

**RSPO PRINCIPLE AND CRITERIA  
PUBLIC SUMMARY REPORT**

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

<b>Client Company name (Parent Company):</b> <b>Boustead Plantations Berhad</b>
Client company Address: 19th Floor Menara Boustead, 69, Jalan Raja Chulan, 50200 Kuala Lumpur, Malaysia
Certification Unit: <b>Telok Sengat Business Unit- Telok Sengat Palm Oil Mill</b>
Location of Certification Unit: Lot 1292, Mukim Johor Lama, Telok Sengat, Kota Tinggi, 81900 Johor Darul Takzim, Malaysia
Date of Final Report: 16/04/2022

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## Section 1: Scope of the Assessment

1. Company Details			
<b>Parent Company</b>	Boustead Plantations Berhad		
<b>RSPO Membership Number</b>	1-0012-04-000-00	<b>Membership Approval Date</b>	11/10/2004
<b>Address</b>	19th Floor Menara Boustead, 69, Jalan Raja Chulan, 50200 Kuala Lumpur, Malaysia		
<b>Palm Oil Mill / Group Manager / Estate (Certification Unit)</b>	Telok Sengat Business Unit- Telok Sengat Palm Oil Mill		
<b>Location / Address</b>	Lot 1292, Mukim Johor Lama, Telok Sengat, Kota Tinggi, 81900 Johor Darul Takzim, Malaysia		
<b>Website</b>	<a href="http://www.bousteadplantations.com.my">www.bousteadplantations.com.my</a>		
<b>Management Representative</b>	Mr. Anuar Semail	<b>E-mail</b>	<a href="mailto:anuar@bplant.com.my">anuar@bplant.com.my</a>
<b>Telephone</b>	+603-21452121	<b>Facsimile</b>	+603-21447917

2. Certification Information			
<b>Certificate Number</b>	RSPO 697033	<b>Certificate Start Date</b>	11/09/2020
<b>Date of First Certification</b>	11/09/2020	<b>Certificate Expiry Date</b>	10/09/2025
<b>Scope of Certification</b>	Production of Palm Oil and Palm Kernel		
<b>Visit Objectives</b>	To conduct a surveillance assessment and look for positive evidence to ensure that elements of the scope of certification and the requirements of the management standard are effectively addressed by the organisation's management system and that the system is demonstrating the ability to support the achievement of statutory, regulatory and contractual requirements and the organisation's specified objectives, as applicable with regard to the scope of the management standard, and to confirm the on-going achievement and applicability of the forward strategic plan and where applicable to identify potential areas for improvement of the management system. This is 70% onsite assessment as continuation from 30% of remote assessment.		
<b>Assessment Cycle</b>	<input type="checkbox"/> Pre Assessment (Choose an item.) <input type="checkbox"/> Initial Assessment <input checked="" type="checkbox"/> Annual Surveillance Assessment (ASA 1) <input type="checkbox"/> Recertification Assessment (Choose an item.) <input type="checkbox"/> Scope Extension		
<b>Applicable Standards / Normative Reference</b>	RSPO Certification System for P&C and RSPO ISH 2020 <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		
<b>Supply Chain Module</b>	<input type="checkbox"/> Identity Preserved; <input checked="" type="checkbox"/> Mass Balance	<b>Mill Capacity</b>	40mt/hour
<b>ISH certification Phase</b>	<input type="checkbox"/> Eligibility <input type="checkbox"/> Milestone A <input type="checkbox"/> Milestone B <input checked="" type="checkbox"/> Not Applicable		

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<b>3. Other Certifications</b>			
<b>Certificate Number</b>	<b>Standard(s)</b>	<b>Certificate Issued by</b>	<b>Expiry Date</b>
QMS 00292	ISO 9001:2015 Quality Management System	SIRIM QAS INTERNATIONAL	13/7/2022
Mill : MSPO 697045	MSPO-4:2013 Part 4: General Principles for Palm Oil Mills	BSI Services Malaysia Sdn Bhd	14/04/2024
Estate : MSPO 697047	MSPO-3:2013 MSPO Part 3 :General Principles for Oil Palm Plantations and Organized Smallholders	BSI Services Malaysia Sdn Bhd	14/04/2024

<b>4. Location(s) of Mill &amp; Supply Bases</b>			
<b>Name (Mill / Supply Base / Group Manager / Smallholders)</b>	<b>Location</b>	<b>GPS Coordinates</b>	
		<b>Latitude</b>	<b>Longitude</b>
Telok Sengat POM	Telok Sengat, 81900 Kota Tinggi, Johor	1°34'04.50" N	104°02'37.50" E
Telok Sengat Estate	Telok Sengat, 81900 Kota Tinggi, Johor	1°34'03.60" N	104°02'13.80" E
Chamek Estate	Jalan Paloh, 86009 Kluang, Johor	2°08'58.08" N	103°14'59.95" E
Kulai Young Estate	Jalan Sedenak, 81000 Kulai, Johor	1°37'31.50" N	103°31'48.50" E

<b>5. Description of Supply Base</b>					
<b>New Planting Development</b>	<input checked="" type="checkbox"/> No (no change in total planted area)		<input type="checkbox"/> Yes (please refer to Principle 7 for details)		
<b>Estate / Smallholders</b>	<b>Total Planted (Mature + Immature) (ha)</b>	<b>HCV (ha)</b>	<b>Infrastructure &amp; Other (ha)</b>	<b>Total Area (ha)</b>	<b>% of Planted</b>
Telok Sengat Estate	3,503.40	60.70	115.90	3,680.00	95.20
Kulai Young Estate	657.50	-	13.00	670.50	98.06
Chamek Estate	795.60	-	21.30	816.90	97.39
<b>Total</b>	<b>4,956.50</b>	<b>60.70</b>	<b>150.20</b>	<b>5,167.40</b>	<b>95.92</b>

