

**RSPO PRINCIPLE AND CRITERIA
PUBLIC SUMMARY REPORT**

- Initial Assessment
- Annual Surveillance Assessment (1_3)
- Recertification Assessment (Choose an item.)
- Extension of Scope

Carotino/JC Chang Group
Unit 30-01, Level 30, Menara Landmark No. 12, Jalan Ngee Heng 80000 Johor Bahru, Johor, Malaysia
Asia Palm Oil Mill & Supply Base (Asia Production Unit)
KM 45, Off Jalan Lahad Datu - Sandakan 91100 Sandakan, Sabah, Malaysia
Date of Final Report: 28/5/2021

TABLE of CONTENTS

Page No

Section 1: Scope of the Certification Assessment.....	4
1. Company Details	4
2. Certification Information	4
3. Other Certifications	5
4. Location(s) of Mill & Supply Bases	5
5. Description of Supply Base	5
6. Plantings & Cycle	6
7. Certified Tonnage of FFB (Own Certified Scope)	6
8. Certified Tonnage of FFB (from other certified unit(s))	6
9. Non-Certified Tonnage of FFB (outside supplier – excluded from certificate)	7
10. Certified Tonnage	7
11. Actual Sold Volume (CPO)	7
12. Actual Sold Volume (PK)	8
13. Independent Smallholders Certification Claims	8
Section 2: Assessment Process	9
2.1 Assessment Methodology, Programme, Site Visits	9
2.2 BSI Assessment Team:	11
2.3 Assessment Plan	12
Section 3: Assessment Findings	15
3.1 Normative requirement applied for this assessment:	15
3.2 Multiple Management Units and Time Bound Plan	15
3.3 Progress of scheme smallholders and/or outgrowers (if applicable to this assessment)	16
3.4 Details of Nonconformities	17
3.4.1 Status of Nonconformities Previously Identified and Observations	19
3.4.2 Summary of the Nonconformities and Status	20
3.5 Stakeholders and previous land owner / user consultation	20
3.6 Impartiality and conflict of interest	23
Formal Signing-off of Assessment Conclusion and Recommendation	24
Appendix A: Summary of Findings <i>include the appropriate checklist used for assessment</i>	25
Appendix B: Approved Time Bound Plan	118
Appendix C: GHG Reporting Executive Summary	122
Appendix D: Supply Chain Declaration	124

RSPO P&C Public Summary Report
Revision 11 (Sept 2020)

Appendix E: Location Map of Certification Unit and Supply bases.....127
Appendix F: Estate Field Map128
Appendix G: List of Smallholder Sampled.....131
Appendix H: List of Abbreviations132

Section 1: Scope of the Certification Assessment

1. Company Details			
Parent Company	Carotino/ JC Chang Group		
RSPO Membership Number	2-0029-06-000-00	Membership Approval Date	10/05/2006
Address	Unit 30-01, Level 30, Menara Landmark No.12, Jalan Ngee Heng 80000 Johor Bahru, Johor, Malaysia		
Palm Oil Mill / Group Manager / Estate (Certification Unit)	Asia Palm Oil Mill (Asia Production Unit)		
Location / Address	KM 45, Off Jalan Lahad Datu – Sandakan 91100 Sandakan, Sabah, Malaysia		
Website	www.carotino.com		
Management Representative	Mr. Chan Chor Laup (Mill Manager) Mr. Seow Chee Chiang	E-mail	seowcc@jcc.com.my
Telephone	+607 223 1633 (Head Office) +6089 567012 (Mill)	Facsimile	+607 224 1546 (Head Office)

2. Certification Information			
Certificate Number	RSPO 651278	Date of First Certification	31/01/2013
		Certificate Start Date	31/01/2018
		Certificate Expiry Date	30/01/2023
Scope of Certification	Palm Oil and Palm Kernel Production		
Visit Objectives	<ul style="list-style-type: none"> - Determination of the conformity of the client's management system, or parts of it, with audit criteria. - Evaluation of the ability of the management system to ensure the client organization meets applicable statutory, regulatory and contractual requirements. 		
Assessment Cycle	<input type="checkbox"/> Initial Assessment <input type="checkbox"/> Recertification Assessment (Choose an item.) <input checked="" type="checkbox"/> Annual Surveillance Assessment (RA 1 ; ASA 3) <input type="checkbox"/> Scope Extension		
Applicable Standards	<input type="checkbox"/> RSPO P&C 2018 for the Production of Sustainable Palm Oil <input checked="" type="checkbox"/> Malaysia National Interpretation 2019 for RSPO P&C 2018 for the Production of Sustainable Palm Oil <input type="checkbox"/> Group Certification 2016 <input type="checkbox"/> RSPO Independent Smallholders Standard 2019		
Supply Chain Module	<input type="checkbox"/> Identity Preserved <input checked="" type="checkbox"/> Mass Balance		

RSPO P&C Public Summary Report
Revision 11 (Sept 2020)

3. Other Certifications			
Certificate Number	Standard(s)	Certificate Issued by	Expiry Date
EU-ISCC-CERT-US201-70600650	International Sustainability and Carbon Certification (ISCC EU)	SCS Global Service	20/12/2020
50450318 MSPO3	MS 2530-3:2013 MSPO Part 3: General Principles For Oil Palm Plantations and Organized Smallholders.	DQS Certification (M) Sdn. Bhd.	13/11/2025
50450207 MSPO4	MS2530-4: 2013 MSPO Part 4: General Principles for Palm Oil Mills	DQS Certification (M) Sdn. Bhd.	13/11/2025

4. Location(s) of Mill & Supply Bases			
Name (Mill / Supply Base)	Location	GPS Coordinates	
		Latitude	Longitude
Asia Palm Oil Mill	KM45 Off Jalan Lahad Datu-Sandakan, 91100 Lahad Datu, Sabah	5° 17' 34.01" N	118° 12' 24.54" E
Asia Oil Palm Estate Div. 2	Sungai Tenegang, CL 095317383, Tenegang / Koyah, Kinabatangan, Sabah, Malaysia.	5° 18' 16.63" N	118° 11' 56.53" E
Melewar Estate Div.2	KM45, Jalan Lahad Datu-Sandakan, 91100 Lahad Datu, Sabah	5° 15' 58.70" N	118° 9' 35.99" E
Hwa Li Estate Div.3	KM45, Jalan Lahad Datu-Sandakan, 91100 Lahad Datu, Sabah	5° 20' 41.59" N	118° 18' 19.33" E

5. Description of Supply Base					
Estate	Total Planted (Mature + Immature) (ha)	HCV (ha)	Infrastructure & Other (ha)	Total Area (ha)	% of Planted
Asia Oil Palm Estate Div.2	2,720.72	-	303.28	3,024.00	89.97
Melewar Estate Div. 2	1,770.41	-	252.99	2,023.40	87.50
Hwa Li Estate Div.3	3,953.24	-	435.47	4,388.71	90.08
Total	8,444.37	-	991.74	9,436.11	89.49

RSPO P&C Public Summary Report
Revision 11 (Sept 2020)

6. Plantings & Cycle							
Estate	Age (Years)					Mature	Immature
	0 - 3	4 - 10	11 - 20	21 - 25	26 - 30		
Asia Oil Palm Estate Div. 2	730.05	489.97	22.52	800.33	677.85	1,990.67	730.05
Melewar Estate Div. 2	360.72	-	-	1,409.69	-	1,409.69	360.72
Hwa Li Estate Div. 3	10.00	-	215.95	3,727.29	-	3,943.24	10.00
Total (ha)	1,100.77	489.97	238.47	5,937.31	677.85	7,343.60	1,100.77

7. Certified Tonnage of FFB (Own Certified Scope)				
Estate	Tonnage / year			
	Estimated (Jan - Dec 2020)	Actual (Nov 2019-Feb 2021)		Forecast (Jan 2021-Dec 2021)
		Previous license period (Nov-Dec 2019)	Current license period (Jan 2020 - Feb 2021)	
Asia Oil Palm Estate Div. 2	40,701.24	2,946.71	41,253.96	38,220.26
Melewar Estate Div. 2	31,300.59	2,039.41	28,551.79	26,868.77
Hwa Li Estate Div. 3	88,834.19	6,892.12	96,489.70	87,598.72
Extension Volume*	40,210.00	-	-	-
Total	201,046.02	178,173.69		152,687.75

* Approved extension date: 29/1/2021

8. Certified Tonnage of FFB (from other certified unit(s))				
Estate	Tonnage / year			
	Estimated (Jan - Dec 2020)	Actual (Nov 2019-Feb 2021)		Forecast (Jan 2021-Dec 2021)
		N/A	Previous license period (Nov-Dec 2019)	
Pahang Estate 2		200.28	2,803.87	
Pahang Estate 3		2,072.13	29,009.82	
Gerola Estate		3.25	45.47	
Kinakulture Sdn.Bhd		3.86	54.02	
Melewar Estate 3		3.69	51.60	
Pekopa Enterprise Sdn Bhd		1.97	27.52	
RKKL Holding Sdn.Bhd		2.53	35.39	

RSPO P&C Public Summary Report

Revision 11 (Sept 2020)

Sri Mulia Sdn.Bhd		2.99	41.85	
Tye Yang Plantations (Sabah) Sdn.Bhd		26.37	369.21	
Total		34,755.82		

9. Non-Certified Tonnage of FFB (outside supplier – excluded from certificate)				
Independent FFB Supplier	Tonnage / year			Forecast (Jan 2021-Dec 2021)
	Estimated (Jan - Dec 2020)	Actual (Nov 2019-Feb 2021)		
		Previous license period (Nov-Dec 2019)	Current license period (Jan 2020 – Feb 2021)	
Independent FFB Suppliers/out-growers	N/A	3,835.37	25,559.00	N/A
Total		29,394.36		

10. Certified Tonnage				
	Estimated (Jan - Dec 2020)	Actual (Nov 2019-Feb 2021)		Forecast (Jan 2021-Dec 2021)
	FFB	FFB		FFB
Mill Capacity: 60 MT/hr	*201,046.02	Previous license period (Nov-Dec 2019)	Current license period (Jan 2020 – Feb 2021)	152,687.75 -
		20,990.15	191,939.36	
		-	-	
	CPO (OER: 20.11 %)	CPO (OER: 19.25 %)		CPO (OER: 19.94 %)
	*45,444.12	4,040.60	36,948.33	30,445.94
		40,988.93		
	PK (KER: 5.43 %)	PK (KER: 5.38 %)		PK (KER: 5.45%)
	*11,933.40	1,129.27	10,326.34	8,321.48
11,455.61				

* including volume extension

11. Actual Sold Volume (CPO)					
Current License period					
	RSPO Certified	Other Schemes Certified		Conventional	Total
		ISCC	Others		

RSPO P&C Public Summary Report
Revision 11 (Sept 2020)

CPO (MT)	25,267.02	3,260.31	-	2,300.19	30,827.52
Previous License period					
CPO (MT)	3,231.17	-	-	489.46	3,720.63
Total	28,498.19	3,260.31	-	2,789.65	34,548.15

12. Actual Sold Volume (PK)					
Current License period					
	RSPO Certified	Other Schemes Certified		Conventional	Total
		ISCC	Others		
PK (MT)	7,951.38	-	-	1,898.02	9,849.40
Previous License period					
PK (MT)	834.94	-	-	62.72	897.66
Total	8,786.32	-	-	1,960.74	10,747.06

13. Independent Smallholders Certification Claims		
	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)
Website: www.bsigroup.com

BSI is a leading global provider of management systems assessment and certification, with more than 84,000 certified locations and clients in over 180 countries. BSI Standards is the UK's National Standards Body. BSI provides independent, third-party certification of management systems. BSI is ASI Accredited (ASI-ACC-067) to conduct RSPO assessment since 31/10/2014 with accredited office located at Kuala Lumpur, Malaysia.

2.1 Assessment Methodology, Programme, Site Visits

The on-site assessment was conducted on 29th – 31st March 2021. The audit programme is included as Section 2.3. Due to the COVID-19 pandemic, this assessment involved a partial remote audit as allowed by RSPO Secretariat – RSPO P&C On-site & Remote Audits dated 24th March 2020. The remote audit was conducted on 30th Nov 2020 – 1st Dec 2020.

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 assessment was conducted off-site due to the MCO.

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 Malaysia National Interpretation 2019 for the Production of Sustainable Palm Oil 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.

RSPO P&C Public Summary Report
Revision 11 (Sept 2020)

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 (Recertification)	Year 2 (ASA 1_1)	Year 3 (ASA 1_2)	Year 4 (ASA 1_3)	Year 5 (ASA 1_4)
Asia Palm Oil Mill	✓	✓	✓	✓	✓
Asia Oil Palm Estate Div. 2	✓	✓	✓	✓	✓
Melewar Estate Div. 2	✓	✓	✓	✓	✓
Hwa Li Estate Div. 3	✓	✓	✓	✓	✓

Tentative Date of Next Visit: November 1, 2021 - November 4, 2021

Total No. of Mandays: 12

RSPO P&C Public Summary Report
Revision 11 (Sept 2020)

2.2 BSI Assessment Team:

Team Member Name	Role <i>(Team Leader or Team member)</i>	Qualifications <i>(Short description of the team members)</i>
Hafriazhar Mohd. Mokhtar	Team Leader	Hafriazhar Mohd. Mokhtar is a Chemical Engineer by qualification. He has more than five years of direct work experience in the upstream processes of palm oil within the plantation industry. He is a qualified Lead Auditor for CDM, ISO 9001, ISO 14001, ISO 45001 and ISO 50001 and has accumulated more than 1000 audit days throughout his current career as the auditor for multiple disciplines covering Malaysia, Indonesia and Thailand. He has been trained in the RSPO P&C and SCCS standards since 2011 and completed his RSPO P&C and SCCS Lead Assessor courses successfully. He has been involved in RSPO audits within Malaysia, Papua New Guinea, Solomon Islands, Gabon, Nigeria and Pakistan. During this assessment, he assessed on the aspects of Policy and commitment, Social requirements, contract agreement, human rights, workers' welfare, smallholder welfare, Stakeholder Consultation, Legal Requirements, land & Legal issue and RSPO supply chain requirements. He is fluent in Bahasa Malaysia and English languages.
Muhammad Fadzli Masran	Team Member	Fadzli graduated in Bachelor of Forestry Science at University Putra Malaysia. He started his career as Assistant Manager at Kulim Plantations Sdn. Bhd. managing the day to day plantation operations. In his career at Kulim Plantation, Fadzli had accumulated more than 10 years of sustainability implementation experience including workers' welfare, workers' occupational, health & safety, environment conservation and protection at buffer areas and continuous improvement management plans. Fadzli had accumulated auditing experience when he was the internal auditor for ISO9001 and ISO14001 at Kulim Plantations. He has completed ISO IMS 9001, 14001, 45001(OHS 18001) Lead Auditor Course in April 2018 and endorsed RSPO Lead Auditor Course in July 2018. During this assessment, he assessed the aspects of Economic management plan, mill best practices, estate best practices, natural and biodiversity conservation, Waste management, GHG, HCV, and RSPO supply chain requirements. Able to communicate in Bahasa Malaysia and English
Muhammad Naqiuddin	Team Member	He hold Bachelor of Science Horticulture at University Putra Malaysia. He has 11 years working experience in oil palm plantation industry as sustainability team. Joining the sustainability team, he managed, implement and monitors the RSPO, ISCC, MSPO and ISO9001 and ISO 18001 certification requirements for the estates, mills, refineries and Smallholder scheme. He also support in providing training related to RSPO, MSPO and other certifications where applicable to the operations during previous company. He is a trained as Safety and Health Officer, Food Safety System (FSSC and ISO 22000) for Mill and refineries, ISO 9001, ISO 45001 and already attend HCV training with Proforest. During assessment, he covered the Economic management plan, estate best practices, natural and biodiversity conservation, Waste management, GHG, HCV, and RSPO supply chain requirements. He is fluent in Bahasa Malaysia and English languages.

Accompanying Persons:

RSPO P&C Public Summary Report
Revision 11 (Sept 2020)

Name	Role
Nil	N/A

2.3 Assessment Plan

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

Date	Time	Subjects	HMM	MNM	MFM
Monday, 29/3/2021	0830 – 0900	Hwa Li Estate Div. 3: Opening Meeting: <ul style="list-style-type: none"> Opening Presentation by Audit team leader. Confirmation of assessment scope and finalize Audit plan (including stakeholder’s consultation). 	✓	✓	✓
	0900 – 1230	Hwa Li Estate Div. 3: 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, Scheduled waste management, worker housing, clinic, Landfill, , etc.	✓	✓	✓
	1230 – 1330	Lunch	✓	✓	✓
	1330 – 1500	Hwa Li Estate Div. 3: Document review P1 – P7: (General Documentation e.g. Legal, Manual and Procedure, production & monitoring records, IPM & HCV records, SEIA documents & records.	✓	✓	✓
	1500 – 1515	Travel to Melewar Estate Div. 2:	✓	✓	✓
	1515 – 1715	Melewar Estate Div. 2: 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, Scheduled waste management, worker housing, clinic, Landfill, , etc.	✓	✓	✓
	1715 – 1730	Day 1 interim closing	✓	✓	✓

RSPO P&C Public Summary Report
Revision 11 (Sept 2020)

Date	Time	Subjects	HMM	MNM	MFM
Tuesday, 30/3/2021	0830 – 1230	Melewar Estate Div. 2: Document review P1 – P7: (General Documentation e.g. Legal, Manual and Procedure, production & monitoring records, IPM & HCV records, SEIA documents & records.	✓	✓	✓
	1030 – 1230	Meeting with stakeholders (Government, village rep, smallholders, Union Leader, contractor etc.)	✓	-	-
	1230 – 1400	Lunch and travel to Asia POM:	✓	✓	✓
	1400 – 1700	Asia POM: 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.	✓	✓	✓
	1700 – 1715	Day 2 interim closing	✓	✓	✓
Wednesday, 31/3/2021	0830 – 1000	Asia POM: Document review P1 – P7: (General Documentation e.g. Legal, Manual and Procedure, production & monitoring records, IPM & HCV records, SEIA documents & records.	✓	✓	✓
	1000 – 1230	Travel to Asia Oil Palm Estate Div. 2: 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, Scheduled waste management, worker housing, clinic, Landfill, , etc.	✓	✓	✓
	1230 – 1330	Lunch	✓	✓	✓
	1330 – 1600	Asia Oil Palm Estate Div. 2: Document review P1 – P7: (General Documentation e.g. Legal, Manual and Procedure, production & monitoring records, IPM & HCV records, SEIA documents & records.	✓	✓	✓

RSPO P&C Public Summary Report
Revision 11 (Sept 2020)

Date	Time	Subjects	HMM	MNM	MFM
	1600 - 1630	Auditors discussion & closing preparation	✓	✓	✓
	1630 - 1700	Closing meeting	✓	✓	✓

Section 3: Assessment Findings

3.1 Normative requirement applied for this assessment:

- Carotino/JC Chang Group 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	Complied
Have all the estates and mills certified within five years after obtaining RSPO membership?	Yes. The Group has achieved 100% RSPO certification for all Operating Units under the management of JC Chang Group at ended year of 2019. The last Production Unit namely Takon Production Unit have undergone RSPO main assessment on 28/10 to 1/11/19 with a positive result and the CB have recommended Takon Production Unit for RSPO certification. However, the certificate is yet to be issued due to pending approval from RSPO on the RaCP concept note. RSPO agreed to hold the result of assessment for Takon Production Unit till Nov. 2020 but unfortunately, the Group can't achieved the deadline as RaCP concept note was yet to approved by RSPO. The Group will reconduct RSPO main assessment for Takon Production Unit without Takon Palm Oil Mill as soon as possible after obtained approval on RaCP concept note from RSPO. Takon Production Unit was restructure on Feb. 2021 as Takon Palm Oil Mill was sold to non-RSPO member on 22/01/21.	Complied
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.	Yes. There is a new acquisition namely Asia Ecogreen Sdn Bhd under Hwa Li Estate Div.3 management. This area to be certified for this year assessment.	Complied
Have there been any changes to the time-bound plan since the last audit (both new acquisition and existing)? If yes, justification is required.	Changes involved the restructure of Takon Production Unit due to selling of Takon Palm Oil Mill to non-RSPO member on 22/1/2021.	Complied

RSPO P&C Public Summary Report
Revision 11 (Sept 2020)

Is this consistent with the ACOP reporting?	Hence, cancelling the certification as production unit but to certified the estates as supply base in existing certification unit. Changes not reflective yet in the existing submitted ACOP 2019 and to be submitted in ACOP 2020.	
Have there been any isolated lapses in implementation of the plan? If yes a Minor non-compliance shall be raised	No isolated lapses in implementation of the plan.	Complied
Have there been any fundamental failure (e.g. unable to justify delay in planning the assessments) to proceed with implementation of the plan? If yes a Major non-compliance shall be raised	No fundamental failure in implementation of the plan.	Complied
Un-Certified Units or Holdings		
No replacement after dates defined in NIs Criterion 7.3: <ul style="list-style-type: none"> • Primary forest. • Any area required to maintain or enhance HCVs in accordance with RSPO P&C criterion 7.3. 	No replacement after dates defined in RSPO P&C MYNI 2019.	Complied
Any new plantings since January 1 st 2010 shall comply with the RSPO New Plantings Procedure.	No new development since 1 st January 2010	Complied
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.	Yes. The land conflict occurred in Takon Production Unit is on the process of authority application.	Complied
Any Labor disputes are being resolved through a mutually agreed process, in accordance with RSPO P&C criterion 6.3.	No labour dispute occurred and reported since last audit.	Complied
Any Legal non- compliance is being addressed through measures consistent with the requirements of RSPO P&C criteria 2.1	No legal non-compliance occurred and reported since last audit.	Complied
Did the company conduct internal audit against the uncertified management units requirement? If yes, a positive assurance statement shall be available.	Yes. Internal audit conducted with findings highlighted for site further improvement.	Complied
Have there been any stakeholder (including NGO) consultation conducted?	Yes. Refer indicator 1.1.4 of the report for details.	Complied

3.3 Progress of scheme smallholders and/or out-growers

Progress of scheme smallholders or outgrowers towards compliance with relevant standards		
Requirement	Remarks	Compliance

<p>Has 100% of scheme smallholders and/or scheme outgrowers comply with the standard within three years of the mill's initial certification?</p> <p>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.</p>	<p>Not applicable.</p>	<p>N/A</p>
---	------------------------	------------

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 was One (1) Critical nonconformity raised. The Asia Palm Oil Mill (Asia Production Unit – APU) 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			
NCR Ref #	2036145-202103-M1	Clause & Category (Critical / Minor)	3.4.3 (Critical/Major)
Date Issued	31/3/2021	Due Date	29/6/2021
Closed (Yes / No)	Yes	Date of nonconformity Closure	30/4/2021
Statement of Nonconformity:	The environmental management plan was not effectively implemented		
Requirement Reference:	The social and environmental management and monitoring plan is implemented, reviewed and updated regularly in a participatory way.		
Objective Evidence:	<p>Melewar Estate Div. 2 and Asia POM:</p> <p>The operating units has established environmental management plan. Under section pollution stated oil trap to be build and maintain appropriate interval to prevent oil spillage reach second compartment of the trap.</p> <p>Sighted at the Engine room in Melewar Estate Division 2, there is evidence of oil in all 3 compartment and flow into the drain.</p> <p>Sighted in Asia Palm Oil Mill, there is evidence of residue from the oil trap around the drain and oil trap.</p>		
Corrections:	<p>The management has held an emergency meeting on 02/04/2021 (Attachment#1) to take action to address this problem, which has appointed a mill supervisor to ensure cleaning can be done in accordance with SOPs and representatives from the management to monitor and control the situation from recurrence. In addition, the oil trap cleaning schedule has also been made on a monthly basis and the provision of re-training and briefings to the operators on duty to understand the requirements of the work directed.</p>		

RSPO P&C Public Summary Report
Revision 11 (Sept 2020)

Root Cause Analysis:	Asia Palm Oil Mill, there is evidence of residue from cleaned oil traps being placed on the ground / grass surface around drains and oil traps.
Corrective Actions:	<ul style="list-style-type: none"> - Appointment of PIC who responsible for monitoring of oil trap in mill area as following: <ol style="list-style-type: none"> 1) Mr. Samsi Bin Laipan (Management) 2) Mr. Wahid Bin Suddin (Mill Supervisor) 3) Mr. Zakaria Bin Osman (Mill Supervisor) - Development and implementation of monthly maintenance schedule and inspection checklist for oil trap - Review the aspects and impact of the in house SEIA improvement plan to improve and make additions to the shortcomings found in. (Attachment#4) - Re-training and briefings to be given to personnel in charge and operator of oil trap maintenance to ensure the maintenance is properly done as per guidelines and standards - Oil trap servicing report dated 6/4/2021
Assessment Conclusion:	<p>Evidence of corrections and corrective actions verified:</p> <ul style="list-style-type: none"> - Appointment letter dated 2/4/2021 to appointed personnel responsible for monitoring of oil trap in mill area - Sample monthly maintenance schedule (April 2021) and inspection checklist for oil trap dated 6/4/2021 - Updated SEIA improvement plan to improve and make additions to the shortcomings found dated 5/4/2021 - Re-training and briefings records of operator for oil trap maintenance dated 6/4/2021 - Actual Work done with pictures and conditions around the oil trap BEFORE and AFTER the action from the management to prove the implementation has been done as instructed dated on 6/4/2021 <p>Evidence of corrections and corrective actions taken confirmed the CAP proposed were effective to address the issue. Hence, Critical NC was closed on 30/4/2021.</p>

Opportunity for Improvements	
OFI #	Description
OFI 1	Nil

Positive Findings	
PF #	Description
PF 1	Nil

3.4.1 Status of Nonconformities Previously Identified and Observations

Non-conformity			
NCR Ref #	1993690-202011-M1	Clause & Category (Critical / Minor)	2.3.1 (Critical/Major)
Closed (Yes / No)	Yes	Date of nonconformity Closure	29/1/2021
Statement of Nonconformity:	Documentation for directly source FBB were not complete		
Requirement Reference:	<p>(C) For all directly sourced FFB, the mill requires:</p> <ul style="list-style-type: none"> Information on geo-location of FFB origins Proof of the ownership status or the right/claim to the land by the grower/smallholder Where applicable, valid planting/operating/trading license, or is part of a cooperative which allows the buying and selling of FFB 		
Objective Evidence:	Proof of ownership status or the right/claim such as land title etc. and valid planting/operating/trading license which allows the buying and selling of FFB such as MPOB license/trading license for directly source FFB were not available during the audit.		
Corrective Actions:	<p>i) Appointment letter for the person in-charge</p> <p>ii) Minutes of meeting on this issue between employer and executive</p> <p>iii) Improvement plan SEIA made to resolve this issue</p> <p>iv) Summary of all Smallholder FFB suppliers who send FFB to the mill related to MPOB License data, Geo-location and Land title as following:</p> <p>a) Meran Sdn. Bhd.</p> <p>b) Kebaco Sdn. Bhd.</p> <p>c) Sentrabayu Sdn. Bhd.</p> <p>d) KJS Resources Sdn. Bhd.</p> <p>e) Tapak Juta Maju</p> <p>f) Benar Waris Sdn. Bhd.</p>		
Assessment Conclusion:	<p>Evidence of corrections and corrective actions verified:</p> <ul style="list-style-type: none"> Appointment letter of responsible for monitoring of documentation for directly sourced FFB dated 2/12/2020 Minutes of meeting between management and person in-charges of external FFB supply dated 2/12/2020 Updated SEIA action plan dated 2/12/2020 Complete documents of MPOB license copies, summary table of FFB origins GPS and evidence of ownership of related suppliers i.e. Meran Sdn. Bhd., Kebaco Sdn. Bhd., Sentrabayu Sdn. Bhd., Tapak Juta Maju and Benar Waris Sdn. Bhd. <p>Evidence of corrections and corrective actions taken confirmed the CAP proposed were effective to address the issue. Hence, Critical NC was closed on 29/1/2021.</p>		

RSPO P&C Public Summary Report
Revision 11 (Sept 2020)

On-site verification:	<p>The mill has established geo-location information for all directly source of FFB documented in Stakeholder List (FFB Supplier). In the list contains information such as FFB supplier name, person responsible, address, contact no., MPOB License and expiry date, land title and geo-location coordinate.</p> <p>The FFB supplier need to undergo due diligence before been accepted as supplier to the mill. Reviewed the due diligence for and document such as MPOB License, Trading License and proof of land ownership/land title as follows:</p> <table border="1" style="width: 100%; border-collapse: collapse;"> <thead> <tr> <th style="width: 25%;">FFB Supplier</th> <th style="width: 25%;">MPOB License</th> <th style="width: 25%;">Land Title no.</th> <th style="width: 25%;">Geo-Location</th> </tr> </thead> <tbody> <tr> <td rowspan="3">Meran Sdn. Bhd.</td> <td rowspan="3">522051002000</td> <td>095311881</td> <td>E118.11936</td> </tr> <tr> <td>095331909</td> <td>N5.34342</td> </tr> <tr> <td>095331883</td> <td></td> </tr> <tr> <td>KJS Resource Sdn. Bhd.</td> <td>544387002000</td> <td>09529936 09529294</td> <td>E118°11'075" N5°18'3.41"</td> </tr> <tr> <td rowspan="3">Benar Waris</td> <td rowspan="3">502523302000</td> <td>115360328</td> <td>E118329173</td> </tr> <tr> <td>115360337</td> <td>N5.234518</td> </tr> <tr> <td>115360346</td> <td></td> </tr> </tbody> </table> <p>This confirmed no recurrence of issue, hence Major NC remained close.</p>	FFB Supplier	MPOB License	Land Title no.	Geo-Location	Meran Sdn. Bhd.	522051002000	095311881	E118.11936	095331909	N5.34342	095331883		KJS Resource Sdn. Bhd.	544387002000	09529936 09529294	E118°11'075" N5°18'3.41"	Benar Waris	502523302000	115360328	E118329173	115360337	N5.234518	115360346	
FFB Supplier	MPOB License	Land Title no.	Geo-Location																						
Meran Sdn. Bhd.	522051002000	095311881	E118.11936																						
		095331909	N5.34342																						
		095331883																							
KJS Resource Sdn. Bhd.	544387002000	09529936 09529294	E118°11'075" N5°18'3.41"																						
Benar Waris	502523302000	115360328	E118329173																						
		115360337	N5.234518																						
		115360346																							

Opportunity for Improvement	
OFI#	Description
OFI 1	Nil

3.4.2 Summary of the Nonconformities and Status

CAR Ref.	Category (Critical / Minor)	P&C Indicator	Issued Date	Status & Date (Closure)
1554102-201709-M1	Major	5.3.3	09/11/2017	Closed on 08/01/2018
1554102-201709-N1	Minor	4.1.3	09/11/2017	Closed out on 16/11/2018
1706395-201811-M1	Major	2.1.1	16/11/2018	Closed out on 08/02/2019
1706395-201811-N1	Minor	2.1.2	16/11/2018	Closed out on 07/11/2019
1845883-201911-N1	Minor	4.7.5	07/11/2019	Closed out on 30/11/2020
1993690-202011-M1	Critical	2.3.1	1/12/2020	Closed out on 29/1/2021
2036145-202103-M1	Critical	3.4.3	31/3/2021	Closed out on 30/4/2021

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 The Asia Palm Oil Mill (Asia Production Unit – APU) Certification Unit’s environmental and social performance, legal and any known dispute issues.

