</p> <p><b>Audit Team Findings:</b> No further issue.</p>
<b>6</b>	<p><b>Feedbacks:</b> Canteen operator (Balau Division)) and sundry shop owner (Siang Estate). Price list of items sold are available and shared with the estate management. Workers can choose to buy either in cash or on credit. Generally, this is not a problem as workers do pay whatever amount is owing when they receive their wages. Occasional spot checks are also conducted by the management. Invited to attend stakeholder meetings and are aware of company policies, minimum wages, child labour, etc.</p> <p><b>Management Responses:</b> Noted the stakeholders' comments.</p> <p><b>Audit Team Findings:</b> No further issue.</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
N/A					

*Not applicable as the company has underwent 2 cycle of replanting.*



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

### 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 (*Lead auditor is required to provide details if there was such circumstances or pressure and provide details of the reporting to the local C&R and BSI Services Malaysia Sdn Bhd*).

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**Formal Signing-off of Assessment Conclusion and Recommendation**

<p>The audit objectives have been achieved and the certificate scope remains appropriate. Based on the results of this audit, it is concluded that Pasir Panjang POM certification unit has complied with the RSPO Principles and Criteria 2018 for Sustainable Palm Oil RSPO 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 Pasir Panjang POM certification unit is continued.</p>	
<b>Report prepared by</b>	<b>Acceptance of Assessment Conclusion</b>
Name: Mohamed Hidhir Zainal Abidin	Name: Salasah Elias
Company Name: BSI Services (M) Sdn Bhd	Company Name: Kulim (Malaysia) Berhad
Title: Lead Auditor	Title: Deputy General Manager
<p>Signature:</p> 	<p>Signature:</p> <p><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></p> 
Date: 1 <sup>st</sup> April 2021	Date: 14 April 2021

**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>Pasir Panjang Oil Palm Mill and its supply base make available documents specified in the RSPO P&amp;C to the public. These documents are either available via the Company's website <a href="http://www.kulim.com.my">http://www.kulim.com.my</a> or available at the office, or can be accessible at each operating unit:</p> <ul style="list-style-type: none"> <li>- Land titles/user rights</li> <li>- Occupational health and safety plans</li> <li>- Plans and impact assessments relating to environmental and social impacts</li> <li>- HCV documentation</li> <li>- Pollution prevention and reduction plans</li> <li>- Details of complaints and grievances</li> <li>- Continuous improvement plans</li> <li>- Public summary of certification assessment report</li> <li>- Human Rights Policy</li> <li>- Summary report of contributions to community development</li> </ul> <p>Stakeholders were also informed of the availability of these documents during stakeholder meeting for all units on 7 October 2020 attended by 77 pax.</p>	Complied

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1.1.2	Information is provided in appropriate languages and accessible to relevant stakeholders. - Minor compliance -	The information is provided in either English or Bahasa Malaysia, or both. This was evidenced from the documents itself, and also during stakeholder meeting held on 7 October 2020 attended by 77 pax. The briefing was conducted in Bahasa Malaysia by the Senior Executive, Sustainability Department of the Company.	Complied
1.1.3	<b>(C)</b> Records of requests for information and responses are maintained. - Critical (Major) compliance -	Evidence was available that records for information and responses were being maintained at each unit. This was based on letters from from SK Tunjuk Laut dated 25 Aug 2020 requesting for soil to plant trees and for donation towards the school annual sports meet.	Complied
1.1.4	<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 -	Kulim (Malaysia) Sdn Bhd has developed an SOP known as Communication and Consultation Management System Issue No. 1 Doc. No. SQD/SMS/1.1 dated 1 August 2020. This SOP applies to all communications and consultations between the Company and its internal and external stakeholders. The objective of the procedure is to ensure the Company has an open and transparent communication methods with local communities and other stakeholders. This procedure was disclosed and explained during stakeholder meeting held at 7 October 2020.  This procedure was also implemented as can be seen during the stakeholder meeting where questions asked by stakeholders were duly answered.	Complied
1.1.5	There is a current list of contact and details of stakeholders and their nominated representatives. - Minor compliance -	Current stakeholder lists for Pasir Panjang POM (updated on 20 Nov 2020), Siang Estate Estate (updated in 2020) and Bukit Payong Estate (1 Sept 2020) were sighted and reviewed. This list contains relevant stakeholders and details of their nominated representatives. These stakeholders include suppliers, contractors, service providers, transporters, list of CPO and PKO buyers, government agencies such as Dept of Safety and Health, SOCSO	Complied

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		Labour Department, Indonesian Consulate, nearby schools, neighbouring plantations, etc.	
<b>Criterion 1.2:</b> The unit of certification commits to ethical conduct in all business operations and transactions.			
1.2.1	<p>A policy for ethical conduct is in place and implemented in all business operations and transactions, including recruitment and contracts.</p> <p>- Minor compliance -</p>	<p>Kulim (Malaysia) Berhad has developed an Ethics Policy signed by the Executive Director on 1 May 2018. Additionally, there is also the No Gift and Entertainment Policy also signed by its Executive Director on 1 May 2018. A review of the stakeholder meeting minutes confirmed that these Policies were communicated to all external stakeholders during stakeholder meeting on 7 October 2020.</p> <p>An addendum to contractors' letter of acceptance also included a provision which requires the contractor to comply with all of Kulim's relevant business policies, where failure to comply may result in termination of the contract. Sighted were the contract Addendum signed by Biokekal Sdn Bhd, SBK Logistics, Syarikat Buana Kita, Semai Setia Transport who are contractors and suppliers to the Pasir Panjang POM and its supply base.</p> <p>The Ethics Policy is also communicated to the recruitment agent. Sighted was the contract dated 13 February 2020 for Indonesian manpower supply between Kulim (Malaysia) Berhad and PT Hamparan Karya Insani. This contract contains the contractor's undertaking that it complies with all applicable laws and codes relating to anti-bribery, fraud and corruption, and undertakes not to offer or accept bribe or any improper advantage from anyone in Kulim (Malaysia) Berhad.</p> <p>During stakeholder consultations held with auditors, the transporters, contractors and service providers also confirmed their awareness, compliance and implementation of the Ethics Policy.</p>	Complied



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1.2.2	<p>A system is in place to monitor compliance and the implementation of the policy and overall ethical business practice.</p> <p>- Minor compliance -</p>	<p>The system in place to monitor compliance and implementation of the No Gift and Entertainment Policy, Ethics Policy and overall business practice include:</p> <ul style="list-style-type: none"> <li>a. Internal audits at Pasir Panjang POM (17 Sept 2020) Siang Estate (13 Sept 2020) and Bukit Payong Estate (14 Sept 2020).</li> <li>b. Contracts Administration Guidelines &amp; Procedures for Kulim Malaysia Bhd (Head Office/Estates/Mill) updated August 2019. This guideline imposes a limit on the value of transaction for each management level;</li> <li>c. Conflict of Interest Declaration forms and Integrity Pledges signed by all levels of employees. Sampled at Pasir Panjang POM were forms and pledges signed by the following workers: <ul style="list-style-type: none"> <li>• Worker No 640148 on 7 October 2020</li> <li>• Worker No 640114 on 14 October 2020</li> <li>• Worker No 640171 on 4 October 2020.</li> </ul> </li> </ul>	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	<p><b>(C)</b> The Unit of Certification complies with legal requirements</p> <p>- Critical (Major) compliance -</p>	<p>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 Pasir Panjang POM complex:</p> <p><u>Pasir Panjang POM</u></p> <p>i) DOE license, ref: AS(B)J31/152/000/007 Jld.11 (12), compliance schedule: 004649 validity period (1/7/20 – 30/6/21), processing capacity 65 mt/hr, method of discharge: land application and composting, BOD3: 1000 mg/l.</p>	Complied

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		<p>ii) MPOB license no. 592302004000 validity period 19/3/20 – 31/12/20) with processing capacity of 270,000 mt.</p> <p>iii) Diesel Permit ref: KPDNKK.J.KTG/PERMIT 0028 (PD)(R), serial no. J000646, quantity: 20,000 liter valid until 12/12/20.</p> <p>iv) BAKAJ River water extraction license (08/A/KT/050 validity until 31/12/2020). Maximum extraction per day: 900 m3/day</p> <p>v) SPAN Water Services Industry (Licencing) Reg 2007 Class Licence No: SPAN/EKS/(PT)/800-4(1)/11/15 valid 15/1/2019 – 14/1/22</p> <p>vi) Deduction permit under Labour Department obtained;          -Ref. TK(NJ)U-21 dated 31/3/19 (Pembayaran Skim Khairat Keluarga Perbadanan Johor)          -Ref. TK(NJ)U-21 dated 2/5/19 (Bayaran kos perubatan melebihi had subsidi)          -Ref. TK(NJ)U-21 dated 31/3/19 (Pembayaran Kelab Sukan dan Rekreasi)</p> <p>vii) Electrical Installation License, serial no. 44569, license no. 2020/01566 for 1600.55 kW valid until 5/07/21.</p> <p>viii) Certificate of Fitness of UPV and SB checked:          - Steam Boiler (JH PMD 1712 valid until 17/02/21)          - Vertical Sterilizer (JH PMT 25364) valid until 17/02/21          - Vertical Sterilizer (JH PMT 25365) valid until 17/02/21          - Vertical Sterilizer (JH PMT 25366) valid until 17/02/21          - Back Pressure Receiver (PMT 78982) valid until 17/02/21          Total of 13 UPV and 2 SB registered and still undergo annual inspection for CF renewal</p> <p>ix) Fire Certificate, serial no. 310249, ref. no. JBPM:JH/7/216/2019 valid until 8/4/20 and in the process of renewal. Inspection was done on 25/11/20 by Fire Department officer and awaiting for renewal.</p> <p>x) Ref No. TK(NJ) U – 21 dated 31 March 2018 for salary deduction</p>	
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		<p>towards payment to Skim Khairat Keluarga Perbadanan Johor;            xi) Ref No. TK (NJ) U – 21 dated 2 May 2019 for salary deduction towards medical expenses exceeding company’s subsidised rate;            xii) Ref No. T (NJ) U – 21 dated 31 March 2019 for salary deduction towards Sports and Recreational Club;</p> <p>Competent Person</p> <table border="1"> <thead> <tr> <th>Competency</th> <th>Validity/effective date</th> <th>Remarks</th> </tr> </thead> <tbody> <tr> <td>Steam engineer, 2nd grade</td> <td>020/2014, issued on 24/2/14</td> <td>FMA, Person in Charge Regulations 2014</td> </tr> <tr> <td>Steam engineer, 2nd grade</td> <td>160/2015, issued on 2/10/15</td> <td>FMA, Person in Charge Regulations 2014</td> </tr> <tr> <td>Scheduled Waste Competent Person, CePSWaM</td> <td>Serial no. CePSWaM/01920 dated 31/5/18</td> <td>EQA 1974, mill’s compliance schedule</td> </tr> <tr> <td>CePPOME Competent Person (Palm Oil Mill Effluent)</td> <td>Serial no. CePSWaM/00041 dated 7/10/16</td> <td>EQA 1974, mill’s compliance schedule</td> </tr> <tr> <td>Authorized Gas Tester and Entry Supervisor for confined space (AGTES)</td> <td>Serial no. NW-NJHR-AGT-0466-Q</td> <td>ICOP Confined Space 2010</td> </tr> <tr> <td>Electrical Charge man (A4)</td> <td>ref: PJ-T-4-B-0467-2016, renewal was done on 7/10/2020.</td> <td>Electric Supply Act 1990</td> </tr> </tbody> </table>	Competency	Validity/effective date	Remarks	Steam engineer, 2nd grade	020/2014, issued on 24/2/14	FMA, Person in Charge Regulations 2014	Steam engineer, 2nd grade	160/2015, issued on 2/10/15	FMA, Person in Charge Regulations 2014	Scheduled Waste Competent Person, CePSWaM	Serial no. CePSWaM/01920 dated 31/5/18	EQA 1974, mill’s compliance schedule	CePPOME Competent Person (Palm Oil Mill Effluent)	Serial no. CePSWaM/00041 dated 7/10/16	EQA 1974, mill’s compliance schedule	Authorized Gas Tester and Entry Supervisor for confined space (AGTES)	Serial no. NW-NJHR-AGT-0466-Q	ICOP Confined Space 2010	Electrical Charge man (A4)	ref: PJ-T-4-B-0467-2016, renewal was done on 7/10/2020.	Electric Supply Act 1990	
Competency	Validity/effective date	Remarks																						
Steam engineer, 2nd grade	020/2014, issued on 24/2/14	FMA, Person in Charge Regulations 2014																						
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Electrical Charge man (A4)	ref: PJ-T-4-B-0467-2016, renewal was done on 7/10/2020.	Electric Supply Act 1990																						

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		Engine Driver, grade 1	Ref: J13/98	FMA, Person in Charge Regulation 2014	
		Engine Driver, grade 1	Ref: J1/03	FMA, Person in Charge Regulation 2014	
		First aider + CPR	Cert. no. BB0169118 Valid until 1/8/21	PPPOM competent first aider	
		First aider + CPR	Cert. no. BB0169112 Valid until 1/8/21		
<p><u>Siang Estate</u></p> <p>i) MPOB license no. 575783002000, valid until 31/08/2021.</p> <p>ii) SPAN Water Services Industry (Licensing) Reg 2007 Class Licence No: SPAN/EKS/(PT)/800-4(1)/11/14 valid 26/08/2020 – 25/08/2023</p> <p>iii) Diesel Permit ref: KPDNKK.J.KTG/PERMIT 0266 (PD), serial no. P: J001290, quantity: 10,080 liter valid until 15/3/21</p> <p>iv) Petrol Permit ref: KPDNKK.J.KTG/PERMIT KHAS 0026 (PD)(R), serial no. J003621, quantity: 100 liter (RON 95) valid until 17 February 2021</p> <p>v) Air Compressor certificate of fitness (CF), JH PMT 22699 valid until 11/12/20</p> <p>vi) BAKAJ River water extraction license (07/A/KT/016) validity until 31/12/2020). Maximum extraction per day: 1160 m3/day</p> <p>vii) Electrical Installation License, serial no. 43242, license no. 2020/01181 for 294 kW valid until 26/5/21</p> <p>viii)Permit Kebenaran Menggunakan Bekalan Air Persendirian, serial no. TK(NJ)JB/43/9, valid until 1/2/22.</p> <p>ix) Ref (5) dlm TK (NJ) JB/43/9 dated 2 Feb 2020 for permission to use own water supply under Section 6(1)(a) of the Employees' Minimum Standard of Housing and Amenities Act 1990</p>					

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		<p><u>Bukit Payung Estate</u></p> <p>i) MPOB license no. 619520002000, (menjual dan mengalih) valid until 31/8/21.</p> <p>ii) SPAN Water Services Industry (Licensing) Reg 2007 Class License No: SPAN/EKS/(PT)/800-4(1)/5/10 valid 16/8/2020 – 15/8/2023</p> <p>iii) Diesel Permit ref: KPDNKK.J.KTG/PERMIT 0085 (PD), serial no. P: J001282, quantity: 10,000 liter, valid until 4/3/21</p> <p>iv) Air Compressor certificate of fitness (CF), JH PMT 22727 valid until 10/12/20</p> <p>vi) Electrical Installation License, serial no. 44920, license no. 2020/01833 for 276.25 kW valid until 4/8/21</p> <p>vii) Written approval for electrical fence under Regulation 15 of Electric Supply Act 1994 using Thunderbird MB1050R, ref: ST(SJB)PGR/JHR/2019/00007 dated 27/7/20.</p> <p>viii) BAKAJ River water extraction license (07/A/KT/018) validity until 31/12/2020). Maximum extraction per day: 102 m<sup>3</sup>/day</p> <p>ix) Ref TK (NJ) U – 21 dated 31 March 2019 for salary deduction towards payment to Skim Khairat Keluarga Perbadanan Johor</p>	
<p>2.1.2</p>	<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>Pasir Panjang POM certification unit continued to implement and maintain their established documented system for identifying, accessing, tracking updates and monitoring of compliance with the legal requirements that are applicable to the CU’s operation. Each office of the operating unit (mill and estate) has its own legal requirements register (LRR) and were being evaluated individually from time to time for compliance mainly through internal audit. Among the applicable legal laws registered are EQA, OSHA, Factory &amp; Machinery Act, Employment Act, Workers’ Minimum Standard of Housing and Amenities Act, Minimum Wages order 2020 to name a few. Other related legal for COVID19 pandemic under Prevention</p>	<p>Complied</p>

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		and Control of Infectious Diseases (Measure Within The Infected Local Areas) Regulation 2020 was also has been identified. 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 units and compiled by RC executive.	
2.1.3	Legal or authorised boundaries are clearly demarcated and visibly maintained, and there is no planting beyond these legal or authorised boundaries. - Minor compliance -	Whenever the land boundaries are adjacent with third party (smallholders, villages, other oil palm companies, etc.) the normal practice of Kulim (M) Berhad to indicate the legal boundaries are through construction of trenches. This was confirmed through the field visit at Siang and Bukit Payung estate. Apart from that, erection of concrete slab with GPS coordinate/peg no. along the boundaries was also commonly practiced and clearly visible.  SPO land title dated 4 <sup>th</sup> September 2007 and company circular dated 12 <sup>th</sup> November 2007 for the placement of estate boundary markers. Boundary pegs/markers installation and maintenance register verified at Siang Estate;  P10/05 – 1/12/20 ( <i>pembersihan di sekeliling tiang dilakukan</i> ) P06/06 – 2/12/20 ( <i>pembersihan di sekeliling tiang dilakukan</i> )	Complied
<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	A list of contracted parties is maintained. - Minor compliance -	List of contracted parties is maintained under stakeholder list dated 20 <sup>th</sup> November for Pasir Panjang POM.  In Siang estate, the list of contractors were made available under stakeholder list dated 1/9/20. This contractor included for activities such as transportation, road maintenance, harvesting and others.	Complied

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<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>All contracts (short and long term), contain specific clauses on meeting applicable legal requirements were spelled out in the contract:</p> <ul style="list-style-type: none"> <li>- Contractor: Vetri Vinot Enterprise, contract: MPSB/Siang 3/2015 (harvesting of FFB in P10 (425.39 ha) at Ladang Siang, Kota Tinggi, Johor.</li> </ul> <p>Evidence of due diligence is demonstrated via declaration between contactor based on letter for Kulim (M) Berhad’s General Manager, Procurement and Contract Department. Each addendum contract signed attached with the employee data and employment practice checklist for self-declaration for compliance. Refer addendum contract signed and self-declared form for harvesting contractor, Vetri Vinot Enterprise, contract ref.: MPSB/Siang 3/2015 (harvesting of FFB in P10 (425.39 ha) at Ladang Siang, Kota Tinggi, Johor. Addendum contract signed dated 30/10/20 available for verification.</p>	<p>Complied</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>All contracts included with the addendums;</p> <p>“The contractors represent and warrant that the Contractor shall comply with applicable labour and employment laws regarding; and prohibit any form of child labour, forced and trafficked labour. Any eligible your labour will be employed only in accordance with Children and Young Person (Employment) 1966.”</p> <p>Addendum agreement signed on 19/10/20 for Selama Masai and Syarikat Buana Kita Sdn Bhd. Acknowledgement for other service provider, GEA Westfalia Separator (M) Sdn Bhd was also sighted dated 7/12/20.</p>	<p>Complied</p>

**Criterion 2.3:** All FFB supplies from outside the unit of certification are from legal sources.

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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>All directly sourced FFB are from Kulim (M) Berhad’s own estates. Information of each estates detailed out under table 4 &amp; 5 of the report.</p>	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>	<p>No indirect sourced of FFB as Pasir Panjang POM is under Identity preserved module.</p>	Complied
<p><b>Principle 3: Optimise productivity, efficiency, positive impacts and resilience</b></p>			
<p><b>Criterion 3.1:</b> There is an implemented management plan that aims to achieve long-term economic and financial viability.</p>			
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 annual business plan is available. The document is in the form of annual budget and the projection for 5 years (Budget year 2019 / PY2 / PY3 / PY4 / PY5) prepared as guidance for future planning. The annual business plan is available as per the Group Financial Procedure. &amp; Guidelines. The Mill budget contains the following components;</p> <ul style="list-style-type: none"> <li>i. FFB processed</li> <li>ii. Mill throughput/utilization</li> <li>iii. Extraction ratios</li> <li>iv. Revenue &amp; expenditure (general charges/production/maintenance)</li> <li>v. General expenditure</li> <li>vi. Profit/Loss, projected cash flow</li> </ul>	Complied



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		<p>Inclusive in the business plan is also Capital Expenditure (CAPEX) among others replacement / upgrading of building/machinery, workers amenities for the mill.</p> <p>Similarly the estate possessed a business management plan among others to include the following components:</p> <ul style="list-style-type: none"> <li>a) Mature area / Immature area</li> <li>b) FFB production &amp; forecast</li> <li>c) Income – FFB selling price</li> <li>d) Revenue expenditure (general charges upkeep &amp; cultivation, harvesting)</li> <li>e) Mechanisation operation</li> <li>f) Depreciation /amortisation</li> <li>g) Capital expenditure</li> <li>h) Gross profit /Loss</li> </ul>																			
<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>All the estates have maintained record of replanting program from 2021 to 2046. For purpose of auditing record the horizon is limited to 5 years. Figures in ha otherwise stated.</p> <table border="1" data-bbox="1137 1010 1926 1252"> <thead> <tr> <th>Estate</th> <th>2020</th> <th>2021</th> <th>2022</th> <th>2023</th> <th>2024</th> </tr> </thead> <tbody> <tr> <td>Siang Estate</td> <td colspan="5">No replanting programme in the next 5 years. 197.68 ha will be replanted in 2025 for field P99</td> </tr> <tr> <td>Bkt Payung Estate</td> <td colspan="5">No replanting programme in the next 5 years. The oldest palm was replanted on 2011.</td> </tr> </tbody> </table>	Estate	2020	2021	2022	2023	2024	Siang Estate	No replanting programme in the next 5 years. 197.68 ha will be replanted in 2025 for field P99					Bkt Payung Estate	No replanting programme in the next 5 years. The oldest palm was replanted on 2011.					<p>Complied</p>
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Bkt Payung Estate	No replanting programme in the next 5 years. The oldest palm was replanted on 2011.																				
<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>The latest management review was carried out on 11<sup>th</sup> November 2020 for Pasir Panjang POM. The issue been discuss was include :-</p> <ol style="list-style-type: none"> <li>1. Results of internal audits</li> </ol>	<p>Complied</p>																		

		<ol style="list-style-type: none"> <li>2. Customer (internal/external) feedback</li> <li>3. Process performance and product conformity</li> <li>4. Status of preventive and corrective actions</li> <li>5. Follow-up actions from management reviews</li> <li>6. Changes that could affect the management system</li> <li>7. Recommendations for improvement</li> <li>8. Complaints and grievances</li> <li>9. Resource needed.</li> </ol>	
<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>Pasir Panjang Palm Oil Mill and estate had the following projects in plan and with few also in progress for the improvement. The continuous action plan was available for verification. Among the established plan:</p> <p>Process efficiency and improvement</p> <ul style="list-style-type: none"> <li>- Fibre cyclone replacement</li> <li>- CPO washing system (chloride removal)</li> </ul> <p>Environmental impacts</p> <ul style="list-style-type: none"> <li>- New water reservoir</li> <li>- Online/continuous desludging (dewatering system)</li> <li>- Biogas engine utilization for process and domestic</li> <li>- Bio-scrubber installation</li> </ul> <p>Social improvement</p> <ul style="list-style-type: none"> <li>- Access road (pro base @ 0.5 km from LBP to mill)</li> </ul>	<p>Complied</p>

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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>          The RSPO metrics template is awaiting decision/agreement by RSPO and the issue is still being discussed.          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.          - Minor Compliance -</p>	<p>The RSPO metrics template has not been finalized by RSPO Secretariat. Hence this requirement is not yet applicable during this assessment. RSPO PalmGHG Calculator is used by the certification unit as a reporting method of its continuous improvement progress          The ACOP was submitted on 05/06/2020 as per email dated 13/10/2020. The ACOP 2019 was available for review at site.</p>	Complied
<b>Criterion 3.3: Operating procedures are Appropriately documented, consistently implemented and monitored.</b>			
3.3.1	<p><b>(C)</b> Standard Operating Procedures (SOPs) for the unit of certification are in place.          - Critical (Major) compliance -</p>	<p>The Mill operations are guided by the following documents</p> <ul style="list-style-type: none"> <li>- Quality Manual (PCPOM/QM) document no PCPOM/QM.4.0 recent reviewed dated 01/2/18</li> <li>- Standards Operating Procedure (PCPOM/SOP) dated 01/2/18 covering the following stations/operations among others</li> </ul> <p>Estates have a separate SOP that covered nursery operations, replanting, upkeep mature and immature oil palm, water management, roads, oil palm pest management, oil palm disease management and manuring immature and mature oil palms.</p>	Complied
3.3.2	<p>A mechanism to check consistent implementation of procedures is in place.          - Minor Compliance -</p>	<p>The following mechanism is available and adopted as standard practices and procedures in the mill and estates operations.          Pasir Panjang Palm Oil Mill</p> <ul style="list-style-type: none"> <li>a) Mill inspectorate Visit program 2x /year</li> <li>b) Internal audit by Sustainability SQD 2x /year</li> <li>c) Task Force visits</li> <li>d) Visiting Accounts Audit 4x/year</li> <li>e) Monthly and weekly ad hoc meeting</li> </ul>	Complied