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<b>6. Plantings &amp; Cycle</b>							
Estate / Smallholders	Age (Years)					Mature	Immature
	0 - 3	4 - 10	11 - 20	21 - 25	26 - 30		
Telok Sengat Estate	562.60	1,202.40	1,387.60	350.80	0	2,940.80	562.60
Kulai Young Estate	-	321.90	136.00	70.70	128.90	657.50	-
Chamek Estate	84.40	137.40	70.10	462.20	41.50	711.20	84.40
<b>Total (ha)</b>	<b>647</b>	<b>1,661.70</b>	<b>1,593.70</b>	<b>883.70</b>	<b>170.40</b>	<b>4,309.50</b>	<b>647.00</b>

<b>7. Summary of Certified Tonnage of FFB (Own Certified Scope)</b>				
Estate / Smallholders	Tonnage / year			
	Estimated last year (Sep 2020-Aug 2021)	Actual (Sept 2020 – Nov 2021)		Forecast (Sep 2021 – Aug 2022)
		Previous license period (Nil)	Current license period (Sept 2020 – Nov 2021)	
Telok Sengat Estate	97,813.00	-	58,604.98	71,100.00
Kulai Young Estate	24,855.00	-	16,712.39	10,400.00
Chamek Estate	22,003.00	-	15,388.58	10,300.00
<b>Total</b>	<b>144,671.00</b>	<b>90,705.95</b>		<b>91,800.00</b>

<b>8. Summary of Certified Tonnage of FFB (from other certified unit(s))</b>				
Estate / Smallholders	Tonnage / year			
	Estimated last year (Sep 2020-Aug 2021)	Actual (Sept 2020 – Nov 2021)		Forecast (Sep 2021 – Aug 2022)
		Previous license period (Nil)	Current license period (Sept 2020 – Nov 2021)	
Nil		-	-	
<b>Total</b>		<b>N/A</b>		

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<b>9. Summary of Non-Certified Tonnage of FFB (outside supplier – excluded from certificate)</b>				
<b>Out growers / smallholders</b>	<b>Tonnage / year</b>			
	<b>Estimated last year (Sep 2020-Aug 2021)</b>	<b>Actual (Sept 2020 – Nov 2021)</b>		<b>Forecast (Sep 2021 – Aug 2022)</b>
		<i>Previous license period (Nil)</i>	<i>Current license period (Sept 2020 – Nov 2021)</i>	
Eldred Estate	-	-	18,853.17	
Bekoh Estate	-	-	22,845.87	
Jaya Sewajar Sdn. Bhd.	-	-	299.32	
Tanjong Buai	-	-	1202.49	
UM Plantations Sdn Bhd	-	-	41.25	
Asia Elmark Sdn Bhd	-	-	6,991.85	
Ladang Petri Tenggara Sdn Bhd	-	-	39.91	
<b>Total</b>			<b>50,273.86</b>	

<b>9A. Monthly Records of Certified and Uncertified FFB Received since the last audit</b>				
<b>No.</b>	<b>Month - Year</b>	<b>Volume of FFB from certified supply base (mt)</b>	<b>Volume of FFB from uncertified supply base (mt)</b>	<b>Total FFB/Month (mt)</b>
1	September 2020	9907.01	4883.76	14790.77
2	October 2020	8482.27	4193.73	12676
3	November 2020	8071.51	3728.73	11800.24
4	December 2020	7439.51	3257.69	10697.2
5	January 2021	5783.9	2517.31	8301.21
6	February 2021	5130.52	3,559.29	8689.81
7	March 2021	6279.23	3060.39	9339.62
8	April 2021	6796.43	3525.86	10322.29
9	May 2021	6567.29	4948.26	11515.55
10	June 2021	7344.6	5521.38	12865.98
11	July 2021	8999.17	5682.72	14681.89
12	August 2021	9904.51	5394.74	15299.25
	<b>TOTAL</b>	<b>90,705.95</b>	<b>50,273.86</b>	<b>140,979.81</b>

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<b>10. Summary of Certified Tonnage (not applicable for ISS)</b>			
<b>Estimated last year</b> (Sep 2020-Aug 2021)	<b>Actual</b> (Sept 2020 – Nov 2021)		<b>Forecast</b> (Sep 2021 – Aug 2022)
	<i>Previous license period</i> (Nil)	<i>Current license period</i> (Sept 2020 – Nov 2021)	
<b>FFB</b>	<b>FFB</b>		<b>FFB</b>
144,671.00 mt	-	90,705.95 mt	91,800.00 mt
<b>CPO (OER: 21.5%)</b>	<b>CPO (OER: 20.99%)</b>		<b>CPO (OER: 21.50%)</b>
31,206.00 mt	-	19,039.17 mt	19,737.00 mt
<b>PK (KER: 4.20%)</b>	<b>PK (KER: 3.59%)</b>		<b>PK (KER: 4.50%)</b>
6,078.50 mt	-	3,256.34 mt	4,131.00 mt
<b>Note:</b> Due to low crop and replanting in estate the FFB was drop from estimation value.			