RSPO P&C Public Summary Report
Revision 11 (Sept 2020)

Meetings were conducted with stakeholders to seek their views on the performance of the company with respect to the RSPO requirements and aspects where they considered that improvements could be made. At the start of each meeting, the interviewer explained the purpose of the audit followed by an evaluation of the relationship between the stakeholder and the company before discussions proceeded. The interviewer recorded comments made by stakeholders and later was verified with the management team. Any comment which is not complying to the RSPO P&C requirements have been incorporated as an assessment finding.

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

List of Stakeholders contacted	
Internal Stakeholders Mill operators Field workers Harvesters Gender committee chairpersons Estate Hospital Assistants Creche ayah	Union/Contractors Local workers JCC representative Foreign workers JCC representatives External FFB supplier Grocery store operator FFB transporter
Government Departments Nil	NGO Community Learning Centre (CLC) teacher

Stakeholders comment	
1	<p>Feedbacks: Grocery store operator: Had issues during Movement Control Order (MCO) and Conditional Movement Control Order (CMCO) period to buy shop's stock from wholesaler due to stringent enforcement by estate management that requires mandatory swab test every time out and come back in estate. Had discussion and allowed to conduct the swab test only if necessary i.e. if have symptoms.</p> <p>Management Responses: Management has to strictly follow company's directive in order to prevent occurrence of COVID-19 case. All companies operating palm oil mills and oil palm estates within Kinabatangan River Valley had implemented voluntary lockdown since October 2020 for at least 6 months to ensure sustainable operations together. Some company that ended its voluntary lockdown earlier had encountered positive COVID-19 cases within their operating units and has been mandatory lockdown by the authorities hence affected their operations badly.</p> <p>Audit Team Findings: No further issue.</p>
2	<p>Feedbacks: CLC teacher: Estate managements always visits and contributes to school programs and activities. 100% of children among estate workers are schooling at CLC including from neighbour estate. School facilities were well maintained by company.</p>

RSPO P&C Public Summary Report
Revision 11 (Sept 2020)

	<p>Management Responses: Positive comments noted.</p> <p>Audit Team Findings: No further issue.</p>
3	<p>Feedbacks: Local & foreign workers JCC representatives: Most of workers felt stressful for not being able to go out of estate and housing compound due to voluntary lockdown enforced by management since October 2020. However it is safer and whatsoever, estates management been very helpful to assist on workers needs including daily sundries.</p> <p>Management Responses: Positive comments noted.</p> <p>Audit Team Findings: No further issue.</p>
4	<p>Feedbacks: External FFB supplier: Daily transactions of FFB still continue with no issue although company had implemented voluntary lockdown. Payments still received on time.</p> <p>Management Responses: Positive comments noted.</p> <p>Audit Team Findings: No further issue.</p>
5	<p>Feedbacks: FFB Transporter: No issue in transportation contracts pricing and payment. Has long business relationship with company for more than 10 years.</p> <p>Management Responses: Positive comments noted.</p> <p>Audit Team Findings: 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
Asia Palm Oil Mill (CL 0953117383)	1990	43.38	No	N/A	N/A
Asia Oil Palm Estate Div. 2 (CL 0953117383)	1990	3024.00	No	N/A	N/A
Melewar Estate Div. 2 (CL 095311201)	1995	2023.4	No	N/A	N/A
Hwa Li Estate Div. 3					

(CL 095324502)	1995	4047.00	No	N/A	N/A
(CL 095327138)	2001	230.60			
(CL 095324600)	2019	101.10			
(CL 095326104)	2019	10.01			



Previous land owner / user comment	
Nil	Feedbacks: N/A
	Management Responses: N/A
	Audit Team Findings: N/A

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.

RSPO P&C Public Summary Report
Revision 11 (Sept 2020)

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 The Asia Palm Oil Mill (Asia Production Unit – APU) has complied with the RSPO Principles and Criteria 2018 for Sustainable Palm Oil (Malaysia National Interpretation 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 Asia Palm Oil Mill (Asia Production Unit – APU) is continued.</p>	
Report prepared by	Acceptance of Assessment Conclusion
Name: Hafriazhar Mohd. Mokhtar	Name:
Company Name: BSI Services Malaysia Sdn. Bhd.	Company Name:
Title: Client Manager	Title:
<p>Signature:</p> 	<p>Signature: <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>  <p>CARSTINO J.C. CHANG GROUP Seow Chee Chiang Senior Manager</p>
Date: 30/4/2021	Date:

Appendix A: Summary of Findings

Criterion / Indicator	Assessment Findings	Compliance	
Principle 1: Behave ethically and transparently			
Criterion 1.1: 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>(C) Documents that are specified in the RSPO P&C are made available to the public.</p> <p>- Critical (Major) compliance -</p>	<p>Management documents specified in the RSPO P&C are made publicly available by all estates and mill within Asia Production Unit (APU) as per sample sighted as following:</p> <ul style="list-style-type: none"> - Social & Human Rights Policy; Date: 14/11/2019; Signed by both Plantation Director and Mill Director respectively. - Guideline for Identifying Legal and Customary Rights and Identifying People Entitled to Compensation; Doc. Ref. # E/002-05/2019; Date: 12/8/2019 - In House Environmental and Social Improvement Plan - Asia Palm Oil Mill; Date of Review: 25.06.2020; Next Reviewed Date: 25.06.2022 - Pollution Mitigation Plan for Mills – Asia Palm Oil Mill; Doc. Ref. # F/019-04/2020; Doc. Date: 10/6/2020 - Melewar Properties Sdn Bhd - Melewar Estate Div. 2 Production Improvement Plan for FY 2020/21 - SOP on Mechanism for Complaints and Grievances; Doc. Ref. # E/001-07/2019; Doc. Date: 12-08-2019 - Hwa Li Estate Div. 3 Land Title Summary - RSPO Improvement Plan for Asia Oil Palm Estate Div. 2 FY2020/2021 <p>Other public information relevant to sustainability also available from the company's website as per link</p>	Complied

RSPO P&C Public Summary Report
Revision 11 (Sept 2020)

		http://www.carotino.com/group-mission-and-management-plan-16.aspx .	
1.1.2	Information is provided in appropriate languages and accessible to relevant stakeholders. - Minor compliance -	Interview conducted on-site with sampled internal and external stakeholders confirmed that the information provided in appropriate languages and accessible to them.	Complied
1.1.3	(C) Records of requests for information and responses are maintained. - Critical (Major) compliance -	Request and response from internal & external stakeholders as per sample records sighted in the Sustainability Complaint/Suggestion/Grievance Monitoring Book. Sample requests made are as following: <ul style="list-style-type: none"> - Asia Palm Oil Mill requested the gatekeeper of Melewar Estate Div. 1, Pahang Oil Palm Estate Div. 2 and Asia Oil Palm Estate Div. 2 to allow the mill contractor to access through gates; Date: 5/3/2020 - Hwa Li Estate Div. 3 requested Asia Palm Oil Mill to weigh lorry from Teck Guan Sdn. Bhd.; Date: 30/9/2020 - Request by SMK Paris 3 from Melewar Estate Div. 2 to repair school cabin building; Date: 30/9/2020 	Complied
1.1.4	(C) Consultation and communication procedures are documented, disclosed, implemented, made available, and explained to all relevant stakeholders by nominated representative. - Critical (Major) compliance -	The procedures available as per documented SOP on Mechanisms for Communication and Consultation; Doc. Ref. # E/004-08/2019; Date: 12/8/2019 which were implemented by all estates and mill within APU. Various communications implemented through letters and emails of consultation in place of meeting that was unable to be conducted due to COVID-19 MCO as per sample sighted as following: <ul style="list-style-type: none"> - External stakeholder consultation email ref. # smartmail.jcc.com.my/print by Melewar Oil Palm Estate Div. 2; Date: 8/10/2020 	Complied

RSPO P&C Public Summary Report
Revision 11 (Sept 2020)

		<ul style="list-style-type: none"> - External stakeholder briefing of company's communication procedures and sustainability policies; Date: 11/7/2020; Stakeholder name: Agromate (M) Sdn. Bhd. (Fertilizer supplier) - External stakeholder briefing of company's communication procedures and sustainability policies; Date: 13/11/2020; Stakeholder name: Hock Wah Auto Parts Sdn. Bhd. (Spare parts supplier) <p>All estate managers and mill manager are responsible for the external stakeholder communication who were assisted by assistant managers in individual operating units. Sighted the appointment letter of Technical Assistant, Mr. Mohd. Faisal Awang Amit as person in-charge in Asia Palm Oil Mill stakeholder communications to assist the Mill Manager, Mr. Ang Jen Ken. Mr. Jukli Bin Hosin, the Mill Assistant also appointed as alternate official.</p>	
1.1.5	<p>There is a current list of contact and details of stakeholders and their nominated representatives.</p> <p>- Minor compliance -</p>	<p>There is a current list of contact and details of stakeholders and their nominated representatives as per sample sighted for Melewar Oil Palm Estate Div. 2 stakeholders list updated on 29/9/2020. The lists registered all relevant internal and external stakeholders among employees, authorities, local communities, vendors and neighbours etc.</p>	Complied
<p>Criterion 1.2: The unit of certification commits to ethical conduct in all business operations and transactions.</p>			
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>Policy for ethical conduct established as Corruption Prevention; Policy Date: 4/9/2015; Signed by both Plantation Director and Mill Director respectively. Sighted sample records of policy briefing to all Asia POM employees on 19/10/2020. Ethical conduct policy also extended to all external stakeholders mainly among vendors of MPU. Sighted sample records of Sustainability Compliance Contract with Operating Unit; Doc. Ref. # E023-01/2019; Doc. Date:</p>	Complied

RSPO P&C Public Summary Report
Revision 11 (Sept 2020)

		12/8/2019; undertaken by recruitment agency of MPU i.e. Agensi Pekerjaan MNK Sdn. Bhd. who signed on 30/8/2020.	
1.2.2	A system is in place to monitor compliance and the implementation of the policy and overall ethical business practice. - Minor compliance -	Monitoring conducted by the management of operating units with assistance from Internal Compliance Team (ICT) for the implementation of the policy and overall ethical business practice within Carotino/JC Chang group. Sighted the sample Questionnaire on Legal Compliance and Ethical Conduct; Doc. Ref. # E/024-02-2020; Date: 20/2/2020 filled in by Agensi Pekerjaan MNK Sdn. Bhd. on 5/8/2020.	Complied
Principle 2: Operate legally and respect rights			
Criterion 2.1: There is compliance with all applicable local, national and ratified international laws and regulations.			
2.1.1	(C) The Unit of Certification complies with legal requirements - Critical (Major) compliance -	Asia Production Unit have continued to comply with the legal requirements as per indicator. Compliance to each applicable law and regulation is monitored by the operating units and sustainability team. Asia Production Unit have obtained and renewed licenses and permits as required by the law. Sample of licenses and permit viewed were: Palm Oil Mill 1. Trading license no. KBTG/2020/764 2. MPOB License no. 500143104000 valid till 30/11/2021 3. "Lesen menggaji pekerja bukan pemastautin" (JTK. H. KBN. 600-4/1/1/10401/0063 4. Salary permit deduction no. 600-1/2/13/13(KBN/2020-0190) 5. Diesel permit no. KPDNHEP.SDK.07/2018 (SK) valid till 26/5/2021 6. DOE Contradiction License no. 005143 with Compliance schedule no. ASSH(B)T:31/152/000/052 valid till 29/8/2021	Complied

RSPO P&C Public Summary Report
Revision 11 (Sept 2020)

		<p>7. DOE Contradiction License no. 004082 with Compliance schedule no. JPLP(UB)/2020/004082 valid till 5/6/2021</p> <p>8. CePSWaM certificate no. CePSWaM/198392</p> <p>9. CePPOME certificate no. CePPOME/184357</p> <p>Asia Oil Palm Estate Div. 2</p> <p>1. Asia Oil Palm Div. 2 MPOB License no. 502330302000 valid till 30/06/2021</p> <p>2. Asia Oil Palm Div. 2 Trading license no. KBTG/2020/1619</p> <p>3. Asia Oil Palm Div. 2 Salary permit deduction no. 600-1/2/13/13(KBN/2020-0190) valid till 13/07/2022</p> <p>4. Asia Oil Palm Div. 2 "Lesen menggaji pekerja bukan pemastautin" no. JTK. H. KBN. 600-4/1/1/01261/0048 valid till 02/08/2021</p> <p>5. Diesel license for storage BL22020040543 valid until 21/11/2021</p> <p>6. Air compressor license PMT-SB/21 40113 valid until 1/6/2022</p> <p>Melewar Estate Div. 2</p> <p>7. Melewar Estate div. 2 Trading license no. KBTG/2020/693</p> <p>8. Permit Potongan Daripada Gaji Pekerja Seksyen 113(4), Ordinan Buruh (Sabah Bab 67); Validity period: 14/7/2020-13/7/2020; Serial # 600-1/2/13/13(11/KBN/2020-0190)</p> <p>Hwa Li Estate Div. 3</p> <p>9. Hwa Li Estate Div. 3 salary permit deduction no. 600-1/2/13/136(11/KBN/2020-0191) valid till 13/07/2022</p>	
--	--	--	--

RSPO P&C Public Summary Report
Revision 11 (Sept 2020)

		<p>10. Permit potongan daripada gaji, seksyen 113(4), Ordinan Buruh (Sabah Bab 67) for bayaran potongan penjagaan kerbau, Sumbangan Surau and Tabungan kakitangan etc.; serial no. 600-1/2/13/136(11/KBN/2020-0191) valid until 13/7/2022.</p> <p>11. Diesel permit, Serial # Q00006 (LDT), Diesel: 40,000 litre expired on 18/1/2024; Ref number; KPDNHEP.LDT.600-4/4(17/2004)P</p> <p>12. Energy commission license; license no.:2020/01125; serial no.: 44010 (validity period 25/5/2020 – 24/5/2021) for 112 kW installation capacity.</p> <p>13. Certificate of fitness (CF) for air compressor, SB PMT 1240 valid until 15/4/2021</p> <p>14. MPOB license: 503266302000 (validity period until 30/11/2021) for selling and transporting of FFB (area: 4,277.6 ha)</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>A list and copies of legal documents and international treaties and agreements were available for verification. Changes in law was normally tracked through www.lawnet.com.my. The person responsible for monitoring compliance to laws and regulations is formally identified in the guidelines. The Unit maintain copy of relevant laws and legislation relevant to palm oil mill and the plantation operation as per listed in the standard. Based on the SOP on Mechanism to Trace Changes in Legal Requirements (Doc. Ref. No.: E/005-06/2016; Subject Trace changes in legal requirements; Doc. date: 29/3/2016) through the Law Changes Register.</p>	<p>Complied</p>
<p>2.1.3</p>	<p>Legal or authorised boundaries are clearly demarcated and visibly maintained, and there is no planting beyond these legal or authorised boundaries.</p> <p>- Minor compliance -</p>	<p>Legal boundaries were clearly demarcated with a few methods such as planting teak trees along the boundary and using GI Pipe painted with red and white color. This was confirmed through site visit at the boundaries between the visited estates and some of the other oil palm companies. Sampling in Morrisem estate and field A06 and</p>	<p>Complied</p>

		A07 and for ASIA estate Div 2 field 94A15 with Kumpulan Jiang Sun Sdn Bhd.	
Criterion 2.2: 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 all contracted parties were maintained in the operating units' stakeholder list. The latest list was updated on 07/10/2020. Among the stakeholders registered were government agencies, neighbouring estates, neighbouring villages, NGO, contractors, suppliers and service providers as per sample in the Asia POM there is only 1 contractor for CPO and Kernel (Pengangkutan Dagang Tera).	Complied
2.2.2	All contracts, including those for FFB supply, contain specific clauses on meeting applicable legal requirements, and this can be demonstrated by the third party. Evidence of legal due diligence of all contracted third parties, recruitment agencies (licensed/ accredited) for migrant workers, service providers and labour contractors, is available. - Minor compliance -	All contractors including FFB suppliers are required to sign Sustainability Compliance Contract with Operating Unit under J.C Chang Group. In the contract stated that all contractors must comply as follows: 1. Meeting applicable legal requirements, which can be demonstrated by contracted party in running the business activities on lawful way. 2. Disallowing child labour, forced labour and trafficked labour in running contracted party's business activities. . If young workers are employed, protection clause should be made available for them in running contracted party's business activities. 3. Commitment toward requirements mentioned in MSPO policy set by the Group. Reviewed the contracts as follows: 1. Meran Sdn. Bhd./Kebaco Sdn. Bhd. dated 23/07/2020 2. Mahee Trading dated 28/02/2020 3. Agency Pekerjaan Holywood Sdn. Bhd. dated 22/07/2020	Complied

2.2.3	<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 contractors including FFB suppliers are required to sign Sustainability Compliance Contract with Operating Unit under J.C Chang Group. In the contract stated that all contractors must comply as follows:</p> <ol style="list-style-type: none"> 1. Meeting applicable legal requirements, which can be demonstrated by contracted party in running the business activities on lawful way. 2. Disallowing child labour, forced labour and trafficked labour in running contracted party's business activities. . If young workers are employed, protection clause should be made available for them in running contracted party's business activities. 3. Commitment toward requirements mentioned in MSPO policy set by the Group. 	Complied												
Criterion 2.3: All FFB supplies from outside the unit of certification are from legal sources.															
2.3.1	<p>(C) For all directly sourced FFB, the mill requires:</p> <ul style="list-style-type: none"> • Information on geo-location of FFB origins • Evidence of the ownership status or the right/claim to the land, or valid use of land by the grower/smallholder • One or more supporting documents for claims • Valid MPOB license <p>- Critical (Major) compliance -</p>	<p>The mill has established geo-location information for all directly source of FFB documented in Stakeholder List (FFB Supplier). In the list contains information such as FFB supplier name, person responsible, address, contact no., MPOB License and expiry date, land tittle and geo-location coordinate.</p> <p>The FFB supplier need to undergo due diligence before been accepted as supplier to the mill. Reviewed the due diligence for and document such as MPOB License, Trading License and proof of land ownership/land title as follows:</p> <table border="1" data-bbox="1137 1209 1935 1380"> <thead> <tr> <th>FFB Supplier</th> <th>MPOB License</th> <th>Land Title no.</th> <th>Geo-Location</th> </tr> </thead> <tbody> <tr> <td rowspan="3">Meran Sdn. Bhd.</td> <td rowspan="3">522051002000</td> <td>095311881</td> <td>E118.11936</td> </tr> <tr> <td>095331909</td> <td>N5.34342</td> </tr> <tr> <td>095331883</td> <td></td> </tr> </tbody> </table>	FFB Supplier	MPOB License	Land Title no.	Geo-Location	Meran Sdn. Bhd.	522051002000	095311881	E118.11936	095331909	N5.34342	095331883		Complied
FFB Supplier	MPOB License	Land Title no.	Geo-Location												
Meran Sdn. Bhd.	522051002000	095311881	E118.11936												
		095331909	N5.34342												
		095331883													

		<table border="1"> <tr> <td>KJS Resource Sdn. Bhd.</td> <td>544387002000</td> <td>09529936 09529294</td> <td>E118°11'075" N5°18'3.41"</td> </tr> <tr> <td>Benar Waris</td> <td>502523302000</td> <td>115360328 115360337 115360346</td> <td>E118329173 N5.234518</td> </tr> </table>	KJS Resource Sdn. Bhd.	544387002000	09529936 09529294	E118°11'075" N5°18'3.41"	Benar Waris	502523302000	115360328 115360337 115360346	E118329173 N5.234518	
KJS Resource Sdn. Bhd.	544387002000	09529936 09529294	E118°11'075" N5°18'3.41"								
Benar Waris	502523302000	115360328 115360337 115360346	E118329173 N5.234518								
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 Indicator 2.3.1.</p> <p>- Minor compliance -</p>	<p>The mill receive only direct source FFB from either smallholders or small-grower plantation company. No indirect source of FFB among FFB traders or collectors.</p>		Not Applicable							
<p>Principle 3: Optimise productivity, efficiency, positive impacts and resilience</p>											
<p>Criterion 3.1: There is an implemented management plan that aims to achieve long-term economic and financial viability.</p>											
3.1.1	<p>(C) 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>Asia Production Unit has continued its commitment to long term sustainability and improvements through a capital expenditure program. The management has forecasted 3 years business plan from FY 2020/21 – 2022/23.</p> <p>Annual business plan in the form of annual budget and the projection for 3 years prepared as guidance for future planning. Sighted the annual budget FY 2022 and business plan FY 2020/21 – 2022/23</p> <p>In the 3 years business plan include items as follows:</p> <ol style="list-style-type: none"> 1. FFB and Yield/Ha, OER and KER 2. Mature upkeep and cultivation Cost 3. Mature Harvesting Collection Cost 4. Immature Cost 5. General Charges 		Complied							

RSPO P&C Public Summary Report
Revision 11 (Sept 2020)

		6. Depreciation Cost 7. Amortisation Charges																									
3.1.2	An annual replanting programme projected for a minimum of five years with yearly review, is available. - Minor compliance -	<p>Long range replanting programme was established for JC Chang Group Estates, 25 years plan until 2041. The group has updated the Guideline On Group's Long Term Replanting Planning, doc ref: A/016-05/2018 dated 20/6/2018.</p> <p>Reviewed the replanting program for estate visited as follows:</p> <table border="1"> <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>Asia Oil Palm Estate Div. 2</td> <td>216.21</td> <td>0.00</td> <td>198.22</td> <td>269.00</td> <td>210.61</td> </tr> <tr> <td>Hwa Li Estate Div. 2</td> <td>0.00</td> <td>175.26</td> <td>196.61</td> <td>210.88</td> <td>0.00</td> </tr> <tr> <td>Melewar Estate Div. 2</td> <td>0.00</td> <td>228.16</td> <td>213.09</td> <td>237.23</td> <td>201.85</td> </tr> </tbody> </table>	Estate	2020	2021	2022	2023	2024	Asia Oil Palm Estate Div. 2	216.21	0.00	198.22	269.00	210.61	Hwa Li Estate Div. 2	0.00	175.26	196.61	210.88	0.00	Melewar Estate Div. 2	0.00	228.16	213.09	237.23	201.85	Complied
Estate	2020	2021	2022	2023	2024																						
Asia Oil Palm Estate Div. 2	216.21	0.00	198.22	269.00	210.61																						
Hwa Li Estate Div. 2	0.00	175.26	196.61	210.88	0.00																						
Melewar Estate Div. 2	0.00	228.16	213.09	237.23	201.85																						
3.1.3	The unit of certification holds management reviews at planned intervals appropriate to the scale and nature of the activities undertake. - Minor compliance -	<p>Asia production Unit conducted the management review meeting on annually basis. Latest MRM was conducted on 27/08/2020. Among the agenda discuss during the meeting as follows:</p> <ol style="list-style-type: none"> 1. Outstanding Issues 2. Results of external assessment 3. Results of Internal Assessment 4. Supply Chain 	Complied																								
Criterion 3.2: 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.																											
3.2.1	(C) 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. - Critical (Major) compliance -	Initial Social & Environmental Impact Assessment which documented as a Preliminary Management Review for JC Chang's Melewar and Asia Business Units, Sabah, Malaysia was conducted by Wild Asia on 26/5/2011. The subsequent Environmental and Social Improvement Plan Sabah was established and reviewed on biannual basis as per sample sighted documents of In-House	Complied																								

RSPO P&C Public Summary Report
Revision 11 (Sept 2020)

		<p>Environmental And Social Improvement Plan - Asia Palm Oil Mill; Date of Review: 25/6/2020; Next Reviewed Date: 25/6/2022. Among aspects identified and implemented its management plan were as following:</p> <ul style="list-style-type: none"> - Pay & Living Condition: Recruitment, Payment - Communication & Consultation: Communication procedure, social conflict, land claim and conflicts - Fair Pricing: Internal, External - Training - Compliance to law regulation <p>For Asia Oil Palm Estate Div. 2, latest reviewed was conducted on 13/07/2020. Among the improvement plan as follows:</p> <ol style="list-style-type: none"> 1. Identify the location and the number of sampling points (entrance, middle and exit) of natural waterways passing through the operation unit. 2. EFB was applied in selected areas which is away from water catchment and buffer zone as per recommendation of the guideline (B/021). Area and application of compost/EFB was maintained and documented properly. 3. Provide more water tank to harvest rainwater thus to reduce the usage of treated water for washing purpose. 4. Optimizing the usage of fuel through awareness briefing. 5. Provide schedule for road maintenance to avoid inefficiency of fuel usage 	
3.2.2	As part of the monitoring and continuous improvement process, annual reports are submitted to the RSPO Secretariat using the [RSPO metrics template].	The RSPO metrics template is not yet made available by the RSPO Secretariat at the time of remote audit. As a record, Carotino/JC Chang Group has submitted its RSPO Annual Communication of Progress 2019 as available in the RSPO website link as following: https://rspo.org/members/43/Carotino-JC-Chang-Group .	Complied

RSPO P&C Public Summary Report
Revision 11 (Sept 2020)

	<p>PROCEDURAL NOTE:</p> <p>The RSPO metrics template is awaiting decision/agreement by RSPO and the issue is still being discussed.</p> <p>Until such metrics is agreed and developed, companies will carry on with existing reporting e.g. PalmGHG, Annual Communication of Progress (ACOP) reporting, and information provided to Certification Body and feedback via RSPO Secretariat is required.</p> <p>- Minor Compliance -</p>		
Criterion 3.3: Operating procedures are Appropriately documented, consistently implemented and monitored.			
3.3.1	<p>(C) Standard Operating Procedures (SOPs) for the unit of certification are in place.</p> <p>- Critical (Major) compliance -</p>	<p>Estates and POM have maintained and revised if required, the Documented Standard Operating Procedures file that contains both the safe operating procedures and the procedures to implement the various major field operations.</p> <p>The Standard Operation Procedure (SOP) for Asia POM contains the procedures for all activities as below:</p> <ol style="list-style-type: none"> 1. Reception Station (Q/040-03/2015) 2. Grading Station (Q/041-03/2015) 3. Fruit Handling Station (Q/042-02/2015) 4. Sterilizer Station (Q/043-02/2015) 5. Threshing Station (Q/045-03/2015) 6. Press Station (Q/046-03/2015) 7. Clarification Station (Q/047-02/2015) 8. Depericarper Station (Q/048-02/2015) 9. Nut & Kernel Station (Q/049-02/2015) 10. Boiler Station (Q/050-02/2015) 11. Engine Room Station (Q/051-06/2015) 12. Water Treatment Plant (Q/052-02/2015) 13. Turner Station (compost plant) (Q/060-01/2014) 14. Digestion Station (Biogas Plant) (Q/202-01/2016) <p>Estates have adequate SOP documented. Sampled Estate SOP Manual/procedures category for the following operations:</p>	Complied