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		<ul style="list-style-type: none"> <li>f) Daily /monthly grading production &amp; financial report</li> <li>g) Daily and monthly lab analysis report.</li> <li>h) Daily supervision by the mill Supervisors/Executives</li> </ul> <p>Siang/Bukit Payung Estates</p> <ul style="list-style-type: none"> <li>a) Plantation Inspectorate Visit program 2x /year</li> <li>b) Internal audit by Sustainability Unit 2x /year</li> <li>c) Task Force visits</li> <li>d) Monthly and weekly ad hoc meeting</li> <li>e) Daily /monthly production &amp; financial report</li> <li>f) Daily supervision by the field staff/Executives.</li> </ul> <p>Mechanism to check consistent implementation of procedure is through Internal Audit, Mill Inspector and Estate Inspector Visit. Internal Audit is planned twice a year by Sustainability Department, refer to internal audit carried out at specific operating units.</p>	
3.3.3	<p>Records of monitoring and any actions taken are maintained and available.</p> <p>- Minor Compliance -</p>	<p>Mill Inspectorate Visit for Pasir Panjang Palm Oil Mill (PPPOM) was conducted on 20<sup>th</sup> October 2020 by Mill Inspectorate Office under Kulim Group of company. Based on performance qualitative reporting dated 20<sup>th</sup> October 2020, 84% rating given by the mill inspector.</p> <p>General Manager visits the estates on quarterly basis to review estate performance against Kulim Sustainability standard. Latest Plantation Inspectorate visit at Siang estate was carried out on 10-11 June 2020 (Report No. 2/2020). Overall estate score was rated at 77% (good: 77-89 %). As for Bukit Payung, latest PI visit was done on 19-20/7/20. Rating given was good at 79% overall based on 2<sup>nd</sup> visit for 2020.</p> <p>3<sup>rd</sup> party bi-annual compliance audit was carried by DOE registered consultant in 2020.</p>	Complied

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		Date of assessment	Report reference	Compliance Status	
		2nd half 2020, (29/9/20)	Environmental Compliance Audit by competent person, EA0103/CESSW140 63	0 NC and 1 observation raised.	
		1 <sup>st</sup> half of 2020 (30/1/20)	Environmental Compliance Audit by competent person, EA0103/CESSW140 63	0 NC and 2 observation raised.	
		Based on the latest compliance audit results, Pasir Panjang POM has continuously complied with the requirements under "Jadual Pematuhan". Observation raised in the previous compliance audit has been rectified resulting improvement of OBS raised in the recent audit.			
<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.					
3.4.1	<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 -	There are no new plantings or new operations within Pasir Panjang POM and its supply base. Nevertheless, each unit has its own Social Impact Assessments done which have been prepared internally by the Company's Sustainable Palm Oil team. Details of the Social Impact Assessment are contained in Indicator 3.4.2 below.			Complied

<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.</p> <p>- Minor Compliance -</p>	<p>Social Impact Assessment (SIA) as well as the Social Management Plans for the Pasir Panjang POM and its supply base are available. The SIA has been prepared with participation of affected stakeholders via interviews and feedback received, including from NUPW and WOW meetings. Sighted during the audit were the Social Management Plans for:</p> <ul style="list-style-type: none"> <li>a. Pasir Panjang POM dated 15 October 2020</li> <li>b. Siang Estate dated 13 September 2020</li> <li>c. Bukit Payong Estate dated 15 Oct 2020</li> </ul> <p>Among the issues raised in the Social Management Plan included positive and negative impacts such as the need to constantly remind workers to use complete PPE, contribution of school uniforms for workers' children, typhoid inoculation for food handlers, and charges imposed by service provider when workers withdraw money using their cashcard.</p>	<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.</p> <p>- Critical (Major) compliance -</p>	<p>Evidence is available that the Management Action Plans are being updated on a yearly basis.</p> <table border="1" data-bbox="1279 976 1796 1169"> <thead> <tr> <th>Mill/ Estates</th> <th>Date action in 2020</th> </tr> </thead> <tbody> <tr> <td>Pasir Panjang Mill</td> <td>15 Oct 2020</td> </tr> <tr> <td>Siang</td> <td>13 Sept 2020</td> </tr> <tr> <td>Bukit Payong</td> <td>15 Oct 2020</td> </tr> </tbody> </table> <p>Evidence is available that the reviews were done in a participatory way as evidenced from minutes of and meetings, discussions, written feedbacks/responses from stakeholders. Each Social Management Plan has identified the positive and negative issues for the unit, and recommendations for social improvement, action, person in charge and monitoring. Among the issues raised included</p>	Mill/ Estates	Date action in 2020	Pasir Panjang Mill	15 Oct 2020	Siang	13 Sept 2020	Bukit Payong	15 Oct 2020	<p>Complied</p>
Mill/ Estates	Date action in 2020										
Pasir Panjang Mill	15 Oct 2020										
Siang	13 Sept 2020										
Bukit Payong	15 Oct 2020										

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		<p>a. The need for food handler to have typhoid inoculation. It was verified that this was carried out by Klinik Moiz on 22 September 2020.</p> <p>b. Provision of school uniforms for workers' school-going children is also being continuously implemented.</p> <p>c. Charges imposed by service provider when workers withdraw cash using CashCard. This issue arose because workers were not adequately briefed of the charges. Briefing was done to the workers on 2 March 2020 at Siang Estate. Interviews conducted with workers also confirmed that this matter has been resolved.</p> <p>Based on the above, evidence was available that the Social Management Plans are implemented, reviewed and updated regularly in a participatory way.</p>	
<b>Criterion 3.5:</b> A system for managing human resources is in place.			
3.5.1	<p>Employment procedures for recruitment, selection, hiring, promotion, retirement and termination are documented and made available to the workers and their representatives where applicable.</p> <p>- Minor Compliance -</p>	<p>Reviewed and verified during the audit were the following SOPs:</p> <p>a. Recruitment of New Foreign Workers Rev. No. 1 Issue No. 1 dated 1 Jan 2019. It was observed that this SOP does not contain procedures related to termination, promotion and retirement of foreign workers. Nevertheless, it was noted that termination is clearly stipulated under workers' employment contracts. And although the procedure for promotion is not available in the SOP for foreign worker, evidence is available that this is being practiced at the Mill via letter dated 30 August 2020 issued to Worker No. 640114 which confirmed his change from Empty Bunch Operator to Apprentice Workshop.</p> <p>b. Recruitment of Local Workers for Operating Units Rev No. 00 Issue No. 01 dated 1 October 2020. This SOP</p>	Complied

		contains procedures for recruitment, promotion, retirement, and termination.  These Policies are available at the respective Mill and Estate premises for review by the workers or their representatives.									
3.5.2	Employment procedures are implemented, and records are maintained. - Minor Compliance -	Pasir Panjang Mill and its supply base were able to demonstrate that the employment procedures are implemented, and that records are duly maintained. During the audit, the following records were sampled and reviewed at Pasir Panjang Mill: recruitment documents and employment procedures related to Worker No. 640114, job confirmation via letter dated 1 April 2017 by Mahamurni Plantations Sdn Bhd, employment contract dated 25 Nov 2016 upon job confirmation, job confirmation letter dated 1 April 2017, letter on operator allowance dated 1 July 2017, etc.	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 -	<p>The estates had identified and reviewed significant hazards and risks and determined appropriate risk control measures. The hazard identification, risk assessment and risk control (HIRARC) records, as well as CHRA reports were verified during the assessment. HIRARC is subject for a review in event of the following;</p> <ul style="list-style-type: none"> <li>a) Change in work process</li> <li>b) Revision/changes in legislative requirement</li> <li>c) Occurrence of accidents</li> </ul> <p>The estates had list of review on HIRARC dated 09/8/20 and 22/9/20 respectively for Bkt Payung and Siang Estates among others</p> <table border="1" style="width: 100%; border-collapse: collapse;"> <thead> <tr> <th style="width: 5%;"></th> <th style="width: 65%;">Areas/Activities</th> <th style="width: 5%;"></th> <th style="width: 25%;">Areas /Activities</th> </tr> </thead> <tbody> <tr> <td style="text-align: center;">1</td> <td>Palm /bunch census</td> <td style="text-align: center;">11</td> <td>Harvesting &amp; collection</td> </tr> </tbody> </table>		Areas/Activities		Areas /Activities	1	Palm /bunch census	11	Harvesting & collection	Complied
	Areas/Activities		Areas /Activities								
1	Palm /bunch census	11	Harvesting & collection								



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2	Circle /selective spraying	12	Transportation workers
3	Confined space	13	Walking palm to palm
4	Drainage-machine	14	Loose fruit collection
5	Grass cutting	15	MB machine 0.50mt
6	Compound sanitation	16	Water catchment
7	Fertilizer application	17	Chemical mixing
8	Replanting	18	EFB/ Rat Baiting
9	Bridge maintenance	19	Housing Complex
10	Water treatment plant	20	Workshop operations

HIRARC for the mill was formalized on in 2015 with review made annually recent being on 24/7/20. The significant and routine activities for mill were adequately covered with details among others as follows;

	Areas/Activities (Mill)		Areas /Activities
1	Reception –Weighbridge	11	Engine Room
2	Fruit Handling	12	Product storage
3	Sterilizer	13	Laboratory
4	Threshing / pressing	14	Water treatment
5	Clarification / Oil Room	15	Effluent Treatment Pond
6	Boiler House	16	Crop reception – Ramp
7	Confined space	17	Working at height
8	EFB press	18	Housing Complex
9	Bio Compost	19	Store lubricant / chemical
10	Biogas operations	20	ESP - Multi cyclone

The mill reviewed the HIRARC by including the (Hurricane - dust precipitant multi-cyclone installation, Biogas Plant and the Bio Polishing Installation commissioned in 2019 & 2020 upon handling over from the manufacturer.

Appropriate risk control measures were determined and implemented for the respective activities and operation. Most of

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		<p>the moving part and rotating machinery were installed with machine guarding and properly covered. Appropriate administrative controls such as safety signage were displayed at all work stations in the mill and estate office and workshop. In general, the control measures were appropriate to the identified risks.</p>																										
<p>3.6.2</p>	<p><b>(C)</b> The effectiveness of the H&amp;S plan to address health and safety risks to people is monitored.          - Critical (Major) compliance -</p>	<p>KMB Health and Safety Improvement Plan among others include the following. The implementation of OSH plan was monitored by internal audits conducted by OSH executives from SQD Unit.</p> <table border="1" data-bbox="1189 678 1906 1313"> <thead> <tr> <th>No</th> <th>Task</th> <th>Activity</th> </tr> </thead> <tbody> <tr> <td>1</td> <td>OSH Legal Compliance</td> <td>Review all relevant legal compliance</td> </tr> <tr> <td rowspan="3">2</td> <td rowspan="3">Emergency Response Plan</td> <td>ERP Training</td> </tr> <tr> <td>Fire drill</td> </tr> <tr> <td>Enforcement Visit</td> </tr> <tr> <td rowspan="2">3</td> <td rowspan="2">OSH Management System</td> <td>Review documentation</td> </tr> <tr> <td>HIRARC review</td> </tr> <tr> <td rowspan="3">4</td> <td rowspan="3">Risk Management</td> <td>Identify High Risk Area</td> </tr> <tr> <td>maintenance</td> </tr> <tr> <td>Hygiene Tech</td> </tr> <tr> <td rowspan="3">5</td> <td rowspan="3">Accident Investigation/ Reporting</td> <td>Accident Investigation</td> </tr> <tr> <td>JKKP 8/6 submission</td> </tr> <tr> <td>Chemical Register</td> </tr> </tbody> </table>	No	Task	Activity	1	OSH Legal Compliance	Review all relevant legal compliance	2	Emergency Response Plan	ERP Training	Fire drill	Enforcement Visit	3	OSH Management System	Review documentation	HIRARC review	4	Risk Management	Identify High Risk Area	maintenance	Hygiene Tech	5	Accident Investigation/ Reporting	Accident Investigation	JKKP 8/6 submission	Chemical Register	<p>Complied</p>
No	Task	Activity																										
1	OSH Legal Compliance	Review all relevant legal compliance																										
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		Fire drill																										
		Enforcement Visit																										
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		HIRARC review																										
4	Risk Management	Identify High Risk Area																										
		maintenance																										
		Hygiene Tech																										
5	Accident Investigation/ Reporting	Accident Investigation																										
		JKKP 8/6 submission																										
		Chemical Register																										
<p><b>Criterion 3.7:</b> All staff, workers, Scheme Smallholders, out-growers, and contract workers are appropriately trained.</p>																												

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<p>3.7.1</p>	<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>The annual training program has been established and significantly covers all aspects of the RSPO requirements. There were also additional subjects including the estate operating procedures, parameters, vehicles maintenance etc. The training program also specified the target group of employees to be trained under the allocated subjects. The program mainly covers both requirement of the estates and mill in the CU. The subjects for the training are issued and assisted by the SQD personnel. The following topics included in the annual training program 2020 among others as follows;</p> <table border="1" data-bbox="1198 715 1921 1391"> <thead> <tr> <th rowspan="2"></th> <th rowspan="2">(Estate) subject</th> <th colspan="3">schedule</th> </tr> <tr> <th>1-4</th> <th>5-8</th> <th>9-12</th> </tr> </thead> <tbody> <tr><td>1</td><td>Requirement RSPO MSPO</td><td></td><td>/</td><td></td></tr> <tr><td>2</td><td>ESH objective, target &amp; program</td><td>/</td><td></td><td></td></tr> <tr><td>3</td><td>New FW – Induction Program</td><td>/</td><td>/</td><td>/</td></tr> <tr><td>4</td><td>Equal Opportunity</td><td></td><td>/</td><td></td></tr> <tr><td>5</td><td>ESH role &amp; function</td><td>/</td><td></td><td>/</td></tr> <tr><td>6</td><td>SW/Waste Management</td><td>/</td><td></td><td></td></tr> <tr><td>7</td><td>ERP procedure and evacuation</td><td></td><td></td><td>/</td></tr> <tr><td>8</td><td>Legal &amp; other requirement</td><td></td><td>/</td><td></td></tr> <tr><td>9</td><td>Permit - work / tools equipment</td><td>/</td><td>/</td><td></td></tr> <tr><td>10</td><td>HIRARC &amp; EAI</td><td></td><td>/</td><td></td></tr> <tr><td>11</td><td>Equality /Freedom of Unionized</td><td></td><td>/</td><td></td></tr> <tr><td>12</td><td>Housing Amenities (Hygiene)</td><td></td><td>/</td><td></td></tr> <tr><td>13</td><td>Chemical Management/Handling</td><td>/</td><td></td><td></td></tr> <tr><td>14</td><td>SOP &amp; ECP for individual procedure</td><td>/</td><td>/</td><td>/</td></tr> <tr><td>15</td><td>PPE adherence</td><td>/</td><td>/</td><td>/</td></tr> <tr><td>16</td><td>Scheduled waste management</td><td>/</td><td></td><td>/</td></tr> <tr><td>17</td><td>Wages Guidelines</td><td>/</td><td></td><td></td></tr> <tr><td>18</td><td>Mill/Estates practices SOP</td><td>/</td><td>/</td><td>/</td></tr> <tr><td>19</td><td>SDS understanding / IPM</td><td>/</td><td>/</td><td></td></tr> <tr><td>20</td><td>Riparian Zone Management</td><td>/</td><td>/</td><td></td></tr> </tbody> </table>		(Estate) subject	schedule			1-4	5-8	9-12	1	Requirement RSPO MSPO		/		2	ESH objective, target & program	/			3	New FW – Induction Program	/	/	/	4	Equal Opportunity		/		5	ESH role & function	/		/	6	SW/Waste Management	/			7	ERP procedure and evacuation			/	8	Legal & other requirement		/		9	Permit - work / tools equipment	/	/		10	HIRARC & EAI		/		11	Equality /Freedom of Unionized		/		12	Housing Amenities (Hygiene)		/		13	Chemical Management/Handling	/			14	SOP & ECP for individual procedure	/	/	/	15	PPE adherence	/	/	/	16	Scheduled waste management	/		/	17	Wages Guidelines	/			18	Mill/Estates practices SOP	/	/	/	19	SDS understanding / IPM	/	/		20	Riparian Zone Management	/	/		<p>Complied</p>
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3.7.2	<p>Records of training are maintained.          - Minor Compliance -</p>	<p>The estates and mill training are held/organized during the daily briefing prior to work commencement. Mainly the issues discussed/briefed were related to estate and mill operations, environmental and safety compliance. These training records are maintained and were sighted during the audit.</p> <table border="1"> <thead> <tr> <th></th> <th>Subject</th> <th>PPPOM</th> <th>SE</th> <th>BPE</th> </tr> </thead> <tbody> <tr><td>1</td><td>SOP Weeding / HIRARC</td><td>02/2/20</td><td>13/8/20</td><td>17/2/20</td></tr> <tr><td>2</td><td>Company Policies Briefing</td><td>02/8/20</td><td>14/5/20</td><td>01/9/20</td></tr> <tr><td>3</td><td>RSPO Briefing - employees</td><td>16/8/20</td><td>03/6/20</td><td>09/10/20</td></tr> <tr><td>4</td><td>Anti Bribery Mgmt</td><td>18/10/20</td><td>06/10/20</td><td>03/9/20</td></tr> <tr><td>5</td><td>Harvesting safety SOP</td><td>-</td><td>21/2/20</td><td>13/5/20</td></tr> <tr><td>6</td><td>Tractors driving SOP</td><td>22/9/20</td><td>07/6/20</td><td>29/1/20</td></tr> <tr><td>7</td><td>OSH guidelines</td><td>17/3/20</td><td>-</td><td>24/11/20</td></tr> <tr><td>8</td><td>Air compressor SOP</td><td>02/2/20</td><td>-</td><td>17/6/20</td></tr> <tr><td>9</td><td>RSPO MSPO SCCS</td><td>04/9/20</td><td>14/9/20</td><td>11/11/20</td></tr> <tr><td>10</td><td>Stakeholders briefing</td><td>01/1/20</td><td>25/9/20</td><td>07/10/20</td></tr> <tr><td>11</td><td>Circle raking /spraying</td><td>-</td><td>18/4/20</td><td>17/2/20</td></tr> <tr><td>12</td><td>Workshop management</td><td>13/1/20</td><td>06/6/20</td><td>12/5/20</td></tr> <tr><td>13</td><td>Salary system awareness</td><td>16/6/20</td><td>02/3/20</td><td>19/10/20</td></tr> <tr><td>14</td><td>FFB crop quality - Contract</td><td>-</td><td>09/3/20</td><td>20/1/20</td></tr> <tr><td>15</td><td>Harvesting SOP</td><td>-</td><td>15/5/20</td><td>28/8/20</td></tr> <tr><td>16</td><td>Harvesting Safety</td><td>-</td><td>08/4/20</td><td>25/8/20</td></tr> </tbody> </table>		Subject	PPPOM	SE	BPE	1	SOP Weeding / HIRARC	02/2/20	13/8/20	17/2/20	2	Company Policies Briefing	02/8/20	14/5/20	01/9/20	3	RSPO Briefing - employees	16/8/20	03/6/20	09/10/20	4	Anti Bribery Mgmt	18/10/20	06/10/20	03/9/20	5	Harvesting safety SOP	-	21/2/20	13/5/20	6	Tractors driving SOP	22/9/20	07/6/20	29/1/20	7	OSH guidelines	17/3/20	-	24/11/20	8	Air compressor SOP	02/2/20	-	17/6/20	9	RSPO MSPO SCCS	04/9/20	14/9/20	11/11/20	10	Stakeholders briefing	01/1/20	25/9/20	07/10/20	11	Circle raking /spraying	-	18/4/20	17/2/20	12	Workshop management	13/1/20	06/6/20	12/5/20	13	Salary system awareness	16/6/20	02/3/20	19/10/20	14	FFB crop quality - Contract	-	09/3/20	20/1/20	15	Harvesting SOP	-	15/5/20	28/8/20	16	Harvesting Safety	-	08/4/20	25/8/20	Complied
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		17	PPE usage	-	09/3/20	17/2/20	
		18	Fire Drill	01/3/20	16/1/20	13/9/20	
		19	ESP operations	21/10/20	-	-	
		20	Chemical spillage ERP	23/1/20	02/3/20	17/2/20	
		22	ERP bund rupture	01/3/20	-	-	
		23	First Aid -briefing	-	19/7/20	09/9/20	
		24	LOTO / Guidelines	27/1/20	-	-	
		25	Rat Baiting	-	02/2/20	15/10/20	
		26	Working at height	02/2/20	-	05/5/20	
		27	Health Awareness	-	20/3/20	20/3/20	
		28	Harvesting SOP	-	10/3/20	-	
		29	Gen set operations	01/3/20	08/3/20	29/8/20	
		30	Vicon spreader - Manuring	-	22/9/20	13/2/20	
		31	Pesticides Handling	-	04/3/20	18/8/20	
		32	SW management	01/3/20	11/5/20	10/9/20	
		33	Road grading	-	24/4/20	-	
		34	IPM Management	-	11/2/20	18/2/20	
		35	First Aid Kit & ERP	06/10/20	15/10/20	06/3/20	
		36	GHG - Mass Balance	17/3/20	-	-	
		37	RSPO - Supply chain	17/3/20	03/1/20	-	
		38	Protection -HCV /Buffer	31/10/20	12/8/20	13/9/20	
		39	fertilizer - application	-	05/10/20	07/9/20	
		40	FFB grading SOP	21/1/20	19/1/20	21/1/20	
		41	ETP management	16/1/20	-	-	
		42	Process / Operation SOP	06/12/19	5/8/20	20/1/20	
		43	Driving SOP & PPE	-	01/1/20	05/12/20	
		44	Line site hygiene	01/1/20	08/2/20	29/8/20	
		45	WTP management	12/7/20	10/8/20	20/2/20	
		46	PPE adherence	07/1/20	03/9/20	17/2/20	
		47	SW management	23/1/20	04/3/20	23/1/20	
		48	Spraying P& D - PPE	-	13/7/20	20/1/20	
		49	Hearing awareness	12/1/20	-	-	
		50	Covid 19 reminders -MCO	15/10/20	26/3/20	17/3/20	

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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>	<p>Supply chain training carried out for personnel carrying out the tasks critical to the effective implementation of the Supply Chain Certification Standard (SCCS).</p> <p>Training conducted on 22<sup>nd</sup> November 2020 – attended by security personnel, weighbridge operator and laboratory supervisor.</p>	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 process certified and uncertified FFB without physically separating them, then only Mass Balance Module is applicable.</p>	<p>Pasir Panjang Palm Oil Mill only receives certified FFB from own certified supply base. Therefore, qualifies for the Identity Preserved supply chain system and module. During the P&amp;C assessment, the audit team verified the volumes and sources of certified FFB entering the mill, the implementation of processing controls and volume sales of RSPO certified products.</p>	Complied																																			
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</p>	<p>Pasir Panjang POM is under Identity Preserved module. Thus, this indicator is not applicable.</p>	Not Applicable																																			

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	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.		
3.8.3	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&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.	The estimated tonnage of CPO and PK products that could potentially be produced by the certified mill is recorded in this public summary report. Summary of CPO and PK deliver in a year (November 2019 to November 2020) reported under B of the report.	Complied
3.8.4	The mill shall also meet all registration and reporting requirements for the appropriate supply chain through the RSPO IT platform.	The mill has met all registration and reporting requirements for the appropriate supply chain through the RSPO supply chain managing organization, Palm Trace.  The registration of Palm Trace will be carried out by the Marketing Department in HQ. Company has registered in Palm Trace system as follows: Members ID: RSPO_PO1000005256 License valid until 8/03/2021 Member category : Oil Mill	Complied
3.8.5	Documented procedures 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: a) Complete and up to date procedures covering the implementation of all the elements of the supply chain model requirements. b) Complete and up to date records and reports that demonstrate compliance with the supply chain model requirements (including training records).	Kulim (Malaysia) Berhad has developed Traceability Procedure (Doc. No.: SQD/SMS/1.2, Issue No. 1, Rev. No.: 05 dated 1/8/20) and RSPO Supply Chain Procedure (Doc. No.: MKD/001, Rev. 01 dated 9/10/2018). On the marketing side, Procedure title: RSPO Supply Chain; Procedure # MKD/001; Date: 9/10/2018 is referred to.  b) Seen the records that included in the procedure are as below: i. Weighbridge tickets ii. Training records iii. Internal audit report	Complied