<b>10A. Monthly Records of Certified CPO &amp; PK since the last audit</b>			
<b>No.</b>	<b>Month - Year</b>	<b>Certified CPO (mt)</b>	<b>Certified PK (mt)</b>
1	September 2020	2,065.61	465.30
2	October 2020	1,791.46	367.28
3	November 2020	1,640.94	324.47
4	December 2020	1,510.26	275.27
5	January 2021	1,140.01	231.93
6	February 2021	1,189.89	210.86
7	March 2021	1,373.27	271.89
8	April 2021	1,423.33	273.00
9	May 2021	1,434.05	272.54
10	June 2021	1,478.87	262.05
11	July 2021	1,890.73	359.97
12	August 2021	2,100.75	407.08
<b>TOTAL</b>		<b>19,039.17</b>	<b>3256.34</b>

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<b>11. Summary of Actual Volume sold</b>					
<b>Current License period (Sept 2020 – Nov 2021)</b>					
	RSPO Certified	Other Schemes Certified		Conventional	Total
		ISCC	Others		
<b>CPO (MT)</b>	6,998.07	-	-	11,900.00	18,898.07
<b>PK (MT)</b>	1,413.27	-	-	1,840.00	3,253.27
<b>Credits</b>	-	-	-	-	-
<b>Previous License period (Nil)</b>					
<b>CPO (MT)</b>	-	-	-	-	-
<b>PK (MT)</b>	-	-	-	-	-
<b>Credits</b>	-	-	-	-	-

**Note:** Conventional is RSPO certified material but sold as non-RSPO.

<b>11A. Records of Certified CPO &amp; PK Sold under PalmTrace since the last audit (if any)</b>				
No.	Buyers Name	Palmtrace Trading License Number	Certified CPO Sold (mt)	Certified PK Sold (mt)
	A	xxxx	2,799.28	-
	B	xxxx	3,499.26	-
	C	xxxx	699.53	-
	D	xxxx	-	1,413.27
<b>TOTAL</b>			<b>6,998.07</b>	<b>1,413.27</b>

<b>11B. Records of CPO &amp; PK Sold under other schemes since the last audit (if any)</b>				
No.	Buyers Name	Scheme Name	CPO Sold (mt)	PK Sold (mt)
	Nil			
<b>TOTAL</b>			<b>N/A</b>	<b>N/A</b>

<b>11C. Records of CPO &amp; PK Sold as conventional since the last audit (if any)</b>			
No.	Buyers Name	CPO Sold (mt)	PK Sold (mt)
1	A	11,900	-
2	B	-	1,840
<b>TOTAL</b>		<b>11,900</b>	<b>1,840</b>



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11D. 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		
<b>TOTAL</b>			<b>N/A</b>

12. Independent Smallholders Certified Tonnage / Volume									
Phase	Estimated last year (Not Applicable)			Actual (Not Applicable)			Forecast (Not Applicable)		
	Eligibility	MS A	MS B	Eligibility	MS A	MS B	Eligibility	MS A	MS B
	40%	70%	100%	40%	70%	100%	40%	70%	100%
<b>FFB</b>			Nil			Nil			Nil
<b>IS-CSPO</b>	Nil	Nil		Nil	Nil		Nil	Nil	
<b>IS-CSPKO</b>	Nil	Nil		Nil	Nil		Nil	Nil	
<b>IS-CSPKE</b>	Nil	Nil		Nil	Nil		Nil	Nil	

13. Independent Smallholders Actual Sold Tonnage / Volume						
	FFB	FFB Conventional	FFB Other schemes	IS-CSPO	IS-CSPK	IS-CSPKE
<b>Current License period</b> (Not Applicable)						
<b>Credits</b>				Nil	Nil	Nil
<b>Physical</b>	Nil	Nil	Nil			

## Section 2: Assessment Process

### Certification Body:

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

BSI is a leading global provider of management systems assessment and certification, with more than 92,000 certified locations and clients in over 193 countries. BSI 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 **20-22/12/2021 and 17/1/2022**. 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 24<sup>th</sup> March 2020. The remote audit was conducted on **5, 7-8/7/2021**.

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

The methodology for collection of objective evidence included physical site inspections, observation of tasks and processes, interviews of staff, workers and their families and external stakeholders, review of documentation and monitoring data. Malaysia National Interpretation 2019 of the RSPO P&C 2018 was used as the normative reference to assess compliance. The comments made by external stakeholders were also taken into account in the assessment.

The minimum sample size is four estates. Sample size for certification unit with more than four (4) estates were determined based on formula  $N = (\sqrt{y}) \times (z)$  where y is the number of estates and where z is the multiplier defined by risk assessment. While, the sampling of smallholders were based on the formula  $(\sqrt{y}) \times (z)$ ; where y is total number of group member and where z is the multiplier defined by the risk assessment. The sampled smallholder listed in Appendix E.

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

Structured worker interviews with male and female workers and staff were held in private at the workplace in the mill and the estates. Fieldworkers were interviewed informally in small groups in the field. In addition, the wives of workers and staff were interviewed in informal group meetings at their housing. Separate visits were made to each 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 3.4.

The non-conformities for this audit are detailed in Section 3.3 and unless it is stated in this section, all previous nonconformities including minor nonconformities are remains closed.

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This report is structured to provide a summary of assessment finding as provided in Appendix A. The assessment was conducted based on risk based approach sampling and therefore nonconformities may exist.

For Initial, Re-certification and Extension of Scope assessment, the report was externally reviewed by approved external peer reviewer prior to certification decision by BSI.