RSPO P&C Public Summary Report
Revision 11 (Sept 2020)

		<ol style="list-style-type: none"> 1. Guidelines on Estate Vehicle Maintenance (G/001-01/2018) 2. Guidelines on Fertilizer Receipts, Management and Application (H/001- 03/2016) 3. Buffalo Management (K/001-01/2008) 4. Guidelines on Integrated Pest and Disease Management of Oil Palm (L/001-06/2017) 5. Rat control and baiting (L/002-07/2016) 	
3.3.2	A mechanism to check consistent implementation of procedures is in place. - Minor Compliance -	<p>There are few mechanisms to check a consistency such as Plantation Short Visit report by General manager by Mr. Lee Min Khin dated July 2020 in Hwa Li 3 estate. On manager view no other serious pest and disease infestation reported.</p> <p>In Melewar 2 estate, latest visit by General Manager was on Feb 2021 to ensure the implementation of procedure in place. As per remark of Rat baiting was also seasonally overspent due to additional round applied as population was still very high and damages was not reduced. As per verification on census implementation record sighted the damage was around 17.57% to 22.97% as per census record dated 4/11/2020.</p> <p>For Mill, the GM visit report was available dated July 2019 until June 2020.</p>	Complied
3.3.3	Records of monitoring and any actions taken are maintained and available. - Minor Compliance -	<p>The operating units visited maintain all visit report for General Manager, Internal Control Team and Monthly performance reports and action taken for the reports. Reviewed the visit reports as follows:</p> <ol style="list-style-type: none"> 1. Mill controller visit report for period of FY July 2019 – June 2020 dated 28/08/2020 2. Estate monthly performance reports to General manager for the month of October 2020 for Melewar 2 Estate 	Complied

RSPO P&C Public Summary Report
Revision 11 (Sept 2020)

		<ol style="list-style-type: none"> 3. Internal audit Reports from ICT conducted on 27/07/2020 (Asia Palm Oil Mill) and 24-25/07/2020 (Hwa Li 3 Estate) 4. In Hwa Li 3 estate as per to check consistent implementation, sampling on IPM plan on Ganoderma census in Field 96A record show Dec 2020 infected palm was 3.27%. this same as per reported in GM report accordingly. 5. The monitoring in Melewar 2 estate, the rat damage census been conducted by management dated 4/11/2020 show result around 17% to 22%. The record was available in estate. 	
<p>Criterion 3.4: A comprehensive Social and Environmental Impact Assessment (SEIA) is undertaken prior to new plantings or operations, and a social and environmental management and monitoring plan is implemented and regularly updated in ongoing operations.</p>			
<p>3.4.1</p>	<p>(C) 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.</p> <p>- Critical (Major) compliance -</p>	<p>No new planting undertaken by all estates within APU. For existing operation, the initial Social & Environmental Impact Assessment which documented as a Preliminary Management Review for JC Chang’s Melewar and Asia Business Units, Sabah, Malaysia was conducted by Wild Asia on 26/5/2011.</p> <p>External stakeholder consultation was implemented through letters and emails in place of meeting that was unable to be conducted due to COVID-19 MCO as per sample sighted as following:</p> <ul style="list-style-type: none"> - External stakeholder consultation email ref. # smartmail.jcc.com.my/print by Melewar Oil Palm Estate Div. 2; Date: 8/10/2020 - External stakeholder briefing of company’s communication procedures and sustainability policies; Date: 11/7/2020; Stakeholder name: Agromate (M) Sdn. Bhd. (Fertilizer supplier) - External stakeholder briefing of company’s communication procedures and sustainability policies; Date: 13/11/2020; Stakeholder name: Hock Wah Auto Parts Sdn. Bhd. (Spare parts supplier) 	<p>Complied</p>

		<p>The Social & Environmental Impact Assessment established was based on the Initial assessment conducted by Wild Asia on 26/05/2011 Social & Environmental Impact Assessment and a 5-year Improvement Plan of Asia Production Units (N006).</p> <p>Additionally, Asia production Unit has conducted the Environmental Impact Assessment for all estate involve in replanting and submitted the NREB.</p> <p>The estates submitted Environmental Compliance Report to NREB twice a year.</p>	
3.4.2	<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>Asia Production Unit has established environmental management plan base on the environmental aspect impact conducted and documented in Environmental and Social Improvement Plan. The plan is subjected to review as a minimum every two (2) years or when required to reflect the results of monitoring and where there are operational changes that may have positive and negative impacts to environmental and social.</p> <p>The Plan established covers on:</p> <ol style="list-style-type: none"> 1. Pay and living conditions 2. Communications and consultation 3. Fair pricing 4. Operational procedure 5. Compliance with law regulation 6. Local development 7. Training 8. Soil 9. Water course and wetland 10. Pollution 	Complied

		11. Energy 12. Waste	
3.4.3	<p>(C) 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>Reviewed the sampled implementation of the management plan established as follows:</p> <ol style="list-style-type: none"> 1. Mill has maintained monitoring of water usage for processing FFB which recorded every month. Water for processing is abstracted from water pond. Reviewed the water monitoring records FY July 2019 – June 2020. 2. The operating units visited monitor and maintain the records inventory scheduled waste generated. Reviewed the records and submitted to DOE through EWISS. Reviewed the EWISS report for the month of September, October 2020. 3. The operating units visited provide the workers with adequate clean water through treated water at water treatment plant. Drinking water analysis was conducted once per year. Reviewed the drinking water quality analysis certificate in Hwa Li 3 Estate, Melewar 2 Estate and Asia POM FY 2020. The water quality were found conform to DWQI. 4. For estate without replanting, river water sampling was conducted once a year. Reviewed the river water sampling report no R20/8/216 dated 25/08/2020 at Hwa Li 3 Estate. The result was conform to NWQI Class III. For estate with replanting, Environmental Compliance report was submitted twice a year to NREB. Reviewed the report for Melewar 2 Estate and Asia Oil Palm 2 Estate FY 2020. The river water analysis was conform to NWQI Class III. <p>However, during the field visit, it was sighted at the Engine room in Melewar Estate Division 2 that there is evidence of oil in all 3 compartment and flow into the drain. Sighted also in Asia Palm Oil</p>	<p>Non-compliance</p>

RSPO P&C Public Summary Report
Revision 11 (Sept 2020)

		<p>Mill, there is evidence of residue from the oil trap around the drain and oil trap.</p> <p>These were found not in-line with established environmental management plan, under section pollution stated oil trap to be build and maintain appropriate interval to prevent oil spillage reach second compartment of the trap.</p> <p>Hence, a noncompliance has been raised.</p>							
Criterion 3.5: 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>The procedure established as Guidelines on Procedure or System of Recruitment, Selection, Hiring, Promotion, Retirement and Termination; Doc. Ref. # E020-01/2019; Doc. Date: 12/8/2019. The procedure was briefed to all existing employees and new employees on periodical basis and made available to them upon requests.</p>	Complied						
3.5.2	<p>Employment procedures are implemented, and records are maintained.</p> <p>- Minor Compliance -</p>	<p>Employment procedures are well implemented with records well maintained as per information reported in indicator 6.1.1 to 6.6.2 below.</p>	Complied						
Criterion 3.6: An occupational health and safety (H&S) plan is documented, effectively communicated and implemented.									
3.6.1	<p>(C) All operations are risk assessed to identify H&S issues. Mitigation plans and procedures are documented and implemented.</p> <p>- Critical (Major) compliance -</p>	<p>Issues on Health and Safety have been assessed and documented in the HIRADC forms). The assessment include all processing activities and support activities base on workstation. . All activities with significant risk has been listed and mitigation plan to improve the condition has been established and documented. The document was reviewed once every 2 year or if accident occur. Reviewed the latest review as follows:</p> <table border="1" style="width: 100%; border-collapse: collapse;"> <thead> <tr> <th style="width: 33%;">Operating Unit</th> <th style="width: 33%;">Review Date</th> <th style="width: 33%;">Review period</th> </tr> </thead> <tbody> <tr> <td>Asia Palm Oil Mill</td> <td>25/06/2020</td> <td>Annual Review</td> </tr> </tbody> </table>	Operating Unit	Review Date	Review period	Asia Palm Oil Mill	25/06/2020	Annual Review	Complied
Operating Unit	Review Date	Review period							
Asia Palm Oil Mill	25/06/2020	Annual Review							

RSPO P&C Public Summary Report
Revision 11 (Sept 2020)

		<table border="1" style="width: 100%; border-collapse: collapse;"> <tr> <td style="width: 30%;">Asia Oil Palm Estate 2</td> <td style="width: 20%;">22/09/2020</td> <td style="width: 50%;">Annual Review</td> </tr> <tr> <td>Hwa Li 3 Estate</td> <td>15/01/2020</td> <td>Accident occur on 06/01/2020</td> </tr> <tr> <td>Melewar Estate 2</td> <td>15/05/2020</td> <td>Annual Review</td> </tr> </table> <p>For COVID 19, JC Chang Group has established the HIRARC dated 18/03/2020</p> <p>In Hwa Li sampling accident happen on 5/1/2020, the HIRARC already been updated after accident investigation dated 6/1/2021.</p> <p>In Asia POM, there also Noise Risk Assessment been done by Sherman Services & Supply (Report Ref: SSS/Noise-0164/19) in Asia POM dated 6-7/10/2019. As per recommendation by Assessor, the training on Hearing Conservation by Assistant dated 28/7/2020. CHRA (Ref No; HQ/15/ASS/00/364-2020/12) dated 27 June 2020 by Sherman Services & Supply, the fogging work and fogging chemical that was not been covered under CHRA assessment, latest forging been conducted was on 15/3/2021.</p> <p>In Asia Oil Palm Estate Div. 2 the HIRARC already review on 21/9/2020, no accident happen in estate as per JKPP 8/72338/2021. For chemical hazard, management already conducted CHRA (Ref No: HQ/15/ASS/00/364-2020/7 dated 25/6/2020. Chemical register dated 25/6/2020</p>	Asia Oil Palm Estate 2	22/09/2020	Annual Review	Hwa Li 3 Estate	15/01/2020	Accident occur on 06/01/2020	Melewar Estate 2	15/05/2020	Annual Review	
Asia Oil Palm Estate 2	22/09/2020	Annual Review										
Hwa Li 3 Estate	15/01/2020	Accident occur on 06/01/2020										
Melewar Estate 2	15/05/2020	Annual Review										
3.6.2	<p>(C) The effectiveness of the H&S plan to address health and safety risks to people is monitored.</p> <p>- Critical (Major) compliance -</p>	<p>The effectiveness of H&S plan to address health and safety risks was available in estate as per sampling below:-</p> <p>Hwa Li Estate Div. 3</p> <p>As per Noise Risk Assessment (SSS/NOISE – 0167/19) dated 9/10/2019 by Sherman Services & Supply. Refer as H&S plan</p>	Complied									

RSPO P&C Public Summary Report
Revision 11 (Sept 2020)

		<p>(reviewed 1/9/2020) the audiometric test will be conduct on 30/1/2021, record evidence to screening programmed available as per letter from Klinik Mabello (Paris) Sdn Bhd dated 4/3/2021.</p> <p>ASIA Pom</p> <p>In Mil the H&S plan available dated 25/6/2020. Sampling on LEV monitoring conducted by DYNAKIMIA Sdn Bhd referred letter IHT(II)/2020/0705/APOM dated 13/7/2020, from comment the average face for fume hoods were met the recommended value by ACGIH.</p> <p>Another monitoring of H&S plan, as per CHRA (Ref no. HQ/15/ASS/00/364-2020/12) dated 27 June 2020 by Sherman Services & Supply. Previously CHRA (HQ/11/ASS/00/298-2019/215) dated 19/9/2019 been conducted by Chemclass Sdn Bhd recommendation, the management already conduct the medical surveillane on 18/8/2020. The result for all workers was fit to work with registered chemical.</p>	
Criterion 3.7: All staff, workers, Scheme Smallholders, out-growers, and contract workers are appropriately trained.			
3.7.1	<p>(C) 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&C, in a form they understand, and which includes assessments of training.</p> <p>- Critical (Major) compliance -</p>	<p>No Scheme Smallholders within APU however training planned on annual basis for employees in all operating units within APU was also extended to external stakeholders as per sample records sighted of Asia POM Training Program 2020. Sighted sample of trainings conducted for external stakeholders as following:</p> <ul style="list-style-type: none"> - Group sustainability policies briefings; Date: 27/11/2020 - Mechanism for Communication and Consultation; Date: 18/1/2020 <p>Internal stakeholder among all employees’ trainings were planned and conducted throughout the year as per sample sighted as following:</p> <ul style="list-style-type: none"> - SOP Manurer, Handling of Fertilizer Surplus; Date: 29/1/2020 	Complied

RSPO P&C Public Summary Report
Revision 11 (Sept 2020)

		<p>- Sustainability awareness – Company Policy (OSH, Social & Human Right, Equal Opportunity, Environmental, Corruption Prevention, Sexual Harassment, Reproductive Right; Date: 30/10/2020</p> <p>Training methodology given to workers are commonly On-The-Job Training, Coaching/Mentoring and Hands-on Practical Session with plenty of Graphical/Pictorial illustration than wordings as these approaches get their attention and better understanding.</p> <p>Formal training program for the year 2021 was established and made available at the beginning of each Financial Year and implemented accordingly. Training identification and needs analysis were applied to recognize the staff, workers and contractor’s deficient skills or knowledge gaps, particularly, in aspects of RSPO P&C and the Supply Chain Certification System. There were no associated smallholders at this Certification Unit and thus no training given to them.</p>	
3.7.2	<p>Records of training are maintained.</p> <p>- Minor Compliance -</p>	<p>The operating units maintain the records of training conducted. Among the training conducted as follows:</p> <p>Asia Palm Oil Mill</p> <ol style="list-style-type: none"> 1. Weighbridge(reception) station training dated 06/02/2020 2. FFB Grading station training dated 21/01/2020 3. Nut and Kernel Plant training dated 11/06/2020 4. Water treatment training dated 28/05/2020 5. Workshop training dated 23/09/2020 6. ERP (flood) training dated 04/09/2020 7. PPE training dated 26/06/2020 8. Chemical handling training dated 17/08/2020 	Complied

		<p>9. Fire drill training dated 01/02/2020 10. Covid 19 briefing dated 17/03/2020 11. Scheduled Waste training dated 02/10/2020</p> <p>Asia Oil Palm 2 Estate</p> <p>1. Fire drill and firefighting training dated 24/07/2020 2. First aid training dated 16/03/2020 3. PPE awareness training dated 18/07/2020 4. Safety work procedure for workshop training dated 11/09/2020 5. Pesticides handling training dated 18/09/2020 6. Scheduled waste training dated 14/08/2020</p> <p>Hwa Li 3 Estate</p> <ul style="list-style-type: none"> • SOP for manure training dated 10/03/2020 • SOP for spraying training dated 11/03/2020 • Water sampling training dated 08/07/2020 • IPM training dated 08/07/2020 • Oil and Chemical trap training dated 10/07/2020 • First aid kit training 14/10/2020 <p>Melewar Division 2 Estate</p> <p>1. Chemical handling, chemical mixing and triple rinsing dated 02/01/2020 2. Tractor driving training dated 05/09/2020</p>	
--	--	---	--

RSPO P&C Public Summary Report
Revision 11 (Sept 2020)

		<ul style="list-style-type: none"> 3. SOP for manuring and PPE awareness training dated 09/03/2020 4. Grass-cutting training dated 12/09/2020 5. General Workers PPE awareness training dated 17/09/2020 6. Riparian buffer zone training dated 09/03/2020 	
3.7.3	<p>Appropriate training is provided for personnel carrying out the tasks critical to the effective implementation of the Supply Chain Certification Standard (SCCS). Training is specific and relevant to the task(s) performed.</p> <p>- Minor Compliance -</p>	<p>There were three trainings conducted related to RSPO SC since the last assessment, i.e.:</p> <ul style="list-style-type: none"> - Sustainability briefing certification & supply chain by SPO Dept., conducted on 21/1/2021, attended by 13 participants from the mill - ii) Assistant give briefing & supply chain Certification Standard with Transporter & Contractor by the Assistant Mill Manager, conducted on 17/2/2020, attended by 12 participants included Pengangkutan Dagang Tera 	Complied
<p>Criterion 3.8: Supply chain requirement for mills (note: All supply chain requirements are considered as Critical (C). 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&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>Asia POM receives and process both certified and non-certified FFB. Hence it uses the Mass Balance supply chain system and module. During the remote assessment, the audit team verified the volumes and sources of certified and non-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 and 3rd party certified supply base. In that scenario, the mill can claim only the volume of oil palm products produced from processing of the certified FFB as MB.</p>	<p>Asia POM receives and process both certified and non-certified FFB. Hence it uses the Mass Balance supply chain system and module. During the remote assessment, the audit team verified the volumes and sources of certified and non-certified FFB entering the mill, the implementation of processing controls and volume sales of RSPO certified Products.</p>	Complied
3.8.3	<p>The estimated tonnage of CPO and PK products that could potentially be produced by the certified mill shall be recorded by the certification body (CB) in the public summary of the P&C certification report. This figure represents the total volume of certified oil palm product (CPO and PK) that the certified mill is allowed to deliver in a year. The actual tonnage produced shall then be recorded in each subsequent annual surveillance report.</p>	<p>The estimated tonnage of CPO and PK products produced by Asia POM was recorded in the documents as per sample as following:</p> <ul style="list-style-type: none"> - Asia Oil Palm Sdn. Bhd. (Asia Palm Oil Mill) Production Statement For The Month of October 2020; LintraMax Mill Director; Printed On : 26/11/2020; CPO produced (own-estate) October 2020: 3,251.925 mt - Asia Oil Palm Sdn. Bhd. (Asia Palm Oil Mill) Production Statement For The Month of October 2020; LintraMax Mill Director; Printed On : 26/11/2020; PK produced (own-estate) October 2020: 970.469 mt 	Complied
3.8.4	<p>The mill shall also meet all registration and reporting requirements for the appropriate supply chain through the RSPO IT platform.</p>	<p>Asia POM meet all registration and reporting requirements for MB supply chain through the RSPO IT platform as per sighted latest sample records as following:</p> <ul style="list-style-type: none"> - Product: CSPO; SC Model: MB; Certified volume: 32,344.12 mt; Volume sold: 17,431.72 mt - Product: CSPK; SC Model: MB; Certified volume: 8,733.40 mt; Volume sold: 7,299.94 mt 	Complied
3.8.5	<p>Documented procedures</p> <p>The mill shall have written procedures and/or work instructions or equivalent to ensure the implementation of all elements of the applicable supply chain model specified. This shall include at minimum the following:</p>	<p>Written procedures established as Asia Palm Oil Mill Standard Operation Procedure - Standard Operation Procedure for SCC Standard Mass Balance Calculation; Doc. Ref. # SC/MBC-05/2019-AOM; Doc. Date: 15/4/2019</p>	Complied

RSPO P&C Public Summary Report
Revision 11 (Sept 2020)

	<ul style="list-style-type: none"> 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). 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. 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>Complete and up to date records and reports demonstrated compliance including daily production reports, mass balance records and SCCS training (latest conducted date: 12/7/2020) etc. Identified person in-charge was Mohd. Faisal Awang Amit, Technical Assistant of Asia POM as per letter of appointment dated 2/9/2019.</p> <p>Asia POM certified as MB for its SCC. The mill has a documented procedure of Mechanism for Handling Non-Conforming Oil Palm Products and/or Documents; Doc. Ref. # SC/MEC-06/2020-AOM; Doc. Date: 6/10/2020.</p>	
3.8.6	<p>Internal Audit</p> <ul style="list-style-type: none"> i) The mill shall have a written procedure to conduct annual internal audit to determine whether the mill: <ul style="list-style-type: none"> a. Conforms to the requirements in the RSPO Supply Chain Certification Standard and the RSPO Market Communications and Claims Documents. b. Effectively implements and maintains the standard requirements within its organisation. 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 review at least annually. The mill shall maintain the internal audit records and reports. 	<p>SOP for Internal audit written as Guideline for Internal Auditing and Management Review of The Sustainability and Supply Chain System; Doc. Ref. # T001-03/2018; Doc. Date: 3/6/2018 was established. Latest internal audit was conducted on 27/7/2020 by ICT personnel.</p> <p>1 Major CAR was raised by the internal auditors had been addressed accordingly through identification of root cause and implementation of corrective actions. The Major CAR was verified closed by internal auditors on 29/9/2020.</p>	Complied
3.8.7	Purchasing and Goods In	Asia POM certified as MB for its SCC. The mill has a documented procedure of Mechanism for Handling Non-Conforming Oil Palm Products and/or Documents; Doc. Ref. # SC/MEC-06/2020-AOM;	Complied

RSPO P&C Public Summary Report
Revision 11 (Sept 2020)

	<ul style="list-style-type: none"> i) The mill shall verify and document the tonnage and sources of certified and the tonnage of non-certified FFBs received. ii) The mill shall inform the CB immediately if there is a projected overproduction of certified tonnage. iii) The mill shall have a mechanism in place for handling non-conforming FFB and/or documents. 	<p>Doc. Date: 6/10/2020 to verify and document the tonnage and sources of certified and non-certified respectively.</p> <p>Verification of the certified and non-certified tonnage will be determined from weighbridge ticket of FFB suppliers which already categorized in the computer database system. Furthermore, all FFB weighbridge tickets were stamped and ticked its category of either sustainable (certified) FFB or non-sustainable (non-certified) FFB source. Sighted sample of certified and non-certified FFB weighbridge tickets as following:</p> <ul style="list-style-type: none"> - Certified FFB: Ticket # FFB20003540W; Date: 9/3/2020; Supplier: M/S Hwa Li Estate 3 (HLE3); Net weight: 13.36 mt - Non-Certified FFB: Ticket # FFB20003509W; Date: 9/3/2020; Supplier: M/S Sentrabayu Industries Sdn. Bhd. (SRB); Net weight: 4.46mt <p>The procedure also specified that the mill supply chain person in-charge shall inform CB immediately if there is a projected overproduction.</p>	
<p>3.8.8</p>	<p>Sales and Goods Out</p> <p>The supplying mill shall ensure that the following minimum information for RSPO certified products is made available in document form. The information shall be complete and can be presented either on a single document or across a range of documents issued for RSPO certified oil palm products (for example, delivery notes, shipping documents and specification documentation):</p> <ul style="list-style-type: none"> a) The name and address of the buyer; b) The name and address of the seller; c) The loading or shipment / delivery date; d) The date on which the documents were issued; 	<p>Asia POM ensured all minimum information for RSPO certified products is made available in set of documents of all products deliveries as per sample sighted as following:</p> <p>Certified CPO delivery:</p> <ul style="list-style-type: none"> - Despatch slip ticket # CPORS20000640W; Date: 25/11/2020; Buyer: Lahad Datu Edible Oils Sdn. Bhd. (LDEO); Product code: CPO/RSPO MB; DO # 39810; Net weight: 33.080 mt <p>Certified PK delivery:</p> <ul style="list-style-type: none"> - Despatch slip ticket # PKRS20000311W; Date: 24/11/2020; Buyer: Lahad Datu Edible Oils Sdn. Bhd. (LDEO); Product code: PK RSPO MB; DO # 10600; Net weight: 27.800 mt 	<p>Complied</p>

	<ul style="list-style-type: none"> e) RSPO certificate number; f) A description of the product, including the applicable supply chain model (Identity Preserved or Mass Balance or the approved abbreviations); g) The quantity of the products delivered; h) Any related transport documentation; i) A unique identification number. 		
<p>3.8.9</p>	<p>Outsourcing Activities</p> <ul style="list-style-type: none"> i) The mill shall not outsource its milling activities. In cases where he mill outsources activities to independent third parties (e.g. subcontractors for storage, transport or other outsourced activities), the mill holding the certificate shall ensure that the independent third party complies with relevant requirements of this RSPO Supply Chain Certification ii) The mill shall ensure the following: <ul style="list-style-type: none"> a) The mill has legal ownership of all input material to be included in outsourced processes 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. c) The mill has a documented control system with explicit procedures for the outsourced process which is communicated to the relevant contractor. 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 	<p>Outsource only involved transportation of products, i.e. CSPO and CSPK, subjected to the buyers' contractual requirements either ex-mill or delivered. Mostly delivered contracts involved CSPO and ex-mill involved CSPK. Implementation was based on the procedure: Asia Palm Oil Mill Standard Operation Procedure; Doc. Ref. # SC/07-06/2019-AOM; Critical Control Point 7: CPO & PK Despatch and Transportation; Date: 30/9/2019.</p> <p>The mill trades CSPO and CSPK with its buyers among refineries and/or oleochemical plants. Based on agreements, transporter has no ownership of transported products. Sighted the recent contract for both CSPO and CSPK were delivered, hence requiring outsource process i.e. transportation. The recent outsourcing of CSPO and CSPK transport as per following:</p> <ul style="list-style-type: none"> - Crude Palm Oil Transportation Agreement between Asia Oil Palm Sdn. Bhd. and Pengangkutan Dagang Tera Sdn. Bhd.; Dated 1/7/2017; Renewal Crude Palm Oil Transport Agreement to continue the service from 1/7/2020 – 30/6/2023 - Palm Kernel Transportation Agreement between Asia Oil Palm Sdn. Bhd. and Pengangkutan Dagang Tera Sdn. Bhd.; Dated 1/7/2017; Renewal of Palm Kernel Transport Agreement to continue the service from 1/7/2020 – 30/6/2023 	<p>Complied</p>

RSPO P&C Public Summary Report
Revision 11 (Sept 2020)

	operations, systems, and all information, when this is announced in advance.	Documented control system established as per CCP 9 - Transporter. Sighted sample Training Report conducted on 17/2/2020 by Asia Palm Oil Mill for Pengangkutan Dagang Tera drivers.	
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 transporters used for the physical handling of RSPO certified oil palm products were recorded and registered in the mill supplier database system and stakeholder list i.e. Stakeholders List (Contractor) Asia Palm Oil Mill; Last updated 7/10/2020.	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.	Names and contact details of any new transporter used for the physical handling of RSPO certified oil palm products to be informed by mill supply chain PIC upon available.	Complied
3.8.12	<p>Record keeping</p> <p>i) The mill shall maintain accurate, complete, up-to-date and accessible records and reports covering all aspects of this RSPO Supply Chain Certification Standard requirements.</p> <p>ii) Retention times for all records and reports shall be a minimum of two (2) years and shall comply with relevant legal and regulatory requirements and be able to confirm the certified status of raw materials or products held in stock.</p> <p>iii) For Identity Preserved Module, the mill shall record and balance all receipts of RSPO certified FFB and deliveries of RSPO certified CPO and PK on a real-time basis.</p> <p>iv) For Mass Balance Module, the mill:</p> <p>a) Shall record and balance all receipts of RSPO certified FFB and deliveries of RSPO certified CPO and PK on a real-time basis and / or three-monthly basis.</p>	<p>Asia POM kept the records such as SOP, training, despatch note as per RSPO SCCS requirements as per sample sighted in indicator 3.8.3 to 3.8.10 above.</p> <p>The records are kept for 7 years as per own established SOP, Standard Operation Procedure for SCC Standard Mass Balance Calculation, Clause 5) Record keeping of Standard Operation Procedure for SCC Standard Mass Balance Calculation; Doc. Ref. # SC/MBC-05/2019-AOM; Doc. Date: 15/4/2019.</p> <p>Asia POM receives and process both certified and non-certified FFB. Hence it uses the Mass Balance supply chain system and module.</p> <p>The estimated tonnage of CPO and PK products produced by Asia POM was recorded in the documents as per sample as following:</p> <ul style="list-style-type: none"> - Asia Oil Palm Sdn. Bhd. (Asia Palm Oil Mill) Production Statement For The Month of October 2020; LintraMax Mill Director; Printed On : 26/11/2020; CPO produced (own-estate) October 2020: 3,251.925 mt 	Complied

RSPO P&C Public Summary Report
Revision 11 (Sept 2020)

	<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>	<ul style="list-style-type: none"> - Asia Oil Palm Sdn. Bhd. (Asia Palm Oil Mill) Production Statement For The Month of October 2020; LintraMax Mill Director; Printed On : 26/11/2020; PK produced (own-estate) October 2020: 970.469 mt 	
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>The OER and KER are measured on daily basis, aggregated and reported on daily, weekly, monthly and annually basis through the mill production report. Based on the sample production report as following:</p> <ul style="list-style-type: none"> - Asia Oil Palm Sdn. Bhd. (Asia Palm Oil Mill) Production Statement For The Month of October 2020; LintraMax Mill Director; Printed On : 26/11/2020; CPO produced (own-estate) October 2020: 3,251.925 mt - Asia Oil Palm Sdn. Bhd. (Asia Palm Oil Mill) Production Statement For The Month of October 2020; LintraMax Mill Director; Printed On : 26/11/2020; PK produced (own-estate) October 2020: 970.469 mt <p>The actual OER and KER for the month of October 2020 are as following:</p> <ul style="list-style-type: none"> - Actual OER: 19.13 % - Actual KER: 5.71 % 	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 OER and KER are measured on daily basis, aggregated and reported on daily, weekly, monthly and annually basis through the mill production report. Based on the sample production report as following:</p> <ul style="list-style-type: none"> - Asia Oil Palm Sdn. Bhd. (Asia Palm Oil Mill) Production Statement For The Month of October 2020; LintraMax Mill 	Complied