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	<p>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 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>iv. Invoice and contracts v. Delivery and storage records vi. Daily Production Report</p> <p>Training records for RSPO Supply Chain &amp; Stamping was sighted where the training was conducted on 22/11/2020 for the critical control point responsible person such as Weighbridge Operators and Security Guards. Seen the attendance list and interviewed with the attendees confirmed that they are understand the procedure.</p> <p>c) Head of each operating unit has automatically appointed as person responsible for all certification inclusive of RSPO SCCS. Responsibility of the person-in-charge has clearly stated in the appointment letter dated 22/9/2019.</p> <p>d) Kulim (Malaysia) Berhad has developed Traceability Procedure (Doc. No.: SQD/SMS/1.2, Issue No. 1, Rev. No.: 05 dated 1/8/20) and RSPO Supply Chain Procedure (Doc. No.: MKD/001, Rev. 01 dated 9/10/2018) which has covered the process of incoming of FFB and ensuring no contamination in the IP mill.</p>	
3.8.6	<p>Internal Audit</p> <p>i) 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>ii) 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</p>	<p>Kulim (Malaysia) Berhad has developed Internal Audit Procedure (Doc. No.: SQD/SMS/5/0, Issue No.: 1, Rev. No.: 0 dated 1/7/2018) where the objective is to ensure that the implementation of company's RSPO, ISCC and MSPO management system is in line with the policies, procedures and other requirements. The frequency of the internal audit to be carried out is at least once within 12 months (before expiry of the certificate). The latest internal audit was carried out on 17/9/2020 by SQD team. There no non-conformance was raised based on Internal Audit Report. All the clauses in RSPO SCCS and RSPO Market Communications and Claims were covered during the audit.</p>	Complied



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	<p>review at least annually. The mill shall maintain the internal audit records and reports.</p>		
<p>3.8.7</p>	<p>Purchasing and Goods In</p> <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>When FFB delivered to the mill from the estate, the transporters presented FFB despatch report to the mill weighbridge clerk in order the FFB to be received by the mill.</p> <p>E.g. of information available in the FFB despatch report is as follows:</p> <ul style="list-style-type: none"> <li>• FFB despatch no. (DB A No. 218141)</li> <li>• Estate's names (Siang Estate)</li> <li>• Date of delivery (6/12/20)</li> <li>• Field No. (field P03/04/05/06/07/08/09/10/11 &amp;12)</li> <li>• Lorry no. JTY 8020</li> <li>• Weight (36.09 mt)</li> <li>• WB ticket: 104487</li> <li>• Traceability Identification: RSPO certified FFB (RSPO 657192)</li> </ul> <ul style="list-style-type: none"> <li>• FFB despatch no. (DB A no. 62276)</li> <li>• Estate's names (Bukit Payung Estate)</li> <li>• Date of delivery (6/12/20)</li> <li>• Field No. (field P14)</li> <li>• Lorry no. LBP 2</li> <li>• Weight (4.09 mt)</li> <li>• WB ticket: 104481</li> <li>• Traceability Identification: RSPO certified FFB (RSPO 657192)</li> </ul> <p>Diversion crop from other certified management unit (Sedenak Complex)</p> <ul style="list-style-type: none"> <li>• FFB despatch no. (DB A No. 21 81018)</li> <li>• Estate's names (Ulu Tiram Estate)</li> </ul>	<p>Complied</p>

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		<ul style="list-style-type: none"> <li>• Date of delivery (9/4/20)</li> <li>• Field No. (field P86/88)</li> <li>• Lorry no. JSB 1660</li> <li>• Weight (25.92 mt)</li> <li>• WB ticket: 91488</li> <li>• Traceability Identification: RSPO certified FFB (RSPO 537873)</li> </ul> <ul style="list-style-type: none"> <li>• FFB despatch no. (DB A No. 21 81018)</li> <li>• Estate's names (Basir Ismail Estate)</li> <li>• Date of delivery (9/4/20)</li> <li>• Field No. (field P08, P09, P10)</li> <li>• Lorry no. JNW 5011</li> <li>• Weight (38.99 mt)</li> <li>• WB ticket: 91671</li> <li>• Traceability Identification: RSPO certified FFB (RSPO 537873)</li> </ul>	
3.8.8	<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> <ol style="list-style-type: none"> <li>The name and address of the buyer;</li> <li>The name and address of the seller;</li> <li>The loading or shipment / delivery date;</li> <li>The date on which the documents were issued;</li> <li>RSPO certificate number;</li> </ol>	<p>Pasir Panjang POM ensured the required information is available in document form. Sampled of CPO contract: CPOIP-M20005 dated 11/12/19, quantity 600 mt (delivery month – May 2020)</p> <ul style="list-style-type: none"> <li>• The name and address of the buyer; XXX</li> <li>• The name and address of the seller: Pasir Panjang POM</li> <li>• The loading or shipment/ delivery date; e.g. 21/5/20</li> <li>• The date on which the documents were issued;</li> <li>• A description of the product, including the applicable supply chain model (Identity Preserved, Segregated or Mass Balance or the approved abbreviations); Crude Palm Oil (CPO) RSPO IP</li> <li>• The quantity of the products delivered; e.g. 41.2 mt</li> <li>• Any related transport documentation; e.g. Despatch note e.g. #C06783</li> </ul>	Complied

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	<p>f) A description of the product, including the applicable supply chain model (Identity Preserved or Mass Balance or the approved abbreviations);</p> <p>g) The quantity of the products delivered;</p> <p>h) Any related transport documentation;</p> <p>i) A unique identification number.</p>	<ul style="list-style-type: none"> <li>• Supply chain certificate number of the seller; e.g. On weighbridge ticket e.g. RSPO 657192</li> <li>• A unique identification number: palm trace no. TR-9bf7b7c1-847a</li> <li>• Available in a few forms e.g. DN no., seal no., etc.</li> </ul> <p>Pasir Panjang POM ensured the required information is available in document form. Sampled of PK contract: MPOK 2021 IP dated 22/4/20, quantity 1,000 mt (delivery month – April 2020)</p> <ul style="list-style-type: none"> <li>• The name and address of the buyer; XXX</li> <li>• The name and address of the seller: Pasir Panjang POM</li> <li>• The loading or shipment/ delivery date; e.g. 29/5/20</li> <li>• The date on which the documents were issued;</li> <li>• A description of the product, including the applicable supply chain model (Identity Preserved, Segregated or Mass Balance or the approved abbreviations); Palm Kernel (PK) RSPO IP</li> <li>• The quantity of the products delivered; e.g. 41.04 mt</li> <li>• Any related transport documentation; e.g. Despatch note e.g. #K01605</li> <li>• Supply chain certificate number of the seller; e.g. On weighbridge ticket e.g. RSPO 657192</li> <li>• A unique identification number: palm trace no. TR-24be4788-06b2</li> <li>• Available in a few forms e.g. DN no., seal no., etc.</li> </ul>	
<p>3.8.9</p>	<p><b>Outsourcing Activities</b></p> <p>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</p>	<p>No CPO and PK process, bulking facilities outsourced by the mill. Transporter for PK was assigned by buyer. For CPO, contract agreement with a few contractors as per below:</p>	<p>Complied</p>

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	<p>the certificate shall ensure that the independent third party complies with relevant requirements of this RSPO Supply Chain Certification</p> <p>ii) The mill shall ensure the following:</p> <p>a) The mill has legal ownership of all input material to be included in outsourced processes</p> <p>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.</p> <p>c) The mill has a documented control system with explicit procedures for the outsourced process which is communicated to the relevant contractor.</p> <p>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.</p>	<p>i) Selama Masai Sdn Bhd, refer to LOA, MPSB/G1/6/2(2020) dated 15<sup>th</sup> June 2020. Date commencement: 1<sup>st</sup> June 2020, completion date: 31<sup>st</sup> May 2023.</p> <p>ii) SBK Sdn Bhd, refer to LOA, MPSB/G1/6/2(2020) dated 15<sup>th</sup> June 2020. Date commencement: 1<sup>st</sup> June 2020, completion date: 31<sup>st</sup> May 2023.</p> <p>Under clause 6 on the contract; <i>For contract operation in RSPO, ISCC and MSPO certified mills or estates, the contractor is required to comply with all RSPO, ISCC and MSPO requirements related to the execution of the contract.</i></p>	
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.	Names and contact details of all contractors used for the physical handling of CSPO listed under stakeholder list 20 <sup>th</sup> July 2020.	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.	No change of names and contract details of transporter for the physical handling of RSPO certified oil palm products	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>The mill has maintained the accurate, complete, up-to-date and accessible records and reports covering all aspects of these Sustainability Management System as below:</p> <ul style="list-style-type: none"> <li>- Dispatch of CPO/PK delivery order</li> <li>- Daily Production Report</li> <li>- FFB Despatch Report from supplying estate</li> </ul>	Complied

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	<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>- Training records          - FFB Transaction records</p> <p>ii) Traceability Procedure (Doc. No.: SQD/SMS/1.2, Issue No. 1, Rev. No.: 02 dated 28/2/2019), the records retention for all RSPO Supply Chain related records to be retained for a minimum of 5 years' period</p> <p>iii) Records and balance of all receipts of RSPO certified FFB and deliveries of RSPO certified CPO and PK monitored on a real-time basis on daily/monthly production figure.</p>	
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. Last year's average from November 2019 to November 2020 were 22.27 % (OER) &amp; 5.4 % (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>It has been confirmed 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</p>	Complied

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	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.	and storage to strive for 100% separation. No incoming of uncertified FFB and mill only process RSPO certified FFB from Kulim (M) Berhad group estates.	
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>	Shipping announcement in the RSPO IT platform carried out by the mills when RSPO certified products are sold as certified to refineries. Details of transaction summarized under table D.	Complied
3.8.17	<p>Claims</p> <p>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.</p>	Kulim (Malaysia) Berhad has obtained Trademark License from RSPO and seen the trademark license# 1-0080-09-100-00 which valid from 23/8/2019 – 22/8/2021 for IP Model for Pasir Panjang POM. The facility is aware with the requirements of the RSPO Rules on Market Communications and Claims.	Complied
<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.	Kulim (Malaysia) Berhad has stated the member's history with regard to RSPO in the company's website and annual report 2019 without the use of trademark logo.	Complied
4.2	<p>In corporate communications a member is allowed to:</p> <p>a. Display its RSPO membership status</p> <p>b. Display the RSPO web address (www.rspo.org)</p> <p>c. State that the member supports the work of the RSPO</p> <p>d. State the member's history with regard to the RSPO.</p> <p>e. Use the RSPO trademark to promote its membership of the RSPO.</p>	Kulim (Malaysia) Berhad has stated the member's history with regard to RSPO in the company's website and annual report 2019 without the use of trademark logo.	Complied

	Additionally, where an RSPO member displays the RSPO trademark in digital format this must be accompanied by the text 'Check our progress at www.rspo.org' where the link must lead to the member's profile page.		
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 company does not make any statement that may misleading to the consumers to believe that RSPO membership by itself implies that selling of RSPO-certified oil palm products by verified through the website.	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 that made via website is consistent, clear and does not mislead the consumer and stakeholders as to the certified content of oil palm products in their own products.	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 RSPO corporate logo has been used verified through website, notice board, business card, shipping documentation and procurement/ purchasing document.	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. Verified the weighbridge tickets to buyer where claim of CSPO (Identity Preserved) was stamped on the tickets.	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.	Shipping documentation verified and conformance with the requirements of RSPO SCCS. In the weighbridge ticket, it stated that the product is CSPO (Identity Preserved) with RSPO certificate number: RSPO 657192..	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	Pasir Panjang Palm Oil Mill is not under distributor or wholesaler category. Thus, this requirement is not applicable.	Not Applicable

	<p>number. This covers both brand and own brand products. However, in the case of own brand products it is essential that customers are aware that the product has been made on behalf of the distributor or wholesaler, with specific evidence either through on-pack claims or documentation.</p> <p>b. If the distributor or wholesaler is supply chain-certified they should follow the requirements outlined in section 5.2.</p>		
<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 Pasir Panjang POM and only produce 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 Pasir Panjang POM and only produce 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 Pasir Panjang POM and only produce 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 Pasir Panjang POM and only produce 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 Pasir Panjang POM and only produce 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 Pasir Panjang POM and only produce crude and unfinished product. This is not applicable for POM	Not Applicable



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 Pasir Panjang POM and only produce 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 Pasir Panjang POM and only produce 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.	Oil palm content is 100% CPO and claim as RSPO IP-certified.	Complied
	For SG, 95% or above of the oil palm content must be SG, or a combination of SG and IP.	No SG claim made.	Complied
	Where there is any percentage of non-certified oil palm within the product, the reason for this must be fully justified and an action plan for moving to fully certified oil palm must be in place, in accordance with the requirements of the RSPO SCCS. In addition, the volume of non-certified	Oil palm content is 100% CPO and claim as RSPO IP-certified. All infeed material (FFB) is RSPO certified.	Complied

	oil palm products must be covered by the purchase of RSPO Credits of equivalent volume.		
<b>Labelling and trademark (IP)</b>			
	<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>	As to date, no RSPO trademark used on the RSPO products. Kulim (Malaysia) Berhad has stated the member's history with regard to RSPO in the company's website and annual report 2019 without the trademark logo used.	Complied
<b>Messaging (IP)</b>			
	<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> <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> </ul>	As to date, no RSPO trademark used on the RSPO products. Kulim (Malaysia) Berhad has stated the member's history with regard to RSPO in the company's website and annual report 2019 without the trademark logo used.	Complied

	<ul style="list-style-type: none"> <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>		
<b>Principle 4: Respect community and human rights and deliver benefits</b>			
<b>Criterion 4.1:</b> The unit of Certification respects human rights, which includes respecting the rights of Human Rights Defenders.			
4.1.1	<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>Kulim (Malaysia) Berhad has a Sustainability Policy which among others, states its commitment to respect, support and protect international human rights against violence, threats, all forms of retaliation, and effective elimination of all forms of violation of human rights which include against HRD, whistleblowers, complainants and community spokespersons.</p> <p>This Policy was communicated to all levels of workforce during briefing held at Pasir Panjang Mill (on 2 August 2020), Siang Estate (on 7 July 2020) and at Bukit Payong Estate on 27 Nov 2020).</p>	Complied
4.1.2	<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 evidence of any use of violence or the instigation of violence within the Pasir Panjang POM &amp; its supply base. This was further verified from stakeholder meeting minutes, interview with stakeholders and during audit interviews held with security personnel.</p>	Complied
<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			
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>An agreed and documented system which deals with complaints and grievances is available and documented as Grievance Procedure Doc No. SQD/SMS/4.1 dated 1 August 2020. This SOP is to ensure that the Company has a documented system for dealing with complaints and grievances that is agreeable to all sides and accepted by all stakeholders. This SOP is applicable to all parties who deal with the Company who may have complaints and grievances. Clause 5.8 states that complainants' anonymity would be respected and protected if requested.</p>	Complied

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		<p>Sighted the complaints record at Siang Estate which contained the following complaints:</p> <ul style="list-style-type: none"> <li>a. On 6 January 2020, workers complained about presence of macaques around housing area causing rubbish to scatter. Record was also available of the action taken by the security personnel.</li> <li>b. On 14 October 2020 a request by a stakeholder (driver of school transport) for Siang Estate to trim palm fronds along the probase road. Record of pruning work which was completed on 19 Oct 2020 was also available.</li> </ul>	
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>Briefings on complaints and grievance procedures are given to ensure that the system is understood by affected parties. The external stakeholders were briefed on 7 October 2020 during stakeholder meeting.</p> <p>To ensure understanding by illiterate parties, the briefings were given verbally, and when necessary, translators from among the workers (usually a worker representatives) are sought to translate documents including procedures for dealing with complaints and grievances.</p> <p>Workers were briefed on the procedures at Panjang POM (on 2 August 2020, Siang Estate (on 12 October 2020) and Bukit Payong Estate (on 20 July 2020).</p> <p>Workers interviewed during the audit (including contractor's worker) confirmed their understanding of the procedure.</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>Based on complaints book sighted, aggrieved parties were informed of the progress of their grievance, and the outcome was communicated and acknowledged by the complainant. At Siang Estate, the following complaints and actions taken were recorded:</p>	Complied

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		<p>a. On 6 January 2020, workers complained about presence of macaques around housing area causing rubbish to scatter. Record was also available of the action taken by the security personnel.</p> <p>b. On 14 October 2020 a request by a stakeholder (driver of school transport) for Siang Estate to trim palm fronds along the probase road. Record of pruning work which was completed on 19 Oct 2020 was also available.</p> <p>Similarly, reports of repairs that needed to be carried out also contained status of repair works done and and acknowledged by the complainant.</p>	
4.2.4	<p>The conflict resolution mechanism includes the option of access to independent legal and technical advice, the ability for complainants to 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>Clause 5.5 of Grievance Mechanism Doc. No. SQD/SMS/4.1 Issue No. 1 dated 1 August 2020 gives the option to engage independent legal, technical advice and third-party mediator.</p>	Complied
<p><b>Criterion 4.3:</b> The unit of Certification contributes to local sustainable development as agreed by local communities.</p>			
4.3.1	<p>Contributions to community development that are based on the results of consultation with local communities are demonstrated.</p> <p>- Minor compliance -</p>	<p>Evidence was available that contributions to local development was made based on results of consultation with the respective communities. Among the contributions made were cash contribution made by the Pasir Panjang Mill pursuant to letter from SK Tunjuk Laut dated 25 Aug 2020 requesting for soil to plant tree, and cash donation for annual sports meet pursuant to letter from SK TL dated 10 Feb 2020.</p>	Complied
<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>			
4.4.1	<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</p>	<p>Copies of land titles were available and verified. Details of the respective land titles to demonstrate the right to use the land are shown below. Quit rents were paid accordingly. There was no</p>	Complied

	<p>history of land tenure and the actual legal or customary use of the land are available.</p> <p>- Critical (Major) compliance -</p>	<p>evidence of any part of the land overlapping with customary land owners.</p> <p><u>Pasir Panjang Mill:</u>  The Mill is located within the premises of Pasir Panjang Estate, the latter under land title HS(D) 8578, No. PT: PTD 558 with 99-year lease expiring on 16 Sept 2112.</p> <p><u>Siang Estate:</u></p> <ul style="list-style-type: none"> <li>a. HS(D) No. 33258, No. PT: PTD532 for 3413.98ha with 99-year lease expiring on 23 January 2087. Specific conditions: to be planted with oil palm.</li> <li>b. HS (D) No. 35429, No. PT: Lot 1221 for 29.119 ha with 99-year lease expiring on 9 October 2112. Specific conditions: to be planted with oil palm.</li> </ul> <p><u>Bukit Payong Estate:</u></p> <ul style="list-style-type: none"> <li>a. HS (D) 35105 No PT: PTD4143, for 2282.6 ha with 99-year lease expiring on 12 Sept 2112. Specific conditions: to be planted with oil palm.</li> <li>b. HS (D) 35106 No PT: PTD 4144 for 25.03 ha with 99-year lease ending 12 Sept 2112. Specific conditions: to be planted with oil palm.</li> </ul>	
4.4.2	<p>Copies of documents evidencing agreement-making processes and negotiated agreements detailing the FPIC process are available and include:</p>	<p>Based on documentation review, observations made, interviews with management and stakeholders, there is no evidence that the land for oil palm has diminished the legal, customary or user rights of other users without their free, prior and informed consent. Therefore, there was no documents evidence of any negotiated agreements detailing FPIC process.</p>	Not Applicable

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>	Based on documentation review, observations made, interviews with management and stakeholders, there is no evidence that the land for oil palm has diminished the legal, customary or user rights of other users without their free, prior and informed consent.	Not Applicable
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>	Based on documentation review, observations made, interviews with management and stakeholders, there is no evidence that the land for oil palm has diminished the legal, customary or user rights of other users without their free, prior and informed consent.	Not Applicable
4.4.2c	<p>Evidence that the legal, economic, environmental and social implications of permitting operations on their land have been understood and accepted by affected communities, including the implications for the legal status of their land at the expiry of the unit of certification's title, concession or lease on the land.</p> <p>- Minor compliance -</p>	Based on documentation review, observations made, interviews with management and stakeholders, there is no evidence that the land for oil palm has diminished the legal, customary or user rights of other users without their free, prior and informed consent.	Not Applicable
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>	Based on documentation review, observations made, interviews with management and stakeholders, there is no evidence that the land for oil palm has diminished the legal, customary or user rights of other users without their free, prior and informed consent.	Not Applicable
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>	Based on documentation review, observations made, interviews with management and stakeholders, there is no evidence that the land for oil palm has diminished the legal, customary or user rights of other users without their free, prior and informed consent.	Not Applicable

	- Minor compliance -		
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>	Based on documentation review, observations made, interviews with management and stakeholders, there is no evidence that the land for oil palm has diminished the legal, customary or user rights of other users without their free, prior and informed consent.	Not Applicable
4.4.6	<p>There is evidence that implementation of agreements negotiated through FPIC is annually reviewed in consultation with affected parties.</p> <p>- Minor compliance -</p>	Based on documentation review, observations made, interviews with management and stakeholders, there is no evidence that the land for oil palm has diminished the legal, customary or user rights of other users without their free, prior and informed consent.	Not Applicable
<p><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.</p>			
4.5.1	<p><b>(C)</b> Documents showing identification and assessment of demonstrable legal, customary and user rights are available.</p> <p>- Critical (Major) compliance -</p>	Based on documentation review, observations made, interviews with management and stakeholders, there is no evidence that the land for oil palm has diminished the legal, customary or user rights of other users without their free, prior and informed consent.	Not Applicable
4.5.2	<p><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 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>	Based on documentation review, observations made, interviews with management and stakeholders, there is no evidence that the land for oil palm has diminished the legal, customary or user rights of other users without their free, prior and informed consent.	Not Applicable
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.</p>	Based on documentation review, observations made, interviews with management and stakeholders, there is no evidence that the land for oil palm has diminished the legal, customary or user rights of other users without their free, prior and informed consent.	Not Applicable



	Negotiated agreements are non-coercive and entered into voluntarily and carried out prior to new operations. - Minor compliance -		
4.5.4	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. - Minor compliance -	Based on documentation review, observations made, interviews with management and stakeholders, there is no evidence that the land for oil palm has diminished the legal, customary or user rights of other users without their free, prior and informed consent.	Not Applicable
4.5.5	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. - Minor compliance -	Based on documentation review, observations made, interviews with management and stakeholders, there is no evidence that the land for oil palm has diminished the legal, customary or user rights of other users without their free, prior and informed consent.	Not Applicable
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 -	Based on documentation review, observations made, interviews with management and stakeholders, there is no evidence that the land for oil palm has diminished the legal, customary or user rights of other users without their free, prior and informed consent.	Not Applicable
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 -	Based on documentation review, observations made, interviews with management and stakeholders, no land was acquired as a result of expropriations without consent.	Not Applicable
4.5.8	<b>(C)</b> New lands are not acquired in areas inhabited by communities in voluntary isolation. - Critical (Major) compliance -	Based on documentation review, observations made, interviews with management and stakeholders, there is no evidence that land was acquired in areas inhabited by communities in voluntary isolation.	Not Applicable

<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	<p><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.</p> <p>- Critical (Major) compliance -</p>	<p>Kulim (M) Berhad has developed a procedure for Land Encroachment and kept at all visited operating units. Refer to procedure under Property Management Department, Land Encroachment, Doc. No. PROP/MP/5 rev:4, issue: 0 dated 6<sup>th</sup> June 2020.</p> <p>The procedure has separated into a few phases and start with identification of potential land conflict (LC) and confirmation of case. Final stage is to surrender the area (overplanted/encroached) and negotiation with claim of compensation (if required).</p>	Complied
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>Procedure for calculating and distributing fair compensation has been established under Property Management Department, Land Encroachment, Doc. No. PROP/MP/5 rev:4, issue: 0 dated 6<sup>th</sup> June 2020.</p> <p>The SOP explains the standard of compensation calculation which also gives the compensated person a bargaining/negotiation position. However, there is no record of any compensation paid to any legal, customary or user rights holder within Pasir Panjang POM certification unit.</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>	<p>Pasir Panjang POM does not have any arrangements for scheme smallholdings. Therefore, this indicator is not applicable.</p>	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>Based on documents sighted and interviews conducted with stakeholders, there was no evidence of any dispute with any previous owner or occupants. Therefore, this indicator is not applicable.</p>	Not Applicable