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

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

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

**Tentative Date of Next Visit:** July 4, 2022 - July 8, 2022

**Total Number of Mandays:** 13 (including SCCS)

## 2.2 BSI Assessment Team

Name	Role	Competency
Muhamad Naqiuddin Mazeli (MNM)	Team Leader	<p><b>Education:</b> Bachelor of Science Horticulture, University Putra Malaysia</p> <p><b>Work Experience:</b> 11 years working experience in oil palm industry managing sustainability implementation and certification of RSPO P&amp;C, ISCC, and ISO9001 and ISO 18001 for the estates, mills, refineries and Smallholder scheme. He also support in providing training related to RSPO and other certifications where applicable to the operations during previous company.</p> <p><b>Training attended:</b> ISO 9001: 2015 LA Training (2018), ISO 14001: 2015 LA Training (2019), ISO 45001: 2018 LA Training (2019), HCV &amp; HCS Training (2020), RSPO P&amp;C LA Training (2018) and Social Auditing &amp; SMETA Training (2021)</p> <p><b>Aspect covered in this audit:</b> During this assessment, he assessed on the aspects of legal, mill best practices, estate best practices, safety and health and environmental aspect.</p> <p><b>Language proficiency:</b> English and Bahasa Malaysia</p>
Hafriazhar Mohd Mokhtar (HMM)	Team Member	<p><b>Education:</b> Bachelor of Engineering (Hons.) Chemical Engineering, University Technology Malaysia</p> <p><b>Work Experience:</b> 4 years working experience in oil palm industry as Mill Engineer, 2 years working experience in mining industry as Project Control Engineer and 1 year working experience as Environmental Officer. Since 2011 has been qualified as Lead Auditor for various standards including CDM,</p>

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		<p>ISO9001, ISO14001, Sustainable Palm Oil Standard, Energy Management and SMETA.</p> <p><b>Training attended:</b> Social Auditing &amp; SMETA Training (2021), ISO 45001 LA Training (2018), Endorsed RSPO P&amp;C LA Training (2017), Endorsed RSPO SCCS LA Training (2016), RSPO P&amp;C LA Training (2015), ISO 9001 LA Training (2013), ISO 50001 LA Training (2012), ISO 14001 LA Training (2011)</p> <p><b>Aspect covered in this audit:</b> During this assessment, he assessed on the aspects of legal, Social aspect, Stakeholder consultation and RSPO Supply Chain requirements.</p> <p><b>Language proficiency:</b> English and Bahasa Malaysia</p>
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**Accompanying Persons:**

Name	Role
Nil	

**2.3 Assessment Plan**

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

Remote Assessment Plan for RSPO – Annual Surveillance Assessment 1(ASA 1) – Boustead Telok Sengat Palm Oil Mill and Supply Base (Mass Balance Module)

Date	Time	Subjects	MNM	HMM	ICT Planned
Monday, 28/06/2021	0930 - 1000	Test call between client and BSI auditor Communication on document preparation for remote such as audit plan, ICT audit, any proposal preparation and additional requirement.	√	√	Teleconference, Microsoft Team Meeting, Email and Whatsapps
Monday, 05/07/2021	0830 - 0900	<p>Opening Meeting:</p> <ul style="list-style-type: none"> <li>Opening Presentation by Audit team leader</li> <li>Confirmation of assessment scope and finalize</li> <li>Audit plan (including stakeholder’s consultation)</li> </ul> <p>Verification on previous audit findings and other requirement</p>	√	√	Teleconference, Microsoft Team Meeting, Email and Whatsapps
Wednesday 07/07/2021	0900-1230 Boustead Chamek Estate	<p>Assessment and documentation review on:</p> <ul style="list-style-type: none"> <li>Legal and other requirements, Land used right, OHS and continual improvement, Good agriculture practice, appropriate Integrated Pest Management (IPM), environmental aspect and impact and HCV.</li> <li>Budget, replanting, new planting, contractor requirement and reviews their economic, RSPO Metric, social and environmental performance and develops</li> </ul>	√	√	Teleconference, Microsoft Team Meeting, Email

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		<ul style="list-style-type: none"> <li>Social aspects and Social and Environmental Impact Assessment (SEIA), legal requirements, complaints and grievances, employees' welfare and stakeholder management</li> <li>Plans to reduce pollution and emissions, including greenhouse gases (GHG), are developed, implemented and monitored and new developments are designed to minimise GHG emissions.</li> </ul>			
	1230-1330	Lunch Break	√	√	
	1330-1700 Boustead Telok Sengat POM	Continue with document review: <ul style="list-style-type: none"> <li>Legal and other requirements, land used right, OHS and continual improvement, Good Mill practice, environmental aspect and impact and HCV.</li> <li>Budget, contractor requirement and reviews their economic, social and environmental performance and develops</li> <li>Social aspects and Social and Environmental Impact Assessment (SEIA), legal requirements, complaints and grievances, employees' welfare and stakeholder management.</li> <li>Plans to reduce pollution and emissions, including greenhouse gases (GHG), are developed, implemented and monitored and new developments are designed to minimise GHG emissions.</li> <li>Supply chain requirement for mills</li> </ul>	√	√	Teleconference, Microsoft Team Meeting, Email
	1700-1730	Interim closing for remote/ICT audit	√	√	Teleconference, Microsoft Team Meeting, Email
Thursday 08/07/2021	0830-1100 Boustead Kulai Young Estate	Continue with Assessment and documentation review on: <ul style="list-style-type: none"> <li>Legal and other requirements, Land used right, OHS and continual improvement, Good agriculture practice, appropriate Integrated Pest Management (IPM), environmental aspect and impact and HCV.</li> <li>Budget, replanting, new planting, contractor requirement and reviews their economic, social and environmental performance and develops</li> <li>Social aspects and Social and Environmental Impact Assessment (SEIA), legal requirements, complaints and grievances, employees' welfare and stakeholder management</li> </ul>	√	√	Teleconference, Microsoft Team Meeting, Email