RSPO P&C Public Summary Report
Revision 11 (Sept 2020)

		<p>Director; Printed On : 26/11/2020; CPO produced (own-estate) October 2020: 3,251.925 mt</p> <ul style="list-style-type: none"> - Asia Oil Palm Sdn. Bhd. (Asia Palm Oil Mill) Production Statement For The Month of October 2020; LintraMax Mill Director; Printed On : 26/11/2020; PK produced (own-estate) October 2020: 970.469 mt <p>The actual OER and KER for the month of October 2020 are as following:</p> <ul style="list-style-type: none"> - Actual OER: 19.13 % - Actual KER: 5.71 % 	
3.8.15	<p>Processing</p> <p>For Identity Preserved Module, the mill shall assure and verify through documented procedures and record keeping that the RSPO certified oil palm product is kept separated from non-certified oil palm products, including during transport and storage to strive for 100% separation.</p>	<p>Asia POM receives and process both certified and non-certified FFB. Hence it uses the Mass Balance supply chain system and module.</p>	Complied
3.8.16	<p>Registration of Transactions</p> <p>i) Shipping Announcement in the RSPO IT platform shall be carried out by the mills when RSPO certified products are sold as certified to refineries, crushers, and traders not more than three months after dispatch with the dispatch date being the Bill of Lading or the dispatch documentation date.</p> <p>ii) Remove: RSPO certified volumes sold under different scheme or as conventional, or in case of underproduction, loss or damage shall be removed in the RSPO IT platform.</p>	<p>Shipping Announcement available in the RSPO IT platform as per sample records sighted for delivery sample as following:</p> <p>CSPO Shipping Announcement:</p> <ul style="list-style-type: none"> - Seller: Member Name Carotino/JC Chang Group – Asia Production Unit; Member ID # RSPO_PO1000000524; Buyer: Member Name Lahad Datu Edible Oils Sdn. Bhd.; Member ID # RSPO_PO1000000071; Seller Contract Number: AOP/A0445/09/20; Product Name CSPO; Supply Chain Model: Mass Balance; Volume: 2,799.28 mt; Transaction ID: TR-b65ed647-1a84; Transaction Status: Confirmed; Confirmation Date: 28-10-2020 <p>CSPK Shipping Announcement:</p>	Complied

RSPO P&C Public Summary Report
Revision 11 (Sept 2020)

		- Seller: Member Name Carotino/JC Chang Group – Asia Production Unit; Member ID # RSPO_PO1000000524; Buyer: Member Name Lahad Datu Edible Oils Sdn. Bhd. (KCP); Member ID # RSPO_PO1000006525; Seller Contract Number: AOP/2431/09/20; Product Name CSPK; Supply Chain Model: Mass Balance; Volume: 570.19 mt; Transaction ID: TR-828c3ecf-b424; Transaction Status: Confirmed; Confirmation Date: 28-10-2020	
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>	Based on the established SOP for SCC Standard Mass Balance Calculation, Clause 10: The mill should only make claims regarding the use of or support of RSPO certified oil Palm products that are in compliance with RSPO Rules on Market Communications and Claims and on the products that contains MSPO certified oil palm planted areas which have been certified for the oil palm management certification standard as being sustainably managed.	Complied
General corporate communications			
4.1	A corporate communication is one made by any RSPO member that highlights its membership of the RSPO and/or its commitment to the principles of the RSPO. Corporate communication is an 'off-product' claim.	Asia POM has not made any claims for its sustainable products. Hence, this requirement is not applicable.	Not Applicable
4.2	<p>In corporate communications a member is allowed to:</p> <ul style="list-style-type: none"> a. Display its RSPO membership status b. Display the RSPO web address (www.rspo.org) c. State that the member supports the work of the RSPO d. State the member's history with regard to the RSPO. e. Use the RSPO trademark to promote its membership of the RSPO. <p>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.</p>	Asia POM has not made any claims for its sustainable products. Hence, this requirement is not applicable.	Not Applicable

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.	Asia POM has not made any claims for its sustainable products. Hence, this requirement is not applicable.	Not Applicable
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.	Asia POM has not made any claims for its sustainable products. Hence, this requirement is not applicable.	Not Applicable
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.	Asia POM has not made any claims for its sustainable products. Hence, this requirement is not applicable.	Not Applicable
Business to business communications			
5.1	Business to Business communication relates to RSPO members in the supply chain selling to and/or communicating with other organizations in the supply chain about the use of certified sustainable oil palm products.	Asia POM has not made any claims for its sustainable products. Hence, this requirement is not applicable.	Not Applicable
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.	Asia POM has not made any claims for its sustainable products. Hence, this requirement is not applicable.	Not Applicable
5.3	Where a distributor or wholesaler takes title to products containing certified sustainable oil palm products, the requirements of the RSPO SCCS can follow either of two options: a. If the distributor or wholesaler holds only a Distributor license, it may only communicate RSPO-certified oil palm products by linking the product to the manufacturer using the manufacturer's SCCS certificate number. This covers both brand and own brand products. However, in the case of own brand products it is essential that customers are aware that the product has been made on behalf of the distributor or wholesaler, with specific evidence either through on-pack claims or documentation.	Asia POM has not made any claims for its sustainable products. Hence, this requirement is not applicable.	Not Applicable

	b. If the distributor or wholesaler is supply chain-certified they should follow the requirements outlined in section 5.2.		
Business to consumer communication			
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.	Asia POM has not made any claims for its sustainable products. Hence, this requirement is not applicable.	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.	Asia POM has not made any claims for its sustainable products. Hence, this requirement is not applicable.	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.	Asia POM has not made any claims for its sustainable products. Hence, this requirement is not applicable.	Not Applicable
6.4	Business to consumer communication shall not include information about the claimant's RSPO membership status.	Asia POM has not made any claims for its sustainable products. Hence, this requirement is not applicable.	Not Applicable
6.5	Members shall not communicate to consumers' information about their suppliers' RSPO membership status.	Asia POM has not made any claims for its sustainable products. Hence, this requirement is not applicable.	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.	Asia POM has not made any claims for its sustainable products. Hence, this requirement is not applicable.	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.	Asia POM has not made any claims for its sustainable products. Hence, this requirement is not applicable.	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	Asia POM has not made any claims for its sustainable products. Hence, this requirement is not applicable.	Not Applicable

	<p>undertaken via a remote audit, prior to the trademark use, during which the retailer or food service company will need to demonstrate that the use of the trademark is in compliance with the rules contained within this document and that the claim itself can be supported through a certified supply chain. Any other palm oil claims, including those highlighting the absence of palm oil, must be highlighted to the CB during the audit to ensure that all claims comply with the requirements of these rules. The CB will confirm the outcome of these audits, to be conducted annually, to RSPO who may continue to grant a trademark license or withdraw permission based upon the audit findings. This is in keeping with the rules applying to RSPO supply chain certified members. The guidance document for audits is available on www.rspo.org.</p>		
<p>MODULE B – MASS BALANCE SPECIFIC RULES</p>			
<p>Minimum Mass Balance content</p>			
	<p>95% or above of the oil palm content must be RSPO MB-certified.</p>	<p>The CPO & PK produced from Asia POM is 100% RSPO MB certified.</p>	<p>Complied</p>
	<p>Where there is any percentage of non-certified oil palm within the product, the reason for this must be fully justified and an action plan for moving to fully certified oil palm must be in place, in accordance with the requirements of the RSPO SCCS. In addition, the non-certified volume must be covered by equivalent volume of RSPO Credits.</p>	<p>The CPO & PK produced from Asia POM is 100% RSPO MB certified.</p>	<p>Complied</p>
<p>Labelling and trademark (MB)</p>			
	<p>Members are allowed to use the RSPO label in one of the following ways:</p> <ul style="list-style-type: none"> Surrounded by the text: 'Certified sustainable palm oil'. The RSPO label MUST contain the tag 'MIXED'. The tag MIXED designates oil palm products sourced under the Mass Balance (MB) supply chain system, which administratively balances inputs and outputs of certain palm oil volumes. The tag 'MIXED' on a product does 	<p>Asia POM is not using or claim RSPO Label and Trademark for MB.</p>	<p>Not Applicable</p>

	<p>not guarantee that the product itself contains the certified material; some or all of it may reside in a product that does not carry a claim.</p> <ul style="list-style-type: none"> • The RSPO label can also include the statement: '[The palm oil contained in this product] contributes to the production of certified sustainable palm oil'. • Wherever the RSPO trademark is displayed, the applicable trademark license number must be shown immediately under or next to the trademark or the 'statement'. Font must be Calibri, font size must be at least 4 pt (1.4 mm or 0.06 inch). • In on-pack communications, the RSPO trademark can be printed anywhere on the pack. Further guidance on use of the trademark is provided in the RSPO Trademark License Terms and Conditions and in Annex 1 of the Rules on Market Communications & Claims document. 		
Messaging (MB)			
	<p>Messaging ALLOWED in storytelling in product-related communications includes:</p> <ul style="list-style-type: none"> • [Oil palm products]/[palm oil]/[palm kernel oil] from RSPO-certified mills and plantations were mixed with non-certified oil palm products in the supply chain. • The volume of [oil palm products][palm oil]/[palm kernel oil] in this product reflects an equivalent volume of palm oil or palm kernel oil produced by RSPO certified mills and plantations. <p>In off-product communications, reference to (or images of) particular RSPO-certified production units, if the relationship to those units can be shown in company records is allowed.</p> <p>Messaging NOT ALLOWED in storytelling in product-related communications:</p>	<p>Asia POM is not using or claim RSPO Label and Trademark for MB.</p>	<p>Not Applicable</p>

	<ul style="list-style-type: none"> Anything that can lead consumers to believe that RSPO-certified palm products are (certified to be) part of the product. 		
Principle 4: Respect community and human rights and deliver benefits			
Criterion 4.1: The unit of Certification respects human rights, which includes respecting the rights of Human Rights Defenders.			
4.1.1	<p>(C) 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>	Carotino/JC Chang Group has established the Social & Human Rights Policy; Date: 14/11/2019; Signed by both Plantation Director and Mill Director respectively. The policy include prohibiting retaliation against HRD was documented and communicated as per sample records of policy briefing to all Asia POM employees on 19/10/2020.	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>	Based on the interview of internal stakeholders among workers as well relevant external stakeholders, the mill and estates within APU do not instigate violence or use any form of harassment in their operations.	Complied
Criterion 4.2: 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>(C) 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 whistle-blowers, where requested, without risk of reprisal or intimidation and follows the RSPO policy on respect for HRD.</p> <p>- Critical (Major) compliance -</p>	Based on the records of complaints and grievances no issue of whistle-blowing that requires anonymity of complainants and/or grievance parties. Interview conducted with internal stakeholders among workers and relevant external stakeholders also confirmed the information.	Complied
4.2.2	<p>Procedures are in place to ensure that the system is understood by the affected parties, including by illiterate parties.</p> <p>- Minor compliance -</p>	The procedures available as per documented SOP on Mechanisms for Communication and Consultation; Doc. Ref. # E/004-08/2019; Date: 12/8/2019 which were implemented by all estates and mill within APU. Various communications implemented through letters and emails of consultation in place of meeting that was unable to	Complied

RSPO P&C Public Summary Report
Revision 11 (Sept 2020)

		<p>be conducted due to COVID-19 MCO as per sample sighted as following:</p> <ul style="list-style-type: none"> - External stakeholder consultation email ref. # smartmail.jcc.com.my/print by Melewar Oil Palm Estate Div. 2; Date: 8/10/2020 - External stakeholder briefing of company's communication procedures and sustainability policies; Date: 11/7/2020; Stakeholder name: Agromate (M) Sdn. Bhd. (Fertilizer supplier) - External stakeholder briefing of company's communication procedures and sustainability policies; Date: 13/11/2020; Stakeholder name: Hock Wah Auto Parts Sdn. Bhd. (Spare parts supplier) 	
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>Request and response from internal & external stakeholders as per sample records sighted in the Sustainability Complaint/Suggestion/Grievance Monitoring Book. Sample requests made are as following:</p> <ul style="list-style-type: none"> - Asia Palm Oil Mill requested the gatekeeper of Melewar Estate Div. 1, Pahang Oil Palm Estate Div. 2 and Asia Oil Palm Estate Div. 2 to allow the mill contractor to access through gates; Date: 5/3/2020 - Hwa Li Estate Div. 3 requested Asia Palm Oil Mill to weigh lorry from Teck Guan Sdn. Bhd.; Date: 30/9/2020 - Request by SMK Paris 3 from Melewar Estate Div. 2 to repair school cabin building; Date: 30/9/2020 <p>All requests were responded back to grievance parties within agreed timeframe as acknowledge in the records.</p>	Complied
4.2.4	<p>The conflict resolution mechanism includes the option of access to independent legal and technical advice, the ability for complainants to</p>	<p>All operating units within APU implemented the conflict resolution mechanism based on the established SOP on Mechanism for Complaints and Grievances; Doc. Ref. # E/00107/2019; Doc. Date:</p>	Complied

RSPO P&C Public Summary Report
Revision 11 (Sept 2020)

	<p>choose individuals or groups to support them and/or act as observers, as well as the option of a third-party mediator.</p> <p>- Minor compliance -</p>	<p>12/8/2019. The SOP stated that further arrangements to go for the independent arbitration will include 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>Criterion 4.3: The unit of Certification contributes to local sustainable development as agreed by local communities.</p>			
<p>4.3.1</p>	<p>Contributions to community development that are based on the results of consultation with local communities are demonstrated.</p> <p>- Minor compliance -</p>	<p>Based on the interview of internal stakeholders among workers and relevant external stakeholders, contributions to community development are demonstrated. As per sample feedbacks from CLC teacher, estate managements always visits and contributes to school programs and activities. 100% of children among estate workers are schooling at CLC including from neighbour estate. School facilities were well maintained by company.</p>	<p>Complied</p>
<p>Criterion 4.4: Use of the land for oil palm does not diminish the legal, customary or user rights of other users without their free, prior and informed consent.</p>			
<p>4.4.1</p>	<p>(C) Documents showing legal ownership or lease, or authorised use of customary land authorised by customary landowners through a Free, Prior and Informed Consent (FPIC) process. Documents Related to the history of land tenure and the actual legal or customary use of the land are available.</p> <p>- Critical (Major) compliance -</p>	<p>APU implemented the company's Guideline for Identifying Legal and Customary Rights and Identifying People Entitled to Compensation Documents; Doc. Ref. # E/002-05/2019; Doc. Date: 12/8/2019 in case of land dispute issue occurs. Documents showing legal ownership available as per sample land titles sighted as following:</p> <ul style="list-style-type: none"> - Asia Oil Palm Estate Div. 2 & POM sample Land title # CL 095317383; Owner: Asia Oil Palm Sdn. Bhd.; Leasing period: 1/1/1990 – 31/12/2088; Area: 3,024 ha - Melewar Oil Palm Estate Div. 2 sample Land title # CL 095311201; Owner: Melewar Properties Sdn. Bhd.; Leasing period: 1/1/1979 – 31/12/2077; Area: 2,023.4 ha - Hwa Li Estate Div. 3 sample Land title # CL 095324502; Owner: Sharikat Keratong Sdn. Bhd.; Leasing period: 1/1/1994 – 31/12/2092; Area: 4,047 ha 	<p>Complied</p>

		No issues of land dispute issue occurs in all estates within APU that requires FPIC process since the last audit. Consultation with relevant stakeholders conducted on-site confirmed the information.	
4.4.2	Copies of documents evidencing agreement-making processes and negotiated agreements detailing the FPIC process are available and include:	No issues of land dispute issue occurs in all estates within APU that requires FPIC process since the last audit. Consultation with relevant stakeholders conducted on-site confirmed the information.	Complied
4.4.2a	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. - Minor compliance -	No issues of land dispute issue occurs in all estates within APU that requires FPIC process since the last audit. Consultation with relevant stakeholders conducted on-site confirmed the information.	Complied
4.4.2b	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. - Minor compliance -	No issues of land dispute issue occurs in all estates within APU that requires FPIC process since the last audit. Consultation with relevant stakeholders conducted on-site confirmed the information.	Complied
4.4.2c	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. - Minor compliance -	No issues of land dispute issue occurs in all estates within APU that requires FPIC process since the last audit. Consultation with relevant stakeholders conducted on-site confirmed the information.	Complied
4.4.3	(C) 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). - Critical (Major) compliance -	Land maps for the sampled Asia Oil Palm Estate Div. 2 and Melewar Oil Palm Estate Div. 2 with appropriate scales showing estate's boundaries with neighbours. The maps in-line with area specified in individual land titles.	Complied

4.4.4	All relevant information is available in appropriate forms and languages, including assessments of impacts, proposed benefit sharing, and legal arrangements. - Minor compliance -	No issues of land dispute issue occurs in all estates within APU that requires FPIC process since the last audit. Consultation with relevant stakeholders conducted on-site confirmed the information.	Complied
4.4.5	(C) 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. - Critical (Major) compliance -	No issues of land dispute issue occurs in all estates within APU that requires FPIC process since the last audit. Consultation with relevant stakeholders conducted on-site confirmed the information.	Complied
4.4.6	There is evidence that implementation of agreements negotiated through FPIC is annually reviewed in consultation with affected parties. - Minor compliance -	No issues of land dispute issue occurs in all estates within APU that requires FPIC process since the last audit. Consultation with relevant stakeholders conducted on-site confirmed the information.	Complied
Criterion 4.5: No new plantings are established on local peoples' land where it can be demonstrated that there are legal, customary or user rights, without their FPIC. This is dealt with through a documented system that enables these and other stakeholders to express their views through their own representative institutions.			
4.5.1	(C) Documents showing identification and assessment of demonstrable legal, customary and user rights are available. - Critical (Major) compliance -	No new planting and issues of customary land occurs in all estates within APU that requires FPIC process since the last audit. Consultation with relevant stakeholders conducted on-site confirmed the information.	Complied
4.5.2	(C) 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. - Critical (Major) compliance -	No new planting and issues of customary land occurs in all estates within APU that requires FPIC process since the last audit. Consultation with relevant stakeholders conducted on-site confirmed the information.	Complied
4.5.3	Evidence is available that affected local peoples understand they have the right to say 'no' to operations planned on their lands before and during	No new planting and issues of customary land occurs in all estates within APU that requires FPIC process since the last audit.	Complied

	<p>initial discussions, during the stage of information gathering and associated consultations, during negotiations, and up until an agreement with the unit of certification is signed and ratified by these local peoples. Negotiated agreements are non-coercive and entered into voluntarily and carried out prior to new operations.</p> <p>- Minor compliance -</p>	<p>Consultation with relevant stakeholders conducted on-site confirmed the information.</p>	
4.5.4	<p>To ensure local food and water security, as part of the FPIC process, participatory SEIA and participatory land-use planning with local peoples, the full range of food and water provisioning options are considered. There is transparency of the land allocation process.</p> <p>- Minor compliance -</p>	<p>No new planting and issues of customary land occurs in all estates within APU that requires FPIC process since the last audit. Consultation with relevant stakeholders conducted on-site confirmed the information.</p>	Complied
4.5.5	<p>Evidence is available that the affected communities and rights holders have had the option to access to information and advice that is independent of the project proponent, concerning the legal, economic, environmental and social implications of the proposed operations on their lands.</p> <p>- Minor compliance -</p>	<p>No new planting and issues of customary land occurs in all estates within APU that requires FPIC process since the last audit. Consultation with relevant stakeholders conducted on-site confirmed the information.</p>	Complied
4.5.6	<p>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.</p> <p>- Minor compliance -</p>	<p>No new planting and issues of customary land occurs in all estates within APU that requires FPIC process since the last audit. Consultation with relevant stakeholders conducted on-site confirmed the information.</p>	Complied
4.5.7	<p>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.</p> <p>- Minor compliance -</p>	<p>No new planting and issues of customary land occurs in all estates within APU that requires FPIC process since the last audit. Consultation with relevant stakeholders conducted on-site confirmed the information.</p>	Complied
4.5.8	<p>(C) New lands are not acquired in areas inhabited by communities in voluntary isolation.</p>	<p>No new planting and issues of customary land occurs in all estates within APU that requires FPIC process since the last audit.</p>	Complied

	- Critical (Major) compliance -	Consultation with relevant stakeholders conducted on-site confirmed the information.	
Criterion 4.6: 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	(C) A mutually agreed procedure for identifying legal, customary or user rights, and a procedure for identifying people entitled to compensation, is in place. - Critical (Major) compliance -	No new planting and issues of customary land occurs in all estates within APU that requires FPIC process and compensation since the last audit. Consultation with relevant stakeholders conducted on-site confirmed the information.	Complied
4.6.2	(C) 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. - Critical (Major) compliance -	No new planting and issues of customary land occurs in all estates within APU that requires FPIC process and compensation since the last audit. Consultation with relevant stakeholders conducted on-site confirmed the information.	Complied
4.6.3	Evidence is available that equal opportunities are provided to both men and women to hold land titles for scheme small holdings. - Minor compliance -	No new planting and issues of customary land occurs in all estates within APU that requires FPIC process and compensation since the last audit. Consultation with relevant stakeholders conducted on-site confirmed the information.	Complied
4.6.4	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. - Minor compliance -	No new planting and issues of customary land occurs in all estates within APU that requires FPIC process and compensation since the last audit. Consultation with relevant stakeholders conducted on-site confirmed the information.	Complied
Criterion 4.7: 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	(C) A mutually agreed procedure for identifying people entitled to compensation is in place. - Critical (Major) compliance -	No new planting and issues of customary land occurs in all estates within APU that requires FPIC process and compensation since the last audit. Consultation with relevant stakeholders conducted on-site confirmed the information.	Complied

4.7.2	<p>(C) A mutually agreed procedure for calculating and distributing fair and gender-equal compensation (monetary or otherwise) is established and implemented, monitored and evaluated in a participatory way, and corrective actions taken as a result of this evaluation.</p> <p>- Critical (Major) compliance -</p>	<p>No new planting and issues of customary land occurs in all estates within APU that requires FPIC process and compensation since the last audit. Consultation with relevant stakeholders conducted on-site confirmed the information.</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>No new planting and issues of customary land occurs in all estates within APU that requires FPIC process and compensation since the last audit. Consultation with relevant stakeholders conducted on-site confirmed the information.</p>	Complied
<p>Criterion 4.8: The right to use the land is demonstrated and is not legitimately contested by local people who can demonstrate that they have legal, customary, or user rights.</p>			
4.8.1	<p>Where there are or have been disputes, proof of legal acquisition of title and evidence that mutually agreed compensation has been made to all people who held legal, customary, or user rights at the time of acquisition is available and provided to parties to a dispute, and that any compensation was accepted following a documented process of FPIC.</p> <p>- Minor compliance -</p>	<p>No new planting and issues of customary land occurs in all estates within APU that requires FPIC process and compensation since the last audit. Consultation with relevant stakeholders conducted on-site confirmed the information.</p>	Complied
4.8.2	<p>(C) Land conflict is not present in the area of the unit of certification. Where land conflict exists, acceptable conflict resolution processes (see Criteria 4.2 and 4.6) are implemented and accepted by the parties involved. In the case of newly acquired plantations, the unit of certification addresses any unresolved conflict through appropriate conflict resolution mechanisms.</p> <p>- Critical (Major) compliance -</p>	<p>No new planting and issues of customary land occurs in all estates within APU that requires FPIC process and compensation since the last audit. Consultation with relevant stakeholders conducted on-site confirmed the information.</p>	Complied
4.8.3	<p>Where there is evidence of acquisition through dispossession or forced abandonment of customary and user rights prior to the current operations and there remain parties with demonstrable customary and land use</p>	<p>No new planting and issues of customary land occurs in all estates within APU that requires FPIC process and compensation since the last audit. Consultation with relevant stakeholders conducted on-site confirmed the information.</p>	Complied

	rights, these claims will be settled using the relevant requirements (Indicators 4.4.2, 4.4.3 and 4.4.4) - Minor compliance -		
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 -	No new planting and issues of customary land occurs in all estates within APU that requires FPIC process and compensation since the last audit. Consultation with relevant stakeholders conducted on-site confirmed the information.	Complied
Principle 5: Support smallholder inclusion			
Criterion 5.1: 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 -	Asia POM displayed the current and previous period prices paid for FFB in front of the weighbridge counter on a white board. Sighted records of current and previous FFB prices for November 2020 displayed as following: - Date: 23/11/2020; FFB price: RM 688/mt FFB - Date: 24/11/2020; FFB price: RM 675/mt FFB - Date: 25/11/2020; FFB price: RM 678/mt FFB - Date: 26/11/2020; FFB price: RM 675/mt FFB - Date: 27/11/2020; FFB price: RM 676/mt FFB	Complied
5.1.2	(C) 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). - Critical (Major) compliance -	Evidence that the mill explains FFB pricing available in the contract agreement as per sample sighted for Asia POM FFB Sales and Purchase Agreement 2020 between Asia Oil Palm Sdn. Bhd. (Buyer) and Meran Sdn. Bhd. (Seller) – MPOB License # 52205102000; Date: 11/5/2020. Latest explanation to all FFB suppliers including smallholders was done through letters and emails of consultation in place of meeting that was unable to be conducted due to COVID-19 MCO as per sample sighted for letter dated on 8/10/2020.	Complied

RSPO P&C Public Summary Report
Revision 11 (Sept 2020)

5.1.3	<p>(C) Fair pricing, calculated as a portion of the international CPO price less costs is provided to smallholders in the supply base and documented.</p> <p>- Critical (Major) compliance -</p>	<p>FFB pricing and calculation was included in the FFB Sales and Purchase Agreement which was based on the MPOB prices as well as the FFB grading quality. Latest explanation to all FFB suppliers including smallholders was done through letters and emails of consultation in place of meeting that was unable to be conducted due to COVID-19 MCO as per sample sighted for letter dated on 8/10/2020.</p>	Complied
5.1.4	<p>(C) Evidence is available that all parties, including women and independent representative organisations assisting smallholders where requested, are involved in decision-making processes and understand the contracts. These include those involving finance, loans/credits, and repayments through FFB price reductions for replanting and or other support mechanisms where applicable.</p> <p>- Critical (Major) compliance -</p>	<p>Evidence that the mill involved all parties available in the contract agreement as per sample sighted for Asia POM FFB Sales and Purchase Agreement 2020 between Asia Oil Palm Sdn. Bhd. (Buyer) and Meran Sdn. Bhd. (Seller) – MPOB License # 52205102000; Date: 11/5/2020. Latest explanation to all FFB suppliers including smallholders was done through letters and emails of consultation in place of meeting that was unable to be conducted due to COVID-19 MCO as per sample sighted for letter dated on 8/10/2020.</p>	Complied
5.1.5	<p>Contracts are fair, legal and transparent and have an agreed timeframe.</p> <p>- Minor compliance -</p>	<p>Contracts are fair, legal and transparent and have an agreed timeframe as per sample sighted for Asia POM FFB Sales and Purchase Agreement 2020 between Asia Oil Palm Sdn. Bhd. (Buyer) and Meran Sdn. Bhd. (Seller) – MPOB License # 52205102000; Date: 11/5/2020.</p>	Complied
5.1.6	<p>(C) 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>Based on the agreements, full payment shall be made by Buyer to Seller for the whole month's deliveries not later than ten (10) working days after the official announcement of the MPOB Crude Palm Oil and Palm Kernel prices. Records shown all payments were made on time.</p>	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>Asia POM verified its weighing equipment as per mandatory requirements of Weights and Measures Act 1972 as per latest</p>	Complied

RSPO P&C Public Summary Report
Revision 11 (Sept 2020)

		records of stamping by Metrology Corporation Malaysia Sdn. Bhd. as following: - Weighbridge stamp # Q001893-2.1K; Serial # 191950202; Model: 60,000 kg Avery ZM 305; Calibration date: 1/2/2020	
5.1.8	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. - Minor compliance -	The mill supports the FFB Suppliers among independent smallholders in certification through consultation and information sharing upon requested. Consultation made with smallholders confirmed that they were provided with information of sustainable certifications mainly in MSPO since it is mandatory for the smallholders. Consulted smallholders however refused to enter the mutual agreements on RSPO certifications for the time being although support made ready by the company.	Complied
5.1.9	(C) The unit of certification has a grievance mechanism for smallholders and all grievances raised are dealt with in a timely manner. - Critical (Major) compliance -	Asia POM established its own Complaint Grievance Procedure based on the company's documented SOP on Mechanisms for Communication and Consultation; Doc. Ref. # E/004-08/2019; Date: 12/8/2019. Grievance from internal & external stakeholders as per sample records sighted in the Sustainability Complaint/Suggestion/Grievance Monitoring Book. No grievance recorded since last audit from among FFB suppliers including smallholders.	Complied
Criterion 5.2: The unit of certification supports improved livelihoods of smallholders and their inclusion in sustainable palm oil value chains.			
5.2.1	The Company consults with interested smallholders (irrespective of type) within the Unit of Certification, including women or other partners in their supply base, to assess their needs for support to improve their livelihoods and their interest in RSPO certification. - Minor compliance -	The mill supports the FFB Suppliers among independent smallholders in certification through consultation and information sharing upon requested. Consultation made with smallholders confirmed that they were provided with information of sustainable certifications mainly in MSPO since it is mandatory for the smallholders. Consulted smallholders however refused to enter the mutual agreements on RSPO certifications for the time being although support made ready by the company.	Complied