<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.			
4.7.1	<p><b>(C)</b> A mutually agreed procedure for identifying people entitled to compensation is in place.</p> <p>- Critical (Major) compliance -</p>	<p>Procedure for calculating and distributing fair compensation has been established under Property Management Department, Land Encroachment, Doc. No. PROP/MP/5 rev:4, issue: 0 dated 6<sup>th</sup> June 2020.</p> <p>The SOP explains the standard of compensation calculation which also gives the compensated person a bargaining/negotiation position. However, there is no record of any compensation paid to any legal, customary or user rights holder within Pasir Panjang POM certification unit.</p>	Complied
4.7.2	<p><b>(C)</b> A mutually agreed procedure for calculating and distributing fair compensation (monetary or otherwise) is in place and documented and made available to affected parties.</p> <p>- Critical (Major) compliance -</p>	<p>Procedure for calculating and distributing fair compensation has been established under Property Management Department, Land Encroachment, Doc. No. PROP/MP/5 rev:4, issue: 0 dated 6<sup>th</sup> June 2020.</p> <p>The SOP explains the standard of compensation calculation which also gives the compensated person a bargaining/negotiation position. However, there is no record of any compensation paid to any legal, customary or user rights holder within Pasir Panjang POM certification unit.</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.</p> <p>- Minor compliance -</p>	<p>Based on documentation review, observations made, interviews with management and stakeholders, there is no evidence that communities have lost access and rights to land for plantation expansion.</p>	Not Applicable
<b>Criterion 4.8:</b> 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.			
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</p>	<p>Based on documentation review, observations made, interviews with management and stakeholders, there is no evidence that the</p>	Not Applicable

	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. - Minor compliance -	land for oil palm has diminished the legal, customary or user rights of other users without their free, prior and informed consent. Neither has there been any dispute.	
4.8.2	<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. - Critical (Major) compliance -	Based on documentation review, observations made, interviews with management and stakeholders, there is no evidence that the land for oil palm has diminished the legal, customary or user rights of other users without their free, prior and informed consent. Neither has there been any dispute.	Not Applicable
4.8.3	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) - Minor compliance -	Based on documentation review, observations made, interviews with management and stakeholders, there is no evidence that the land for oil palm has diminished the legal, customary or user rights of other users without their free, prior and informed consent. Neither has there been any dispute.	Not Applicable
4.8.4	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). - Minor compliance -	Based on documentation review, observations made, interviews with management and stakeholders, there is no evidence that the land for oil palm has diminished the legal, customary or user rights of other users without their free, prior and informed consent. Neither has there been any dispute.	Not Applicable
<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	Current and previous period prices paid for FFB are publicly available and accessible by smallholders. - Minor compliance -	The Pasir Panjang POM is an Identity Preserved Mill as evidenced by Certificate No. RSPO 657192 which is valid from 9 March 2017 to 8 March 2022. The Mill processes only FFB from its own estates namely Pasir Panjang, Tunjuk Laut, Bukit Payung, Siang, Bukit	Not Applicable

		Kelompok, Pasir Logok Estates, and therefore this Indicator is 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>	The Pasir Panjang POM is an Identity Preserved Mill as evidenced by Certificate No. RSPO 657192 which is valid from 9 March 2017 to 8 March 2022. The Mill processes only FFB from its own estates namely Pasir Panjang, Tunjuk Laut, Bukit Payung, Siang, Bukit Kelompok, Pasir Logok Estates, and therefore this Indicator is not applicable.	Not Applicable
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>	The Pasir Panjang POM is an Identity Preserved Mill as evidenced by Certificate No. RSPO 657192 which is valid from 9 March 2017 to 8 March 2022. The Mill processes only FFB from its own estates namely Pasir Panjang, Tunjuk Laut, Bukit Payung, Siang, Bukit Kelompok, Pasir Logok Estates, and therefore this Indicator is not applicable.	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>	The Pasir Panjang POM is an Identity Preserved Mill as evidenced by Certificate No. RSPO 657192 which is valid from 9 March 2017 to 8 March 2022. The Mill processes only FFB from its own estates namely Pasir Panjang, Tunjuk Laut, Bukit Payung, Siang, Bukit Kelompok, Pasir Logok Estates, and therefore this Indicator is not applicable.	Not Applicable
5.1.5	<p>Contracts are fair, legal and transparent and have an agreed timeframe.</p> <p>- Minor compliance -</p>	<p>Sighted during the audit were the following contracts:</p> <ol style="list-style-type: none"> <li>1. Mahamurni Plantations Sdn Bhd and Semai Setia Transport for transporting CPO from Mill to refineries dated 15 June 2020 valid until 31 May 2023.</li> <li>2. Syarikat Buana Kita for transporting CPO from Mill to refineries dated 15 June 2020 valid until 31 May 2023.</li> </ol>	Complied

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		<p>3. Sungai Rezeki Sdn Bhd letter of acceptance dated 12 April 2020 (Ref MPSB/C1/13/26(2020) for transporting FFB from ramp to Pasir Panjang POM from 1 April 2020 to 31 March 2023.</p> <p>The above contracts are fair, legal and transparent as they contain agreed time frame, scope of work, fees and payment of services, rights and obligations of both parties, mutual termination clause, force majeure, etc. This was further confirmed during audit interviews conducted with contractors and suppliers.</p>	
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>Clause 5.3 of all contracts signed state that parties agree that payment of fees shall be made within 30 days of submission of invoice. Based on the following, Pasir Panjang Mill and its supply base were able to demonstrate that payments were made within 30 days of invoice as agreed in the contracts:</p> <ul style="list-style-type: none"> <li>a. Invoice No. 1-20090005 dated 30 Sept 2020 from SBK Logistics Sdn Bhd for RM20,543.71 was paid via payment voucher No. 20000617 dated 20 Oct 2020</li> <li>b. Invoice No. 1-2001065 dated 25 Aug 2020 from Biokekal Sdn Bhd for RM2610.00 was paid via payment voucher No. 20000618 dated 20 Oct 2020.</li> <li>c. Invoice No. 0896 from Sungai Rezeki Sdn Bhd dated 16 October 2020 for RM130,343.82 was paid via payment voucher 2000575 dated 20 Oct 2020.</li> </ul>	Complied
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>Records of weighing equipment stamping was maintained on annual basis at visited operating units even though there is no smallholder within Pasir Panjang certification unit. Summary of stamping records as follows:</p>	Complied

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		Weighing equipment	Model/capacity	Date of stamping, certificate no.	Operating Unit	
		Serial no.	JME -ATK	5/1/2020, JME -ATK	Pasir Panjang POM	
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>	No independent smallholder at Pasir Panjang POM Certification Unit.				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>An agreed and documented system which deals with complaints and grievances are available and documented as follows:</p> <ul style="list-style-type: none"> <li>a. Grievance Policy dated 1 May 2018. This Policy commits to a transparent process ensuring stakeholder’s grievances and complaints are dealt with fairly, consistently and promptly.</li> <li>b. Grievance Procedure Doc No. SQD/SMS/4.1 dated 1 August 2020. This SOP is applicable to all parties who deal with the Company who may have complaints and grievances.</li> </ul> <p>This the grievance mechanism which the Company has, are applicable to all parties, including smallholders.</p>				Complied
<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	The Pasir Panjang POM is an Identity Preserved Mill as evidenced by Certificate No. RSPO 657192 which is valid from 9 March 2017				Not Applicable

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	supply base, to assess their needs for support to improve their livelihoods and their interest in RSPO certification. - Minor compliance -	to 8 March 2022. The Mill processes only FFB from its own estates namely Pasir Panjang, Tunjuk Laut, Bukit Payung, Siang, Bukit Kelompok, Pasir Logok Estates, and therefore this Indicator is 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 -	The Pasir Panjang POM is an Identity Preserved Mill as evidenced by Certificate No. RSPO 657192 which is valid from 9 March 2017 to 8 March 2022. The Mill processes only FFB from its own estates namely Pasir Panjang, Tunjuk Laut, Bukit Payung, Siang, Bukit Kelompok, Pasir Logok Estates, and 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 -	The Pasir Panjang POM is an Identity Preserved Mill as evidenced by Certificate No. RSPO 657192 which is valid from 9 March 2017 to 8 March 2022. The Mill processes only FFB from its own estates namely Pasir Panjang, Tunjuk Laut, Bukit Payung, Siang, Bukit Kelompok, Pasir Logok Estates, and 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 -	No independent smallholder at Pasir Panjang POM Certification Unit	Not Applicable
5.2.5	The unit of certification regularly reviews and publicly reports on the progress of the Smallholder support programme. - Minor compliance -	No independent smallholder at Pasir Panjang POM Certification Unit	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	The Policies that have been developed by Kulim (Malaysia) Berhad to deal with equal opportunity and non-discrimination are: a. Business Policy	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>b. Core Labour Standard</p> <p>c. People Policy</p> <p>where fairness and equal opportunities for relevant group such as all employees, including foreign and local are embedded. These Policies prevent discrimination based on 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>Based on interviews held with Malaysian and foreign workers from Indonesia and Bangladesh, Pasir Panjang Mill and its supply base have been able to demonstrate that no form of any discrimination occurs.</p> <p>Reviewed during the audit was contract dated 13 February 2020 between Kulim (Malaysia) Berhad and PT Hamparan Karya Insani for manpower supply from Indonesia. The agreement states among others that cost of workers' transportation to the respective estates/mill will be borne by Kulim. The Demand Letter issued by Indonesian consulate dated 17 Feb 2020 also specifies that levy and PLKS fees are to be borne by employer. No recruitment fees are imposed on any of the foreign workers, and this was further confirmed by foreign workers interviewed.</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>Evidence was available that the process of recruitment, selection and hiring are based on skills, capabilities, qualities and medical fitness. This was evidenced by the recruitment process of Pasir Panjang POM Worker No. 640171 who was employed after satisfying the pre-employment medical examination for new workers. Sighted was the medical examination chit dated 30 Dec 2018 issued by the Health Assistant.</p>	Complied

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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>Based on interview held with representatives of Women On Wards (WOW) Committee members at the Pasir Panjang POM and estates, pregnancy tests are not conducted on discriminatory manner and health screenings are conducted only when legally mandated (when handling chemicals).</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>In place at the Pasir Panjang Mill and its supply base is Women OnWards (WOW) committee which is a women employee outreach programme endorsed and funded by the Company. Its members comprise female employees and wives of workers. WOW promotes gender equality and empower women’s knowledge and skills. In 2020, committee meetings were held to discuss among others, reproductive rights, sexual harassment and domestic violence. Sampled were meetings held at Pasir Panjang POM (on 5 November 2020) and Bukit Payong Estate on 21 February 2020).</p> <p>Based on minutes sighted, committee members were briefed on sexual harassment, domestic violence, how to make complaints if there was a case, reproductive rights, the new census for new mothers, and briefings on Company policies.</p>	Complied
6.1.6	<p>There is evidence of equal pay for the same work scope.</p> <p>- Minor compliance -</p>	<p>From payslips reviewed, evidence was available that workers receive equal pay for the same work scope. Sampled were the following workers at the following estates:</p> <ul style="list-style-type: none"> <li>a. Bukit Payong Estate: <ul style="list-style-type: none"> <li>- Worker No. 624016 (General worker, female, Malaysian)</li> <li>- Worker No. 624033 (General worker, female, Malaysian)</li> </ul> </li> <li>b. Siang Estate: <ul style="list-style-type: none"> <li>- Worker No. 639580 (Gardener, female, Malaysian)</li> </ul> </li> </ul>	Complied

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		- Worker No. 639466 (Gardener, female, Malaysian)													
<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).															
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>Kulim (Malaysia) Berhad is a member of the Malaysian Agricultural Producers Association (MAPA) and is therefore subjected to the agreement between MAPA and the National Union of Plantation Workers (NUPW). Clause 9 of the employment contract states that unless otherwise stated, all terms and conditions of contract are subjected to the Employment Act 1955 and SOCSO Act 1969, and the current MAPA/NUPW contract.</p> <p>Applicable labour laws related to duration, hours of work, overtime, annual/medical leave, public holiday, mutual termination, salary deductions, maternity entitlement, etc are stipulated in the employment contracts. Sampled were employment contracts for Malaysian and Indonesian workers which have been prepared in Bahasa Malaysia. For Bangladeshi workers, the contracts were in the workers' language, i.e. Bengali, and they were briefed on the contents prior to signing. Interviews conducted with the workers confirmed their understanding of salient points in their employment contracts.</p> <p>The following workers' employment contracts were sampled and reviewed:</p> <table border="1"> <thead> <tr> <th>Mill/Estates</th> <th>Worker No</th> <th>Date of employment contract/letter of job offer</th> </tr> </thead> <tbody> <tr> <td rowspan="4">Pasir Panjang Mill</td> <td>640176</td> <td>10 October 2019</td> </tr> <tr> <td>640185</td> <td>10 October 2019</td> </tr> <tr> <td>640148</td> <td>10 October 2019</td> </tr> <tr> <td>640169</td> <td>10 January 2019</td> </tr> </tbody> </table>	Mill/Estates	Worker No	Date of employment contract/letter of job offer	Pasir Panjang Mill	640176	10 October 2019	640185	10 October 2019	640148	10 October 2019	640169	10 January 2019	Complied
Mill/Estates	Worker No	Date of employment contract/letter of job offer													
Pasir Panjang Mill	640176	10 October 2019													
	640185	10 October 2019													
	640148	10 October 2019													
	640169	10 January 2019													

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		Siang Estate	638766	3 November 2019		
			651251	6 February 2020		
			639176	4 March 2020		
		Bukit Payung	624728	1 September 2019		
			624016	1 June 2019		
			624033	6 July 2020		
			624897	1 June 2019		
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 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>Details of payments and conditions of employment are stated and documented in the employment contracts given to all workers. The contract contains terms related to duration, hours of work, overtime, annual/medical leave, public holiday, mutual termination, salary deductions, maternity entitlement, etc. The terms are in compliance with the Employment Act 1955, and the MAPA/NUPW agreement.</p> <p>Payroll documents, namely the payslip, also give accurate information on compensation for all work done. This includes those who receive daily-rated wages, piece rated wages, payment for any overtime work done, and public holiday pay. Also confirmed via sampled payslips that wages and overtime pay were paid in compliance with national legal requirements such as Minimum Wages Order 2020, Employment Act 1955, SOCSO Act 1969, EPF Act 1991, EIS Act 2017.</p> <p>Salary deductions and overtime were in accordance with the relevant laws (SOCSO, EPF, EIS) and Labour Office permits (refer to Indicator 2.1.1 above).</p> <p>The sampled employment contracts and payslips were as follows:</p>				Complied

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Mill/Estates	Worker No	Date employment contract/letter of job offer	of	Payslips
Pasir Panjang Mill	640176	10 October 2019	of	Feb, May, Sept 2020
	640185	10 October 2019	of	Feb, May, Sept 2020
	640148	10 October 2019	of	Feb, May, Sept 2020
	640169	10 January 2019	of	Feb, May, Sept 2020
Siang Estate	638766	3 November 2019	of	Feb, July, August 2020
	651251	6 February 2020	of	Feb, July, August 2020
	639176	4 March 2020	of	Feb, July, August 2020
Bukit Payung	624728	1 September 2019	of	Jan, July, Sept 2020
	624016	1 June 2019	of	Jan, July, Sept 2020
	624033	6 July 2020	of	Jan, July, Sept 2020
	624897	1 June 2019	of	Jan, July, Sept 2020

None of the sampled workers had any family members performing work.

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<p>6.2.3</p>	<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>- Critical (Major) compliance -</p>	<p>Based on review of punch cards, workers' employment contracts and payslips, evidence was available that Pasir Panjang POM and its supply base were able to demonstrate compliance with Employment Act 1955 related to regular working hours, overtime, sickness and holiday entitlement, maternity leave, etc. This includes statutory deductions (SOCSO, EPF, EIS) and non-statutory deductions (e.g. mosque funds, electricity bills, etc) in accordance with the relevant laws and Labour Office permits. These permits are as detailed out under Indicator 2.1.1 above.</p> <p>Sampled during the audit were the following workers' employment contracts and payslips:</p> <table border="1" data-bbox="1137 742 1921 1385"> <thead> <tr> <th>Mill/Estates</th> <th>Worker No</th> <th>Date of employment contract/letter of job offer</th> <th>Payslips</th> </tr> </thead> <tbody> <tr> <td rowspan="4">Pasir Panjang Mill</td> <td>640176</td> <td>10 October 2019</td> <td>Feb, May, Sept 2020</td> </tr> <tr> <td>640185</td> <td>10 October 2019</td> <td>Feb, May, Sept 2020</td> </tr> <tr> <td>640148</td> <td>10 October 2019</td> <td>Feb, May, Sept 2020</td> </tr> <tr> <td>640169</td> <td>10 January 2019</td> <td>Feb, May, Sept 2020</td> </tr> <tr> <td rowspan="3">Siang Estate</td> <td>638766</td> <td>3 November 2019</td> <td>Feb, July, August 2020</td> </tr> <tr> <td>651251</td> <td>6 February 2020</td> <td>Feb, July, August 2020</td> </tr> <tr> <td>639176</td> <td>4 March 2020</td> <td>Feb, July, August 2020</td> </tr> </tbody> </table>	Mill/Estates	Worker No	Date of employment contract/letter of job offer	Payslips	Pasir Panjang Mill	640176	10 October 2019	Feb, May, Sept 2020	640185	10 October 2019	Feb, May, Sept 2020	640148	10 October 2019	Feb, May, Sept 2020	640169	10 January 2019	Feb, May, Sept 2020	Siang Estate	638766	3 November 2019	Feb, July, August 2020	651251	6 February 2020	Feb, July, August 2020	639176	4 March 2020	Feb, July, August 2020	<p>Complied</p>
Mill/Estates	Worker No	Date of employment contract/letter of job offer	Payslips																											
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		Bukit Payung	624728	1 September 2019	Jan, July, Sept 2020	
			624016	1 June 2019	Jan, July, Sept 2020	
			624033	6 July 2020	Jan, July, Sept 2020	
			624897	1 June 2019	Jan, July, Sept 2020	
6.2.4	<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 visits made to Pasir Panjang Mill, Siang Estate and Bukit Payong housing areas, adequate housing, sanitation facilities, water supplies, medical and welfare amenities are being provided to all employees and their family members residing within the premises. Houses have between 2 to 3 bedrooms with between 2 to 3 occupants per house. Electricity and water are available 24 hours a day, and electricity usage of up to 50kW per month is subsidised. Water is provided free of charge.</p> <p>The areas surrounding the housing area are generally clean and well maintained, and houses were generally in good state of repair and grass kept reasonably short. Domestic waste bins are emptied thrice per week. Except as mentioned below, perimeter drains are clear of any blockages.</p> <p>Housing inspections are conducted once a week where records of inspections were sighted. At Pasir Panjang Mill, weekly inspections were carried out on 5 Nov, 28 Oct, 22 Oct, 15 Oct, 8 Oct, 1 Oct 2020. At Bukit Payong Estate, housing inspections were carried out on 3 Dec, 26 Nov, 19 Nov, 12 Nov 2020 where the inspection forms also contained comments on grass height and domestic waste with remarks on when the situation was addressed.</p>	Non-compliance			

		<p>Medical facilities are available at Pasir Panjang Estate (for the Mill workers) and at the respective estates. The estate clinics are visited fortnightly by a Visiting Medical Officer from Klinik Moiz Sdn Bhd in Kota Tinggi, Johor. The VMO also attends to patients during those visits.</p> <p>However, housing conditions at Siang Estate are not in accordance with the requirements of the Employees' Minimum Standard of Housing, Accommodation and Amenities Act 1990.</p> <p>At Siang Division housing area, the following were observed:</p> <ol style="list-style-type: none"> <li>1. The area surrounding the workers' housing was not maintained in a clean and sanitary condition. At the back of House No. 7 (Block F), construction waste and debris such broken doors, metal poles, exposed and rusty nails, discarded furniture, BRC wire, and scheduled waste (fluorescent tubes), etc, were kept in a disorderly and perilous manner.</li> <li>2. The perimeter drain between Blocks F and G was not in a good state of repair, not clear of debris to permit free flow.</li> </ol> <p>At Balau Division, the following were observed:</p> <ol style="list-style-type: none"> <li>3. An old and discarded motorbike with visible oil spill was left next to House No I3.</li> </ol> <p>The weekly housing inspection has not been conducted in an effective manner as it has failed to identify and record all the above. All the above were not in accordance with Section 23 (1) and (2) of the Employees' Minimum Standard of Housing, Accommodation and Amenities Act 1990.</p> <p>Therefore, a Major Non-Compliance was raised.</p>	
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<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>Pasir Panjang Mill and its supply base have demonstrated efforts to improve workers' access to adequate, sufficient and affordable food. Visits were made to the canteen/grocery shop at Bukit Payong Estate. Interview was also conducted with the operators of canteen and grocery shop at Siang Estate. The canteen at Balau Division is open from 6.30AM to 8.30PM. Workers are able to purchase items either on credit or in cash.</p> <p>The operators are required to submit price list of items sold to the estate management on a regular basis for price monitoring. Sighted at Bukit Payung Estate the price listings for Dec 2020, Sept 2020, Oct 2020.</p> <p>In addition to the canteens and grocery shops, night markets are also allowed to operate fortnightly, enabling workers to purchase food items. However, operations of the night markets have been temporarily halted due to the Covid-19 pandemic.</p>	<p>Complied</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></p> <p>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</p>	<p>Based on pay slips sighted, all sampled workers who complete the number of days offered in a month receive at least minimum wages applicable, which is RM1,200 per month, or more.</p> <p>Pasir Panjang POM and its supply base have also carried out the calculation of prevailing wages and in-kind benefits. The calculation took into account housing, electricity, water, education, clothing, food and healthcare. The breakdown of the prevailing wage calculation is therefore as follows:</p> <table border="1" data-bbox="1160 1257 1908 1393"> <thead> <tr> <th>Mill/Estate</th> <th>In-kind benefits</th> <th>Average take-home pay</th> <th>Prevailing wage</th> </tr> </thead> <tbody> <tr> <td>Pasir Panjang POM</td> <td>RM663.69</td> <td>RM2049.17</td> <td>RM2712.86</td> </tr> </tbody> </table>	Mill/Estate	In-kind benefits	Average take-home pay	Prevailing wage	Pasir Panjang POM	RM663.69	RM2049.17	RM2712.86	<p>Complied</p>
Mill/Estate	In-kind benefits	Average take-home pay	Prevailing wage								
Pasir Panjang POM	RM663.69	RM2049.17	RM2712.86								

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<p>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 workers in the Unit of Certification aligned with the RSPO Guidance for Implementing a Decent Living Wage (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).</i></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>	<table border="1" style="width: 100%;"> <tr> <td style="width: 25%;">Siang Estate</td> <td style="width: 25%;">RM332.55</td> <td style="width: 25%;">RM1930.00</td> <td style="width: 25%;">RM2262.55</td> </tr> <tr> <td>Bukit Payong Estate</td> <td>RM2276.22</td> <td>RM1408.16</td> <td>RM3679.38</td> </tr> </table>	Siang Estate	RM332.55	RM1930.00	RM2262.55	Bukit Payong Estate	RM2276.22	RM1408.16	RM3679.38	<p>Based on the breakdown given, the calculation of prevailing wages including in-kind benefits is reasonable.</p>
Siang Estate	RM332.55	RM1930.00	RM2262.55							
Bukit Payong Estate	RM2276.22	RM1408.16	RM3679.38							

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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>Pasir Panjang POM its supply base only employ full-time employees. There was no casual, temporary or day labour employed as evidenced by documents sighted and interviews conducted with workers and management.</p>	Complied
<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 Pasir Panjang POM and its supply base. 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 which states that Kulim recognises and respects the rights of employees to form and/or join trade unions of their choice which are given due recognition by KULIM.</li> </ul> <p>Review of meeting minutes and interview held with the NUPW representative of Bukit Payong Branch confirmed that freedom of association and right to collective are being implemented.</p> <p>Trainings were also held during Policy training held at Pasir Panjang (6 Sept 2020), Siang Estate (22 Oct 2020) and Bukit Payung Estate (29 Nov 2020).</p>	Complied
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</p>	<p>Sampled during the audit were the following meeting between NUPW/AMESU representatives and the respective management teams:</p>	Complied