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		<ul style="list-style-type: none"> <li>Plans to reduce pollution and emissions, including greenhouse gases (GHG), are developed, implemented and monitored and new developments are designed to minimise GHG emissions.</li> <li>Supply chain requirement for mills</li> </ul>			
	1230-1330	Lunch Break	√	√	
	1330-1630 Boustead Telok Sengat Estate	Assessment and documentation review on: <ul style="list-style-type: none"> <li>Legal and other requirements, Land used right, OHS and continual improvement, Good agriculture practice, appropriate Integrated Pest Management (IPM), environmental aspect and impact and HCV.</li> <li>Budget, replanting, new planting, contractor requirement and reviews their economic, RSPO Metric, social and environmental performance and develops</li> <li>Social aspects and Social and Environmental Impact Assessment (SEIA), legal requirements, complaints and grievances, employees' welfare and stakeholder management</li> <li>Plans to reduce pollution and emissions, including greenhouse gases (GHG), are developed, implemented and monitored and new developments are designed to minimise GHG emissions.</li> </ul>	√	√	Teleconference, Microsoft Team Meeting, Email
	1630-1700	Assessment team discussion and preparation of closing meeting	√	√	Teleconference, Microsoft Team Meeting, Email
	1700-1730	Closing Meeting	√	√	Teleconference, Microsoft Team Meeting, Email

Major NC Close Out verification plan for RSPO Annual Surveillance Assessment – Boustead Telok Sengat POM and Supply Base.

Date	Time	Subjects	MNM	ICT Planned
Monday, 20/09/2021	0930 - 1000	Test call between client and BSI auditor Communication on document preparation for remote such as audit plan, ICT audit, any proposal preparation and additional requirement.	√	Teleconference, Microsoft Team Meeting, Email and Whatsapp

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Date	Time	Subjects	MNM	ICT Planned
Friday, 24/9/2021	0830-0900	Telok Sengat POM: Opening Meeting: <ul style="list-style-type: none"> <li>Opening Presentation by Audit team leader.</li> </ul> Confirmation of assessment scope and finalize Audit plan (including stakeholder’s consultation).	√	Teleconference, Microsoft Team Meeting, Email and Whatsapps
	0900–1130	Telok Sengat POM: Verification on Major NC. Site observation , PIC and workers interview (individual and group session) if necessary Document review – implemented evidence	√	Teleconference, Microsoft Team Meeting, Email and Whatsapps
	1130–1230	Closing	√	Teleconference, Microsoft Team Meeting, Email and Whatsapps

On-Site Assessment Plan for RSPO – Annual Surveillance Assessment 1(ASA 1) – Boustead Telok Sengat Palm Oil Mill and Supply Base (Mass Balance Module)

Date	Time	Subjects	MNM	HMM
Sunday, 19/12/2021		Travel from KL to JB and check in Hotel.	√	√
Monday, 20/12/2021 <b>Boustead Chamek Estate</b>	0730 -0830	Travel from Hotel To Estate	√	√
	0830 - 0930	Opening Meeting: <ul style="list-style-type: none"> <li>Opening Presentation by Audit Team Leader</li> <li>Confirmation of assessment scope and finalize Audit plan (including stakeholder’s consultation).</li> </ul>	√	√
	0930 -1230	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. Meeting with stakeholders (Government, village rep, smallholders, Union Leader, contractor etc.)	√	√
	1230 -1330	Lunch	√	√
	1330 -1630	Document review P1 – P7: (General Documentation e.g. Legal, Manual and Procedure, production & monitoring records, IPM & HCV records, SEIA documents & records, OSH records, review pay documents, records of communication with stakeholder/workers representatives, new planting, CIP and implementation & etc.)	√	√
	1630 -1700	Interim Closing Briefing	√	√

Date	Time	Subjects	MNM	HMM
Tuesday, 21/12/2021 <b>Boustead Kulai Young Estate</b>	9.00 – 12.30	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.  Meeting with stakeholders (Government, village rep, smallholders, Union Leader, contractor etc.)	√	√
	1230 -1330	Lunch	√	√
	1330 -1630	Document review P1 – P7: (General Documentation e.g. Legal, Manual and Procedure, production & monitoring records, IPM & HCV records, SEIA documents & records, OSH records, review pay documents, records of communication with stakeholder/workers representatives, new planting, CIP and implementation & etc.)	√	√
	1630 -1700	Interim Closing Briefing	√	√
Wednesday 22/12/2021 <b>Boustead Telok Sengat POM</b>	9.00 – 12.30	Inspection: FFB receiving, warehouse, workshop, wastes management & Landfill, Effluent Ponds, OSH & ERP, Environment issues, POME application, water treatment. Laboratory, weighbridge and palm product storage area, staff, workers and contractor interview, housing and facility inspection, clinic, Lab, weighbridge and palm product storage area, etc.	√	√
	1230 -1330	Lunch	√	√
	1330 -1630	Document Review P1 – P7: SOPs, Review on SEIA documents and records, wage records, employee data, training records, legal permits, mill inspection and internal monitoring records, CIP & implementation. RSPO SCC general requirements, internal audit, management review, sales and purchasing documents, mass balance accounting and other relevant documents and records	√	√
	1630 -1700	Interim Closing Briefing	√	√
Thursday 17/1/2022 <b>Boustead Telok Sengat Estate</b>	0930 -1230	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.  Meeting with stakeholders (Government, village rep, smallholders, Union Leader, contractor etc.)	√	√
	1230 -1330	Lunch		