5.2.2	<p>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).</p> <p>- Minor compliance -</p>	<p>The mill supports the FFB Suppliers among independent smallholders in certification through consultation and information sharing upon requested. Consultation made with smallholders confirmed that they were provided with information of sustainable certifications mainly in MSPO since it is mandatory for the smallholders. Consulted smallholders however refused to enter the mutual agreements on RSPO certifications for the time being although support made ready by the company.</p>	Complied
5.2.3	<p>Where applicable, the unit of certification provides support to smallholders to promote legality of FFB production.</p> <p>- Minor compliance -</p>	<p>The mill supports the FFB Suppliers among independent smallholders in certification through consultation and information sharing upon requested. Consultation made with smallholders confirmed that they were provided with information of sustainable certifications mainly in MSPO since it is mandatory for the smallholders. Consulted smallholders however refused to enter the mutual agreements on RSPO certifications for the time being although support made ready by the company.</p>	Complied
5.2.4	<p>(C) Evidence exists that the unit of certification trains Scheme Smallholders on pesticide handling.</p> <p>- Critical (Major) compliance -</p>	<p>The mill supports the FFB Suppliers among independent smallholders in certification through consultation and information sharing upon requested. Consultation made with smallholders confirmed that they were provided with information of sustainable certifications mainly in MSPO since it is mandatory for the smallholders. Consulted smallholders however refused to enter the mutual agreements on RSPO certifications for the time being although support made ready by the company.</p>	Complied
5.2.5	<p>The unit of certification regularly reviews and publicly reports on the progress of the Smallholder support programme.</p> <p>- Minor compliance -</p>	<p>The mill supports the FFB Suppliers among independent smallholders in certification through consultation and information sharing upon requested. Consultation made with smallholders confirmed that they were provided with information of sustainable certifications mainly in MSPO since it is mandatory for the smallholders. Consulted smallholders however refused to enter the</p>	Complied

RSPO P&C Public Summary Report
Revision 11 (Sept 2020)

		mutual agreements on RSPO certifications for the time being although support made ready by the company.	
Principle 6: Respect workers' rights and conditions			
Criterion 6.1: Any form of discrimination is prohibited.			
6.1.1	<p>(C) A publicly available non-discrimination and equal opportunity policy is implemented in such a way to prevent discrimination based on ethnic origin, caste, national origin, religion, disability, gender, sexual orientation, gender identity, union membership, political affiliation or age.</p> <p>- Critical (Major) compliance -</p>	APU implemented the company's Equal Opportunity Policy; Date: 12/8/2019; Signed by both Plantation Director and Mill Director respectively. Regular briefing also conducted to all employees as per sample sighted for Sustainability awareness – Company Policy (OSH, Social & Human Right, Equal Opportunity, Environmental, Corruption Prevention, Sexual Harassment, Reproductive Right; Date: 19/10/2020.	Complied
6.1.2	<p>(C) 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>	Records of employments and interview conducted on-site with sampled internal and external stakeholders confirmed that the workers and groups including local communities, women, and migrant workers have not been discriminated against.	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>	APU implemented its recruitment based on the company's Guidelines on Procedure of Recruitment, Selection, Hiring, Promotion, Retirement and Termination; Doc. Ref. # E020-01/2019; Doc. Date: 12/08/2019. Sighted sample advertisements and records of new employee's recruitments as well as promotion of exiting employees confirmed that it was based on skills, capabilities, qualities and medical fitness necessary.	Complied
6.1.4	<p>Pregnancy testing is not conducted as a discriminatory measure and is only permissible when it is legally mandated. Alternative equivalent employment is offered for pregnant women.</p> <p>- Minor compliance -</p>	Pregnancy testing was conducted only for women employee involved in chemical handling work to ensure no pregnant women working with the risk of chemical exposure. All women employees involved in chemical handling work within Asia Production Unit (APU) underwent Urine Pregnancy Test (UPT) conducted by	Complied

RSPO P&C Public Summary Report
Revision 11 (Sept 2020)

		<p>Hospital Assistant on monthly basis as per sample sighted as following:</p> <ul style="list-style-type: none"> - Hwa Li Estate Div. 3: Total women employee handling chemical = 27; Latest test date: 5/3/2021; Result: 27 negatives; 0 positive - Asia POM: Total women employee in mill = 12; Latest test date: 4/3/2021; Result: 12 negatives; 0 positive - Asia Oil Palm Estate Div. 2; Particulars of Health and Pregnancy Test for Female Store Keeper, Sprayer, Manurer & Nursery; Date: 1/3/2021 	
6.1.5	<p>(C) 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>Gender committee available in all operating units within APU where the committee members responsible to raise awareness, identify and address issues of concern as well as opportunities and improvements for women through various activities and events. Sighted sample minutes of meeting records for gender committee meeting conducted on 15/7/2020 at Asia POM, 24/8/2020 at Hwa Li Estate Div. 3 and on 20/8/2020 at Asia Oil Palm Estate Div. 2.</p> <ul style="list-style-type: none"> - Latest Gender Committee meeting Melewar Estate Div. 2 records Mesyuarat Kumpulan Jantina (Gender Group) Kali ke 1 2021; Date: 18/1/2021; Venue: Melewar 2 Conference Room - Latest Gender Committee meeting Asia POM minutes of meeting records date: 12/1/2021; Venue: Asia POM Meeting Room - Latest conducted by Asia Oil Palm Estate Div. 2 as per records of Minit Mesyuarat Jawatankuasa Jantina Kali Pertama 2021; Date: 22/2/2021 	Complied
6.1.6	<p>There is evidence of equal pay for the same work scope.</p> <p>- Minor compliance -</p>	<p>Evidence of equal pay for the same work scope available based on the payroll system i.e. LintraMax Plantation Director; Worker Payslip Listing (Detail payslip with piece-rate work price) as per sample sighted as following:</p> <p>Asia Oil Palm Estate Div. 2:</p>	Complied

RSPO P&C Public Summary Report
Revision 11 (Sept 2020)

		<ul style="list-style-type: none"> - Female employee ID # CZ00611; Gang: R02; Post: Field Worker; March 2020 salary: RM 1,155.15 - Male employee ID # AT00680; Gang: R01; Post: Field Worker; March 2020 salary: RM 1,272.56 <p>Melewar Estate Div. 2:</p> <ul style="list-style-type: none"> - Female employee ID # MLT1374; Gang: R07_PR1; Post: Field Worker; March 2020 salary: RM 1,155.29 - Male employee ID # MLT0037; Gang: R04_PR1; Post: Harvester; March 2020 salary: RM 1,503.40 <p>Hwa Li Estate Div. 3:</p> <ul style="list-style-type: none"> - Female employee ID # HE300718; Gang: R12; Post: Field Worker; March 2020 salary: RM 1,230.28 - Male employee ID # HE301320; Gang: R05; Post: Harvester; March 2020 salary: RM 1,508.09 <p>Melewar POM:</p> <ul style="list-style-type: none"> - Female employee ID # G181; Gang: G36; Post: Process Operator; March 2020 salary: RM 1,311.75 - Male employee ID # G067; Gang: G37; Post: Process Operator; March 2020 salary: RM 1,279.95 	
<p>Criterion 6.2: Pay and conditions for staff and workers and for contract workers always meet at least legal or industry minimum standards and are sufficient to provide decent living wages (DLW).</p>			
6.2.1	<p>(C) 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>Collective agreements and documentations of pay and conditions available to the workers for sample employees sighted as per indicator 6.1.6 above. Explanation made from time to time upon updates of salary related changes mainly the Minimum Wages Order as per sample sighted for Asia POM briefing of Minimum Wages and Method of Wages Payment dated on 2/3/2020 by the mill management.</p>	Complied

<p>6.2.2</p>	<p>(C) 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>Employment contracts detailing payments and conditions of employment available to the workers for sample employees sighted as per following:</p> <p>Asia POM samples:</p> <ul style="list-style-type: none"> - Employee # G317; Post: Solvent Plant; Date joined: 1/8/2017; Nationality: Malaysia - Employee # G376; Post: Gate Keeper; Date joined: 15/9/2020; Nationality: Malaysia - Employee # G031; Post: Biogas Plant; Date joined: 6/9/2017; Nationality: Indonesia - Employee # G156; Post: Line Sweeper; Date joined: 15/3/2017; Nationality: Indonesia - Employee # G112; Post: Lab Sampling; Date joined: 17/8/2017; Nationality: Philippine - Employee # G359; Post: FFB Grader; Date joined: 15/7/2019; Nationality: Philippine <p>Based on <i>Senarai Harga Gaji Harian Dan Kerja Pajak Ladang Hwa Li 3</i> (updated 1/7/2020), Hwa Li Estate Div. 3 samples:</p> <ul style="list-style-type: none"> - Employee # HE301628; Post: Harvester; Date joined: 2/11/2019; Nationality: Malaysia - Employee # HE301570; Post: General Worker; Date joined: 1/2/2021; Nationality: Indonesia - Employee # HE301405; Post: Harvester; Date joined: 1/9/2020; Nationality: Indonesia - Employee # HE301129; Post: LF Picker; Date joined: 12/8/2018; Nationality: Indonesia 	<p>Complied</p>
--------------	--	---	-----------------

RSPO P&C Public Summary Report
Revision 11 (Sept 2020)

		<ul style="list-style-type: none"> - Employee # HE300621; Post: Creche Ayah; Date joined: 1/8/2014; Nationality: Indonesia - Employee # HE300188; Post: Buffalo Watchman; Date joined: 15/1/2002; Nationality: Indonesia <p>Based on <i>Senarai Harga Gaji Harian Dan Kerja Pajak Ladang Melewar Estate Div. 2</i> (updated 1/7/2020), Hwa Li Estate Div. 3 samples:</p> <ul style="list-style-type: none"> - Employee # MLT1046; Post: Buffalo Watchman; Date joined: 21/5/2010; Nationality: Indonesia - Employee # MLT1374; Post: Sprayer; Date joined: 1/12/2014; Nationality: Indonesia - Employee # MLT0973; Post: Creche Ayah; Date joined: 1/10/2009; Nationality: Indonesia - Employee # MLT1185; Post: Backhoe Driver; Date joined: 2/2/2012; Nationality: Indonesia - Employee # MLT1473; Post: Manurer; Date joined: 4/5/2016; Nationality: Indonesia - Employee # MLT00600; Post: Harvester; Date joined: 17/10/2006; Nationality: Indonesia <p>Asia Oil Palm Estate Div. 2 samples:</p> <ul style="list-style-type: none"> - Employee # AE200837; Post: General Worker; Date joined: 19/1/2021; Nationality: Malaysia - Employee # AE200407; Post: Weeder; Date joined: 1/8/2019; Nationality: Indonesia - Employee # AE200483; Post: Harvester; Date joined: 1/6/2018; Nationality: Indonesia 	
--	--	---	--

RSPO P&C Public Summary Report
Revision 11 (Sept 2020)

		<ul style="list-style-type: none"> - Employee # AE200577; Post: General Worker; Date joined: 1/6/2020; Nationality: Philippine - Employee # AE200601; Post: Harvester; Date joined: 1/6/2020; Nationality: Philippine - Employee # AE200380; Post: Loose Fruit Picker; Date joined: 1/11/2017; Nationality: Philippine <p>Regular working hours, deductions, overtime, sick leave, holiday entitlement, maternity leave, reasons for dismissal, period of notice, etc. in compliance with Sabah Labour Ordinance and Minimum Wages Order.</p>	
6.2.3	<p>(C) 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>Records of payslip and check-roll documents available to the workers for sample employees sighted as per indicator 6.2.2 above shown 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>	Complied
6.2.4	<p>(C) 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>Adequate housing, sanitation facilities, water supplies, medical, educational and welfare amenities in compliance with the Workers Minimum Housing and Amenities Standard Act 1990 provided by the company as evidence from the site visit. Regular monitoring also conducted as per sample records of following:</p> <ul style="list-style-type: none"> - Latest VMO visit Melewar Estate Div. 2; Date: 17/3/2020, previous visit by VMO conducted line site inspection dated 4/3/2021 by Dr. Mohamad Fikri Bin Zanal Abidin; OHD DOSH Reg. # HQ/16/DOC/00/557; Mabello Group of Clinics. - Asia POM latest housing inspection records i.e. Checklist Inspection of Labour Line conducted on 26/3/2021. Latest VMO visit Asia POM; Date: 17/3/2020, previous visit by VMO conducted line site inspection dated 4/3/2021 by Dr. Mohamad 	Complied

RSPO P&C Public Summary Report
Revision 11 (Sept 2020)

		<p>Fikri Bin Zanal Abidin; OHD DOSH Reg. # HQ/16/DOC/00/557; Mabello Group of Clinics.</p> <ul style="list-style-type: none"> - Fogging was conducted as part of identified social aspects from SIA reports conducted by Wild Asia. Latest fogging conducted was conducted on 15/3/2021 as per Asia POM Fogging Schedule Records. 	
6.2.5	<p>The unit of certification makes efforts to improve workers' access to adequate, sufficient and affordable food.</p> <p>- Minor compliance -</p>	<p>Based on the sample records, Asia POM monitored through records of price comparison in sundry shop available within Asia POM workers housing area Transasia and Asia Estate workers housing area Chin Kui Min. Sighted price comparison made for the month of Sep-20, Oct-20, Nov-20, Dec-20, Jan-21 & Feb-21. Other grocery shop operator i.e. Mahee Trading sundry shop price list also available..</p>	Complied
6.2.6	<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>PROCEDURAL NOTE: STATEMENT FROM THE RSPO STANDARDS STANDING COMMITTEE REGARDING INDICATOR 6.2.6 ON DECENT LIVING WAGE</p> <p>With reference to procedural note of indicator 6.2.6, the RSPO has published a guidance on the DLW calculation in June 2019. The RSPO Secretariat will endeavour to carry out DLW country benchmarks for palm oil producing countries in which RSPO members operate and for which no Global Living Wage Coalition (GLWC) benchmarks exist (As of September 2019, GLWC has developed national benchmarks in Bangladesh, Belize, Brazil, China, Colombia, Costa Rica, Dominican Republic, Ecuador, Ethiopia, Ghana, Guatemala, India, Kenya, Malawi, Mexico, Nicaragua, Pakistan, South Africa, Sri Lanka, Uganda and Vietnam These benchmarks are developed based on banana, coffee, floriculture, textile, manufacturing, seafood processing and tea industry. The RSPO is in the process of commissioning benchmarks for Malaysia and Indonesia for the palm oil sector and will develop methods to calculate and/or define DLW applicability for all palm oil producing countries in which RSPO members operate).</p> <p><i>Where a GLWC living wage standard (benchmark), or one that fulfils the basic requirements of the RSPO-endorsed living wage methodology, has been established in the country or region of operation, the same should be used as benchmarks.</i></p>	<p>All APU employees received decent living wages based on the company's (Carotino/JC Chang) group documents of Implementation Plan for Decent Living Wage (DLW); Doc. Ref. # E/027-01/2019; Doc. Date: 29/11/2019. The DLW assessment in the plan covers whole operating units in Sabah and Peninsular Malaysia. As an average, the Prevailing Wage for APU is RM 1,519.93/month which is far higher than the mandatory Minimum Wages Order 2020.</p>	Complied

	<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"> • Updated assessment on prevailing wages and in-kind benefits • There is annual progress on the implementation of living wages • 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 • 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. <p>- Minor compliance -</p>		
6.2.7	<p>Permanent, full-time employment is used for all core work performed by the unit of certification. Casual, temporary and day labour is limited to jobs that are temporary or seasonal.</p> <p>- Minor compliance -</p>	<p>Employment contracts detailing payments and conditions of employment available to the permanent workers employed as per samples sighted in indicator 6.2.2 above. No casual, temporary and day labour employed within all operating units within APU.</p>	Complied

<p>Criterion 6.3: 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>(C) 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 statement on recognising freedom of association was published in the Social & Human Rights Policy; Date: 14/11/2019; Signed by both Plantation Director and Mill Director respectively. The policy stated that the management will respect the right of employees to join any association freely. Regular briefing also conducted to all employees as per sample sighted for Sustainability awareness – Company Policy (OSH, Social & Human Right, Equal Opportunity, Environmental, Corruption Prevention, Sexual Harassment, Reproductive Right; Date: 19/10/2020.</p>	Choose an item.
6.3.2	<p>Minutes of meetings between the unit of certification with trade unions or workers representatives, who are freely elected, are documented in national languages (English and/or Bahasa Malaysia) and made available upon request.</p> <p>- Minor compliance -</p>	<p>Minutes of meetings between the unit of certification with trade unions or workers representatives, who are freely elected, are documented in national languages (English and/or Bahasa Malaysia) and made available upon request as per samples sighted as following:</p> <ul style="list-style-type: none"> - Melewar Estate Division 2 Minutes of Meeting records of Mesyuarat Jawatankuasa Rundingan Bersama Majikan (JCC) kali ke-4 2020; Date: 31/12/2020; Venue Melewar 2 Conference Room. - Asia POM Jawatankuasa Persidangan Diantara Pekerja dan Majikan (JCC); Date: 25/2/2021; Venue: Mill office - Asia Oil Palm Estate Div. 2 Minit Mesyuarat Jawatankuasa Perundingan Bersama Joint Consultative Committee (JCC) Kali Pertama 2021; Date: 10/3/2021 	Complied
6.3.3	<p>Management does not interfere with the formation or operation of registered unions/ labour organisations or associations, or other freely</p>	<p>Based on the interview conducted with the workers’ representatives and records of JCC election at all operating units within APU, it was</p>	Complied

	<p>elected representatives for all workers including migrant and contract workers.</p> <p>- Minor compliance -</p>	<p>confirmed that management does not interfere with the formation or operation of the workers committee.</p>	
<p>Criterion 6.4: Children are not employed or exploited.</p>			
6.4.1	<p>A formal policy for the protection of children, including prohibition of child labour and remediation is in place, and included into service contracts and supplier agreements.</p> <p>- Minor compliance -</p>	<p>A formal policy for the protection of children, including prohibition of child labour was in place as Children Protection Policy; Date: 20/2/2020; Signed by both Plantation Director and Mill Director respectively. Children Protection Policy also extended to all external stakeholders mainly among vendors of APU. Sighted sample records of Sustainability Compliances Contract with Operating Unit; Doc. Ref. # E023-01/2019; Doc. Date: 12/8/2019; undertaken by external FFB supplier of Asia POM i.e. Meran Sdn. Bhd./Kebaco Sdn. Bhd. that signed on 28/7/2020.</p>	Complied
6.4.2	<p>(C) There is evidence that minimum age requirements are met. Personnel files show that all workers are above the national minimum age or above company policy minimum age, whichever is higher. There is a documented age screening verification procedure.</p> <p>- Critical (Major) compliance -</p>	<p>Records of employee master lists for sampled estates and mill within APU shown the birth date of them that indicated the minimum age requirements are met. The documented Guidelines on Procedure of Recruitment, Selection, Hiring, Promotion, Retirement and Termination has specified the screening verification procedure which able to be done via HR computer system which will trigger alarm if underage worker data keyed-in the database.</p>	Complied
6.4.3	<p>(C) Young persons may be employed only for non- hazardous work, with protective restrictions in place for that work.</p> <p>- Critical (Major) compliance -</p>	<p>Based on the interview and employees master lists data, no young person below 18 years old employed within all operating units within APU.</p>	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>Interview conducted on-site with sampled internal and external stakeholders confirmed that the information on no child labour policy and the negative effects of child labour were provided in appropriate languages and accessible to them. Records of communication also available as per sample sighted for FFB supplier</p>	Complied

RSPO P&C Public Summary Report
Revision 11 (Sept 2020)

		of Asia POM i.e. Meran Sdn. Bhd./Kebaco Sdn. Bhd. that was signed on 28/7/2020.	
Criterion 6.5: There is no harassment or abuse in the workplace, and reproductive rights are protected.			
6.5.1	(C) A policy to prevent sexual and all other forms of harassment and violence is implemented and communicated to all levels of the workforce. - Critical (Major) compliance -	APU implemented the company's Sexual Harassment Policy; Date: 1/7/2012; Signed by both Plantation Director and Mill Director respectively. Latest internal communication was done during Sustainability awareness – Company Policy (OSH, Social & Human Right, Equal Opportunity, Environmental, Corruption Prevention, Sexual Harassment, Reproductive Right; Date: 19/10/2020.	Complied
6.5.2	(C) A policy to protect the reproductive rights of all, especially of women, is implemented and communicated to all levels of the workforce. - Critical (Major) compliance -	APU implemented the company's Guideline on Reproductive Rights; Doc. Ref. # E/015-02/2015; Doc. Date: 5/11/2015 established by Plantation Department, Head Office. Latest internal communication was done during Sustainability awareness – Company Policy (OSH, Social & Human Right, Equal Opportunity, Environmental, Corruption Prevention, Sexual Harassment, Reproductive Right; Date: 19/10/2020.	Complied
6.5.3	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. - Minor compliance -	New mothers assessment was undertaken by gender committee representatives as per records of gender committee meeting conducted on 15/7/2020 at Asia POM, 24/8/2020 at Hwa Li Estate Div. 3 and on 20/8/2020 at Asia Oil Palm Estate Div. 2.	Complied
6.5.4	A grievance mechanism, which respects anonymity and protects complainants where requested, is established, implemented and communicated to all levels of the workforce. - Minor compliance -	Interview conducted on-site with sampled internal stakeholders among all workforce confirmed that the information on grievance mechanism, which respects anonymity and protects complainants where requested, is established and communicated to them. No grievance issues that requires the implementation of the mechanism occurs in all operating units within APU since the last audit.	Complied
Criterion 6.6: No forms of forced or trafficked labour are used.			

RSPO P&C Public Summary Report
Revision 11 (Sept 2020)

6.6.1	<p>(C) All workers have entered into employment voluntarily and the following are prohibited:</p> <ul style="list-style-type: none"> • Retention of identity documents or passports (except for administration purposes including legalisation and renewal processes) • Charging the workers for recruitment fees. • Contract substitution • Involuntary overtime • Lack of freedom of workers to resign • Penalty for termination of employment • Debt bondage • Withholding of wages <p>- Critical (Major) compliance -</p>	<p>Employment contracts detailing payments and conditions of employment available to the workers for sample employees sighted as per indicator 6.1.6 above. Each employment contracts were agreed and signed by both employee and employer which confirmed that all work is voluntary and force labour are prohibited.</p>	Complied
6.6.2	<p>(C) 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>APU implemented the Guidelines on Workers Employment for Casual or Temporary Employee; Doc. Ref. # E/021-01/2018; Doc. Date: 15/11/2018 in case of any temporary or migrant workers are employed. Records of employment shown no temporary or migrant recruitment take place since last audit.</p>	Complied
Criterion 6.7: The unit of certification ensures that the working environment under its control is safe and without undue risk to health.			
6.7.1	<p>(C) The responsible person(s) for H&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>The Mill/Estate manager has appointed the Asst. Mill/Estate Manager as person responsible for safety and health cum secretary for safety and health committee. The mill management has appointed several staff and workers as OSH Committee.</p> <p>All safety, health and welfare issue been discussed during OSH committee meeting such as accident report from other group mill. The meeting was on quarterly basis. Reviewed the minutes meeting for OSH committee for FY 2020.</p>	Complied

RSPO P&C Public Summary Report
Revision 11 (Sept 2020)

		<p>Regular OSH Meetings were conducted by the respective units. Records of OSH Meeting Minutes was available for verification during the assessment. The sampled OSH Meeting Minutes were as below.</p> <p>Hwa Li Estate Div 3:- 15/3/2021 – OSH meeting - 76 14/12/2020 – OSH Meeting – 75 30/9/2020 – OSH Meeting – 74</p> <p>Melewar estate Div 2:- 31/12/2021 – OSH Meeting – 4 28/10/2020 – OSH meeting- 3 20/7/2020 – OSH Meeting – 2</p> <p>Asia POM:- 25/2/2021 – OSH Meeting – 90/JKKP/APOM/02/2021 27/11/2020 – OSH Meeting – 89/JKKP/APOM/11/2020 11/9/2020 – OSH Meeting – 89/JKKP/APOM/09/2020</p> <p>Appointment letter for OSH communities in Melewar estate available dated 25/7/2018 for Manager and for secretary was on 1/5/2019.</p>	
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>Asia production units has established Emergency Response plan such for emergency as follows:</p> <ol style="list-style-type: none"> 1. Accident 2. Fire 3. Chemical spillage 4. Chemical poison 5. Flood 	Complied

		<ol style="list-style-type: none"> 6. Earthquake 7. Workers Riot 8. Encroachment 9. Landslide 10. Animal and poisonous insect attack 11. COVID-19 <p>Operating units in Asia Production units has established Emergency response team lead by the Mill/Estate Manager as the Team Commander. The team consist of firefighting team, first aid team, chemical spillage and chemical poisoned team, Land slide control team, flood control team, typhoon control team, safety and encroachment control team, riot control team, animal attack and poisonous insect control team and COVID-19 control team.</p> <p>Emergency response plan and procedure established by management for;</p> <ul style="list-style-type: none"> - SOP and ERP for flood, doc. ref. U/007-01/2015 dated 28/1/15 - SOP and ERP for chemical spillage, doc. ref. U/006-01/2015 dated 28/1/15 - SOP and ERP for typhoon, doc. ref. U/005-01/2015 dated 28/1/15 - SOP and ERP for building evacuation, doc. ref. U/002-01/2015 dated 28/1/15. - Guidelines for accident reporting and investigation is documented under doc. ref. .no. M/015-03/2018 dated 12/12/18. Classification of accidents, investigation and reporting requirements were included in the guidelines. <p>Competent first aider were present at the operating units.</p>	
--	--	---	--

**RSPO P&C Public Summary Report
Revision 11 (Sept 2020)**

		<p>The operating units continuously provided training on emergency and accident procedure for the employee. Reviewed the training records as follows:</p> <table border="1" data-bbox="1137 467 1825 837"> <thead> <tr> <th>Units</th> <th>Date</th> </tr> </thead> <tbody> <tr> <td>Asia Palm Oil Mill</td> <td>02/03/2020</td> </tr> <tr> <td>Asia Oil Palm Estate div. 2</td> <td>01/07/2020 14/08/2020 16/09/2020</td> </tr> <tr> <td>Melewar Estate div. 2</td> <td>14/08/2020 02/11/2020</td> </tr> <tr> <td>Hwa Li Estaet div. 3</td> <td>05/10/2020</td> </tr> </tbody> </table> <p>The operating units maintain records for accident occurs and reported to the Internal Control Team. Reviewed the sampled accident records as follows:</p> <ol style="list-style-type: none"> 1. Asia Palm Oil Mill Reviewed accident investigation reports for accident occur at press station dated 01/07/2020 2. Asia Oil Palm Estate Div. 2 The estate maintain the accident investigation records in Accident Investigation Report and Accident Register Record Book. As for FY 2020, no accident was recorded. 3. Melewar Estate Div. 2 In Melewar 2 estate, there 2 accident happen in year 2020 as per JKKP 8 (JKKP 8/55971/2020 dated 8/1/2021. The accident with total 5 MC been sampling in this audit, the MC been pay by 	Units	Date	Asia Palm Oil Mill	02/03/2020	Asia Oil Palm Estate div. 2	01/07/2020 14/08/2020 16/09/2020	Melewar Estate div. 2	14/08/2020 02/11/2020	Hwa Li Estaet div. 3	05/10/2020	
Units	Date												
Asia Palm Oil Mill	02/03/2020												
Asia Oil Palm Estate div. 2	01/07/2020 14/08/2020 16/09/2020												
Melewar Estate div. 2	14/08/2020 02/11/2020												
Hwa Li Estaet div. 3	05/10/2020												

RSPO P&C Public Summary Report
Revision 11 (Sept 2020)