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	<p>national languages (English and/or Bahasa Malaysia) and made available upon request.</p> <p>- Minor compliance -</p>	<ul style="list-style-type: none"> <li>- Pasir Panjang POM dated 17 August 2020;</li> <li>- Bukit Payong Estate dated 1 August 2020.</li> </ul> <p>All minutes of meetings were prepared and documented in Bahasa Malaysia.</p> <p>Interview held with the NUPW representative of Bukit Payong branch also confirmed that NUPW representatives were freely elected by the workers. Management also did not prohibit the NUPW representative from attending regular meetings at the NUPW office Kota Tinggi. The last meeting which the NUPW representative attended was on 13 Oct 2020.</p>	
<p>6.3.3</p>	<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 audit interview held with NUPW representative of Bukit Payong Branch, review of minutes of meetings between NUPW representatives and management dated 17 Aug 2020 (Pasir Panjang Mill), and on 1 August 2020 (Bukit Payong Estate), evidence was available that management does not interfere with the formation or operation of the NUPW. Workers' representatives were chosen from among the workers as confirmed by the NUPW representative.</p>	<p>Complied</p>
<p><b>Criterion 6.4: Children are not employed or exploited.</b></p>			
<p>6.4.1</p>	<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>- Minor compliance -</p>	<p>Kulim (Malaysia) Berhad has established Core Labour Standard Policy dated 1 May 2018 where they are not engaged in or support the use of Child Labour and will provide adequate support to enable children of its employees to attend and remain in school until no longer a child. This was verified during field observations and review of check roll list. The minimum age of workers to recruit is 18 years old. This requirement is also included in all agreements with its contractors via Addendum to the Agreement.</p> <p>Sampled were the addendums signed by Vetri Vinod Enterprise (harvesting contractor), Soko Enterprise (harvesting contractor),</p>	<p>Complied</p>

		Tiong Lim Enterprise (FFB transporter), Syarikat Buana Kita (CPO transporter).	
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>	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 workers' NRIC and passports, all workers were at least 18 years old when employed.	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>	Based on the workers list of all Pasir Panjang POM and its supply base, interviews conducted and observations made, there is no evidence that young persons are being employed.	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>Kulim (Malaysia) Berhad has established Core Labour Standard Policy dated 1 May 2018 where they are not engaged in or support the use of Child Labour and will provide adequate support to enable children of its employees to attend and remain in school until no longer a child. This Policy is displayed on main notice boards.</p> <p>This Policy was also communicated during stakeholder meeting held on 26 October 2020.</p> <p>Contractors are also required to sign contract addendums which contain a provision stating that the contractor shall comply with applicable labour and employment laws regarding and prohibit any form of child labour, forced or trafficked labour. Sampled and reviewed during the audit were the contract Addendum signed by Vetri Vinod Enterprise (harvesting contractor), Soko Enterprise (harvesting contractor), Tiong Lim Enterprise (FFB transporter), Syarikat Buana Kita (CPO transporter).</p> <p>Interviews held with contractors and suppliers also confirmed their understanding of this obligation.</p>	Complied
<p><b>Criterion 6.5:</b> There is no harassment or abuse in the workplace, and reproductive rights are protected.</p>			

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>A Policy to prevent sexual and other forms of harassment are available in Sexual Harassment Policy dated 1 May 2018 signed by Executive Director. This Policy has been communicated to all levels of workforce via Wow meetings held at Pasir Panjang Mill (on 5 Nov 2020) and Bukit Payong Estate (on 21 Feb 2020).</p> <p>Further briefing was also given during Policy training and during muster briefings at Pasir Panjang Mill (on 2 August 2020), Siang Estate (on 4 May 2020) and at Bukit Payong Estate (on 21 Jan 2020 and 15 October 2020).</p>	Complied
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>Kulim (Malaysia) Berhad’s Core Labour Standard dated 1 May 2018 signed by Executive Director provides protection of reproductive rights of all workers. The Labour Standard specifies that the Company recognizes the rights of employees to reproduction and reproductive health, including the right to make decision on reproduction.</p> <p>Interviews with female employees also show 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. This Standard was communicated to all levels of workforce during briefings on Company policies at Pasir Panjang Mill (on 4 Sept 2020), and via WoW meetings as follows at Pasir Panjang Mill (on 5 Nov 2020) and Bukit Payong Estate on 21 Feb 2020).</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>	<p>A census form to assess the needs of new mothers is available. This form enables the assessment to be done of new mothers’ needs for creche/childcare, antenatal, vaccination, maternity and paternity, postpartum care, prenatal check-up, breastfeeding facilities, awareness and counselling. However, there has been no new</p>	Complied

		mother during the past one year. Nevertheless, female employees interviewed confirmed their awareness of this assessment form.							
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>Reviewed during the audit was Grievance Mechanism Doc. No. SQD/SMS/4.1 Issue No. 1 dated 1 Aug 2020. The scope covers all those who deal with Kulim (Malaysia) Berhad and may have complaints or grievances. The aim of this mechanism is to have a documented system for dealing with complaints and grievances that is agreeable and accepted by all stakeholders. Clause 5.8 states that anonymity of complainants will be respected and protected if requested. This mechanism was briefed during muster briefings at Pasir Panjang Mill (on 2 August 2020), Siang Estate (on 12 October 2020), and at Bukit Payong Estate (20 July 2020).</p> <p>Based on interviews conducted with stakeholders and workers, evidence is available that the grievance mechanism has been communicated effectively and implemented.</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> <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>Pasir Panjang POM and its supply base are able to demonstrate that all workers have entered into employment voluntarily. This was further confirmed from interviews conducted with the workers themselves.</p> <p><b>Passports:</b></p> <p>Workers are given the option of either keeping their own passports, or to keep their passports at the management office for safety reasons. Sighted during the audit, letters from workers confirming their preference to keep their passports at the office for safety reasons. Among those sighted were letters from the following workers:</p> <table border="1"> <thead> <tr> <th>Mill/Estates</th> <th>Worker No</th> <th>Country of origin</th> </tr> </thead> <tbody> <tr> <td> </td> <td> </td> <td> </td> </tr> </tbody> </table>	Mill/Estates	Worker No	Country of origin				Complied
Mill/Estates	Worker No	Country of origin							

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- Critical (Major) compliance -	Pasir Panjang Mill	640114 640185 640148 640169 640170	Indonesia Indonesia Indonesia Indonesia Indonesia
	Siang Estate	639464 639072 639535 639176 639507	Bangladesh Bangladesh Indonesia Indonesia Indonesia
	Bukit Payong Estate	624869 624917 624920 624897 624567	Indonesia Indonesia Bangladesh Bangladesh Bangladesh
	<p><b>Recruitment fees:</b>            Reviewed was contract dated 13 February 2020 between Kulim (Malaysia) Berhad and PT Hamparan Karya Insani for manpower supply from Indonesia. The agreement states among others, that cost of transportation to the respective estates/mill will be borne by Kulim. No recruitment fees are imposed on any of the foreign workers. This was further confirmed in interviews held with the workers from Indonesia and Bangladesh.</p>		
	<p><b>Contract substitution:</b>            Employment contracts with workers, recruitment agent contracts with PT Hamparan Karya Insani, and interviews held with the</p>		



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		<p>workers from Indonesia and Bangladesh confirmed that no contract substitution has occurred.</p> <p><b>Involuntary overtime:</b></p> <p>Based on documents signed by workers on overtime, and based on interviews conducted, there is no evidence of involuntary overtime within the Pasir Panjang Mill and its supply base. Reviewed the overtime form for weighbridge operators during weeks 20 Sept – 26 Sept and 4 – 9 Oct 2020. The form also contains information on the workers’ job description, start, end and total overtime hours. The forms were signed by the respective workers and the Head of Department.</p> <p>At Siang Estate, overtime records for Worker No 639536 was reviewed. This record which showed that he worked 67 hours in November 2020 was signed by the worker, Assistant Manager and Senior Manager. The number of hours worked was between 3 to 4 hours per day.</p> <p><b>Lack of freedom of workers to resign &amp; penalty for termination of employment:</b></p> <p>Clause 5 of employment contracts allow for early termination of contract by giving of 2 months’ notice (upon confirmation) and 2 weeks’ notice (on probation). There is no mention of any penalty payable.</p> <p><b>Debt bondage &amp; withholding of wages:</b></p> <p>Based on payslips sighted and interview with workers, there was no evidence of any debt bondage and withholding of wages.</p>	
6.6.2	<p><b>(C)</b> Where temporary or migrant workers are employed, a specific labour policy and/or procedures are established and implemented.</p> <p>- Critical (Major) compliance -</p>	<p>A special labour policy and procedures have been established under the Kulim (Malaysia) Berhad Core Labour Standard signed by Executive Director dated 1 May 2018. This Policy:</p>	Complied

		<ul style="list-style-type: none"> <li>- prohibits the employment of children and young persons, forced and bonded labour</li> <li>- provides for signing of written employment contracts in a language they understand with clear remuneration and description of duties</li> <li>- workers' entitlement to housing and basic amenities which are at par with statutory requirements</li> <li>- free of discrimination, coercion or violence</li> <li>- rights of employees to join trade unions</li> <li>- accessibility to grievance procedure</li> <li>- entitled to one day off per week.</li> </ul> <p>Based on pay slips, employment contracts, punch cards reviewed, and interviews conducted with workers, Pasir Panjang POM and its supply base are able to demonstrate the implementation of this Policy.</p>																									
<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>																											
<p>6.7.1</p>	<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>Both the estates/mill management conduct regular two-way communication with their employees through the quarterly OSH meeting. The dates of meetings held are recorded below.</p> <table border="1" data-bbox="1169 1086 1883 1273"> <thead> <tr> <th>No</th> <th>Estate</th> <th>1st</th> <th>2nd</th> <th>3rd</th> <th>4th</th> </tr> </thead> <tbody> <tr> <td>1</td> <td>SE</td> <td>25/12/19</td> <td>24/7/20</td> <td>15/10/20</td> <td>30/11/20</td> </tr> <tr> <td>2</td> <td>BPE</td> <td>27/11/19</td> <td>13/05/20</td> <td>27/7/20</td> <td>08/9/20</td> </tr> <tr> <td>3</td> <td>PPPOM</td> <td>25/12/19</td> <td>16/3/20</td> <td>21/6/20</td> <td>27/9/20</td> </tr> </tbody> </table> <p>Agenda discussed among others;</p> <p>a) Confirmation of minutes previous meeting</p>	No	Estate	1st	2nd	3rd	4th	1	SE	25/12/19	24/7/20	15/10/20	30/11/20	2	BPE	27/11/19	13/05/20	27/7/20	08/9/20	3	PPPOM	25/12/19	16/3/20	21/6/20	27/9/20	<p>Complied</p>
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		<ul style="list-style-type: none"> <li>b) Workplace inspection report</li> <li>c) Accident report</li> <li>d) General Safety</li> <li>e) HIRARC/training</li> <li>f) Complaint from Employee/External Party.</li> <li>g) Other matters</li> </ul> <p>There were deferment of meeting in Bkt Payung Estate due to the MCO restriction. Documented reasoning was stated in a letter 23/4/20 issued by the HQ OSH. Workplace inspections are made prior to the ESH meeting. The respective Managers were appointed as ESH Chairman (PIC) through letter signed by Chairman ESH Head Office. All letters were sighted and verified.</p> <table border="1" data-bbox="1169 815 1877 1002"> <thead> <tr> <th>No</th> <th>Estate</th> <th>Chairman</th> <th>Date</th> </tr> </thead> <tbody> <tr> <td>1</td> <td>Siang Estate</td> <td>Manager</td> <td>21/9/19</td> </tr> <tr> <td>2</td> <td>Bkt Payung Estate</td> <td>Manager</td> <td>21/9/20</td> </tr> <tr> <td>3</td> <td>Pasir Panjang POM</td> <td>Manager</td> <td>21/9/19</td> </tr> </tbody> </table>	No	Estate	Chairman	Date	1	Siang Estate	Manager	21/9/19	2	Bkt Payung Estate	Manager	21/9/20	3	Pasir Panjang POM	Manager	21/9/19	
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6.7.2	<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>The procedures for accident and emergencies has been established. There is formation of ERP team &amp; ERP for all the identified incidences. In addition the procedures have been summarized in a chart flow form and displayed for information of all employees in the estates/mill. They includes emergencies relating fire, chemical spillage, flood and accident at work place.</p> <ul style="list-style-type: none"> <li>a) <i>Ahli J/Kuasa Pasukan Bertindak Kecemasan 2020</i> headed by the Estate/Mill Manager</li> <li>b) <i>Carta Aliran Pelan Tindakan Kecemasan Semasa Kebakaran</i></li> </ul>	Complied																

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- c) *Carta Aliran Pelan Tindakan Kecemasan Semasa Berlaku Banjir*
- d) *Carta Aliran Pelan Tindakan Kecemasan Semasa Berlaku Tumpahan Kimia*

The organization chart for the ERP team was established and displayed for information of the employees. The important telephone contact numbers were also provided therein. Procedures guidelines were issued by SQD and amended to tailor to the situation differences in the estates and mill.

	Emergency situation	Mill	Estate
1	Fire	/	/
2	Oil spillage	/	-
3	Effluent overflow	/	-
4	Chemical spillage	/	/
5	Flood	-	/
6	Accident at work place	-	/

ERT members received training and practice in emergency procedures appropriate to their respective workplace and degree of risk. The training are conducted by an accredited or qualified organization who can demonstrate their suitability to provide training.

The trained personnel for the First Aid were among the employees working as field staff/mandores. The first aid boxes were available at various points in the estate office, workshop, and store. The estate distributed the first aid box to the mandores and brought

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		<p>along to the field during operations. In addition, there are also first aid boxes kept in the office, store and workshops</p> <p>Records of all accidents are kept and filed. The methodology of occupational injuries is recorded using LTA. (Lost Man day MC.) This is summarized officially in the JKKP 8. Records are kept for a minimum 10 years in the office. Summary for the year is described in the JKKP 8 a mandatory requirement with submission as follows. Accident Statistics are being maintained in a satisfactory manner</p> <table border="1" data-bbox="1167 699 1899 932"> <thead> <tr> <th rowspan="2"></th> <th rowspan="2">Estate</th> <th colspan="4">No of cases in 2019</th> <th rowspan="2">JKKP 8 submission</th> </tr> <tr> <th>cases</th> <th>LTI</th> <th>Non LTI</th> <th>Total</th> </tr> </thead> <tbody> <tr> <td>1</td> <td>Siang</td> <td>4</td> <td>13</td> <td>18</td> <td>22</td> <td>30/1/20</td> </tr> <tr> <td>2</td> <td>Bkt Payung</td> <td>19</td> <td>29</td> <td>0</td> <td>19</td> <td>12/1/20</td> </tr> <tr> <td>3</td> <td>PPPOM</td> <td>0</td> <td>0</td> <td>0</td> <td>0</td> <td>28/1/20</td> </tr> </tbody> </table> <p>Siang Estate had an incident 10/3/2019 - a harvester cut his right hand finger while sharpening his harvesting knife. LTI is 7 days with investigation made on 22/3/2109 and remedy made to including further training. Bkt Payung Estate had series of minor incidences of LTI less than 4 days mainly in the harvesting related activities. Investigation was also initiated with corrective/preventive actions proposed and implemented.</p>		Estate	No of cases in 2019				JKKP 8 submission	cases	LTI	Non LTI	Total	1	Siang	4	13	18	22	30/1/20	2	Bkt Payung	19	29	0	19	12/1/20	3	PPPOM	0	0	0	0	28/1/20	
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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</p>	<p>The estates and mill provide PPE to the employees such as apron, safety helmets, and safety shoes relevant to the work handled by the workers. Records of PPE issuance for the estate were sighted. During the site visit workers was observed to be in PPE. Based on</p>	Complied																																

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	<p>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>the HIRARC carried out at the estates/mill the PPE types for the various activities has been identified and implemented.</p> <ul style="list-style-type: none"> <li>a) Harvester- Safety helmet, sickle cover, hand glove. wellington boots</li> <li>b) Sprayers- Respirator, nitrile glove (chemical resistant) goggles, wellington boots, apron.</li> <li>c) Manuring- Apron, wellington boots, dust mask, nitrile glove.</li> <li>d) Water treatment Plant Operator - Safety boots, ear muff, safety vest, helmet, cotton glove, dust mask.</li> </ul> <p>The mill issued PPE to its employees for their protection at workplace. Records of PPE issued are maintained individually to all employees. PPE issued to the workers is safety helmets, safety shoes. Special PPE for workers assigned to height, confined space. Safety shoes issued on a 6 monthly basis and recorded.</p> <ul style="list-style-type: none"> <li>a) Mill operator – Safety boots, ear muff, safety vest, helmet, cotton glove</li> <li>b) Water treatment Plant Operator - Safety boots, ear muff, safety vest, helmet, cotton glove, dust mask.</li> </ul> <p>Sighted issuance of PPE records for the estates/mill employees in 2020.</p>							
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>Both the Estates and Mill in the CU uses SOCSO for the coverage for the local and foreign workers. The insurance coverage has ceased effective 2018 following the Government directive on the coverage.</p> <table border="1" data-bbox="1220 1305 1724 1396"> <thead> <tr> <th></th> <th>Estate/Mill</th> <th>SOCSO ref no</th> </tr> </thead> <tbody> <tr> <td>1</td> <td>Siang Estate</td> <td>E1100003598V</td> </tr> </tbody> </table>		Estate/Mill	SOCSO ref no	1	Siang Estate	E1100003598V	Complied
	Estate/Mill	SOCSO ref no							
1	Siang Estate	E1100003598V							

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		<table border="1"> <tr> <td>2</td> <td>Bkt Payung Estate</td> <td>E11000086446</td> </tr> <tr> <td>3</td> <td>P Panjang POM</td> <td>E1100017529P</td> </tr> </table>	2	Bkt Payung Estate	E11000086446	3	P Panjang POM	E1100017529P	
2	Bkt Payung Estate	E11000086446							
3	P Panjang POM	E1100017529P							
6.7.5	Occupational injuries are recorded using Lost Time Accident (LTA) metrics. - Minor compliance -	Records of all accidents are kept and filed. The methodology of occupational injuries is recorded using LTA. (Lost Man day MC.) This is summarized officially in the JKPP 8. Records are kept for a minimum 10 years in the office. Summary of cases for the year is described in the JKPP 8 as a mandatory requirement.	Complied						
<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 -	Both the Estates continued to monitor the Implementation of Integrated Pest Management (IPM) plans. a) The estates had in place documented the IPM plan which covered monitoring of pest, control of pest population levels at below threshold levels by using cultural, biological, physical/mechanical and use of pesticides. The plan was guided by ARM Section J01-J10. b) In order to minimize use of insecticides on leaf-eating pest, the estates planted beneficial plants such as <i>Turnera subulata</i> , <i>Cassia cobanensis</i> , <i>Antigonon leptopus</i> , <i>Euphorbia heterophylla</i> , along the roadsides and designated points in the fields and also within the nursery perimeter. c) The plan also advocated single layer compost mulching in order to prevent the breeding of rhinoceros beetles. Monthly detection and observation of leaf eating pests, mammalian pests and diseases had been continued. These	Complied						

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		<p>monthly detection and observations were carried by staff.</p> <p>d) Census records for Ganoderma affected palms were sighted. All the estates carried census on rat damage and diseases like Ganoderma.</p> <p>e) Rat baiting was by calendar baiting at 2 campaigns per year where recommended by the PI /Agronomist. Baiting are continued until bait acceptance threshold level</p>	
7.1.2	<p>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.</p> <p>- Minor compliance -</p>	<p>This is not practiced in the two estates visited. None of species were referenced in the Global Invasive Species Database and CABI.org are used in the management of IPM. The estates have declared this compliance in the status of IPM species invasiveness.</p>	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 was no land preparation in CU Mill and Estates by burning ever since KMB practiced zero burning as per the policy in:</p> <p>a) ARM-SOP-Section A04 - Under felling/clearing &amp; land preparation</p> <p>b) Kulim Sustainability Handbook - Pollution Management pg 29</p> <p>KMB has a policy of no open burning. As advocated, the estates practiced zero burning. There was no evidence that fire had been used to prepare land for replanting in the estate No fire was used for waste disposal. This was sighted in compliance during the field visit on young areas 2017,2018 and 2019 planting in Bkt Payung Estate.</p>	Complied
<b>Criterion 7.2:</b> Pesticides are used in ways that do not endanger health of workers, families, communities or the environment.			
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>All pesticides used were those officially registered under the Pesticide Act 1974. The CU confined usage to only class II, class III &amp; class IV pesticides.</p> <p>a) No illegal agrochemicals (stated by local and international laws) paraquat was used in the 2 estates.</p> <p>b) The usage of the agrochemicals was based on the Agricultural</p>	Complied



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		<p>Reference Manual (ARM) Section H01, SOP and in the Pictorial Safety Standard Book where written justifications had been provided for various fields operations.</p> <p>c) The Manual has included chemical register list which indicates the use of selective products that are specific to the targeted pest, weed or disease. The procedures also covered the use of PPE when handling the chemicals. The estates continued to use pesticides as per the SOPs in ARM Section H01.</p> <p>d) Purchases of pesticides are made on a centralized arrangement via Head Office thus a control by the organization.</p>	
7.2.2	<p>(C) 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>The 2 Estates had records to show the types of pesticides used with active ingredients and their LD50 and where these pesticides had been used, the total quantity, number of applications and active ingredients (ai) per ha.</p> <p>a) Pesticides are used only when justified and areas used are recorded in bin cards, program sheets, chemical register, field-cost books and in progress reports. Records of pesticides used were available and verified.</p> <p>b) All pesticides used were those officially registered under the Pesticide Act 1974. The CU had used only class II ,class III &amp; class IV pesticides.</p> <p>c) No illegal agrochemicals (stated by local and international laws) in particular paraquat were used in their estates.</p>	Complied
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>During the audit, it was observed and recorded that the 2 Estates had not use chemicals categorized as World Health Organization (WHO) type 1A or 1B or listed by the Stockholm or Rotterdam Conventions.</p> <p>a) Paraquat usage has been prohibited in all units and the entirety of the organization.</p> <p>b) The Safety Procedures for pesticides application were well</p>	Complied

		described in Pictorial Safety Standard.	
7.2.4	<p>There is no prophylactic use of pesticides, unless in exceptional circumstances, as identified in national best practice guidelines.</p> <p>- Minor compliance -</p>	<p>The 2 estates are committed to minimize the usage of agrochemicals through the implementation of IPM practices among others;</p> <ul style="list-style-type: none"> <li>a) The planting of beneficial plants i.e. <i>Tunera subulata</i>, <i>Cassia cobanensis</i> and <i>Antigonon leptopus</i> rate of 200m: 3.5 ha. Guidelines as stated in ARM section J10.</li> <li>b) Blanket spraying was not practiced by this CU and soft grasses maintained in the field. It had also been the practice that insecticides are used only after a threshold level has been exceeded as per the Agricultural Reference Manual (ARM) Section J51-Intergrated Pest Management</li> <li>c) There is no prophylactic use of pesticides. The quantity of agrochemicals required for various field conditions are documented and justified in KMB Agriculture Reference Manual Section H01.</li> </ul>	Complied
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> <ul style="list-style-type: none"> <li>a) Judgment of the threat and verify why this is a major threat</li> <li>b) Why there is no other alternative which can be used</li> <li>c) Which process was applied to verify why there is no other less hazardous alternative</li> <li>d) What is the process to limit the negative impacts of the application</li> </ul>	<p>The 2 estates in the confined usage of pesticides which are were officially registered under the Pesticides Act 1974 (Act 149) and the relevant provision (Section 53A) and in accordance with USECHH Regulations 2000.</p> <ul style="list-style-type: none"> <li>a) The review of the chemical register concluded that all pesticides used were of class II, III &amp; class IV. The use of paraquat had been prohibited in all KMB estates.</li> <li>b) There was no evidence of pesticides that are categorized as World Health Organization Class 1A or 1B, or that were listed by the Stockholm or Rotterdam Conventions been used.</li> <li>c) Sighted from records and interviews with workers, staff and estate assistants, concluded that training were held with all precautions being taken and all legal requirements met.</li> </ul>	Complied