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Date	Time	Subjects	MNM	HMM
	1330 -1600	Document review P1 – P7: (General Documentation e.g. Legal, Manual and Procedure, production & monitoring records, IPM & HCV records, SEIA documents & records, OSH records, review pay documents, records of communication with stakeholder/workers representatives, new planting, CIP and implementation & etc.)	√	√
	1600 -1630	Preparation for Closing Meeting and Audit team discussion	√	√
	1630 - 1700	Closing Meeting	√	√

### Section 3: Assessment Findings

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

Requirement	Assessment	Compliance
Does the time bound plan include all current subsidiaries, estates and mills that is under the control and/or minor shareholding of the holding company?	Yes. Please refer to appendix B for details on the mills and estates of Boustead Plantations Berhad.	Complied.
Have all the estates and mills certified within five (5) years after obtaining RSPO membership?	The Loagan Bunut and Kanowit was delayed from year 2022 to 2023 due to COVID-19. This already been sent to RSPO.	Complied
Have there been any new acquisitions? If yes, the new acquisitions shall be certified within three (3) years from the date of acquisition. Certification plan for the new acquisition shall be available.	Yes, new acquisitions took place in 2018 involving Pertama Business Unit, Sabah from Duta Plantations Berhad and in 2019 involving Tawai Business Unit, Sabah from Sit Seng & Sons Realty Sdn Bhd. Certification plan for the new acquisition is 2022 as per planned. This deferred to 2022 (initially 2021) due to Pandemic Covid-19	Complied
Any deviations from the maximum periods requires approval by the RSPO Secretariat.	There are the deviation on Loagan Bunut deferred to 2023 (initially 2022) To allow Pertama & Tawai BU first.	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. Is this consistent with the ACOP reporting?	Boustead acquired Pertama Group estates 11,579.31ha plantation land in District of Labuk and Sugut from Duta Plantation in May 2018. This operating unit was deferred to 2022 (initially 2021) due to Pandemic Covid-19. Boustead then acquired 4,915.25ha together with 45 tonnes per hour palm oil mill from Sit Seng & Sons Reality in May 2019. This will certified on 2022 as per planned. This same as per ACOP 2020.	Complied
Have there been any isolated lapses in implementation of the plan? If yes a <b>Minor</b> non-compliance shall be raised	No lapses in 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 <b>Major</b> non-compliance shall be raised	There are some delayed due to COVID-19 issue. This already been informed and approved RSPO.	Complied
<b>Un-Certified Units or Holdings</b>		
No replacement of primary forest or any area required to maintain or enhance HCVs and HCS in accordance with RSPO P&C criterion 7.12.	Neither any replacement after dates defined in NIs Criterion 7.3 for primary forest nor any area required to maintain or enhance HCVs in accordance with RSPO P&C criterion 7.3.	Complied

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Any new plantings since January 1 <sup>st</sup> 2010 shall comply with the RSPO New Plantings Procedure.	No new planting in uncertified unit as per internal audit report verification.	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 4.4, 4.5, 4.6, 4.7 and 4.8.	No any land conflicts occurred that require to be resolved through a mutually agreed process, such as RSPO Complaints System or Dispute Settlement Facility, in accordance with RSPO P&C criteria 2.2, 6.4, 7.5 and 7.6.	Complied
Any Labor disputes are being resolved through a mutually agreed process, in accordance with RSPO P&C criterion 4.2	No labour dispute reported. During this audit, interview with the workers shows no labour dispute.	Complied
Any Legal non- compliance is being addressed through measures consistent with the requirements of RSPO P&C criteria 2.1	No. Findings raised on legal non-compliance during this audit was resolved prior to certification.	Complied
Did the company conduct internal audit for those uncertified estates against the uncertified management units requirement and covering the RSPO P&C criterion 2.1 4.2, 4.4, 4.5, 4.6, 4.7, 4.8 and 7.12? If yes, a positive assurance statement shall be available and justified.	Yes, the internal audit been conducted by the sustainability team. Positive assurance was through the internal audit report conducted on the operation units which have complied with the company policy and SOPs.	Complied
Are there any Critical (Major) non-compliance raised against any of the RSPO P&C criterion 2.1 4.2, 4.4, 4.5, 4.6, 4.7, 4.8 and 7.12 during the last internal audit of the uncertified estates? If yes is the NC(s) actively addressed with RSPO?	No. As part of the RSPO P&C compliance, internal audit has been conducted at uncertified estates. Report of improvement was provided for site's further improvement.	Complied
Have there been any stakeholder (including NGO) consultation conducted?	The management unit conducted the stakeholder consultation during internal audit conducted on March 2022.	Complied