		<p>employer verified as per payslip (employee no: MLT0600) and check roll book. Reviewed accident investigation reports for accident occur during slashing/manual weeding operation dated 29/08/2020</p> <p>4. Hwa Li Estate Div. 3</p> <p>Reviewed accident investigation reports for accident occur in transportation operation dated 05/01/2020. Based on sampling accident on 5/1/2020 in Hwa Li estate, the management also establish Standard for safety work for Driver Doc Ref No. M/006-01/2007 dated 13/2/2007. This procedure been brief to workers after accident cases on 7/1/2020 during morning muster. This training also been conducted on 18/3/2021 attended by 39 drivers. As per first aid record on Jan 2020 been check on 15/1/20201 by Hospital assistant.</p>																						
6.7.3	<p>(C) Workers use appropriate personal protective equipment (PPE), which is provided free of charge to all workers at the place of work to cover all potentially hazardous operations, such as pesticide application, machine operations, land preparation, and harvesting. Sanitation facilities for those applying pesticides are available, so that workers can change out of PPE, wash and put on their personal clothing.</p> <p>- Critical (Major) compliance -</p>	<p>The Shower room and changeroom also available in sampling estate, the spraying and manuring worker also aware regarding to ensure change the cloth before going home and keep their PPE in closet that management have prepared.</p> <p>For Hwa Li, PPE issuance as per below: -</p> <table border="1" data-bbox="1137 1066 1926 1235"> <thead> <tr> <th>Type of PPE</th> <th>Date</th> <th>Work station</th> </tr> </thead> <tbody> <tr> <td>Hard hat</td> <td>12/9/2019</td> <td>Driver</td> </tr> <tr> <td>Ear Plug</td> <td>15/3/2021</td> <td>Driver</td> </tr> <tr> <td>Rubber Boots</td> <td>6/6/2018</td> <td>Driver</td> </tr> <tr> <td>Cotton glove</td> <td>6/6/2018</td> <td>Driver</td> </tr> </tbody> </table> <p>For Asia POM, PPE issuance as per below:-</p> <table border="1" data-bbox="1137 1286 1926 1382"> <thead> <tr> <th>Type of PPE</th> <th>Date</th> <th>Work station</th> </tr> </thead> <tbody> <tr> <td>Ear Muff</td> <td>14/10/2019</td> <td>Boiler man</td> </tr> </tbody> </table>	Type of PPE	Date	Work station	Hard hat	12/9/2019	Driver	Ear Plug	15/3/2021	Driver	Rubber Boots	6/6/2018	Driver	Cotton glove	6/6/2018	Driver	Type of PPE	Date	Work station	Ear Muff	14/10/2019	Boiler man	Complied
Type of PPE	Date	Work station																						
Hard hat	12/9/2019	Driver																						
Ear Plug	15/3/2021	Driver																						
Rubber Boots	6/6/2018	Driver																						
Cotton glove	6/6/2018	Driver																						
Type of PPE	Date	Work station																						
Ear Muff	14/10/2019	Boiler man																						

RSPO P&C Public Summary Report
Revision 11 (Sept 2020)

		<table border="1"> <tr> <td>Ear plug</td> <td>3/1/2021</td> <td>Boiler man</td> </tr> <tr> <td>Semi Leather glove</td> <td>17/1/2019</td> <td>Boiler man</td> </tr> <tr> <td>Dust mask</td> <td>3/9/2019</td> <td>Boiler man</td> </tr> <tr> <td>Half face respirator</td> <td>3/10/2020</td> <td>Lab operator</td> </tr> <tr> <td>Rubber hand glove</td> <td>3/10/2020</td> <td>Lab operator</td> </tr> <tr> <td>Ear plug</td> <td>17/10/2020</td> <td>Lab operator</td> </tr> </table> <p>Asia Oil Palm Div 2:-</p> <table border="1"> <thead> <tr> <th>Type of PPE</th> <th>Date</th> <th>Work station</th> </tr> </thead> <tbody> <tr> <td>Safety boot</td> <td>24/3/2021</td> <td>Sprayer</td> </tr> <tr> <td>Nitril glove</td> <td>22/6/2020</td> <td>Sprayer</td> </tr> <tr> <td>Respirator</td> <td>26/7/2020</td> <td>Sprayer</td> </tr> <tr> <td>Apron</td> <td>9/11/2018</td> <td>Sprayer</td> </tr> <tr> <td>Goggles</td> <td>27/3/2021</td> <td>Sprayer</td> </tr> </tbody> </table>	Ear plug	3/1/2021	Boiler man	Semi Leather glove	17/1/2019	Boiler man	Dust mask	3/9/2019	Boiler man	Half face respirator	3/10/2020	Lab operator	Rubber hand glove	3/10/2020	Lab operator	Ear plug	17/10/2020	Lab operator	Type of PPE	Date	Work station	Safety boot	24/3/2021	Sprayer	Nitril glove	22/6/2020	Sprayer	Respirator	26/7/2020	Sprayer	Apron	9/11/2018	Sprayer	Goggles	27/3/2021	Sprayer	
Ear plug	3/1/2021	Boiler man																																					
Semi Leather glove	17/1/2019	Boiler man																																					
Dust mask	3/9/2019	Boiler man																																					
Half face respirator	3/10/2020	Lab operator																																					
Rubber hand glove	3/10/2020	Lab operator																																					
Ear plug	17/10/2020	Lab operator																																					
Type of PPE	Date	Work station																																					
Safety boot	24/3/2021	Sprayer																																					
Nitril glove	22/6/2020	Sprayer																																					
Respirator	26/7/2020	Sprayer																																					
Apron	9/11/2018	Sprayer																																					
Goggles	27/3/2021	Sprayer																																					
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>The coverage of insurance provision in accordance with Malaysia law through SOCSO contribution was sufficiently evident for the workers as following:</p> <p>Employee # HL02390; for Month of Dec 2020 Employee # MLT0600; for Month of Nov 2020 Employee # MLT1484; for Month of Nov 2020 Employee # MLT1285; for Month of Dec 2020 Employee # MLT1149; for Month of Dec 2020</p>	Complied																																				
6.7.5	<p>Occupational injuries are recorded using Lost Time Accident (LTA) metrics.</p> <p>- Minor compliance -</p>	<p>Accident incidences are reviewed during the safety meetings. Records on Lost Time Accident (LTA) metrics was maintained. Accident records are found to be updated. JKPP 8 form were submitted to DOE through MyKKP systems.</p>	Complied																																				

RSPO P&C Public Summary Report
Revision 11 (Sept 2020)

		<p>The occurrence of accidents recorded for YTD December 2020 is as shown below:</p> <table border="1" data-bbox="1131 427 1926 670"> <thead> <tr> <th>Operating Unit</th> <th>Days Lost (LTA)</th> <th>Total Cases</th> </tr> </thead> <tbody> <tr> <td>Hwa Li</td> <td>9.32</td> <td>3</td> </tr> <tr> <td>Melawar</td> <td>10.93</td> <td>2</td> </tr> <tr> <td>Asia POM</td> <td>8.55</td> <td>1</td> </tr> <tr> <td>Asia Oil Palm Div 2</td> <td>4.00</td> <td>1</td> </tr> </tbody> </table>	Operating Unit	Days Lost (LTA)	Total Cases	Hwa Li	9.32	3	Melawar	10.93	2	Asia POM	8.55	1	Asia Oil Palm Div 2	4.00	1	
Operating Unit	Days Lost (LTA)	Total Cases																
Hwa Li	9.32	3																
Melawar	10.93	2																
Asia POM	8.55	1																
Asia Oil Palm Div 2	4.00	1																
Principle 7: Protect, conserve and enhance ecosystems and the environment																		
Criterion 7.1: Pests, diseases, weeds and invasive introduced species are effectively managed using appropriate Integrated Pest Management (IPM) techniques.																		
7.1.1	<p>(C) IPM plans are implemented and monitored to ensure effective pest control. - Critical (Major) compliance -</p>	<p>The estates visited has established IPM List and Treatment management plan. The plan is reviewed on annually basis. The plan covers on possible pest outbreaks such as:</p> <ol style="list-style-type: none"> 1. Rat attack 2. Rat attack – immature area 3. Leaf eating caterpillar 4. Leaf eating insects 5. Ganoderma 6. Rhinoceros beetle attack <p>The plan covers on census, planting of beneficial plant and chemical treatment. Reviewed the implementation of the management plan as follows:</p> <ol style="list-style-type: none"> 1. The estate has established work schedule for field upkeep road – predator host plant propogation. Among the beneficial plant planted such as Tunera subulata, Cassia cobanensis, and 	Complied															

RSPO P&C Public Summary Report
Revision 11 (Sept 2020)

		<p>Antigonan leptopus. Reviewed the complete upkeep as at February 2021.</p> <p>2. Rat census was conducted every 6 months. Reviewed the rat census for Melewar 2 Estate dated 04/11/2020 for field P95C3 recorded at 17.57% and P95C4 recorded at 16.22%.</p> <p>3. Rat census was conducted every 6 months. Reviewed the rat census for Melewar 2 Estate dated 26 - 28/10/2020 for field P95B6 recorded at 17.57% and P97A3 recorded at 22.00%.</p> <p>4. For control of Rhinoceros Beetle, the estates placed pheromone trap at the replanting area. Sighted the pheromone trap at PR20A. Reviewed the map of pheromone trap location. 42 trap were place at the area with ratio 1:5 ha.</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>Plan to prevent and monitor the spread of species referenced in the Global Invasive Species Database and CABI.org (if any)</p> <p>This is not practiced in the estates visited. None of species were referenced in the Global Invasive Species Database and CABI.org are used in the management of IPM.</p> <p>In JC Chang Group estates, 3 plant species were used for IPM such as Tunera subulata, Cassia cobanensis, and Antigonan leptopus.</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>No evidence and records of fire usage for pest control at all estate visited.</p> <p>Asia Production Unit has committed to Zero Burning compliance as spelt out in the JC Chang Group Environmental Policy dated 01/01/2008.</p>	Complied
<p>Criterion 7.2: Pesticides are used in ways that do not endanger health of workers, families, communities or the environment.</p>			
7.2.1	<p>(C) 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>Estates have maintained and revised if required, the Documented Standard Operating Procedures file that contains in the safe operating procedures and the procedures to implement the various</p>	Complied

RSPO P&C Public Summary Report
Revision 11 (Sept 2020)

	<p>- Critical (Major) compliance -</p>	<p>major field operations. For example, among others, the Estate SOP Manual has procedures category for the following operations:</p> <ul style="list-style-type: none"> - Justifications for Pesticide Usage under IPM (Insecticide, Fungicide & Rodenticide) (B/008-14/2016) - Justifications for Pesticide Usage under IPM (Weedicides) (B/009- 10/2015) - Weeding Regime & Practices (B/004-01/2008) 																									
<p>7.2.2</p>	<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>Records of pesticides used (including active ingredients used and area treated, amount of active ingredients applied per ha and number of applications) were established and monitored. The records of weeding programme and herbicide master list was sighted for year 2020.</p> <table border="1" data-bbox="1137 879 1917 1375"> <thead> <tr> <th>Estate</th> <th>Type of chemical</th> <th>a.I per ha</th> </tr> </thead> <tbody> <tr> <td rowspan="5">Hwa Li Div. 3</td> <td>Garlon</td> <td>0.0006</td> </tr> <tr> <td>Ally</td> <td>0.023</td> </tr> <tr> <td>Glyphosate</td> <td>0.386</td> </tr> <tr> <td>Ammo Supre</td> <td>0.072</td> </tr> <tr> <td>Storm</td> <td>0.000007</td> </tr> <tr> <td rowspan="2">Melewar Div. 2</td> <td>Glyphosate</td> <td>0.11</td> </tr> <tr> <td>Cypermethrin</td> <td>0.0134</td> </tr> <tr> <td rowspan="2">Asia Div. 2</td> <td>Ally 20DF</td> <td>0.0027</td> </tr> <tr> <td>Halex</td> <td>0.02</td> </tr> </tbody> </table>	Estate	Type of chemical	a.I per ha	Hwa Li Div. 3	Garlon	0.0006	Ally	0.023	Glyphosate	0.386	Ammo Supre	0.072	Storm	0.000007	Melewar Div. 2	Glyphosate	0.11	Cypermethrin	0.0134	Asia Div. 2	Ally 20DF	0.0027	Halex	0.02	<p>Complied</p>
Estate	Type of chemical	a.I per ha																									
Hwa Li Div. 3	Garlon	0.0006																									
	Ally	0.023																									
	Glyphosate	0.386																									
	Ammo Supre	0.072																									
	Storm	0.000007																									
Melewar Div. 2	Glyphosate	0.11																									
	Cypermethrin	0.0134																									
Asia Div. 2	Ally 20DF	0.0027																									
	Halex	0.02																									

			Metron	0.0025	
			Garlon 250	0.025	
7.2.3	<p>(C) Any use of pesticides is minimised as part of a plan, eliminated where possible, in accordance with IPM plans.</p> <p>- Critical (Major) compliance -</p>	<p>The management encourage establishing biological control as per IPM plan. The implementation in the field is consistent with the JC Chang's Group SOP. No prophylactic use of pesticides found at visited operating units.</p> <p>SOP for IPM</p> <p>Guidelines on Integrated Pest and Disease Management of oil palm (Doc Ref. No. L/001-07/2019 dated 13/8/2019</p> <p>Census record</p> <p>As per implementation Pest Damage Census Form on Rat baiting dated 25/2/2021 in field PM17A8 showed result 6.02%</p>			Complied
7.2.4	<p>There is no prophylactic use of pesticides, unless in exceptional circumstances, as identified in national best practice guidelines.</p> <p>- Minor compliance -</p>	<p>No prophylactic use of pesticides since no exceptional circumstances, as identified in national best practice guidelines</p>			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> <ol style="list-style-type: none"> Judgment of the threat and verify why this is a major threat Why there is no other alternative which can be used Which process was applied to verify why there is no other less hazardous alternative What is the process to limit the negative impacts of the application 	<p>JC Chang only purchase chemicals that are registered under the Malaysian Pesticides Act 1974 (Act 149) and Regulations. Sighting of the Chemical Register at sampling estates showed that only class II, III & IV chemicals were used. There were no Class 1A and Class 1B agrochemicals used. Paraquat was eliminated totally. In its place, alternatives such as Glyphosate were used instead.</p> <p>As per Chemical register in Melewar 2 estate dated 11/3/2021, no chemical under class 1A or 1B or that listed by the Stockholm or Rotterdam Conventions, and paraquat.</p> <p>The estates sampled has established the register of pesticides used in the estate. reviewed the Chemical register for Melewar Estate Division 2 dated 03/11/2020, Hwa li Estate division 3 dated</p>			Complied

RSPO P&C Public Summary Report
Revision 11 (Sept 2020)

	<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>November 2020 and Asia Oil Palm Estate Division 2 dated November 2020, only chemical under class III and IV been used in the estates.</p>	
<p>7.2.6</p>	<p>(C) 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>Pesticides were handled, used or applied by trained workers in accordance with the product label. In addition to the product label, Safety Data Sheets were used and explained to the participants with emphasis on PPE, health and environmental risks of pesticide exposure; recognition of acute and long-term exposure; ways to minimize exposure to workers and their families; and international and national instruments or regulations that protect workers' health.</p> <p>The pesticides operators has been given training regarding the usage safety and health issue and proper way for chemical application and attend monthly medical check-up done by the Medical Assistant. Reviewed the training records as follows:</p> <p>Asia Oil Palm Estate division 2</p> <ol style="list-style-type: none"> 1. PPE awareness training dated 18/07/2020 2. Pesticides handling training dated 18/09/2020 <p>Hwa Li 3 Estate</p> <ol style="list-style-type: none"> 1. SOP for spraying training dated 11/03/2020 2. IPM training dated 08/07/2020 3. Oil and Chemical trap training dated 10/07/2020 <p>Melewar Division 2 Estate</p> <ol style="list-style-type: none"> 1. Chemical handling, chemical mixing and triple rinsing dated 02/01/2020 2. General Workers PPE awareness training dated 17/09/2020 	<p>Complied</p>

		3. Riparian buffer zone training dated 09/03/2020	
7.2.7	<p>(C) Storage of all pesticides is in accordance with recognised best practices.</p> <p>- Critical (Major) compliance -</p>	<p>The operating units comply with Regulation 9 of the Pesticides Act 1974 requiring balance of remaining solution to be kept under lock and key. During visit it was noted that all the remaining pesticides are kept in the store and securely locked and comply with regulation. Based on CHRA assessor’s store assessment recommendation, the below action was taken for improvement as such;</p> <p>i) Ventilation system for adequate air flow ii) No workstation placed in the chemical storage iii) DOSH approved PPE is recommended.</p>	Complied
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>Hwa Li Estate Div. 3</p> <p>Empty pesticides containers in Hwa Li estate were triple rinsed, its bottom perforated to render it useless, inventoried and stored. This empty chemical container was been store at estate and disposed as Recycle waste. Latest disposal was on 21/8/2020 with total 1.25mt (Ref weighbridge ticket: SW20000002W) at Newgates Industries (Borneo) Sdn Bhd.</p> <p>Melewar Estate Div. 2</p> <p>As per letter ME2/H110/2020/2021/11/DM/nm dated 3/3/2021 Melewar estate already disposed the empty container at Newgates Industries (Borneo) Sdn Bhd with total 150kg (UG21000002W).</p> <p>Asia Oil Palm Estate Div. 2</p> <p>As per receipt no 08242 dated 26/3/2021 with total 321.43kg by Newgates Industries (Borneo) Sdn Bhd.</p>	Complied

RSPO P&C Public Summary Report
Revision 11 (Sept 2020)

7.2.9	<p>(C) 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>No aerial spraying conducted in the estates sampled. If any aerial spraying applied, please provide the evidence of authority approval and relevant information is provided to affected local communities at least 48 hours prior to application of aerial spraying.</p>	Complied																
7.2.10	<p>(C) Specific annual medical surveillance for pesticide operators, and documented action to treat related health conditions, is demonstrated.</p> <p>- Critical (Major) compliance -</p>	<p>Following the CHRA conducted at each Operating Unit Annual medical surveillance has been carried out for all pesticide operators at the said estates as recommended by the CHRA Assessor.</p> <p>Medical surveillance record of those operators was examined and all of them were certified fit with no detrimental to health by registered Occupational Health Doctor as per below:</p> <table border="1" data-bbox="1137 799 1928 1023"> <thead> <tr> <th>Operating Unit</th> <th>Date of assessment</th> <th>No employee</th> <th>Results</th> </tr> </thead> <tbody> <tr> <td>Hwa Li 3</td> <td>14/10/2020</td> <td>50</td> <td>Fit</td> </tr> <tr> <td>Melewar 2</td> <td>22/9/2020</td> <td>34</td> <td>Fit</td> </tr> <tr> <td>Asia Div 2</td> <td>28/2/2021</td> <td>44</td> <td>Fit</td> </tr> </tbody> </table>	Operating Unit	Date of assessment	No employee	Results	Hwa Li 3	14/10/2020	50	Fit	Melewar 2	22/9/2020	34	Fit	Asia Div 2	28/2/2021	44	Fit	Complied
Operating Unit	Date of assessment	No employee	Results																
Hwa Li 3	14/10/2020	50	Fit																
Melewar 2	22/9/2020	34	Fit																
Asia Div 2	28/2/2021	44	Fit																
7.2.11	<p>(C) 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>Pregnant and breast-feeding women, under-age person and other people that have medical restrictions working with pesticides are strictly prohibited to work with pesticides. Noted, there were women working as sprayers. Verified that the female workers were checked for pregnancy test at three-month interval by the on-site Estate Hospital Assistant. All results showed negative findings. Also, verified master list of workers and interview with management and workers found no record of workers under the of 18 in all estate.</p>	Complied																

Criterion 7.3: Waste is reduced, recycled, reused and disposed of in an environmentally and socially responsible manner.

RSPO P&C Public Summary Report
Revision 11 (Sept 2020)

7.3.1	<p>A waste management plan which includes reduction, recycling, reusing, and disposal based on toxicity and hazardous characteristics, is documented and implemented.</p> <p>- Minor compliance -</p>	<p>Asia production unit has identified waste generated from the mill and estates operation and documented Waste Management Plan. The waste identified has been categorized in recycle waste, non-recycle waste and scheduled waste. In the plan established stated the aspect identified, impact identified, action plan (solution and method), action done, further action required after review, time frame and person responsible.</p>	Complied															
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>Asia Palm Oil Mill</p> <ol style="list-style-type: none"> 1. The mill monitor and maintain the records inventory scheduled waste generated in the mill. Reviewed the inventory records as at 20/03/2021 documented in Scheduled Waste Record Book. Reviewed the records and submitted to DOE through EWISS. Reviewed the EWISS report for the month of September, October, November December 2020 and January 2021. 2. The estate disposed recycled waste through appointed contractor. Reviewed the official receipt dated 03/03/2021. 3. The inventory of scheduled waste were monitored on monthly basis and stored in designated scheduled waste store before disposed through licensed contractors. Reviewed the sampled disposal records as follows: Disposal date: 23/10/2020 <table border="1" data-bbox="1137 1107 1823 1351"> <thead> <tr> <th>No.</th> <th>Waste Code</th> <th>Consignment Note No.</th> </tr> </thead> <tbody> <tr> <td>1.</td> <td>SW 305</td> <td>202010230812CHYS</td> </tr> <tr> <td>2.</td> <td>SW 409</td> <td>2020102308CN8Q07</td> </tr> <tr> <td>3.</td> <td>SW 410</td> <td>2020102308JKMFG3</td> </tr> <tr> <td>4.</td> <td>SW 102</td> <td>2020102309PFN9KU</td> </tr> </tbody> </table>	No.	Waste Code	Consignment Note No.	1.	SW 305	202010230812CHYS	2.	SW 409	2020102308CN8Q07	3.	SW 410	2020102308JKMFG3	4.	SW 102	2020102309PFN9KU	Complied
No.	Waste Code	Consignment Note No.																
1.	SW 305	202010230812CHYS																
2.	SW 409	2020102308CN8Q07																
3.	SW 410	2020102308JKMFG3																
4.	SW 102	2020102309PFN9KU																

**RSPO P&C Public Summary Report
Revision 11 (Sept 2020)**

5.	SW 110	20201030116MBVX4
----	--------	------------------

Disposal date: 20/02/2020

No.	Waste Code	Consignment Note No.
1.	SW 305	2021022012HRK71L
2.	SW 409	2021022012HAO54R
3.	SW 410	2021022012A15OWR
4.	SW 102	2021022012MICVJZ
5.	SW 110	2021022012RCDA17

Domestic waste were collected twice a week and disposed at designated landfill. Reviewed the domestic waste collection records dated 01/03/2021, 04/03/2021, 09/03/2021 and 11/03/2021 (20/06/2020, 23/06/2020, 02/07/2020 and 05/07/2020)

Hwa li 3 Estate

1. The inventory of scheduled waste were monitored on monthly basis and stored in designated scheduled waste store before disposed through licensed contractors. Reviewed the disposal records as follows:

Disposal date: 24/10/2020

No.	Waste Code	Consignment Note No.
1.	SW 305	2020102410VKT6FG
2.	SW 410	2020102410GFKALQ

3.	SW 410	20201024104JP2TR
4.	SW 109	20201024100JZH16
5.	SW 409	20201030095R9YAS

18/02/2021

No.	Waste Code	Consignment Note No.
1.	SW 305	2021021815UOJNKI
2.	SW 410	2021021816@XISJ7
3.	SW 410	2021021815G7YCQ1
4.	SW 109	20210218165AC342
5.	SW 409	2021021815BG19VU
6.	SW 409	2021021815QG1YW0

- The domestic waste was collected twice a week. Reviewed the collection records for the month of August and September 2020. Sighted the landfill located in field A06, no evidence of scheduled waste and recycle waste were disposed in the landfill.

Melewar 2 Estate

- The estate monitor and maintain the records inventory scheduled waste generated in the estate. Reviewed the inventory as at 28/02/2021 documented in Fifth Scheduled form and submitted to DOE through EWISS. Reviewed the EWISS report for the month of October, November December 2020 and January 2021.

**RSPO P&C Public Summary Report
Revision 11 (Sept 2020)**

- 2. The estate disposed recycled waste through appointed contractor. Reviewed the official receipt dated 03/03/2021.
- 3. The inventory of scheduled waste were monitored on monthly basis and stored in designated scheduled waste store before disposed through licensed contractors. Reviewed the disposal records as follows:

Disposal date: 12/06/2020

No.	Waste Code	Consignment Note No.
1.	SW 305	202006131440NG1J
2.	SW 410	2020061314DHFXT
3.	SW 418	2020061314OA69D8
4.	SW 409	2020061315XSBHO6
5.	SW 409	2020061315BTW6AG

Disposal date: 21/10/2020

No.	Waste Code	Consignment Note No.
1.	SW 306	2020102606JC37HW
2.	SW 418	2020102606J2AZU3O
3.	SW 410	2020102807IHKFAY
4.	SW 305	2020102606R6C2K4
5.	SW 409	20201026606IZAKHP

Disposal date: 22/02/2020

No.	Waste Code	Consignment Note No.
-----	------------	----------------------

**RSPO P&C Public Summary Report
Revision 11 (Sept 2020)**

1.	SW 305	B011186
2.	SW 410	B011188
3.	SW 306	B011187
4.	SW 409	B012336
5.	SW 409	B011193

Asia Oil Palm 2 Estate

The estate maintain the inventory records for Scheduled Waste generated recorded in Scheduled Waste inventory Card. Reviewed the inventory records for the month of June, July, August, September and October 2020. November 2020, December 2020, January 2021 and February 2021.