	<p>e) Estimation of the timescale of the application and steps taken to limit application to the specific outbreak.</p> <p>- Minor compliance -</p>	<p>d) The chemical used in the estates among others as listed below;</p> <table border="1" data-bbox="1160 416 1912 651"> <thead> <tr> <th></th> <th>Chemical name</th> <th>Class</th> <th></th> <th>Chemical name</th> <th>Class</th> </tr> </thead> <tbody> <tr> <td>1</td> <td>Glyphosate</td> <td>IV</td> <td>9</td> <td>Triclopyr butoxy ethyl ester</td> <td>III</td> </tr> <tr> <td>2</td> <td>isopropylamine</td> <td>II</td> <td>10</td> <td>Cypermethrin</td> <td>III</td> </tr> <tr> <td>3</td> <td>Thiram</td> <td>II</td> <td>11</td> <td>Canyon 20G</td> <td>IV</td> </tr> <tr> <td>4</td> <td>Glufosinate ammonium</td> <td>III</td> <td>12</td> <td>Miracle</td> <td>IV</td> </tr> <tr> <td>5</td> <td>Brodifacoum</td> <td>IV</td> <td>13</td> <td>Bayfolan</td> <td>IV</td> </tr> <tr> <td>6</td> <td>Antracol</td> <td>IV</td> <td>14</td> <td>Metsulfuron-methyl</td> <td>IV</td> </tr> <tr> <td>7</td> <td>kenlon</td> <td>III</td> <td>15</td> <td>Sodium Chlorate</td> <td>IV</td> </tr> <tr> <td>8</td> <td>multiphos</td> <td>1B</td> <td>16</td> <td></td> <td></td> </tr> </tbody> </table>		Chemical name	Class		Chemical name	Class	1	Glyphosate	IV	9	Triclopyr butoxy ethyl ester	III	2	isopropylamine	II	10	Cypermethrin	III	3	Thiram	II	11	Canyon 20G	IV	4	Glufosinate ammonium	III	12	Miracle	IV	5	Brodifacoum	IV	13	Bayfolan	IV	6	Antracol	IV	14	Metsulfuron-methyl	IV	7	kenlon	III	15	Sodium Chlorate	IV	8	multiphos	1B	16			
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<p>7.2.6</p>	<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>Records showed that pesticides were handled, used and applied by trained persons and as per the SDS of the product.</p> <p>a) The staff and workers such as the storekeepers, sprayers, fertilizer and rat bait workers were trained and they had understood the hazards involved and how the chemicals should be handled in a safe method.</p> <p>b) The trade and generic names of the chemicals were made known to the workers through the SDS training. SDS was also displayed at all storage areas as observed during the audit.</p> <p>c) The training included the safety aspects and usage of PPE when handling with pesticides. Records of training are shown in 3.7.2 and verified.</p> <p>d) All workers involved in pesticide application were provided with appropriate PPE and replaced when worn-out. PPE issuance &amp; replacement records were verified by the auditors.</p> <p>e) From interviews conducted with workers and staffs in the field and stores clerks it was established that they had been trained and were aware of safe handling procedure.</p> <p>f) Training in relation to pesticides &amp; chemical handling among others as shown below.</p> <table border="1" data-bbox="1144 1350 1919 1378"> <tr> <td>Subject</td> <td>PPPOM</td> <td>SE</td> <td>BPE</td> </tr> </table>	Subject	PPPOM	SE	BPE	<p>Complied</p>																																																		
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		<table border="1"> <tr><td>1</td><td>SOP Weeding / HIRARC</td><td>02/2/20</td><td>13/8/20</td><td>17/2/20</td></tr> <tr><td>2</td><td>OSH guidelines</td><td>17/3/20</td><td>-</td><td>24/11/20</td></tr> <tr><td>3</td><td>Circle raking /spraying</td><td>-</td><td>18/4/20</td><td>17/2/20</td></tr> <tr><td>4</td><td>PPE usage</td><td>-</td><td>09/3/20</td><td>17/2/20</td></tr> <tr><td>5</td><td>Chemical spillage ERP</td><td>23/1/20</td><td>02/3/20</td><td>17/2/20</td></tr> <tr><td>6</td><td>First Aid -briefing</td><td>-</td><td>19/7/20</td><td>09/9/20</td></tr> <tr><td>7</td><td>Pesticides Handling</td><td>-</td><td>04/3/20</td><td>18/8/20</td></tr> <tr><td>8</td><td>WTP management</td><td>12/7/20</td><td>10/8/20</td><td>20/2/20</td></tr> <tr><td>9</td><td>PPE adherence</td><td>07/1/20</td><td>03/9/20</td><td>17/2/20</td></tr> <tr><td>10</td><td>Spraying P&amp; D - PPE</td><td>-</td><td>13/7/20</td><td>20/1/20</td></tr> <tr><td>11</td><td>Laboratory</td><td>19/7/29</td><td>-</td><td>-</td></tr> </table>	1	SOP Weeding / HIRARC	02/2/20	13/8/20	17/2/20	2	OSH guidelines	17/3/20	-	24/11/20	3	Circle raking /spraying	-	18/4/20	17/2/20	4	PPE usage	-	09/3/20	17/2/20	5	Chemical spillage ERP	23/1/20	02/3/20	17/2/20	6	First Aid -briefing	-	19/7/20	09/9/20	7	Pesticides Handling	-	04/3/20	18/8/20	8	WTP management	12/7/20	10/8/20	20/2/20	9	PPE adherence	07/1/20	03/9/20	17/2/20	10	Spraying P& D - PPE	-	13/7/20	20/1/20	11	Laboratory	19/7/29	-	-	
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7.2.7	<p><b>(C)</b> Storage of all pesticides is in accordance with recognised best practices.</p> <p>- Critical (Major) compliance -</p>	<p>The chemical stores in the estates were found to be in compliance with the Occupational Safety and Health Act 1994 (Act 514) as well as in the Pesticides Act 1974 (Act 149).</p> <ul style="list-style-type: none"> <li>a) Records of purchase, storage and use were maintained.</li> <li>b) All store buildings were equipped with exhaust fans with the door secured. Only authorized personnel are assigned to handle the chemicals.</li> <li>c) All the chemicals were segregated in storage accordingly.</li> </ul> <p>Empty pesticides containers were triple rinsed, holes punched and stored separately in the scheduled wastes store. Thereafter disposal arrangement will follow accordingly as per procedures currently to a registered recycler company M/s G-Planter Sdn Bhd</p>	Choose an item.																																																							
7.2.8	<p>All pesticide containers are triple rinsed and punctured before being disposed of and/or handled responsibly if used for other purposes.</p> <p>- Minor compliance -</p>	<p>The procedure SPO/W1/06–Scheduled Wastes (Hazardous Waste) Management dated 01/10/2020 has been established.</p> <ul style="list-style-type: none"> <li>a) Collection of SW is made by Kualiti Alam Sdn Bhd.licensed vendor registered with DOE.</li> <li>b) The clinical waste SW 404 is disposed to Kualiti Alam Sdn Bhd</li> <li>c) Empty containers were tripled rinsed, pierced and delivered to a registered recycler company M/s G-Planter Sdn Bhd. Details as per 7.3.2.</li> </ul>	Complied																																																							

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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 provided to affected local communities at least 48 hours prior to application of aerial spraying.</p> <p>- Critical (Major) compliance -</p>	<p>Aerial application of agrochemicals is not practiced in both Estates. This is confirmed through observation during the site visit, estate complex and interview with the employees. Such method is no longer in existence in the KMB estates practices.</p>	Complied																																										
7.2.10	<p><b>(C)</b> Specific annual medical surveillance for pesticide operators, and documented action to treat related health conditions, is demonstrated.</p> <p>- Critical (Major) compliance -</p>	<p>The CHRA for the estates/mill in the CU was conducted with details as shown below.</p> <table border="1" data-bbox="1153 675 1877 863"> <thead> <tr> <th>OU</th> <th>Date</th> <th>Assessor</th> <th>JKKP No</th> </tr> </thead> <tbody> <tr> <td>SE</td> <td>27/02/18</td> <td>QMSPRO Sdn Bhd</td> <td>HQ/03/ASS/00/309</td> </tr> <tr> <td>BPE</td> <td>23/04/18</td> <td>QMSPRO Sdn Bhd</td> <td>HQ/03/ASS/00/309</td> </tr> <tr> <td>PPPOM</td> <td>27/11/18</td> <td>AmCen Lab Sdn Bhd</td> <td>HQ/14/ASS/00/350</td> </tr> </tbody> </table> <p>The recommendation from the CHRA is mainly on the training for operators working in laboratory, ETP, WTP, Boiler, workshop, scheduled waste and chemical store. In addition the assessor recommended medical surveillance be conducted for the categories of employees in the workshop and laboratory and chemicals handlers. Similar CHRA was compiled for the estates with details provided therein. below. The CHRA report among others described requirement of medical surveillance to be made for the listed category of employees.</p> <p>The medical surveillance was carried out on in the CU as follows;</p> <table border="1" data-bbox="1137 1270 1921 1377"> <thead> <tr> <th rowspan="2"></th> <th rowspan="2">OU</th> <th colspan="5">Employees categories</th> </tr> <tr> <th>Date</th> <th>Wshop/stor</th> <th>Fertilizer</th> <th>sprayers</th> <th>WTP</th> </tr> </thead> <tbody> <tr> <td>1</td> <td>Siang</td> <td>18/10/20</td> <td>5</td> <td>0</td> <td>30</td> <td>1</td> </tr> <tr> <td>2</td> <td>B Payung</td> <td>20/9/20</td> <td>2</td> <td>19</td> <td>43</td> <td>2</td> </tr> </tbody> </table>	OU	Date	Assessor	JKKP No	SE	27/02/18	QMSPRO Sdn Bhd	HQ/03/ASS/00/309	BPE	23/04/18	QMSPRO Sdn Bhd	HQ/03/ASS/00/309	PPPOM	27/11/18	AmCen Lab Sdn Bhd	HQ/14/ASS/00/350		OU	Employees categories					Date	Wshop/stor	Fertilizer	sprayers	WTP	1	Siang	18/10/20	5	0	30	1	2	B Payung	20/9/20	2	19	43	2	Complied
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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 the estates and mill in the CU complied with procedure and guidelines provided the Standard Operating Procedure adopted by KMB Agrochemical Management ref SQD/SMS/6.1dated 01/8/2020 whereby;</p> <ul style="list-style-type: none"> <li>a. No work with pesticides is given to pregnant or breast-feeding women. <i>Tidak dibenarkan pekerja wanita yang MENGANDUNG / MENYUSUKAN anak membuat kerja-kerja penyemburan)</i></li> <li>b. The estates maintained the list of sprayers. There was no lady workers engaged to spraying operations /chemical handling in both the estates.</li> <li>c. Field interviews with the lady workers confirmed that such a regulation is a standard practice in the estates and in compliance.</li> </ul>	Complied																			
<p><b>Criterion 7.3:</b> Waste is reduced, recycled, reused and disposed of in an environmentally and socially responsible manner.</p>																						

<p>7.3.1</p>	<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>Pasir Panjang Mill and all the 2 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 539 1917 858"> <thead> <tr> <th></th> <th>Receptor</th> <th>Sources</th> </tr> </thead> <tbody> <tr> <td>1</td> <td>Air</td> <td>Sources from boiler stack (smoke and particulate), vehicle &amp; generator (smoke and gases), anaerobic processes (ETP, EFB dumping)- GHG</td> </tr> <tr> <td>2</td> <td>Water</td> <td>Cleaning water/run-off/process station waters (hydro-cyclone /sterilizer condensate/clarification waste) &amp; boiler quenching water and blow down</td> </tr> <tr> <td>3</td> <td>Land</td> <td>Scheduled waste, clinical waste, Industrial waste, domestic waste and industrial/process waste.</td> </tr> </tbody> </table> <p>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:</p> <table border="1" data-bbox="1167 1050 1910 1289"> <thead> <tr> <th></th> <th>Type of waste</th> <th>Details</th> </tr> </thead> <tbody> <tr> <td>1</td> <td>Scheduled waste</td> <td>Spent IPA, hexane, filter, lubricants, hydraulic oil, grease, used batteries</td> </tr> <tr> <td>2</td> <td>Domestic waste</td> <td>rubbish from the mill/estate complex and employees' quarters</td> </tr> <tr> <td>3</td> <td>Industrial waste</td> <td>Fiber, palm kernel shell, boiler ash, scrap iron</td> </tr> <tr> <td>4</td> <td>Sewage</td> <td>Sewage from housing/office complex</td> </tr> </tbody> </table> <p>The pollution identified from the mill/estates activities:</p>		Receptor	Sources	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.		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	<p>Complied</p>
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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 Pasir Panjang POM and the estates in the CU, procedure SPO/W1/06-10 Scheduled Wastes (Hazardous Waste) Management 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) 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>d) Among the identified wastes include empty chemical containers including pesticides containers. Empty pesticides containers were washed at washing station prior to disposal.</p> <p>e) Inventory and consignment documents verified for confirmation of proper management and disposal. The CU scheduled waste is disposed to <i>Kualiti Alam Sdn Bhd</i> registered with DOE. Recent records of disposal as shown below.</p> <table border="1"> <thead> <tr> <th colspan="8">PPPOM -27/11/2020</th> </tr> <tr> <th>SW 429</th> <th>SW 409</th> <th>SW 410</th> <th>SW 306</th> <th>SW 109</th> <th>SW 110</th> <th>SW 305</th> <th>SW 408</th> </tr> </thead> <tbody> <tr> <td>-</td> <td>0.054</td> <td>0.191</td> <td>0.393</td> <td>-</td> <td>0.019</td> <td>0.739</td> <td>-</td> </tr> </tbody> </table>	PPPOM -27/11/2020								SW 429	SW 409	SW 410	SW 306	SW 109	SW 110	SW 305	SW 408	-	0.054	0.191	0.393	-	0.019	0.739	-	Complied
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<i>Siang Estate -19/7/20 &amp; 30/9/20 SW 404</i>							
SW 404	SW 409	SW 410	SW 306	SW 102	SW 110	SW 305	SW 307
.0001	0.042	0.140	0.176	0.200	-	1.255	0.081
<i>Bkt Payung Estate - 16/7/20</i>							
SW 429	SW 409	SW 410	SW 307	SW 305	SW 110	SW 306	SW 408
-	0.094	0.027	0.449	0.243	0.027	0.098	0.025

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

	Estate	Regn Date	SW Buyers/Vendor
1	Siang	20/4/2021	Kualiti Alam Sdn Bhd
2	Bkt Payung	20/4/2021	Kualiti Alam Sdn Bhd
3	PPPOM	20/4/2021	Kualiti Alam Sdn Bhd

Empty containers for the estates were dispatched to licensed buyer G -Planter upon triple rinsing and pierced. Sighted the following transaction.

	Type container	Quantity/ units	
		<i>Siang</i>	<i>Bkt Payung</i>
	Date	01/12/20	07/12/20

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1	20 L	58	84
2	4 L	66	48
3	10kg	-	-
4	20 L	-	-
5	1 L	64	42
6	10 kg	287	-
7	500 ml	400	10

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

Estate	Landfill site	Remarks
Siang	P07 Block 2	Collection 2/3 x week
Bkt Payung	P12/ Block 2	Collection 2/3 x week
PPPOM	P14 Ldg P Panjang	Collection 2/3 x week

All landfill sites except for the PPPOM were visited and verified for compliance.

There are procedures and guidelines in the disposal of wastes and pollutants guided by SQD Head Office level to minimize pollution on the routine operation.

Estate/mill			
	Type	Description	Location
1	Domestic waste	Rubbish	Line sites, office, workshop, store,
2	Industrial waste	Fertilizer bags	Empty bags store
		Scrap metal	workshop



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			licensed contractor for sewage management.												
4	Schedule d Waste	SW 404 Clinical waste	Inventory maintained. Storage in sharp bin in clinic. Disposal to Kualiti Alam Sdn Bhd.												
		SW rags, plastics, filters	Inventory maintained. Storage in scheduled waste store. Disposal to licensed contractor.												
		Spent lubricant & hydraulic oil	Collection by licensed vendor. Inventory maintained.												
		Disposed containers, bags, equipment contaminated with chemicals, pesticides, SW	Inventory maintained. Storage in SW store. All containers are labeled. Empty containers collected by authorized vendor.												
<table border="1"> <tr> <td colspan="2">Pasir Panjang Mill (Waste peculiar to the mill processing)</td> </tr> <tr> <td>Waste Type</td> <td>Action</td> </tr> <tr> <td>1 POME</td> <td>Application at designated field specified by Agronomist.</td> </tr> <tr> <td>2 EFB</td> <td>Application at designated field specified by Agronomist.</td> </tr> <tr> <td>3 Fibre/shell</td> <td>Utilization as fuel in the boiler. Surplus fibre used in compost production &amp; shell sold externally</td> </tr> <tr> <td>4 Boiler Ash</td> <td>Placed in area far from water source to prevent water pollution.</td> </tr> </table>				Pasir Panjang Mill (Waste peculiar to the mill processing)		Waste Type	Action	1 POME	Application at designated field specified by Agronomist.	2 EFB	Application at designated field specified by Agronomist.	3 Fibre/shell	Utilization as fuel in the boiler. Surplus fibre used in compost production & shell sold externally	4 Boiler Ash	Placed in area far from water source to prevent water pollution.
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7.3.3	<p>The unit of certification does not use open fire for waste disposal.</p> <p>- Minor compliance -</p>	<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) 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
<p><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.</p>			
7.4.1	<p>Good agriculture practices, as contained in SOPs, are followed to manage soil fertility to optimise yield and minimise environmental impacts.</p> <p>- Minor compliance -</p>	<p>Kulim (M) Berhad Agriculture Manual has established covers Replanting, roads drains Bridges culverts and fences, construction of estate building, manuring, harvesting, pruning and ablation, soil conservation, justification of chemical use, weed management, integrated pest management and plant diseases. There are 19 SOPs and 18 WI's covering all aspects of oil palm management. The related SOP, namely Leaf and Soil Sampling Notes procedure was sighted. New revised Agriculture Manual dated 31/10/17 was sighted under A07-02-Planting Terrace and A20 – Standard Operating Guidelines For Conversion of Oil Crop Other Than Oil Palm To Oil.</p> <p>All estates operate in accordance with the Agriculture Manual and standard operating procedures. The practices consistently monitored by estate operation management and estate inspectorate. The recommendations for improvements are given to maintain the sustainable practices</p>	Complied
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>Foliar and soil sampling was carried out by Internal Agronomist from Agronomy Advisory and Services Department prior to the fertilizer</p>	Complied

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	<p>- Minor compliance -</p>	<p>recommendation for the next financial year. Leaf and soil nutrient analysis are commonly used in the diagnosis of fertilizer requirements in oil palms. The frequency for leaf sampling must be conduct for every year while for soil analysis, the frequency for soil sampling is conducted at 5 years intervals (Leaf and Soil Sampling Notes Procedure - Kulim (M) Bhd. Analysis reports were summarized as per below:</p> <table border="1" data-bbox="1137 630 1928 992"> <thead> <tr> <th data-bbox="1137 630 1402 694">Estates</th> <th data-bbox="1402 630 1666 694">Foliar analysis (yearly)</th> <th data-bbox="1666 630 1928 694">Soil Sampling (5 yearly)</th> </tr> </thead> <tbody> <tr> <td data-bbox="1137 694 1402 842">Siang Estate</td> <td data-bbox="1402 694 1666 842">Report ref: F1/2020/11/41 dated 12/11/20</td> <td data-bbox="1666 694 1928 842">Report ref: SI/2020/10/21 dated 29/10/20</td> </tr> <tr> <td data-bbox="1137 842 1402 992">Bukit Payong Estate</td> <td data-bbox="1402 842 1666 992">Latest analysis was carried out on 2-12/11/20. Pending for result</td> <td data-bbox="1666 842 1928 992">Report ref: SI/1808/0185-0188 dated 12/8/18</td> </tr> </tbody> </table>	Estates	Foliar analysis (yearly)	Soil Sampling (5 yearly)	Siang Estate	Report ref: F1/2020/11/41 dated 12/11/20	Report ref: SI/2020/10/21 dated 29/10/20	Bukit Payong Estate	Latest analysis was carried out on 2-12/11/20. Pending for result	Report ref: SI/1808/0185-0188 dated 12/8/18	
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Siang Estate	Report ref: F1/2020/11/41 dated 12/11/20	Report ref: SI/2020/10/21 dated 29/10/20										
Bukit Payong Estate	Latest analysis was carried out on 2-12/11/20. Pending for result	Report ref: SI/1808/0185-0188 dated 12/8/18										
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>POME and composting were applied as per agricultural manual:</p> <ol style="list-style-type: none"> <li>D05: EFB Utilization at rate 50mt/ha.</li> <li>D08: Bio-compost application at the rate of 7mt/ha or 50kg/palm on selected area.</li> </ol> <table border="1" data-bbox="1137 1177 1928 1343"> <thead> <tr> <th data-bbox="1137 1177 1339 1212">Estate</th> <th data-bbox="1339 1177 1536 1212">Amount</th> <th data-bbox="1536 1177 1733 1212">Type</th> <th data-bbox="1733 1177 1928 1212">Remark</th> </tr> </thead> <tbody> <tr> <td data-bbox="1137 1212 1339 1343">Siang Estate</td> <td data-bbox="1339 1212 1536 1343">3,401.4 mt</td> <td data-bbox="1536 1212 1733 1343">Manual application (Shredded fibre)</td> <td data-bbox="1733 1212 1928 1343">Field P09, P10, P11 (113.38 ha)</td> </tr> </tbody> </table>	Estate	Amount	Type	Remark	Siang Estate	3,401.4 mt	Manual application (Shredded fibre)	Field P09, P10, P11 (113.38 ha)	Complied	
Estate	Amount	Type	Remark									
Siang Estate	3,401.4 mt	Manual application (Shredded fibre)	Field P09, P10, P11 (113.38 ha)									

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		Bukit Payung Estate	2,566.35 mt	Manual application (bio-compost)	Field P12, P13, P11 (366.02 ha)																				
7.4.4	Records of fertiliser inputs are maintained. - Minor compliance -	<p>Fertilizers are applied as per agronomist recommendation. Record shows application date, filed number, dosage applied per palm, type of fertilizer and number of applicators.</p> <p><u>Siang Estate</u> Fertilizer recommendation included in the agronomist report by R&amp;D department dated 20/7/2020, The latest application (5<sup>th</sup> programme) was carried out on August 2020 at P04/4 (64.55 ha) for BRP (1.25 kg/palm) (208 bags x 50 kg/bag).</p> <p><u>Bukit Payung Estate</u> Fertilizer recommendation included in the agronomist report by R&amp;D department dated 21/7/2020 (4<sup>nd</sup> amendment). The latest application (2<sup>nd</sup> programme) was carried out on May 2020 at P15/5 for MIX2+B (2.00 kg/palm) (164 bags x 50 kg/bag).</p>			Complied																				
<b>Criterion 7.5:</b> Practices minimise and control erosion and degradation of soils.																									
7.5.1	<b>(C)</b> Maps identifying marginal and fragile soils, including steep terrain, are available. - Critical (Major) compliance -	<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" style="margin-left: auto; margin-right: auto;"> <thead> <tr> <th></th> <th></th> <th>Siang</th> <th>Bkt Payung</th> </tr> </thead> <tbody> <tr> <td>1</td> <td>Marang Apek</td> <td>0.24</td> <td>-</td> </tr> <tr> <td>2</td> <td>Rengam</td> <td>-</td> <td>34.77</td> </tr> <tr> <td>3</td> <td>Tai Tak</td> <td>-</td> <td>16.63</td> </tr> <tr> <td>4</td> <td>Lempung Org</td> <td>20.21</td> <td>-</td> </tr> </tbody> </table>					Siang	Bkt Payung	1	Marang Apek	0.24	-	2	Rengam	-	34.77	3	Tai Tak	-	16.63	4	Lempung Org	20.21	-	Complied
		Siang	Bkt Payung																						
1	Marang Apek	0.24	-																						
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		<table border="1"> <tr><td>5</td><td>Rengam-Merbau</td><td>-</td><td>21.4</td></tr> <tr><td>6</td><td>Local alluv</td><td>3.31</td><td>6.73</td></tr> <tr><td>7</td><td>Apek</td><td>1.4</td><td>-</td></tr> <tr><td>8</td><td>Durian</td><td>10.83</td><td>-</td></tr> <tr><td>9</td><td>Marang</td><td>30.07</td><td>-</td></tr> <tr><td>10</td><td>Tavi</td><td>0.63</td><td>-</td></tr> <tr><td>11</td><td>Melaka</td><td>30.06</td><td>-</td></tr> <tr><td>12</td><td>Rusila</td><td>2.94</td><td>-</td></tr> <tr><td>13</td><td>Tawar</td><td>-</td><td>1.97</td></tr> <tr><td>14</td><td>Serdang</td><td>0.14</td><td>-</td></tr> <tr><td>15</td><td>Seremban</td><td>0.17</td><td>-</td></tr> <tr><td>16</td><td>Binjal</td><td>-</td><td>0.51</td></tr> <tr><td>17</td><td>Batu Lapan</td><td>-</td><td>4.57</td></tr> <tr><td>18</td><td>Data</td><td>-</td><td>10.82</td></tr> <tr><td>19</td><td>Others</td><td>-</td><td>2.6</td></tr> <tr><td></td><td>TOTAL</td><td>100.00</td><td>100.00</td></tr> </table> <p>There were no other problem soils (e.g. podzols and acid sulphate soils) in the 2 estates.</p>	5	Rengam-Merbau	-	21.4	6	Local alluv	3.31	6.73	7	Apek	1.4	-	8	Durian	10.83	-	9	Marang	30.07	-	10	Tavi	0.63	-	11	Melaka	30.06	-	12	Rusila	2.94	-	13	Tawar	-	1.97	14	Serdang	0.14	-	15	Seremban	0.17	-	16	Binjal	-	0.51	17	Batu Lapan	-	4.57	18	Data	-	10.82	19	Others	-	2.6		TOTAL	100.00	100.00	
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7.5.2	No replanting on steep slopes (above 25 degrees) unless approved by state governments. In case of replanting is permitted, no replanting in	Like all KMB Estates, the estates visited in CU continued to have a management strategy for planting on slopes in order to minimize	Complied																																																																