**3.2 Progress of scheme smallholders and/or outgrowers**

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

**Approved Time Bound Plan**

No	PMU	Location	Main Assessment	Certification Status	Progress	Updated Information for Partial Certification, Clause 4.5.3 RSPO Time-bound Plan & 4.5.4 Requirements for uncertified management units
1.	Sg. Jernih BU	Pahang	11 Sep 2011	Stage 2	Certification completed	nil
			11 Sep 2016	Recertification	Recertification completed	nil
2.	Nak BU	Sabah	16 May 2015	Stage 2	Certification completed	nil
			28 Feb 2020	Recertification	Recertification completed	nil
3.	Trong BU	Perak	20 July 2017	Stage 2	Certification completed	nil
4.	Segaria BU	Sabah	Dec 2017	Stage 2	Certification completed	nil
5.	Segamaha BU	Sabah	Oct 2018	Stage 2	Certification completed	nil
6.	Telok Sengat BU	Johor	Sep 2020	Stage 2	Certification completed	nil
7.	Lepan Kabu	Kelantan	2022	-	CB appointment process deferred to 2022 (initially 2020) due to Pandemic Covid-19 and land liability disclosure)	Lepan Kabu Mill ceased operation in May 2018. In July 2019, LKE undergo RSPO Internal Audit. Lepan Kabu,(All estates without own mill-loose estates)
8.	Bekoh Eldred	Johor	2022	-	CB appointment process deferred to 2022 (initially 2020) due to Pandemic Covid-19 and land liability disclosure)	The management unit undergo RSPO internal audit on March 2022. This estate without own mill loose estates.
9.	Rimba Nilai (Sugut) BU	Sabah	2022	-	CB appointed; Deferred to 2022 (initially 2020) due to Pandemic Covid-19	External audit that scheduled by BSI tentatively on 7 <sup>th</sup> - 11 <sup>th</sup> November 2020 has been postponed until further notice due to restrictions entering Sabah state.

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10.	Pertama BU	Sabah	2022	-	Deferred to 2022 (initially 2021) due to Pandemic Covid-19	New Acquisition in 2018 from Duta Plantations Berhad. As per RSPO Certification Systems Nov 2020; new acquisitions shall be certified within a three-year timeframe.
11.	Tawai BU	Sabah	2022	-	To combine audit with Pertama BU in 2022 due to same area of location	New Acquisition in 2019 from Sit Seng & Sons Realty Sdn Bhd. As per RSPO Certification Systems Nov 2020; new acquisitions shall be certified within a three-year timeframe.
12.	Loagan Bunut BU	Sarawak	2023	-	Deferred to 2023 (initially 2022) To allow Pertama & Tawai BU first	Loagan Bunut BU has been proposed for disposal and still in negotiation process. (Company internal transformation programme)
13.	Kanowit BU	Sarawak	2023	-	Deferred to 2023 (initially 2022) To allow Pertama & Tawai BU first	Kanowit BU has been proposed for disposal and still in negotiation process. All decision is pending for the Board of Directors discretion and direction. (Company internal transformation programme)

### 3.3 Details of Nonconformities

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

During this Assessment there were *one* (1) Critical; *One* (1) Minor nonconformities and no Opportunity For Improvement raised. The *Boustead Telok Sengat* Certification unit submitted Corrective Action Plans for the nonconformity. Corrective action plans with respect to the nonconformity was reviewed by the BSI audit team and accepted.

The implementation of the corrective action plans to address the minor nonconformity will be followed up during the next surveillance assessment. The implementation of the Corrective Actions for the Critical Nonconformity(ies) has been verified for its effectiveness and closed accordingly. The below is the summary of the non-conformity raised during this assessment.

Non-conformity			
<b>NCR Ref #</b>	2077371-202107-M1	<b>Date Issued</b>	8/7/2021
<b>Due Date</b>	6/10/2021	<b>Date of nonconformity Closure</b>	24/9/2021
<b>Clause &amp; Category (Critical / Minor)</b>	3.8.9 Major (Critical)		
<b>Statement of Nonconformity:</b>	Minimum information for RSPO certified product found inadequate in sample document sighted for e. RSPO certificate number;		
<b>Requirement Reference:</b>	Sales and Goods Out 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): 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; 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.		
<b>Objective Evidence:</b>	Sighted from CPO ticket weighbridge and Delivery order (No; CPO123202100301) dated 3/6/2021 was not using RSPO certificate no (RSPO 697033)		
<b>Corrections:</b>	The Mill had crossed out the incorrect RSPO certificate no and corrected RSPO Certificate No on CPO tickets documents to the appropriate RSPO Certificate No: RSPO 697033. The Mill also had issued a formal request to IT Department to correct the RSPO Certificate No to the correct RSPO Certificate No: RSPO 697033		

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<b>Root Cause Analysis:</b>	The Delivery Order ticket was automatically generated by the centralized Boustead Measuring System (BMS) controlled by the IT Department at Boustead Plantations headquarters. The IT Department had incorrect input information as the RSPO Certificate No for Telok Sengat Mill.
<b>Corrective Actions:</b>	The sustainability department had made yearly checklist inspections with the IT Department to ensure all the correct data information for RSPO requirements. Refer to the inspection schedule programme and correct RSPO certificate No on tickets attached.(Appendix 1 and 2)
<b>Assessment Conclusion:</b>	Major NC Close Out Evidence Verification: - Records of weighbridge ticket CPO (129309) and DO no: CPO123202100593 dated 23/9/2021 using cert RSPO 697033. - Records of weighbridge ticket PK (129228) and DO no: CPO123202100584 dated 21/9/2021 using cert RSPO 697033. Evidence shown the CAP was found to be effective thus the major NC was closed on 24/9/2021. Continuous implementation will be further verified in the next audit.