Disposal date: 21/10/2020

No.	Waste Code	Consignment Note No.
1.	SW 306	2020112316WJ2A9Z
2.	SW 305	202011231609SP3I
3.	SW 410	202011231630TH59
4.	SW 409	2020112316BN4SI8

Disposal date: 18/02/2021

No.	Waste Code	Consignment Note No.
1.	SW 306	2021031016HYINSQ
2.	SW 305	2021031016OMBPH

RSPO P&C Public Summary Report
Revision 11 (Sept 2020)

		<table border="1" style="width: 100%; border-collapse: collapse;"> <tr> <td style="width: 5%; text-align: center;">3.</td> <td style="width: 25%;">SW 410</td> <td style="width: 70%;">2021031016WDRXL1</td> </tr> <tr> <td style="text-align: center;">4.</td> <td>SW 409</td> <td>202103101695BLP4</td> </tr> </table> <p>Domestic waste collection was conducted at minimum twice a week. The waste were disposed in designated landfill as sighted in field P94A15. Reviewed domestic waste collection records in Domestic Waste Collection book dated 10/02/2021, 13/02/2021, 15/02/2021 and 17/02/2021 (15/09/2020, 17/09/2020, 19/09/2020 and 21/09/2020)</p>	3.	SW 410	2021031016WDRXL1	4.	SW 409	202103101695BLP4	
3.	SW 410	2021031016WDRXL1							
4.	SW 409	202103101695BLP4							
7.3.3	<p>The unit of certification does not use open fire for waste disposal.</p> <p>- Minor compliance -</p>	<p>No evidence of fire use in waste disposal as sighted during site visit in the housing area. Domestic waste were put in dustbin and collected twice a week and disposed in designated landfill. Noted during interview with workers shows awareness on prohibition of using fire for waste disposal.</p>	Complied						
Criterion 7.4: Practices maintain soil fertility at, or where possible improve soil fertility to, a level that ensures optimal and sustained yield.									
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>JC Chang Group has established SOPs of good agricultural practices to manage soil fertility to optimise yield and minimise environmental impacts documented in Guideline on Soil and Water Conversation, refer document no. C/002-01/2008 dated on 10/11/2018 and Fertilizer Recommendation, refer document no. B/015-01/2013 dated on 19/07/2013. These guideline has outlined the method to ensure palm oil produce optimal and sustained yield.</p> <p>The sustaining of the soil fertility is guided by the organization SOPs content among others as stated in sections of the following documents:</p> <ol style="list-style-type: none"> 1. Methods of Nutrient Assessment for Oil Palm Fertilizer Recommendation, refer document no. B/015-01/2013. 2. Soil and water conservation refer document no. C/002-01/2008 	Complied						

RSPO P&C Public Summary Report
Revision 11 (Sept 2020)

<p>7.4.2</p>	<p>Periodic tissue and soil sampling is carried out by Companies to monitor and manage changes in soil fertility and plant health.</p> <p>- Minor compliance -</p>	<p>JC Chang group has established SOP for soil and foliar sampling. Refer document as follows:</p> <p>i. Guideline for foliar sampling. Refer document no. C/026-01/2017 dated 31/5/2019</p> <p>ii. Guideline for soil sampling. Refer document no. C/027-01/2017</p> <p>Soil analysis and foliar analysis was done on annually basis as per guidelines established. Soil analysis and foliar sampling will be monitored on yearly basis. Reviewed the sample test results as follows:</p> <p>JC Chang group has established Guidelines for Soil Sampling, refer document no. C/027-01/2017 and Guidelines for Foliar Sampling, refer document no. C/026-01/2017 dated 31/05/2017. The objective of the sampling conducted as follows:</p> <ol style="list-style-type: none"> 1. To determine soil fertility status and fertiliser requirement 2. To assist with the preparation of annual fertiliser program <p>Soil analysis and foliar analysis was done on annually basis as per guidelines established. Soil analysis and foliar sampling will be monitored on yearly basis. Reviewed the sample test results as follows:</p> <ol style="list-style-type: none"> 1. For Melewar Estate div 2 latest soil analysis was conducted on 05/3 2020 as per report no. R20/3/42 dated 23/05/2020. Latest foliar analysis was conducted on 04/03 2020 as per report no. R20/3/144 dated 11/04/2020 2. For Hwa Li Estate div. 3 latest foliar and soil sampling was conducted on 25/03/2020 as per letter reference no. HLE 3/PC/2021/4.2.3/yan. The result is yet to be received by the estate 	<p>Complied</p>
--------------	--	--	-----------------

RSPO P&C Public Summary Report
Revision 11 (Sept 2020)

7.4.3	<p>A nutrient recycling strategy is in place, which includes the recycling of Empty Fruit Bunches (EFB), Palm Oil Mill Effluent (POME), palm residues and optimal use of inorganic fertilisers.</p> <p>- Minor compliance -</p>	<p>Nutrient recycling strategy is in place and includes use of Empty Fruit Bunches (EFB), Palm Oil Mill Effluent (POME), and palm residues after replanting.</p> <p>Reviewed application records for the month of July to October 2020 for Melewar Estate Division 2 recorded at 2,139.60 ton for both replanting and mature area.</p> <p>As at March 2021, EFB dispatch to estates recorded at 19,514 tons.</p>	Complied				
7.4.4	<p>Records of fertiliser inputs are maintained.</p> <p>- Minor compliance -</p>	<p>Fertiliser application was conducted as per SOP established and recommendation by the Agronomist.</p> <p>The estate maintained the fertiliser application records in Daily Cost Book. Reviewed the application records as follows:</p> <p>Hwa Li 3 Estate</p> <table border="1" data-bbox="1137 826 1930 1034"> <tr> <td data-bbox="1144 831 1532 1029"> <p>Field/Block:P96B6 Program: Jul – Aug 2020 Fertiliser: NK Mix Application date: 23/07/2020 – 27/07/2020</p> </td> <td data-bbox="1538 831 1924 1029"> <p>Field/Block:P96A8 Program: Jul – Aug 2020 Fertiliser: NK Mix Application date: 10/07/2020</p> </td> </tr> </table> <p>Melewar Estate 2</p> <table border="1" data-bbox="1137 1129 1930 1337"> <tr> <td data-bbox="1144 1134 1532 1332"> <p>Field/Block: P97 block 3 Program: April 2021 Fertiliser: Borate Application date: 26/03/2021</p> </td> <td data-bbox="1538 1134 1924 1332"> <p>Field/Block:P95D block 1 and 2 Program: Sep – Oct 2020 Fertiliser: BRP Application date: 14 – 15/12/2020</p> </td> </tr> </table>	<p>Field/Block:P96B6 Program: Jul – Aug 2020 Fertiliser: NK Mix Application date: 23/07/2020 – 27/07/2020</p>	<p>Field/Block:P96A8 Program: Jul – Aug 2020 Fertiliser: NK Mix Application date: 10/07/2020</p>	<p>Field/Block: P97 block 3 Program: April 2021 Fertiliser: Borate Application date: 26/03/2021</p>	<p>Field/Block:P95D block 1 and 2 Program: Sep – Oct 2020 Fertiliser: BRP Application date: 14 – 15/12/2020</p>	Complied
<p>Field/Block:P96B6 Program: Jul – Aug 2020 Fertiliser: NK Mix Application date: 23/07/2020 – 27/07/2020</p>	<p>Field/Block:P96A8 Program: Jul – Aug 2020 Fertiliser: NK Mix Application date: 10/07/2020</p>						
<p>Field/Block: P97 block 3 Program: April 2021 Fertiliser: Borate Application date: 26/03/2021</p>	<p>Field/Block:P95D block 1 and 2 Program: Sep – Oct 2020 Fertiliser: BRP Application date: 14 – 15/12/2020</p>						

RSPO P&C Public Summary Report
Revision 11 (Sept 2020)

		Asia Oil Palm 2 Estate									
		<table border="1"> <tr> <td>Field/Block: PR20A C06/C07 Program: Feb - Apr 2020 Fertiliser: Impact Special OP Year 1 Application date: 27/05/2020</td> <td>Field/Block: PR20A C06/C07 Program: Oct - Dec 2020 Fertiliser: Impact Special OP Year 2 Application date: 09 – 10/02/2020</td> </tr> </table>	Field/Block: PR20A C06/C07 Program: Feb - Apr 2020 Fertiliser: Impact Special OP Year 1 Application date: 27/05/2020	Field/Block: PR20A C06/C07 Program: Oct - Dec 2020 Fertiliser: Impact Special OP Year 2 Application date: 09 – 10/02/2020							
Field/Block: PR20A C06/C07 Program: Feb - Apr 2020 Fertiliser: Impact Special OP Year 1 Application date: 27/05/2020	Field/Block: PR20A C06/C07 Program: Oct - Dec 2020 Fertiliser: Impact Special OP Year 2 Application date: 09 – 10/02/2020										
Criterion 7.5: Practices minimise and control erosion and degradation of soils.											
7.5.1	<p>(C) Maps identifying marginal and fragile soils, including steep terrain, are available.</p> <p>- Critical (Major) compliance -</p>	<p>Maps identifying marginal and fragile soil, including steep terrain were available for verification. Based on the sample Soil Maps in Hwa Li Estate Div. 3 by Param Agriculture Soil Survey (M) Sdn. Bhd. dated revise 2004 no fragile soil identified in the estate. Among the soil series identified as follows:</p> <table border="1"> <thead> <tr> <th>Estate</th> <th>Soil Series</th> </tr> </thead> <tbody> <tr> <td>Asia Oil Palm Estate Div. 2</td> <td>Lungmanis & Rumidi (41.21%, Kretam (30.15%), Kinabatangan& Sapi (28.64%)</td> </tr> <tr> <td>Melewar Estate Div. 2</td> <td>Lungmanis (54.80%), Kretam (26.20%), Bidu-bidu (9.52%), Rumidi (7.10%), Sapi (2.38%)</td> </tr> <tr> <td>Hwa Li Estate Div. 3</td> <td>Rumidi (34.77%), Kretam (32.18%), Kinabatangan (26.30%), Lungmanis (4.90%), Sapi (1.85%)</td> </tr> </tbody> </table>	Estate	Soil Series	Asia Oil Palm Estate Div. 2	Lungmanis & Rumidi (41.21%, Kretam (30.15%), Kinabatangan& Sapi (28.64%)	Melewar Estate Div. 2	Lungmanis (54.80%), Kretam (26.20%), Bidu-bidu (9.52%), Rumidi (7.10%), Sapi (2.38%)	Hwa Li Estate Div. 3	Rumidi (34.77%), Kretam (32.18%), Kinabatangan (26.30%), Lungmanis (4.90%), Sapi (1.85%)	Complied
Estate	Soil Series										
Asia Oil Palm Estate Div. 2	Lungmanis & Rumidi (41.21%, Kretam (30.15%), Kinabatangan& Sapi (28.64%)										
Melewar Estate Div. 2	Lungmanis (54.80%), Kretam (26.20%), Bidu-bidu (9.52%), Rumidi (7.10%), Sapi (2.38%)										
Hwa Li Estate Div. 3	Rumidi (34.77%), Kretam (32.18%), Kinabatangan (26.30%), Lungmanis (4.90%), Sapi (1.85%)										
7.5.2	<p>No replanting on steep slopes (above 25 degrees) unless approved by state governments. In case of replanting is permitted, no replanting in contiguous area of steep terrain (greater than 25 degrees) larger than 25 Ha within the Unit of Certification.</p> <p>- Minor compliance -</p>	<p>As per site visit verification in field PM 98B no extensive replanting of oil palm on steep terrain. The highest hill only less than 15 degree around 40% of total estate.</p> <p>For Melewar estate Div. 2 in Field PR 00, verified no extensive replanting of Oil Palm.</p>	Complied								

7.5.3	There is no new planting of oil palm on steep terrain. - Minor compliance -	Not applicable as mentioned in indicator 7.5.2 above.	Not Applicable												
Criterion 7.6: Soil surveys and topographic information are used for site planning in the establishment of new plantings, and the results are incorporated into plans and operations.															
7.6.1	(C) To demonstrate the long-term suitability of land for palm oil cultivation, soil maps or soil surveys identifying marginal and fragile soils, including steep terrain, are taken into account in plans and operations. - Critical (Major) compliance -	Soil series and topography map available for estate visited. No fragile soil categorized in the estates visited as per soil map. As per topography map established, the slope in all 3 sampled estate were at average of 0° to 20° as per sample Soil Maps for Hwa Li Estate Div. 3 by Param Agriculture Soil Survey (M) Sdn Bhd dated revise 2004. No fragile soil in Hwa Li Estate Div. 3 and major soil series in estate was Kinabatangan series, Sapi series, Lungmanis series, Rumidi Series and Kretam Sories. In Melewar Estate Div. 2 was available for reviewed, referred report R19/3/48 by KDC Laboratory dated 27/2/2019. No fragile soil presence too.	Complied												
7.6.2	Extensive planting on marginal and fragile soils, is avoided, or, if necessary, done in accordance with the soil management plan for best practices. - Minor compliance -	Based on soil maps for all estates that were available for verification, which source from British Government's Overseas Development Administration (Land Resources Division) United Kingdom, 1974, for the Sabah Governments no fragile soil in sampling estate.	Complied												
7.6.3	Soil surveys and topographic information guide the planning of drainage and irrigation systems, roads and other infrastructure. - Minor compliance -	Based on sample report in Melewar Estate Div. 2 topography map available, detail sighted as following: <table border="1" data-bbox="1137 1158 1906 1350"> <thead> <tr> <th>Area</th> <th>Ha</th> <th>%</th> </tr> </thead> <tbody> <tr> <td>Very low Hill (0-15)</td> <td>922.67</td> <td>45.6</td> </tr> <tr> <td>Low Hills and Minor valley</td> <td>80.94</td> <td>4</td> </tr> <tr> <td>Moderate Hills (0-20)</td> <td>823.52</td> <td>40.7</td> </tr> </tbody> </table>	Area	Ha	%	Very low Hill (0-15)	922.67	45.6	Low Hills and Minor valley	80.94	4	Moderate Hills (0-20)	823.52	40.7	Complied
Area	Ha	%													
Very low Hill (0-15)	922.67	45.6													
Low Hills and Minor valley	80.94	4													
Moderate Hills (0-20)	823.52	40.7													

		Mountain and Hill	135.57	6.7	
Criterion 7.7: No new planting on peat, regardless of depth after 15 November 2018 and all peatlands are managed responsibly.					
7.7.1	(C) There is no new planting on peat regardless of depth after 15 November 2018 in existing and new development areas. - Critical (Major) compliance -	No peat soil identified at all estates sampled. Verified there is no new planting activity in the estate sampled. Hence, the criteria are not applicable.			Not Applicable
7.7.2	Areas of peat within the managed areas are inventoried, documented and reported (effective from 15 November 2018) to RSPO Secretariat. PROCEDURAL NOTE: 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 -	No peat soil identified at all estates sampled. Verified there is no new planting activity in the estate sampled. Hence, the criteria are not applicable.			Not Applicable
7.7.3	(C) Subsidence of peat is monitored, documented and minimised. - Critical (Major) compliance -	No peat soil identified at all estates sampled. Verified there is no new planting activity in the estate sampled. Hence, the criteria are not applicable.			Not Applicable
7.7.4	(C) A documented water and ground cover management programme is in place. - Critical (Major) compliance -	No peat soil identified at all estates sampled. Verified there is no new planting activity in the estate sampled. Hence, the criteria are not applicable.			Not Applicable
7.7.5	(C) 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.	No peat soil identified at all estates sampled. Verified there is no new planting activity in the estate sampled. Hence, the criteria are not applicable.			Not Applicable

	<p>This is subject to transitional (5 years: 2019 to 2024) arrangement stated in the Drainability Assessment Procedure.</p> <p>Within 12 months initial implementation period, company could submit other alternate methodologies to be considered by RSPO for recognition.</p> <p>- Critical (Major) compliance -</p>		
7.7.6	<p>(C) 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>	No peat soil identified at all estates sampled. Verified there is no new planting activity in the estate sampled. Hence, the criteria are not applicable.	Not Applicable
7.7.7	<p>(C) 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>	No peat soil identified at all estates sampled. Verified there is no new planting activity in the estate sampled. Hence, the criteria are not applicable.	Not Applicable
<p>Criterion 7.8: 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>JC Chang Group has established the Guideline on Water Management Plan – Sabah. Refer document no. C/004-01/2008 dated 12/11/2008. The objective of this guideline is to aim for better water conservation, utilization and control of water pollution in the estate.</p> <p>SOP of Water Management Plan – Sabah covers;</p> <ol style="list-style-type: none"> 1. Riparian Buffer Zone 2. Demarcation of Wetland Area 3. Soil and Water Conservation Measures 	Complied

		<p>4. No Construction of Bunds / Weirs / Dams Across Main Rivers 5. Monitoring of Water in Main River 6. Monitoring of Water for Household Consumption</p> <p>The Asia Production Unit has established Water Management Plan. The plan focus on the method to conserve and minimise pollution of water through implementation of various methods such as best practice of raw water & effluent treatment, maintaining riparian zone, management of land irrigation, maintaining soft vegetation in the field, regular education to employees on conserving water and water pollution preventions.</p> <p>The operating units visited provide the workers with adequate clean water through treated water at water treatment plant. Drinking water analysis was conducted once per year.</p> <p>Hwa Li 3 Estate</p> <p>Latest drinking water analysis was conducted in June 2020 as per certificate of analysis no. W200818-03-0 dated 18/08/2020. The results of water analysis after treatment was found conform to National Standard for Drinking Water Quality.</p> <p>Melewar 2 Estate</p> <p>On 28/07/2020, 'Pejabat Kesihatan Kwasan Kinabatang' conduct drinking water sampling in the estate. 4 water sampling from the water pond, treatment plant, workers housing and staff housing were sampled. The results found that Chlorine reading at water treatment plan is higher that standard as per letter dated 23/10/2020. The estate has conducted resampling on 20/11/2020. Latest drinking water analysis 08/03/2021 and yet to receive the results.</p>	
--	--	---	--

RSPO P&C Public Summary Report
Revision 11 (Sept 2020)

		<p>Asia Oil Palm 2 Estate and Asia Palm Oil Mill</p> <p>Latest drinking water analysis was conducted in 01/09/2020 as per certificate of analysis no. W200901-03-0 dated 17/09/2020. The results of water analysis after treatment was found conform to National Standard for Drinking Water Quality.</p>	
<p>7.8.2</p>	<p>(C) 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>The Asia Production Unit has established Water Management Plan. The plan focus on the method to conserve and minimise pollution of water through implementation of various methods such as best practice of maintaining riparian zone, and regular education to employees on conserving water and water pollution preventions.</p> <p>The estate visited has established riparian buffer zone.</p> <p>Sighted during site visit at riparian buffer zone at field C04 in Hwa Li 3 Estate, P95C3 in Melewar 2 Estate and PM92D9 in Asia Oil Palm 2 Estate, the area was demarcated with yellow pole and yellow ring at the palm trunk. No evidence of chemical application is allowed at the area as sighted during site visit. The vegetation along the buffer zone is well maintained.</p> <p>Signboard on prohibition of chemical application, cutting trees, hunting, fishing and burning was erected at the buffer zone.</p> <p>For estate without replanting, river water sampling was conducted once a year. Reviewed the river water sampling report no R20/8/216 dated 25/08/2020 at Hwa Li 3 Estate. The result was conform to NWQI Class III.</p> <p>For estate with replanting, Environmental Compliance report was submitted twice a year to NREB. Reviewed the report for Melewar 2 Estate and Asia Oil Palm 2 Estate FY 2020. The river water analysis was conform to NWQI Class III except for Dissolve Oxygen. The high concentration of oxygen is considered acceptable as unpolluted</p>	<p>Complied</p>

RSPO P&C Public Summary Report
Revision 11 (Sept 2020)

		<p>watercourses are usually saturated with oxygen as stated in the Proposal for Mitigation Measures.</p>																			
<p>7.8.3</p>	<p>Mill effluent is treated to be in compliance with national regulations. Discharge quality of mill effluent, especially Biochemical Oxygen Demand (BOD), is regularly monitored. - Minor compliance -</p>	<p>The mill applies the biological system equipped with ponds in series for its treatment of effluent. The quality of discharged effluent was analysed every month and the parameters are T, pH, BOD, COD, TS, SS, O&G, AN and TN. Based on the independent lab report, the mill has maintained below 20 ppm of BOD for the last 12 months.</p> <p>Mill effluent is treated through biological anaerobic treatment. Regular monitoring was conducted as per requirement. Monthly and quarterly report was submitted to DOE accordingly. reviewed the Quarterly Return Form to DOE FY 2020 as follows:</p> <p>3rd quarter</p> <table border="1" data-bbox="1137 794 1691 1292"> <thead> <tr> <th>Month</th> <th>Parameter</th> <th>Results</th> </tr> </thead> <tbody> <tr> <td rowspan="2">Jul 10/07/2020</td> <td>BOD</td> <td>20.10</td> </tr> <tr> <td>pH</td> <td>8.80</td> </tr> <tr> <td rowspan="2">Aug 14/08/2020</td> <td>BOD</td> <td>20.00</td> </tr> <tr> <td>pH</td> <td>8.60</td> </tr> <tr> <td rowspan="2">Sep 14/09/2020</td> <td>BOD</td> <td>12.70</td> </tr> <tr> <td>pH</td> <td>8.80</td> </tr> </tbody> </table> <p>2nd quarter</p>	Month	Parameter	Results	Jul 10/07/2020	BOD	20.10	pH	8.80	Aug 14/08/2020	BOD	20.00	pH	8.60	Sep 14/09/2020	BOD	12.70	pH	8.80	<p>Complied</p>
Month	Parameter	Results																			
Jul 10/07/2020	BOD	20.10																			
	pH	8.80																			
Aug 14/08/2020	BOD	20.00																			
	pH	8.60																			
Sep 14/09/2020	BOD	12.70																			
	pH	8.80																			

**RSPO P&C Public Summary Report
Revision 11 (Sept 2020)**

Month	Parameter	Results
Apr 30/04/2020	BOD	0.00
	pH	0.00
May 19/05/2020	BOD	17.20
	pH	9.00
19/06/2020	BOD	11.90
	pH	9.00
1st quarter		
Month	Parameter	Results
Jan 20/01/2020	BOD	18.10
	pH	8.30
Feb 08/02/2020	BOD	17.70
	pH	8.50
	BOD	17.30

		Mar 16/03/2020	pH	8.50												
7.8.4	Mill water use per tonne of FFB is monitored and recorded. - Minor compliance -	Mill has maintained monitoring of water usage for processing FFB which recorded every month. Water for processing is abstracted from water pond. Reviewed the water monitoring records as follows:		Complied												
		<table border="1"> <thead> <tr> <th>Financial Year</th> <th>Water consumption/FFB</th> </tr> </thead> <tbody> <tr> <td>FY 2019/20</td> <td>1.39</td> </tr> <tr> <td>FY 2020/21 as at Feb 2021</td> <td>1.51</td> </tr> </tbody> </table>		Financial Year	Water consumption/FFB	FY 2019/20	1.39	FY 2020/21 as at Feb 2021	1.51							
Financial Year	Water consumption/FFB															
FY 2019/20	1.39															
FY 2020/21 as at Feb 2021	1.51															
Criterion 7.9: Efficiency of fossil fuel use and the use of renewable energy is optimised																
7.9.1	A plan for efficiency of the use of fossil fuels and to optimise renewable energy is implemented, monitored and documented. - Minor compliance -	<p>Plan to improve efficiency of fossil fuel was documented in Energy Management Plan. Among the plan established as follows:</p> <ol style="list-style-type: none"> 1. Optimising the usage of fuel through awareness briefing 2. Service engine to optimal performance thus reduce fuel consumption 3. Monitoring of fuel consumption 4. Provide schedule of road maintenance <p>Reviewed the implementation of the management plan as follows: The estate monitor the fuel usage on monthly basis. Reviewed the records of diesel and petrol consumption per ton FFB as follows:</p>		Complied												
		<table border="1"> <thead> <tr> <th>Period</th> <th>Asia POM</th> <th>Hwa Li 3</th> <th>Melewar 2</th> <th>Asia Oil Palm2</th> </tr> </thead> <tbody> <tr> <td></td> <td></td> <td></td> <td></td> <td></td> </tr> </tbody> </table>		Period	Asia POM	Hwa Li 3	Melewar 2	Asia Oil Palm2								
Period	Asia POM	Hwa Li 3	Melewar 2	Asia Oil Palm2												

RSPO P&C Public Summary Report
Revision 11 (Sept 2020)

		Jul 2019 – Jun 2020	2.14	13.03	9.68	8.47	
		Jul 2020 – Nov - 2020	2.13	15.39	6.91	4.05	
		Jul 2020 – Feb - 2021	2.37	12.47	7.57	4.53	
<p>Criterion 7.10: Plans to reduce pollution and emissions, including greenhouse gases (GHG), are developed, implemented and monitored and new developments are designed to minimise GHG emissions.</p>							
7.10.1	<p>(C) 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>Plan to reduce or minimize the GHG was spelt out in Energy Management and Pollution Prevention Plan under emission.</p> <p>Monitoring of diesel fuel consumption was done by all the visited operating units. The data was then used for GHG calculating by using the RSPO GHG Calculator.</p> <p>Asia Production Unit had used RSPO Palm GHG v4.0 calculator as a tool. Records were maintained individually in the respective office. Reviewed the data submitted to PalmGHG found consistent with data in the individual operating unit.</p>					Complied
7.10.2	<p>(C) 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>	<p>An assessment of identified polluting activities is being conducted and monitored, inclusive of gaseous emissions, particulate / soot emissions and effluent. The Identification of Potential Source of GHG Emission and GHG Reduction Plan is used to identify the waste products and sources of pollution is in place and is being reviewed accordingly. Among the Potential Source of GHG Emission identified such as Palm Oil Mill Effluent (POME), Diesel Usage, Electricity Usage, Chemical Usage and Generator Set.</p> <p>Monitoring of diesel fuel consumption was done by all the visited operating units. The data was then used for GHG calculating by using the RSPO GHG Calculator.</p>					Complied

RSPO P&C Public Summary Report
Revision 11 (Sept 2020)

7.10.3	(C) Other significant pollutants are identified and plans to reduce or minimise them implemented and monitored. - Critical (Major) compliance -	RSPO has made a compulsory for submitting GHG beginning 1/1/2017. Asia Production Unit had used RSPO Palm GHG v4.0 calculator as a tool. Records were maintained individually in the respective office.	Complied
Criterion 7.11: Fire is not used for preparing land and is prevented in the managed area			
7.11.1	(C) Land for new planting or replanting is not prepared by burning. - Critical (Major) compliance -	JC Chang Group has established Guideline on Group’s Long Term Replanting Planning. Refer document no. A/016-07/2020. In the guideline stated the company prohibited the form of replanting by using fire as part of field preparation. All old palms standing will be felled, chipped, stalked and decomposed naturally. The group is committed in implementation of “Zero Burning Policy” in the event of replanting.	Complied
7.11.2	The unit of certification establishes fire prevention and control measures for the areas directly managed by the unit of certification. - Minor compliance -	JC Chang Group has established Guidelines on Fire Prevention, Control and Stakeholders Engagement. Refer document no. M/017-03/2020 dated 17/10/2020. The guidelines includes of selection, placement, use, maintenance and inspection of fire extinguisher; fire drill training and stakeholder engagement to reduce the fire risks to minimal level.	Complied
7.11.3	The unit of certification engages with adjacent stakeholders on fire prevention and control measures. - Minor compliance -	Engagement with adjacent stakeholders on the fire prevention was communicated through stakeholder meeting/phonecall and correspondent email. Reviewed the correspondent email submitted to the stakeholders as per email dated 19/07/2020 (Hwa Li 3 Estate), 24/09/2020 (Melewar 2 Estate), 05/10/2020 (Asia Oil Palm2 Estate) and respond from the stakeholders through due diligence form attached together with the email.	Complied
Criterion 7.12: 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.			

RSPO P&C Public Summary Report
Revision 11 (Sept 2020)

7.12.1	<p>(C) 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>	<p>No new land clearing conducted in Asia Production Unit since 15/11/2018</p>	<p>Complied</p>
7.12.2	<p>(C) 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>PROCEDURAL NOTE: Requirement is further clarified under the Interpretation of Indicator 7.12.2 and Annex 5 (approved by BOG on 12 June 2019).</p> <p>- Critical (Major) compliance -</p>	<p>No new land clearing conducted in Asia Production Unit since 15/11/2018.</p> <p>Asia Production Unit conducted the HCV assessment report conducted on 03 -10/04/2011 and 07 – 08/06/2011 as per Social & Environmental Assessment including a preliminary Management Review, JC Chang group’s Asia and Melewar Production Units, Sabah, Malaysia dated 13/07/2011.</p> <p>No HCV identified within Asia Production Unit as per assessment conducted.</p>	<p>Complied</p>
7.12.3	<p><i>Indicator is not applicable in Malaysia context</i></p>	<p>Not applicable.</p>	<p>Not Applicable</p>
7.12.4	<p>(C) 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</p>	<p>No new land clearing conducted in Asia Production Unit since 15/11/2018.</p> <p>Asia Production Unit conducted the HCV assessment report conducted on 03 -10/04/2011 and 07 – 08/06/2011 as per Social & Environmental Assessment including a preliminary Management</p>	<p>Complied</p>

RSPO P&C Public Summary Report
Revision 11 (Sept 2020)

	consultation with relevant stakeholders and includes the directly managed area and any relevant wider landscape level considerations (where these are identified). - Critical (Major) compliance -	Review, JC Chang group's Asia and Melewar Production Units, Sabah, Malaysia dated 13/07/2011.	
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 -	Not applicable since there is no land clearing after 15 November 2018.	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 -	No new land clearing conducted in Asia Production Unit since 15/11/2018. Asia Production Unit conducted the HCV assessment report conducted on 03 -10/04/2011 and 07 – 08/06/2011 as per Social & Environmental Assessment including a preliminary Management Review, JC Chang group's Asia and Melewar Production Units, Sabah, Malaysia dated 13/07/2011. No rare, threatened or endangered (RTE) species are protected identified within Asia Production Unit as per assessment conducted. Even though no HCV or RTE species identified during the HCV assessment conducted, the APU has established HCV management plan. Among the plan as follows: 1. Briefing to workers to provide information for any sighted animal 2. Briefing awareness to educate on protection of animals 3. To communicate with all peripheral stakeholders to increase their impact on illegal hunting and RTE protection	Complied

RSPO P&C Public Summary Report
Revision 11 (Sept 2020)

		<ul style="list-style-type: none"> 4. To apply suitable IPM techniques 5. Erected signboard on prohibition of hunting and fishing <p>Reviewed the implementation of the management plan as follows:</p> <ul style="list-style-type: none"> 1. The estate visited conducted animal sighting on weekly basis. Reviewed the animal sighting records dated 08/08/2020, 15/08/2020, 10/09/2020, 04/10/2020, 11/10/2020 and 02/11/2020. Among the animal sighted in the estate such as Oriental Pied Hornbill, Cattle Egret, Kingfisher and Spotted Dove 2. Estate continuously provided awareness on HCV and RTE to the workers. Latest awareness and refresher training was conducted as per criteria 3.7.2 3. Engagement with adjacent stakeholders on the environmental issue such as HCV, RTE, and river buffer zone was communicate through stakeholder meeting and correspondent email. Reviewed the correspondent email submitted to the stakeholders as per email dated 08/10/2020 and respond from the stakeholders Genting Bahagia Estate dated 25/11/2020 and G-Planter dated 14/10/2020. 4. All estates visited continuously provided awareness on the stakeholder and workers on the HCV and RTE. Sighted the signboard on prohibition of illegal hunting, collection of RTE species, fishing, chemical application at buffer zone area and cutting of trees erected at strategic places in the estate such as estate entrances, riparian buffer zone and conservation area 	
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.	Not applicable since there is no land clearing after 15 November 2018.	Not Applicable

	- Minor compliance -		
7.12.8	<p>(C) 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 since without prior HCV assessment since November 2005, or without prior HCV-HCSA assessment since 15 November 2018 within Asia Production unit. Thus, this indicator is not available.	Not Applicable

RSPO P&C Public Summary Report
Revision 11 (Sept 2020)