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	<p>contiguous area of steep terrain (greater than 25 degrees) larger than 25 Ha within the Unit of Certification.</p> <p>- Minor compliance -</p>	<p>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> </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="1160 954 1912 1043"> <thead> <tr> <th></th> <th>Gradient</th> <th>0-2</th> <th>2-6</th> <th>6-12</th> <th>12-20</th> <th>20-25</th> <th>&gt;25</th> </tr> </thead> <tbody> <tr> <td>1</td> <td>Siang</td> <td>26.46</td> <td>21.88</td> <td>29.12</td> <td>22.54</td> <td>-</td> <td>-</td> </tr> <tr> <td>2</td> <td>B Payung</td> <td>8.90</td> <td>1.97</td> <td>21.44</td> <td>53.8</td> <td>3.08</td> <td>10.82</td> </tr> </tbody> </table>		Gradient	0-2	2-6	6-12	12-20	20-25	>25	1	Siang	26.46	21.88	29.12	22.54	-	-	2	B Payung	8.90	1.97	21.44	53.8	3.08	10.82	
	Gradient	0-2	2-6	6-12	12-20	20-25	>25																				
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2	B Payung	8.90	1.97	21.44	53.8	3.08	10.82																				
7.5.3	<p>There is no new planting of oil palm on steep terrain.</p> <p>- Minor compliance -</p>	<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>	Complied																								

<p><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.</p>			
7.6.1	<p><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 -</p>	<p>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.</p>	Complied
7.6.2	<p>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 -</p>	<p>KMB Group had no planting on areas of more than 25 degree. Plantings on steep slope are either avoided or minimized.</p>	Complied
7.6.3	<p>Soil surveys and topographic information guide the planning of drainage and irrigation systems, roads and other infrastructure.                      - Minor compliance -</p>	<p>Soil surveys are made and available in a soil map at all estates. Topographic contour map are also available which are both used to manage the drainage and road works in the estates. Details as per 7.5.1 and 7.5.2.</p>	Complied
<p><b>Criterion 7.7:</b> No new planting on peat, regardless of depth after 15 November 2018 and all peatlands are managed responsibly.</p>			
7.7.1	<p><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 -</p>	<p>There is no peat soil or soil categorized as marginal or fragile soil in all estates visited. There was also no new planting in the estates</p>	Complied
7.7.2	<p>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 -</p>	<p>There is no peat soil or soil categorized as marginal or fragile soil in all estates visited. There was also no new planting in the estates</p>	Complied

7.7.3	<p><b>(C)</b> Subsidence of peat is monitored, documented and minimised.          - Critical (Major) compliance -</p>	<p>There is no peat soil or soil categorized as marginal or fragile soil in all estates visited. There was also no new planting in the estates</p>	Complied
7.7.4	<p><b>(C)</b> A documented water and ground cover management programme is in place.          - Critical (Major) compliance -</p>	<p>The water and ground cover management programme is documented in the KMB Agricultural Manual (Water Management in Inland, Costal and Peat lands) issued on 01.07.2011. Details are described in 7.8.1. individual estates and mill had their respective water management plan mainly to monitor among others the following;</p> <ul style="list-style-type: none"> <li>a) Monitor the quality of main water inlet/outlet for pollutants from estate's operations.</li> <li>b) Good drainage system to ensure adequate water supply for the palm trees via growth monitoring.</li> <li>c) Construction of road side pits for a good road drainage.</li> <li>d) Contingency during water shortage.</li> <li>e) Monitoring of water level at low lying fields during the monsoon months for flood mitigation.</li> </ul>	Complied
7.7.5	<p><b>(C)</b> For plantations planted on peat, drainability assessments are conducted following the RSPO Drainability Assessment Procedure, or 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>There is no peat soil or soil categorized as marginal or fragile soil in all estates visited. There was also no new planting in the estates</p>	Complied

	<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>		
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 no peat soil or soil categorized as marginal or fragile soil in all estates visited. There was also no new planting in the estates</p>	<p>Complied</p>
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 Associated with Oil Palm Cultivation on Peat', version 2 (2019) and associated audit guidance.</p> <p>- Critical (Major) compliance -</p>	<p>There is no peat soil or soil categorized as marginal or fragile soil in all estates visited. There was also no new planting in the estates</p>	<p>Complied</p>
<p><b>Criterion 7.8:</b> Practices maintain the quality and availability of surface and groundwater.</p>			
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.</p> <p>b) Workers have adequate access to clean water.</p> <p>- 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,</p> <p>b) water from the reservoir/catchment for the mill operations</p> <p>c) continual training for workers on water efficiency consumption,</p> <p>d) Workers have adequate to clean water. The same water source supplied to the mill and estates are from the same source of supply, own catchment with WTP facilities.</p> <p>e) desilting of water reservoir to retain the reservoir optimal capacity.</p> <p>f) The action plan in event of draught/water pollution and</p>	<p>Complied</p>

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The estates similarly possessed the following water management plan. Among others containing the following initiatives.

	Source	Activity	Threat	Action Plan
1	Reservoir/ pond/ Rain	Chemical mixing	Pollution Draught Wastage	Enforcement of buffer zone as non-spraying activities.
2		General Upkeep	Pollution Draught Wastage	Follow WI & SOP to avoid water pollution. Follow SW SOP to avoid pollution caused from SW.
3		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.
4		Drain upkeep	Interrupt on water flow at drainage system.	Periodic desilting Building of sand bags at specific points to contain water (weirs)

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5			Water pollution	<p>Prohibit workers from activities at water source</p> <p>Drinking water analysis.</p> <p>Monitor condition of septic tank</p> <p>Adhere SW management procedure to avoid pollution caused by SW.</p>
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Water Management Plan review date was sighted and verified with records as follows;

	Estate/Mill	Review date	Issues
1	Siang	01 Aug 2020	Nil
2	Bkt Payung	01 Aug 2020	Nil
3	PPPOM	15 Jan 2020	Nil

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

	location	Waste produced water	Treatment/containment	Reuse/recycle/disposal method
1	Processing stations	<p>Clarification condensate</p> <p>Sterilizer condensate</p> <p>Hydro cyclone condensate</p> <p>Mill floor cleaning water</p>	Oil recovery/ETP	Recover into system

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		2	Boiler	Blow down, cleaning water	Sludge pit, ETP	Monsoon drain																																																								
			Process ramp	Rainfall runoff	Sedimentation trap	Monsoon drain																																																								
		3	Engine room	Steam condensate, turbine cooling water	Monsoon drain, recycled tank	Monsoon drain																																																								
		4	Lab	Cleaning water	Process drain	Monsoon drain																																																								
		5	Wash room	Toilet water, cleaning water	Septic tank	Collected by licensed contractor.																																																								
<table border="1"> <thead> <tr> <th colspan="7"><i>Pasir Panjang Mill - 10/5/2020 raw and treated</i></th> </tr> <tr> <th></th> <th>Parameter</th> <th>unit</th> <th>result</th> <th>Regn raw water</th> <th>Std drinking water</th> <th>Result</th> </tr> </thead> <tbody> <tr> <td>1</td> <td>PH</td> <td>-</td> <td>5.4</td> <td>5.5-9.0</td> <td>6.5-9.0</td> <td>7.0</td> </tr> <tr> <td>2</td> <td>Turbidity</td> <td>-</td> <td>2.5</td> <td>1000</td> <td>5</td> <td>0.8</td> </tr> <tr> <td>3</td> <td>Aluminium</td> <td>NTU</td> <td>ND</td> <td>-</td> <td>0.2</td> <td>ND</td> </tr> <tr> <td>4</td> <td>Chlorine</td> <td>mg/L</td> <td>-</td> <td>-</td> <td>0.2-5</td> <td>1.6</td> </tr> <tr> <td>5</td> <td>Coli form</td> <td>mg/L</td> <td>20</td> <td>5000</td> <td>nil</td> <td>ND</td> </tr> <tr> <td>6</td> <td>E coli</td> <td>MPN/</td> <td>90</td> <td>5000</td> <td>nil</td> <td>ND</td> </tr> </tbody> </table>							<i>Pasir Panjang Mill - 10/5/2020 raw and treated</i>								Parameter	unit	result	Regn raw water	Std drinking water	Result	1	PH	-	5.4	5.5-9.0	6.5-9.0	7.0	2	Turbidity	-	2.5	1000	5	0.8	3	Aluminium	NTU	ND	-	0.2	ND	4	Chlorine	mg/L	-	-	0.2-5	1.6	5	Coli form	mg/L	20	5000	nil	ND	6	E coli	MPN/	90	5000	nil	ND
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<i>Siang Estate 13/5/2020</i>						
	Parameter	unit	result	Regn raw water	Std drinking water	Result
1	PH	-	5.7	5.5-9.0	6.5-9.0	7.1
2	Turbidity	-	2.6	1000	5	0.7
3	Aluminium	NTU	ND	-	0.2	ND
4	Chlorine	mg/L	-	-	0.2-5	0.9
5	Coli form	mg/L	570	5000	nil	ND
6	E coli	MPN/	100	5000	nil	ND

<i>Bkt Payung Estate 10/5/2020</i>						
	Parameter	unit	result	Regn raw water	Std drinking water	Result
1	PH	-	5.5	5.5-9.0	6.5-9.0	7.0
2	Turbidity	-	9.2	1000	5	1.7
3	Aluminium	NTU	ND	-	0.2	ND
4	Chlorine	mg/L	-	-	0.2-5	1.2
5	Coli form	mg/L	ND	5000	Nil	ND
6	E coli	MPN/	40	5000	Nil	ND

The mill collected water samples for the domestic water consumption collected by SPAN twice a year. All results were sighted and verified and sample shown above. Analysis made in



		Decagon Lab & Analytical Testing, Shah Alam Selangor. All parameters are within the limits under Raw Water Quality Standard MOH 2010.																																			
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>- Critical (Major) compliance -</p>	<p>Protection of water courses and wetlands, including maintaining and restoring appropriate riparian buffer zones has been verified at the 2 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 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 815 1794 999"> <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 1150 1794 1337"> <thead> <tr> <th></th> <th>Estates</th> <th>Location</th> <th>Field no</th> </tr> </thead> <tbody> <tr> <td>1</td> <td>Siang</td> <td>Water Catchment</td> <td>P10/Blk 2</td> </tr> <tr> <td>2</td> <td>Bkt Payung</td> <td>Pasir Panjang River</td> <td>P17/Blk 1</td> </tr> <tr> <td>3</td> <td>PPPOM</td> <td>Water catchment</td> <td>P14</td> </tr> </tbody> </table> <p>phosphate and nitrate analysis for detection of fertilizer application</p>		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	Siang	Water Catchment	P10/Blk 2	2	Bkt Payung	Pasir Panjang River	P17/Blk 1	3	PPPOM	Water catchment	P14	Complied
	River width	Buffer zone																																			
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2	Bkt Payung	Pasir Panjang River	P17/Blk 1																																		
3	PPPOM	Water catchment	P14																																		

Water samples from the intake point are taken for

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effect to the water courses. Extracted record of the estates with details below;

Siang Estate 17/11/20					
	Parameter	unit	Pt A	Pt B	Limit
1	Phosphate	mg PO4/L	<0.2	<0.2	0.20
2	N Nitrogen	mg NO3N/L	<0.04	1.59	7.00

Bkt Payung Estate 16/8/20					
	Parameter	unit	Pt A	Pt B	Limit
1	Phosphate	mg PO4/L	0.59	0.57	0.20
2	N Nitrogen	mg NO3N/L	0.66	0.85	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. 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 PPPOM 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.

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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.</p> <p>- 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> <p>a) No over flow was observed, and flow meter reading was recorded daily. The mill monitoring the effluent and submits to DOE through 'Borang Penyata Suku Tahunan'.</p> <p>b) Pasir Panjang Mill DOE license no 004649 was for land application requirement of which is BOD less than 2500 mg/l in Ldg Pasir Panjang field no P14.</p> <p>c) The results from final discharge were compliance within parameter limit. Record was sighted and verified.</p> <table border="1" data-bbox="1211 767 1879 1027"> <thead> <tr> <th>Sample date</th> <th>Std</th> <th>12/7/20</th> <th>09/8/20</th> <th>07/9/20</th> </tr> </thead> <tbody> <tr> <td>PH</td> <td>-</td> <td>8.10</td> <td>8.40</td> <td>8.50</td> </tr> <tr> <td>BOD</td> <td>1000</td> <td>137</td> <td>87</td> <td>107</td> </tr> <tr> <td>COD</td> <td>-</td> <td>690</td> <td>1725</td> <td>1695</td> </tr> <tr> <td>Total solids</td> <td>-</td> <td>2744</td> <td>5612</td> <td>3596</td> </tr> <tr> <td>S Solids</td> <td>-</td> <td>160</td> <td>584</td> <td>364</td> </tr> <tr> <td>Oil &amp; grease</td> <td>-</td> <td>7.00</td> <td>9.00</td> <td>4.00</td> </tr> <tr> <td>A Nitrogen</td> <td>-</td> <td>60</td> <td>10</td> <td>29</td> </tr> <tr> <td>Total N</td> <td>-</td> <td>73</td> <td>41</td> <td>61</td> </tr> </tbody> </table>	Sample date	Std	12/7/20	09/8/20	07/9/20	PH	-	8.10	8.40	8.50	BOD	1000	137	87	107	COD	-	690	1725	1695	Total solids	-	2744	5612	3596	S Solids	-	160	584	364	Oil & grease	-	7.00	9.00	4.00	A Nitrogen	-	60	10	29	Total N	-	73	41	61	<p>Complied</p>
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Total N	-	73	41	61																																												
<p>7.8.4</p>	<p>Mill water use per tonne of FFB is monitored and recorded.</p> <p>- 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" data-bbox="1196 1193 1868 1375"> <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>22597</td> <td>18124</td> <td>1.25</td> </tr> <tr> <td>2</td> <td>Feb</td> <td>21278</td> <td>17968</td> <td>1.20</td> </tr> <tr> <td>3</td> <td>Mac</td> <td>21403</td> <td>19290</td> <td>1.11</td> </tr> </tbody> </table>	No	Month	Water	FFB /mt	Water /FFB	1	Jan	22597	18124	1.25	2	Feb	21278	17968	1.20	3	Mac	21403	19290	1.11	<p>Complied</p>																									
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3	Mac	21403	19290	1.11																																												

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	4	Apr	27394	26834	1.02
	5	May	22309	23250	0.96
	6	June	27717	28414	0.98
	7	July	30985	28362	1.09
	8	Aug	30146	28145	1.07
	9	Sept	31527	28666	1.10
	10	Oct	26094	23199	1.12
<p>There were variations of performance. Probable factors are linked to rainy days, significant boiler water rinsing/discharging for maintenance etc. The base rate is 1.20</p>					

**Criterion 7.9:** 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.</p> <p>- 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.</p> <p>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.</p> <ul style="list-style-type: none"> <li>a) Infrastructure of estates,</li> <li>b) Community size / no of gen-sets,</li> <li>c) No. of vehicles / age of machine.</li> <li>d) Weather interference / crop production volume</li> </ul> <p>There is no opportunity for the estates to capitalize the utilisation of fibre/shell produced from the mill as part of their energy</p>	Complied
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		production in replacement of fossil fuel with the current technology limitation.	
<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	<p><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.</p> <p>- Critical (Major) compliance -</p>	<p>The GHG emissions are identified and assessed for the unit certification by sustainability team. RSPO GHG Calculator version 4 is used. The consumption of fertilisers and diesel were verified through</p> <p>Estates:</p> <ul style="list-style-type: none"> <li>• FFB record book</li> <li>• stock book</li> <li>• monthly stock issue</li> <li>• stock requisition note</li> </ul> <p>Mill:</p> <ul style="list-style-type: none"> <li>• Mill Month End Production Report</li> <li>• Monthly production report</li> <li>• Flowmeter &amp; running hours record book</li> <li>• Bio-gas generation daily monitoring log sheet</li> <li>• Effluent analysis report</li> </ul> <p>Based on the verification of records, all the sampled issuance was traceable</p>	Complied
7.10.2	<p><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).</p> <p>- Critical (Major) compliance -</p>	Not applicable since no new development by the certification unit.	Not Applicable

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7.10.3	<p><b>(C)</b> Other significant pollutants are identified and plans to reduce or minimise them implemented and monitored.          - Critical (Major) compliance -</p>	<p>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 Identification Environmental Improvement Action Plan' is used to identify the waste products and sources of pollution, was in place and is reviewed accordingly.</p>	Complied
<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 new planting and replanting which prepared by burning and in lined with Sustainability handbook has described therein on Environmental Policy (signed by the Executive Director) to include the adoption of Zero Open Burning Policy dated January 2008</p>	Complied
7.11.2	<p>The unit of certification establishes fire prevention and control measures for the areas directly managed by the unit of certification.          - Minor compliance -</p>	<p>Kulim (M) Berhad has subscribed to ASEANFireAlert for the whole group estate's for aerial monitoring. FWI @ Fire Weather Index will be identified at each estate (i.e high risk area – peat soil) to monitor changes in FWI. ASEANFireAlert will trigger any changes in FWI and a notification will be sent to HQ personnel via mobile phone. Operating unit's personnel will be informed and reported to fire department for further action.</p>	Complied
7.11.3	<p>The unit of certification engages with adjacent stakeholders on fire prevention and control measures.          - Minor compliance -</p>	<p>Engagement with adjacent stakeholders was done on 25<sup>th</sup> September 2020 during stakeholder meeting. SOP's on Fire Safety Management presented to adjacent stakeholders.          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;</p>	Complied

		<p>a. Memelihara dan memulihara kepelbagaian biologi</p> <p>b. Pihak berkepentingan boleh melaporkan kepada KMB</p> <p>c. Jika berlaku kebakaran di persempadanan kawasan ladang/kilang</p> <p>d. Pihak ladang/kilang /pekebun kecil berhampiran juga boleh mendapatkan bantuan daripada KMB jika berlaku di kawasan mereka.</p>	
<p><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.</p>			
7.12.1	<p><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.</p> <p>A historic Land Use Change Analysis (LUCA) is conducted prior to any new land clearing, in accordance with the RSPO LUCA guidance document.</p> <p>- Critical (Major) compliance -</p>	No development within Pasir Panjang POM certification unit.	Complied
7.12.2	<p><b>(C)</b> HCVs, HCS forests and other conservation areas are identified as follows:</p> <p>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.</p> <p>b) Any new land clearing (in existing plantations or new plantings) after 15 November 2018 is preceded by an HCV-HCS assessment, using the 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).</p>	<p>The last assessment conducted was in July 2009 for Siang and Bkt Payung Estates respectively. The assessment was conducted by A.J.F.M Dekker. 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 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> <p>a) General biodiversity issues</p> <p>b) Watercourses and drainage</p> <p>c) Habitats natural and man-made</p> <p>d) Wildlife</p> <p>e) Ponds and reservoirs</p> <p>f) Wetlands /watercourses</p>	Complied

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	<p>- Critical (Major) compliance -</p>	<p>g) Legal aspects  h) Immediate and long-term effect.</p> <p>Summary of HCV report by A.J.F.M Dekker as per the following:</p> <table border="1" data-bbox="1137 491 1930 885"> <thead> <tr> <th>Estate</th> <th>Assessment date</th> <th>HCV identified area</th> </tr> </thead> <tbody> <tr> <td>Siang Estate</td> <td>9th July 2009</td> <td>71.11 ha with total of 10 hot spot identified with estate.</td> </tr> <tr> <td>Bkt Payung</td> <td>4th July 2008</td> <td>293.65 ha with total of 10 hot spot identified with estate.</td> </tr> </tbody> </table>	Estate	Assessment date	HCV identified area	Siang Estate	9th July 2009	71.11 ha with total of 10 hot spot identified with estate.	Bkt Payung	4th July 2008	293.65 ha with total of 10 hot spot identified with estate.	
Estate	Assessment date	HCV identified area										
Siang Estate	9th July 2009	71.11 ha with total of 10 hot spot identified with estate.										
Bkt Payung	4th July 2008	293.65 ha with total of 10 hot spot identified with estate.										
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>For Siang estate, Rapid Biodiversity Assessment Fact Sheet dated July 2009 is referred to. For example mammals under schedule I (totally protected); Malayan Tapir was identified. Under schedule II (protected wild animals), pig tailed macaque and Silvered Leaf Monkey were among identified.</p> <p>The management plan was developed based on recommendation of HCV assessment report. HCV management plan developed for Estate summarized as per the following:</p> <p>Siang Estate (plan dated 1<sup>st</sup> August 2020)</p> <table border="1" data-bbox="1137 1276 1915 1324"> <thead> <tr> <th>HCV plan</th> <th>Progress</th> <th>Person In Charge</th> </tr> </thead> <tbody> <tr> <td> </td> <td> </td> <td> </td> </tr> </tbody> </table>	HCV plan	Progress	Person In Charge				Complied			
HCV plan	Progress	Person In Charge										



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		Animal sighting	Monthly sighting records to be submitted	Estate team		
		Encroachment control	Regular patrolling	Sustainability and estate team		
		Buffer zone establishment	Mapped out area Buffer zone peg Twice a year maintenance programme	Sustainability and estate team		
		Protection of substantial mangrove area	Continuously monitor and report any encroachment	Estate team		
		Wildlife/RTE species protection	To monitor and report any sign of wildlife incursion to SQD and PERHILITAN.	Sustainability and estate team		
		<p>Regular security patrol and sighting within the estate was carried out and finding/issue recorded by the respective estate personal/security to monitor the conservation / buffer zone areas. Monitoring and control of any illegal hunting, fishing or collecting activities was also implemented. Signage that prohibit hunting, fishing and water polluting activities were verified on-site found to be satisfactorily maintained.</p>				

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7.12.5	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. - Minor compliance -	No local communities have been identified in self-declared HCV areas within Siang and Bukit Payung Estate	Complied				
7.12.6	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. - Minor compliance -	Although there are RTE species identified at Bukit Payung and Siang estate, there is evidence to continuously prevent and discourage illegal or hunting, fishing or collecting activities. Signage as well as routine patrolling activities were carried out as part of the efforts to create awareness among employees about biodiversity. The latest awareness training on environmental and biodiversity was carried out on 16 <sup>th</sup> April 2020 for internal stakeholders (workers) at Bukit Payung Estate.	Complied				
7.12.7	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. - Minor compliance -	<p>Management plan is incorporated with ongoing monitoring of the status of HCV and RTE species that are affected by plantation or mill operations and reported by the Kulim SQD Team from Head Office. Outcomes of monitoring are communicated with plantation management and with management plan. HCV monitoring/patrolling records available.</p> <p><u>Siang Estate</u> Sample of latest sighting of animal and patrolling records as per below:</p> <table border="1" data-bbox="1137 1190 1930 1391"> <thead> <tr> <th data-bbox="1137 1190 1451 1230">Date of monitoring</th> <th data-bbox="1458 1190 1930 1230">Visited area (hotspots/HCV)</th> </tr> </thead> <tbody> <tr> <td data-bbox="1137 1235 1451 1391">27/11/20, frequency weekly</td> <td data-bbox="1458 1235 1930 1391">Mangrove strip (P03A) Water reservoir (P10/4) Remnant of small hill (P08/1) Swampy area (P11/2) Pond area (P12/1)</td> </tr> </tbody> </table>	Date of monitoring	Visited area (hotspots/HCV)	27/11/20, frequency weekly	Mangrove strip (P03A) Water reservoir (P10/4) Remnant of small hill (P08/1) Swampy area (P11/2) Pond area (P12/1)	Complied
Date of monitoring	Visited area (hotspots/HCV)						
27/11/20, frequency weekly	Mangrove strip (P03A) Water reservoir (P10/4) Remnant of small hill (P08/1) Swampy area (P11/2) Pond area (P12/1)						