Appendix B: Approved Time Bound Plan

No.	Production Units	Location	Status	TBP	Remark
1	Asia Palm Oil Mill		Certified	Certified on 31/01/2013 Recertification completed in November 2017.	Nil
	i) Melewar Estate 2	Lahad Datu, Sabah			
	ii) Hwa Li Estate 3	Lahad Datu, Sabah			
	iii) Asia Oil Palm Estate 2	Lahad Datu, Sabah			
2	Melewar Palm Oil Mill		Certified	Certified on 7/2/2014	Nil
	i) Gerola Estate	Lahad Datu, Sabah			
	ii) Pahang Oil Palm Estate 2	Lahad Datu, Sabah			
	iii) Pahang Oil Palm Estate 3	Lahad Datu, Sabah			
	iv) Melewar Estate 1	Lahad Datu, Sabah			
	v) Tye Yang Estate	Lahad Datu, Sabah			Nil
3	Carotino Palm Oil Mill		Certified	Certified on 27/11/2010. Recertification completed in 2015	Nil
	i) Maran Estate	Kuantan, Pahang			
	ii) Asia Oil Palm Estate	Kuantan, Pahang			
	iii) Hwa Li Estate 1	Segamat, Johor			
	iv) Hwa Li Estate 2	Segamat, Johor			
	v) Pahang Oil Palm Estate 1	Kuantan, Pahang			
4	Takon Palm Oil Mill		Pending main assessment	2018 (Exact period will depend on RSPO approval on the HCV disclosure)	The last remaining production unit is pending for RSPO Main Assessment which is supposed to be completed in 2016. However, the assessment was deferred due to the withdrawal of SGS as certification body. Currently, the delay of Main Assessment is due to pending of
	i) Pelita Estate	Lahad Datu, Sabah			
	ii) Muis Melewar Plantation 1	Tawau, Sabah			
	iii) Muis Melewar Plantation 2	Lahad Datu, Sabah			

RSPO P&C Public Summary Report
Revision 11 (Sept 2020)

	iv) Takon Estate	Lahad Datu, Sabah			<p>approval on HCV Disclosure by RSPO. Updates on JC CHANG GROUP HCV compensation concept note</p> <p>i) On 22/9/2016, J C Chang Group submitted his "Reporting template for disclosure of areas cleared without prior HCV assessment since November 2005.</p> <p>ii) No social liability for the loss of HCVs 4, 5 and 6</p> <p>iii) Total 9.79ha of raw non-compliant land clearing are reported based on LUCA submitted.</p> <p>2). Disclosure template mentioned approved by RSPO and J C Chang Group follow up with RaCp Concept note and conservation plan</p> <p>3). Concept note approved by RSPO on area to area compensation (Muis Melewar Plantation 1 liability compensated under Asia Oil Palm Estate 1). However the concept of additionality and knowledge-based aspects are not fulfilled with HCV status and conservation plan is very basic</p> <p>4). Conservation plan been improved and submitted but RSPO requested more or bigger plan for the submission on compensation plan under Annex 8</p> <p>5). On 23rd October 2017, JC Chang have engaged Wildasia to review of documents (HCV report, RSPO comments, RSPO compensation plan</p> <p>6). On 1st June 2018 a quotation received on "Proposed Subdivision plan for CL 115398920 AT Ulu Tungku District of Lahad Datu"</p> <p>7). On 10th July 2018, The company established a committee for land dispute resolution which decided under chair person of Mr. Kiu HS (The</p>
--	------------------	----------------------	--	--	---

**RSPO P&C Public Summary Report
Revision 11 (Sept 2020)**

					<p>Manager of Takon Estate). After committee selection, The Chairperson form different group of personal to perform stakeholder consultation where to meet with the 42 claimants on Takon land dispute to explained detail on Company decision and request of committee froming from claimants for further land dispute resolution. The committee from Ideal Enterprises Sdn. Bhd. managed consults 26 claimants on first day of consultation. The consultation that were conducted were solely on informing all the claimants to form a committee among all the 42 claimants. After the forming of the committee, they should appoint their lawyer to represent them and proves of appointment should be given to The Company. The Claimants committee should identify all claimants for all respective claimed land and proves of claims should be agreed by all claimants. If there have been changes in ownership of their claimed land, proves of change in ownership of the claimed land must be confirmed, agreed and verified by all claimant's committee members.</p> <p>8). On 19th October 2018 Newsletter Vol. 2 requested respond from claimants before 15/10/18 but no responf been received till 19/10/18. Newsletter Vol. 3 been circular to request respond by 15/1/19</p> <p>9). On 14th November 2018, JC Chang submitted Compensation Plan to RSPO. Pending approval.</p> <p>10) The Group has achieved 100% RSPO certification for all Operating Units under the management of JC Chang Group at ended year of 2019. The last Production Unit namely Takon</p>
--	--	--	--	--	---

**RSPO P&C Public Summary Report
Revision 11 (Sept 2020)**

					<p>Production Unit have undergone RSPO main assessment on 28/10 to 1/11/19 with a positive result and the CB have recommended Takon Production Unit for RSPO certification. However, the certificate is yet to be issued due to pending approval from RSPO on the RaCP concept note. RSPO agreed to hold the result of assessment for Takon Production Unit till Nov. 2020 but unfortunately, the Group can't achieved the deadline as RaCP concept note was yet to approved by RSPO. The Group will reconduct RSPO main assessment for Takon Production Unit without Takon Palm Oil Mill as soon as possible after obtained approval on RaCP concept note from RSPO. Takon Production Unit was restructure on Feb. 2021 as Takon Palm Oil Mill was sold to non-RSPO member on 22/01/21.</p>
--	--	--	--	--	--

Appendix C: GHG Reporting Executive Summary

The GHG emissions that were produced in 2020 for Asia Palm Oil Mill and supply base was calculated using the PalmGHG Calculator version 4. The assessment team had verified the data input in the PalmGHG Calculator against operations records. PalmGHG Calculation Options selected 'Full version' and 'Exclude LUC Emission' calculation option is not applied. The records verified includes:

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

The summary of the Net GHG emitted in 2020 for Asia Palm Oil Mill and supply base are as following:

Emission per product	tCO ₂ e/tProduct
CPO	0.82
PKO	0.82

Extraction	%
OER	19.59
KER	5.00

Production	t/yr
FFB Process	182,333.09
CPO Produced	35,721.365
PKO Produced	9,116.298

Land Use	Ha
OP Planted Area	13,107.80
OP Planted on peat	-
Conservation (forested)	-
Conservation (non-forested)	266.76
Total	13,374.56

Summary of Field Emission and Sink

	Own Crop*		Group		3 rd Party		Total	
	tCO ₂ e	tCO ₂ e / FFB	tCO ₂ e	tCO ₂ e / FFB	tCO ₂ e	tCO ₂ e / FFB	tCO ₂ e	tCO ₂ e / FFB
Emission								
Land Conversion	79,518.65	0.48	1,857.89	0.29	-	-	81,376.54	12.70
CO ₂ Emission from fertilizer	7,961.26	0.05	287.53	0.05	-	-	8,248.79	1.29
NO ₂ Emission	8,171.71	0.05	202.04	0.04	-	-	8,373.75	1.31
Fuel Consumption	2,443.82	0.01	150.35	0.03	-	-	2,594.17	0.40
Peat Oxidation	-	-	-	-	-	-	-	-
Sink								
Crop Sequestration	-67,790.69	-0.41	-1,916.70	-0.39	-	-	-69,707.39	-10.88
Conservation Sequestration	-1,745.00	-0.01	-4.32	-	-	-	-1,749.32	-0.27

RSPO P&C Public Summary Report
Revision 11 (Sept 2020)

Total	28,559.75	0.17	576.79	0.01	-	-	29,136.54	4.55
--------------	-----------	------	--------	------	---	---	-----------	------

*Note: Includes both estates and smallholders

Summary of Mill Emission and Credit

	tCO ₂ e	tCO ₂ e/tFFB
Emission		
POME	3,907.75	0.02
Fuel Consumption	1,279.54	0.01
Grid Electricity Utilization	-	-
Credit		
Export of Grid Electricity	- 519.02	-
Sales of PKS	-	-
Sales of EFB	-	-
Total	- 4,668.27	0.03

Summary of Kernel Crusher Emission and Credit (if applicable)

Emissions	tCO ₂ e
PK from own mill	2,436.30
PK from other source	-
Fuel Consumptions	-
Total Crusher emissions	-

*This mill has no kernel crusher operation.

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

POME Diverted to Anaerobic Digestion:	
Divert to anaerobic pond (%)	-
Divert to methane captured (flaring) (%)	-
Divert to methane captured (energy generation) (%)	100.00

Appendix D: Supply Chain Declaration

A. Monthly Records of Certified and Uncertified FFB Received since the last audit				
No.	Month - Year	Volume of FFB from certified supply bases (mt)	Volume of FFB from uncertified supply bases (mt)	Total FFB/Month (mt)
1	Nov 2019	11,711.41	2,054.47	13,765.88
2	Dec 2019	9,278.75	1,780.90	11,059.65
3	Jan 2020	7,400.47	1,676.08	9,076.54
4	Feb 2020	12,417.68	1,291.87	13,709.55
5	Mar 2020	8,219.97	1,330.08	9,550.05
6	Apr 2020	14,566.29	3,071.53	17,637.82
7	May 2020	18,074.01	1,880.91	19,954.92
8	June 2020	18,231.47	1,956.61	20,188.08
9	July 2020	14,104.30	2,045.58	16,149.88
10	Aug 2020	15,531.43	2,217.97	17,749.40
11	Sept 2020	16,883.59	2,203.25	19,086.84
12	Oct 2020	16,820.64	2,020.25	18,840.89
13	Nov 2020	17,066.18	1,810.18	18,876.36
14	Dec 2020	13,521.24	1,569.14	15,090.38
15	Jan 2021	10,784.16	1,476.78	12,260.94
16	Feb 2021	8,317.93	1,008.77	9,326.70
Total		212,929.51	29,394.37	242,323.87

B. Monthly Records of Certified CPO & PK since the last audit			
No.	Month - Year	Certified CPO (mt)	Certified PK (mt)
1	Nov 2019	2,274.97	677.41
2	Dec 2019	1,837.45	508.71
3	Jan 2020	1,380.69	412.20
4	Feb 2020	2,462.71	644.50
5	Mar 2020	1,679.27	458.40
6	Apr 2020	2,938.65	769.57
7	May 2020	3,475.72	944.32
8	Jun 2020	3,460.88	928.92
9	July 2020	2,625.55	673.71
10	Aug 2020	2,952.94	784.52
11	Sept 2020	3,230.70	966.04

RSPO P&C Public Summary Report
Revision 11 (Sept 2020)

12	Oct 2020	3,202.73	942.12
13	Nov 2020	3,263.02	968.87
14	Dec 2020	2,635.47	727.59
15	Jan 2021	1,980.34	589.56
16	Feb 2021	1,587.85	459.18
Total		40,988.93	11,455.61

C. Records of Certified CPO & PK Sold under PalmTrace since the last audit (if any)				
No.	Buyers Name	Palmtrace Trading License Number	Certified CPO Sold (mt)	Certified PK Sold (mt)
1	Lahad Datu Edible Oils Sdn.Bhd	CB66875	1,329.82	451.44
2	Lahad Datu Edible Oils Sdn.Bhd	CB66875	1,901.35	383.50
3	Lahad Datu Edible Oils Sdn.Bhd	CB66875	1,299.75	-
4	Lahad Datu Edible Oils Sdn.Bhd	CB66875	-	582.12
5	Lahad Datu Edible Oils Sdn.Bhd	CB66875	-	587.91
6	Lahad Datu Edible Oils Sdn.Bhd	CB66875	94.98	24.97
7	Lahad Datu Edible Oils Sdn.Bhd	CB66875	2,507.63	329.22
8	Lahad Datu Edible Oils Sdn.Bhd	CB66875	3,497.19	1,083.63
9	Lahad Datu Edible Oils Sdn.Bhd	CB66875	1,978.34	1,117.10
10	Lahad Datu Edible Oils Sdn.Bhd	CB66875	1,068.42	777.00
11	Lahad Datu Edible Oils Sdn.Bhd	CB66875	2,802.72	746.37
12	Lahad Datu Edible Oils Sdn.Bhd	CB66875	3,380.54	1,114.91
13	Lahad Datu Edible Oils Sdn.Bhd	CB66875	3,129.02	995.61
14	Lahad Datu Edible Oils Sdn.Bhd	CB66875	2,553.57	263.06
15	Lahad Datu Edible Oils Sdn.Bhd	CB66875	1,745.60	-
16	Lahad Datu Edible Oils Sdn.Bhd	CB66875	1,209.26	329.48
Total			28,498.18	8,786.32

D. Records of CPO & PK Sold under other schemes since the last audit (if any)				
No.	Buyers Name	Scheme Name	CPO Sold (mt)	PK Sold (mt)
1	Lahad Datu Edible Oils Sdn Bhd	ISCC	358.41	-
2	Lahad Datu Edible Oils Sdn Bhd	ISCC	877.01	-
3	Lahad Datu Edible Oils Sdn Bhd	ISCC	742.35	-

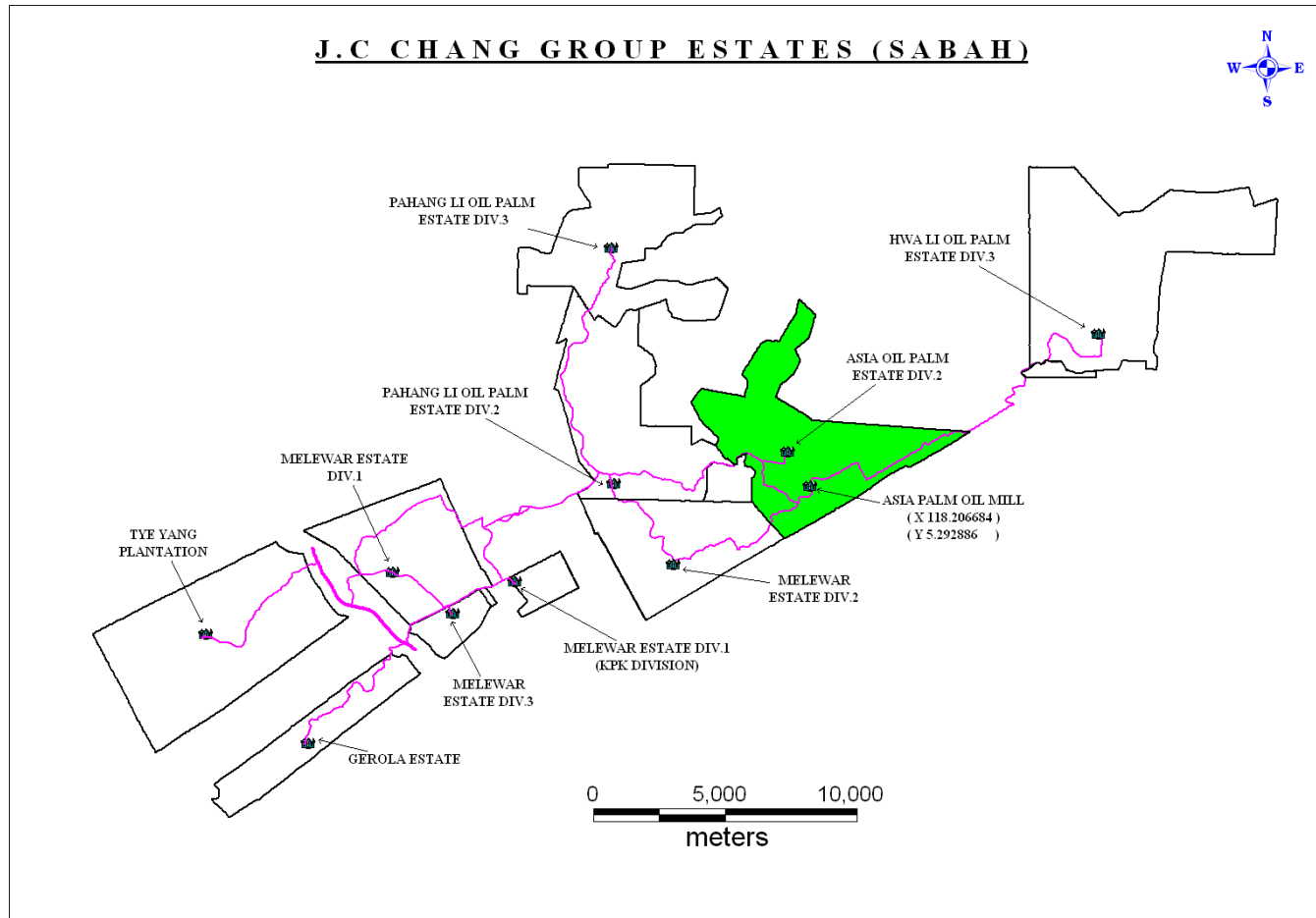
RSPO P&C Public Summary Report
Revision 11 (Sept 2020)

4	Lahad Datu Edible Oils Sdn Bhd	ISCC	32.38	-
5	Lahad Datu Edible Oils Sdn Bhd	ISCC	615.16	-
6	Lahad Datu Edible Oils Sdn Bhd	ISCC	635.00	-
Total			3,260.31	-

E. Records of CPO & PK Sold as conventional since the last audit (if any)			
No.	Buyers Name	CPO Sold (mt)	PK Sold (mt)
1	Lahad Datu Edible Oils Sdn Bhd	106.16	13.60
2	Lahad Datu Edible Oils Sdn Bhd	383.30	49.12
3	Lahad Datu Edible Oils Sdn Bhd	411.19	52.69
4	Lahad Datu Edible Oils Sdn Bhd	50.02	59.96
5	Lahad Datu Edible Oils Sdn Bhd	3.47	-
6	Lahad Datu Edible Oils Sdn Bhd	-	49.95
7	Lahad Datu Edible Oils Sdn Bhd	12.76	129.62
8	Lahad Datu Edible Oils Sdn Bhd	721.61	200.14
9	Lahad Datu Edible Oils Sdn Bhd	537.36	122.39
10	Lahad Datu Edible Oils Sdn Bhd	-	-
11	Lahad Datu Edible Oils Sdn Bhd	51.49	8.39
12	Lahad Datu Edible Oils Sdn Bhd	122.24	-
13	Lahad Datu Edible Oils Sdn Bhd	88.77	137.74
14	Lahad Datu Edible Oils Sdn Bhd	-	497.32
15	Lahad Datu Edible Oils Sdn Bhd	-	533.50
16	Lahad Datu Edible Oils Sdn Bhd	301.29	106.32
Total		2,789.65	1,960.74

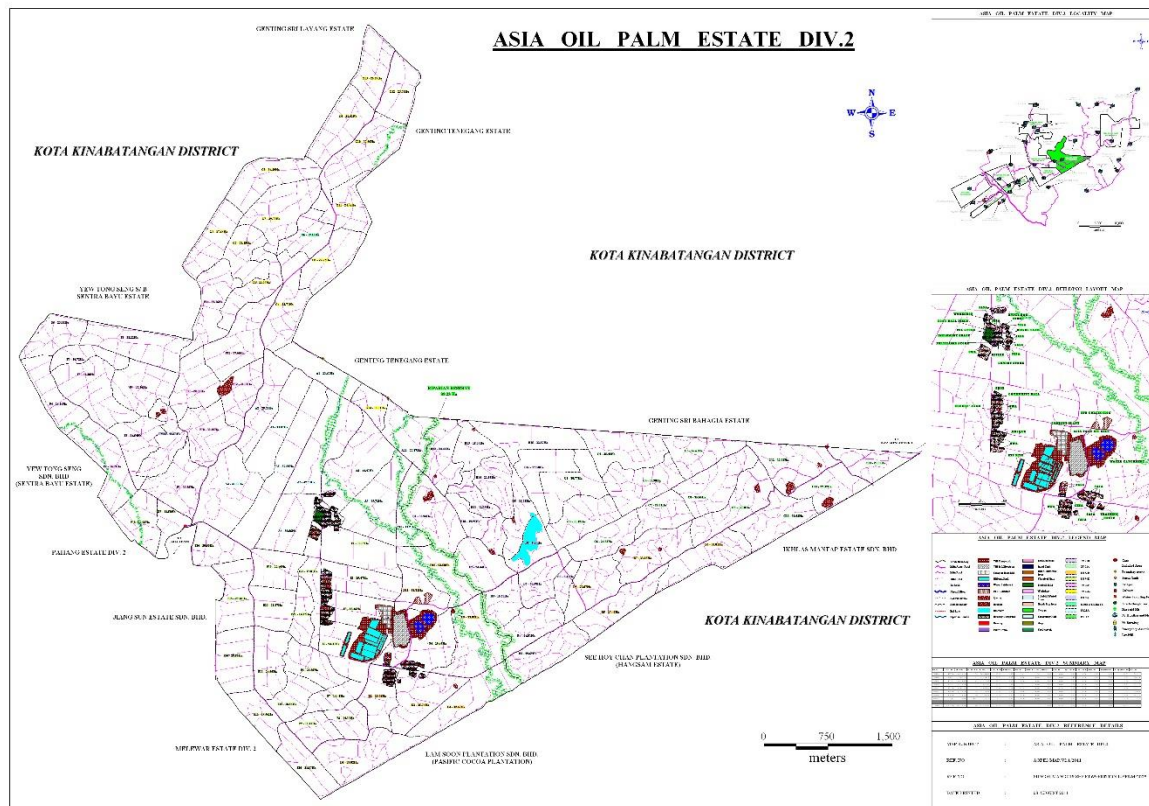
F. Records of Certified CPO Sold under RSPO Credits since the last audit (if any)			
No.	Buyers Name	PalmTrace Trading License Number	RSPO Credits of Certified CPO Sold (mt)
Nil	n/a	n/a	n/a

Appendix E: Location Map of Certification Unit and Supply bases

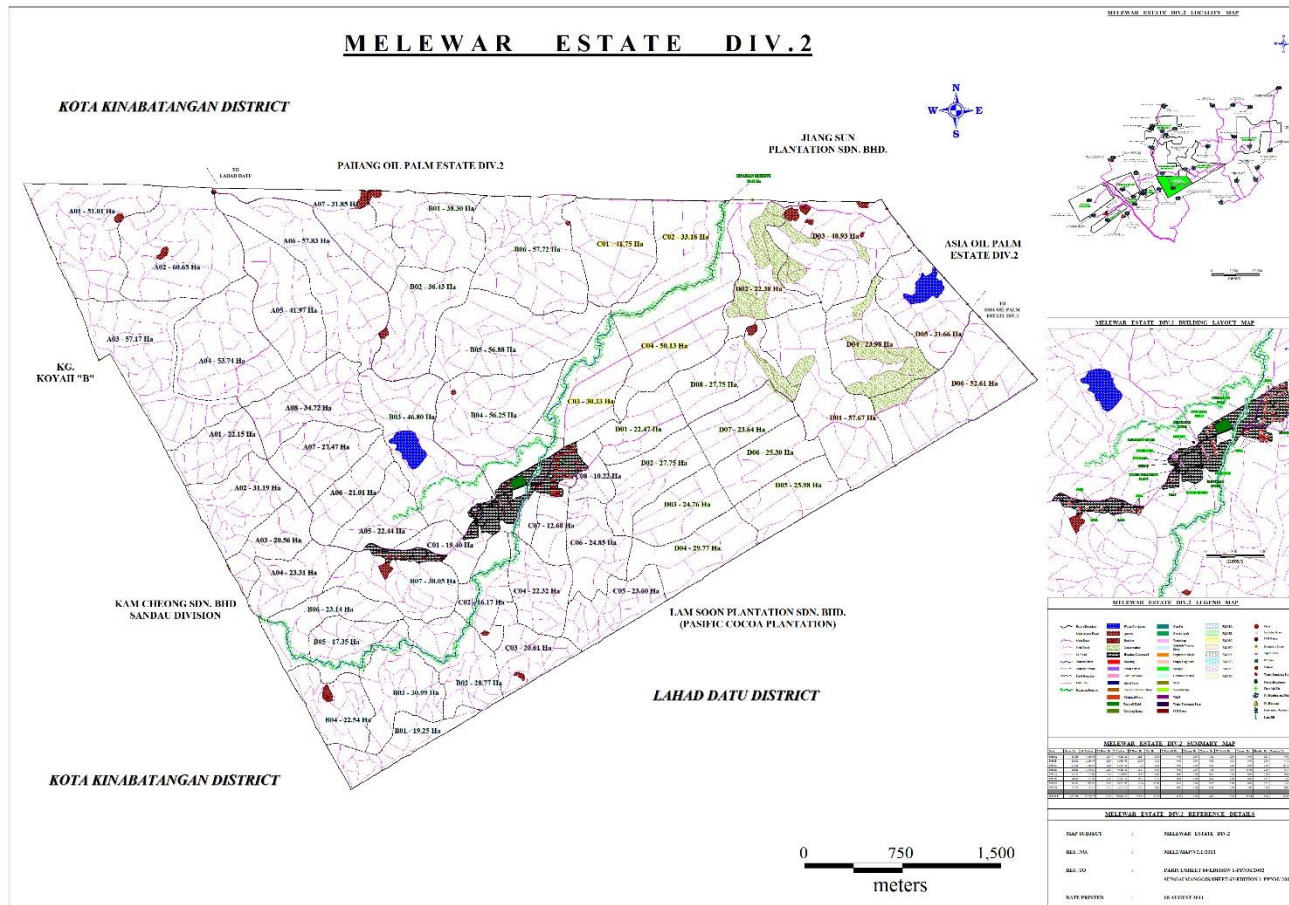


Appendix F: Estate Field Map

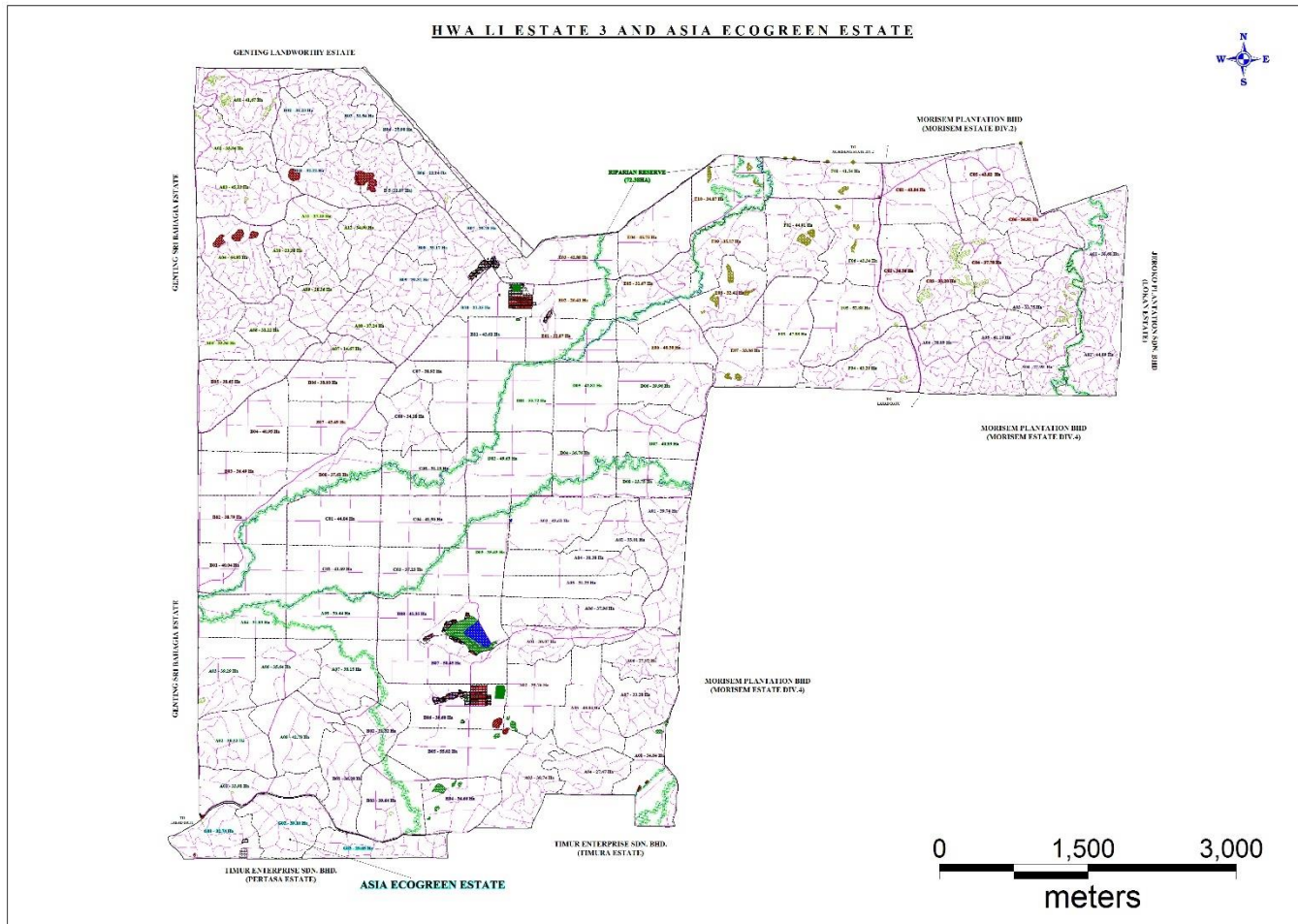
Asia Oil Palm Estate Div. 2:



Melewar Estate Div. 2



Hwa Li Estate Div. 3



Appendix G: List of Smallholder Sampled

Not applicable

Appendix H: List of Abbreviations

a.i	Active Ingredient
APU	Asia Production Unit
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
Div.	Division
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