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		<table border="1"> <tr> <td></td> <td>Logged over/degraded forest(P99/1)</td> </tr> </table> <p><u>Bukit Payung Estate</u>  Sample of latest sighting of animal and patrolling records as per below:</p> <table border="1"> <thead> <tr> <th>Date of monitoring</th> <th>Visited area (hotspots/HCV)</th> </tr> </thead> <tbody> <tr> <td>24/11/20, frequency weekly</td> <td>Forested area on steep slope(P19/5)  Clear-felled and pocketed steep slope (P09)  River reserved (P13)  Swampy (P17)</td> </tr> </tbody> </table>		Logged over/degraded forest(P99/1)	Date of monitoring	Visited area (hotspots/HCV)	24/11/20, frequency weekly	Forested area on steep slope(P19/5) Clear-felled and pocketed steep slope (P09) River reserved (P13) Swampy (P17)	
	Logged over/degraded forest(P99/1)								
Date of monitoring	Visited area (hotspots/HCV)								
24/11/20, frequency weekly	Forested area on steep slope(P19/5) Clear-felled and pocketed steep slope (P09) River reserved (P13) Swampy (P17)								
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>	No land clearing without prior HCV assessment since November 2005 occurred at Siang and Bukit Payung estate.	Complied						

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**Appendix B: Approved Time Bound Plan**

Project	Estate	Plan
Indonesia: SUMASEL	PT Tempirai Palm Resources (PT TPR)	To be included in TBP upon completion of acquisition (expected completion in 2023)
	PT Rambang Agro Jaya (PT RAJ)	
Malaysia Trader	Bukit Layang Estate	Certified in April 2020

List of Estate Manage by Kulim (Malaysia) Berhad			
Mill Base	Kulim / Jcorp Estate	Estate	Status
Tereh Mill	Kulim Estate	Tereh Utara	Certified RSPO
		Tereh Selatan	
		Selai	
		Enggang	
		Mutiara	
		Sg Sembrong	
		Sg Tawing	
		Rengam	
Sedenak Mill		Sedenak	
		Basir Ismail	
		Ulu Tiram	
Sindora Mill		Kuala Kabong	
		REM/Pasak	
		Sindora	
Palong Mill		Sungai Papan	
		Sepang Loi	
		UMAC	
		Labis Bahru	
		Mungka	
		Kemedak	
Pasir Panjang Mill	Kulim Estate	Pasir Panjang	Certified RSPO
		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 Pasir Panjang POM and supply base was calculated using the PalmGHG Calculator version 4.0. 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 **Pasir Panjang POM** and supply base are as following:

Emission per product	tCO <sub>2</sub> e/tProduct
CPO	0.5
PKO	0

Extraction	%
OER	22.75
KER	5.43

Production	t/yr
FFB Process	252,426.87
CPO Produced	58,639.37
PKO Produced	0

Land Use	Ha
OP Planted Area	18,903.62
OP Planted on peat	0
Conservation (forested)	380.61
Conservation (non-forested)	298.43
<b>Total</b>	<b>19,582.66</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	129,796.04	0.51	2,398.30	0.45	0	0	132,194.34	0.96
CO <sub>2</sub> Emission from fertilizer	13,791.53	0.05	226.34	0.04	0	0	14,017.87	0.53
NO <sub>2</sub> Emission	9,371.56	0.04	156.15	0.03	0	0	9,527.71	0.07
Fuel Consumption	4,860.13	0.02	28.85	0.01	0	0	4,888.97	0.03
Peat Oxidation	0	0	0	0	0	0	0	0
<b>Sink</b>								
Crop Sequestration	-123,029.41	-0.49	-2,253.24	-0.42	0	0	-125,282.65	-0.91
Conservation Sequestration	-3,490.19	-0.01	0	0	0	0	-3,490.19	-0.01

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<b>Total</b>	<b>31,299.65</b>	<b>0.12</b>	<b>556.40</b>	<b>0.10</b>	<b>0</b>	<b>0</b>	<b>31,856.05</b>	<b>0.92</b>
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\*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	11,553.09	0.04
Fuel Consumption	616.88	0.00
Grid Electricity Utilization	0.00	0.00
<b>Credit</b>		
Export of Grid Electricity	0.00	0.00
Sales of PKS	-7,517.33	-0.03
Sales of EFB	0.00	0.00
<b>Total</b>	<b>4,652.64</b>	<b>0.02</b>

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

<b>Emissions</b>	<b>tCO<sub>2</sub>e</b>
PK from own mill	0
PK from other source	0
Fuel Consumptions	0
<b>Total Crusher emissions</b>	<b>0</b>

\*This mill has no kernel crusher operation.

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

<b>POME Diverted to Anaerobic Digestion:</b>	
Divert to anaerobic pond (%)	0
Divert to methane captured (flaring) (%)	83
Divert to methane captured (energy generation) (%)	17

**Appendix D: Supply Chain Declaration**

<b>A. Monthly Records of Certified and Uncertified FFB Received since the last audit</b>				
No.	Month - Year	Volume of FFB from certified supply bases (mt)	Volume of FFB from uncertified supply bases (mt)	Total FFB/Month (mt)
1	Nov 2019	22,753.17	-	22,753.17
2	Dec 2019	17,817.35	-	17,817.35
3	Jan 2020	18,124.55	-	18,124.55
4	Feb 2020	17,968.20	-	17,968.20
5	Mar 2020	19,290.93	-	19,290.93
6	Apr 2020	26,834.94	-	26,834.94
7	May 2020	23,250.44	-	23,250.44
8	June 2020	28,414.56	-	28,414.56
9	July 2020	28,362.04	-	28,362.04
10	Aug 2020	28,145.40	-	28,145.40
11	Sept 2020	28,666.52	-	28,666.52
12	Oct 2020	23,199.08	-	23,199.08
13	Nov 2020	21,333.94	-	21,333.94
TOTAL		304,161.12		304,161.12
<b>Note:</b>				

<b>B. Monthly Records of Certified CPO &amp; PK since the last audit</b>			
No.	Month - Year	Certified CPO (mt)	Certified PK (mt)
1	Nov 2019	5,016.92	1,230.25
2	Dec 2019	3,788.45	884.16
3	Jan 2020	4,096.18	983.03
4	Feb 2020	4,110.40	994.42
5	Mar 2020	4,425.45	1,124.64
6	Apr 2020	6,183.77	1,491.06
7	May 2020	5,184.09	1,173.66
8	June 2020	6,161.07	1,368.67
9	July 2020	6,044.06	1,543.05
10	Aug 2020	6,230.13	1,447.99
11	Sept 2020	6,349.33	1,752.10
12	Oct 2020	5,321.69	1,298.47
13	Nov 2020	4,828.85	1,134.68

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TOTAL	67,740.39	16,426.18
<b>Note:</b>		

<b>C. Records of Certified CPO &amp; PK Sold under PalmTrace since the last audit (if any)</b>				
<b>No.</b>	<b>Buyers Name</b>	<b>Palmtrace Trading License Number</b>	<b>Certified CPO Sold (mt)</b>	<b>Certified PK Sold (mt)</b>
1	ABC	TR-6287c764-e529 TR-3d387c19-1fa3 TR-d3ddcdc7-f99c TR-a22be530-4e46 TR-b6105997-36b7 TR-4dc27b80-4fc6 TR-b07706d5-c3dc TR-55010949-1612 TR-6f340e7f-4152 TR-9a477ed4-4d27 TR-739d2de4-c1c1 TR-5ede0084-12bb TR-5a66010d-96bd TR-d6cd2aea-db8d TR-357b9de0-83b4 TR-9f8efd80-c554 TR-01ba4af9-ba2d TR-38727db4-ae8 TR-3f28294e-22fe TR-f6966f94-6f1e TR-73574252-d187 TR-2ad4f48a-5ebf TR-1f6ff121-56f0 TR-cd1ec865-ca45 TR-12d72619-06fb TR-b1114610-3652 TR-67247deb-942a TR-453cfee8-7faa TR-27446344-08c3 TR-c74de137-ced TR-b2ad520f-e2b8	30,866.88	-



		<p>TR-a78f9e99-036f          TR-50dd1241-73c8          TR-12212561-7920          TR-908f7b5e-ca0a          TR-31188f5e-9778          TR-11fae95a-8dc0          TR-4155d085-08bb          TR-a91f8a54-499f          TR-b40834bf-b728          TR-5992bcaf-7db0          TR-e6c25218-05cb          TR-a2ea35bb-0a1d          TR-2dcedf6d-791f          TR-17134126-dbb2          TR-13db6937-e8b2          TR-6dd0f4bd-cb0e          TR-9bf7b7c1-847a          TR-bc34b123-dce6          TR-6dd0f4bd-cb0e          TR-ddc2868a-8892          TR-4a70d757-6c81          TR-6d72541e-075c          TR-56a72590-3d9f          TR-f7efea8f-6eb8          TR-00b609bf-01b7          TR-d134d88b-9a57          TR-d51f4249-46ad          TR-c8edf7a8-c4a1          TR-59debaa6-e34a          TR-66a821da-70e7          TR-c79da82b-5a38          TR-1822d60c-0156          TR-d800fae2-136b          TR-8f479d3e-2ef3          TR-e5a6ae89-2372          TR-6f832e8a-386a          TR-dcb7451b-36df</p>		
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		TR-de9da3d8-3201 TR-2784a91d-e5b4 TR-066bd109-2bad TR-72bdf8d5-812c TR-90c3a965-f3d0 TR-f2246a08-b05b TR-f3c132e2-d11e TR-e4f119ae-61e3 TR-1b1225df-4869 TR-578955a0-b2a5 TR-5911f14d-5bce TR-8dc16504-b0a0 TR-c690730d-f73d TR-e1bbaa41-9a96 TR-772d01a6-62be TR-9cb831c3-897d TR-2792599a-788a TR-0beee961-7e5c TR-f51a3185-3f17 TR-33839897-5c7d TR-2d04c95e-569f TR-b0202ec6-79b2 TR-d209c515-4f6c TR-960394aa-c034 TR-2792599a-788a TR-f80aa354-6252		
2	DEF	TR-0312365f-8482 TR-5d77ab83-63d0 TR-49285284-f2ea TR-f5699829-e257 TR-ac399b0e-d9cb TR-3010cf6a-95cd TR-1f5c488f-51fb TR-319d1e9e-5a16 TR-693570e4-23b5 TR-b07c4182-81f2 TR-341620f7-3aa8	-	13,218.26

		<p>TR-67e3fcb2-29a3          TR-1668604c-b10e          TR-6a5df882-9d37          TR-46b713df-1fce          TR-f3f1e796-abd4          TR-453a2831-9b2c          TR-d2be272a-0583          TR-e481b98f-21ce          TR-d2ede072-8281          TR-209ef45e-94e5          TR-8be481aa-2fee          TR-17d11752-b68d          TR-0893fc46-690c          TR-ab11d3a1-523b          TR-3c7d5691-1afd          TR-24be4788-06b2          TR-462c17ea-3593          TR-d6d9c686-1453          TR-b2b6933d-48a0          TR-69df559e-c6f3          TR-2d9bbf08-3988          TR-97a8a65f-bff5          TR-507891e9-b041          TR-7f344889-46eb          TR-81af2474-e35c          TR-98000476-ee59          TR-18c45789-fb3e          TR-41c61f6f-6519          TR-83156ca8-897b          TR-11fbf975-1115          TR-4cf52b2b-4c05          TR-65b1dcc8-07dc          TR-9e62ddf9-69e2          TR-a1059fa2-a592          TR-c7cea65c-5820          TR-0f93022c-6e3a          TR-611a8c16-973f</p>		
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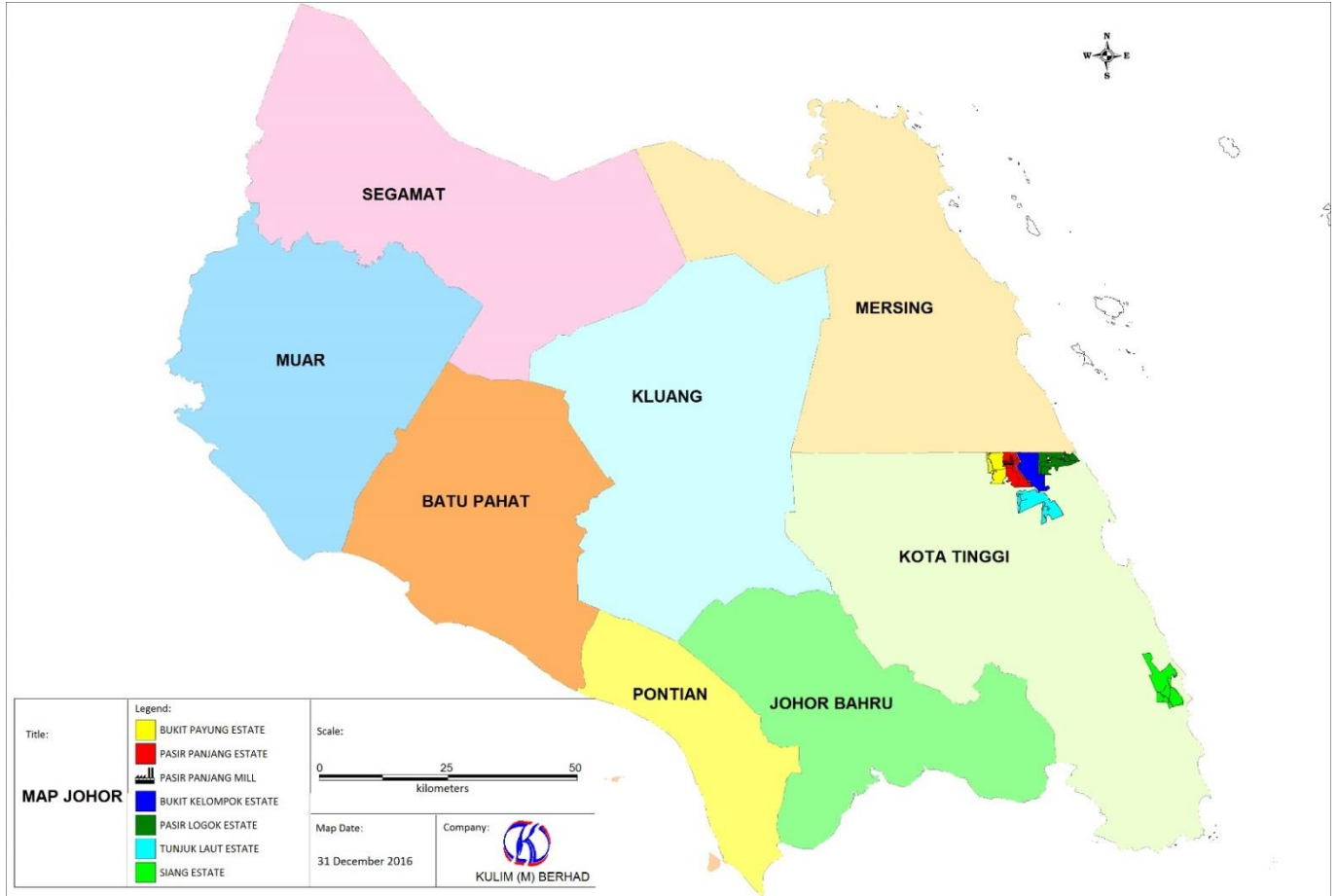
		TR-93de26c1-3d06 TR-b78dbba3-6c42 TR-c0ec9ff9-3dad TR-919bffa2-0d6e		
	TOTAL		30,866.88	13,218.26
<b>Note:</b>				

<b>D. Records of CPO &amp; PK Sold under other schemes since the last audit (if any)</b>				
No.	Buyers Name	Scheme Name	CPO Sold (mt)	PK Sold (mt)
1	GHI	ISCC	2,628.09	-
	Total		2,628.09	-
<b>Note:</b>				

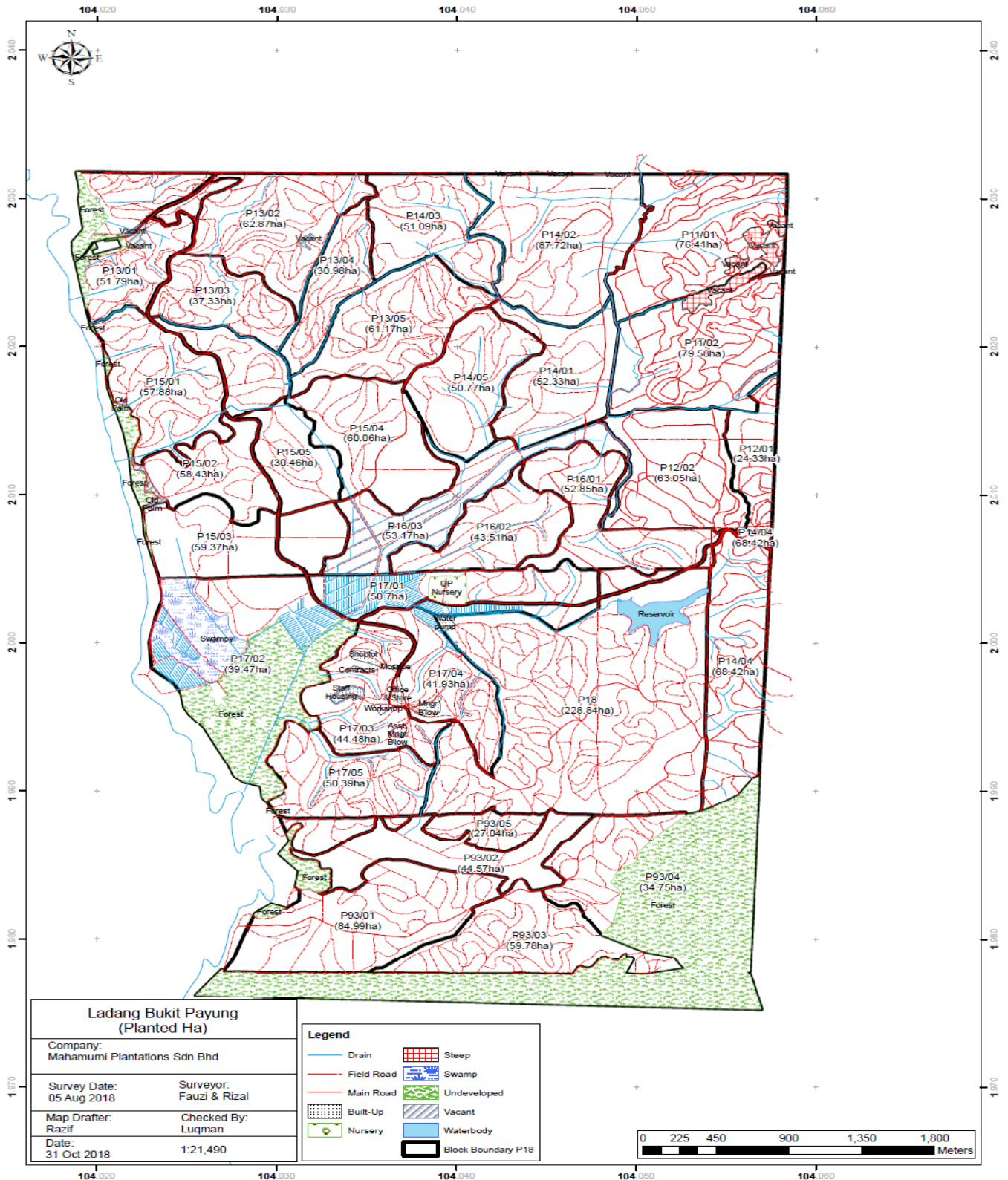
<b>E. Records of CPO &amp; PK Sold as conventional since the last audit (if any)</b>				
No.	Buyers Name	CPO Sold (mt)	PK Sold (mt)	
1	TUV	29,286.91	-	
2	XYZ	-	1,641.44	
	TOTAL	29,286.91	1,641.44	
<b>Note:</b>				

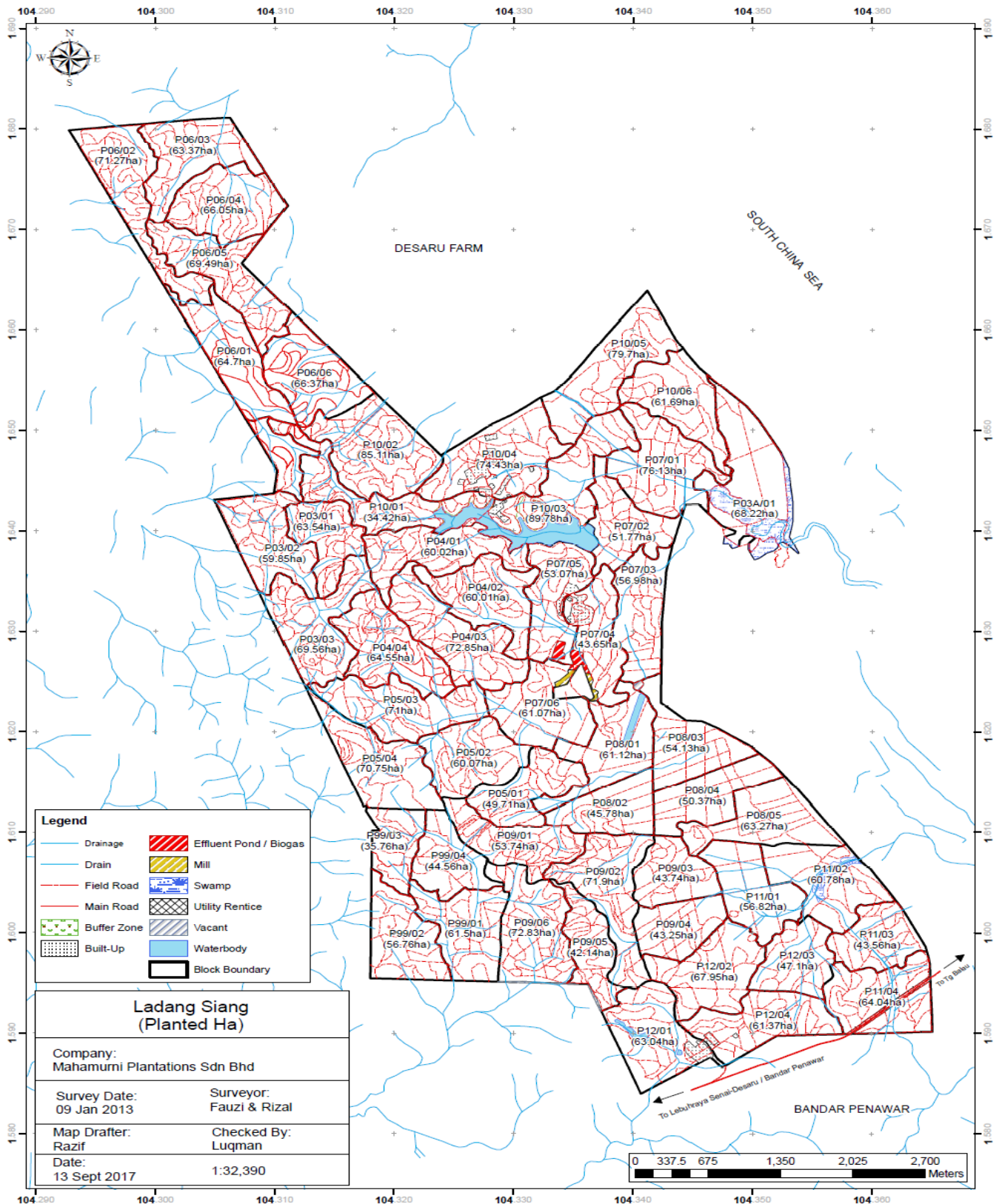
<b>F. Records of Certified CPO Sold under RSPO Credits since the last audit (if any)</b>			
No.	Buyers Name	PalmTrace Trading License Number	RSPO Credits of Certified CPO Sold (mt)
	NIL		
<b>Note:</b>			

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



**Appendix F: Estate Field Map (Bukit Payung and Siang Estate)**





**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
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