<b>Non-conformity</b>			
<b>NCR Ref #</b>	2150250-202112-N1	<b>Date Issued</b>	17/1/2022
<b>Due Date</b>	Next Surveillance	<b>Date of nonconformity Closure</b>	Next Surveillance
<b>Clause &amp; Category (Critical / Minor)</b>	7.3.3 (Minor)		
<b>Statement of Nonconformity:</b>	Found open burning in certification area.		
<b>Requirement Reference:</b>	The unit of certification does not use open fire for waste disposal.		
<b>Objective Evidence:</b>	Found open burning used for waste disposal in Mill workers housing area (MQ 24) verified during site visit.		
<b>Corrections:</b>	The mill issued a circular to remind linesite workers regarding restrictions on open burning of waste disposal.		
<b>Root Cause Analysis:</b>	The new workers have done the open burning.		
<b>Corrective Actions:</b>	The mill has done training to educate the new workers restriction on open burning of waste disposal.		
<b>Assessment Conclusion:</b>	The submitted CAP detailing on proposed actions to be taken to address the nonconformity based on the root cause determined were being reviewed by auditors deemed to be appropriate. Thus, the evidence of effectiveness of CAP will be verify during next coming surveillance assessment.		

Opportunity for Improvements	
OFI #	Description
OFI 1	Nil

Positive Findings	
PF #	Description
PF 1	Good cooperation during assessment day and document retrieved

### 3.3.1 Status of Nonconformities Previously Identified and Observations

Non-conformity			
<b>NCR Ref #</b>	1817083-201908-M1	<b>Date Issued</b>	30/8/2019
<b>Due Date</b>	29/8/2020	<b>Date of nonconformity Closure</b>	14/8/2020
<b>Clause &amp; Category (Critical / Minor)</b>	Indicator 5.2.2 Major		
<b>Statement of Nonconformity:</b>	The management plan to maintain and/or enhance HCV presence was not adequate		
<b>Requirement Reference:</b>	Where rare, threatened or endangered (RTE) species, or HCVs, are present or are affected by plantation or mill operations, appropriate measures that are expected to maintain and/or enhance them shall be implemented through a management plan.		
<b>Objective Evidence:</b>	<p>Recommendation for actions from information available based on the High Conservation Value (HCV) Assessment Report (Multi-site) for Boustead plantations Berhad covering Telok Sengat Estate, Kulai Young Estate, Chamek Estate, Eldred Estate and Bekoh Estate; July 2018 were not fully implemented. Based on the HCV report, few recommendations made by HCV assessor on management and monitoring for identified HCV were not evidence as per following samples:</p> <ul style="list-style-type: none"> <li>- HCV 1: Mark and label boundaries of HCV areas (Present in Telok Sengat &amp; Chamek Estate)</li> <li>- HCV 2: Mark and label boundaries of HCV areas (Potentially present in Telok Sengat Estate)</li> <li>- HCV 3: Mark and label boundaries of HCV areas (Present in Telok Sengat Estate)</li> <li>- HCV 4: Mark and label boundaries of HCV areas (Present in all estates)</li> <li>- HCV 6: Mark and install signage for each HCV site (Present in all estates)</li> </ul>		
<b>Corrections:</b>	Installation of HCV signages at designated locations		
<b>Root Cause Analysis:</b>	Implementation was delayed due non-inclusion of cost in annual budget		
<b>Corrective Actions:</b>	Costing of implementation has been included in the annual budget		
<b>Assessment Conclusion:</b>	Major NC Close Out Evidence Verification:		



	<ul style="list-style-type: none"> <li>- Installation of HCV signages at designated locations photos at Telok Sengat Estate and Chamek Estate</li> <li>- Budgeting FY 2020 inclusion for RSPO implementation</li> </ul> <p>Evidence shown the CAP was found to be effective thus the major NC was closed on 14/8/2020. Continuous implementation will be further verified in the next audit.</p>
<b>ASA1 Verification</b>	From the picture and video call been made showed that the management maintain the HCV signage accordingly, the annual budget also already include to maintain the signage in estate as per CAP thus Major NC remain closed.

<b>Non-conformity</b>			
<b>NCR Ref #</b>	1817083-201908-M2	<b>Date Issued</b>	30/8/2019
<b>Due Date</b>	29/8/2020	<b>Date of nonconformity Closure</b>	14/8/2020
<b>Clause &amp; Category (Critical / Minor)</b>	Indicator 6.1.3 Major		
<b>Statement of Nonconformity:</b>	No management plan established for avoidance or mitigation of negative impacts and promotion of the positive ones and monitoring of impacts identified based on consultation with the affected parties, documented and timetabled, including responsibilities for implementation.		
<b>Requirement Reference:</b>	Plans for avoidance or mitigation of negative impacts and promotion of the positive ones, and monitoring of impacts identified, shall be developed in consultation with the affected parties, documented and timetabled, including responsibilities for implementation.		
<b>Objective Evidence:</b>	No documented Management plan being established by Boustead team as at time of audit.		
<b>Corrections:</b>	Updating of documented management action plan dated on 15/9/2019		
<b>Root Cause Analysis:</b>	Updating of plan was not conducted as per established Sustainability Management Program		
<b>Corrective Actions:</b>	To include actual completed plan upon updating of established annual program		
<b>Assessment Conclusion:</b>	<p>Major NC Close Out Evidence Verification:</p> <ul style="list-style-type: none"> <li>- Updated documented management action plan on 15/9/2019</li> <li>- Updated documented Sustainability Management Program 2019 plan &amp; actual</li> </ul> <p>Evidence shown the CAP was found to be effective thus the major NC was closed on 14/8/2020. Continuous implementation will be further verified in the next audit.</p>		
<b>ASA1 Verification</b>	From the record Jan 2021 of environmental aspect and impact also the management plan showed that management implementation of CAP accordingly thus Major NC remained closed.		

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Non-conformity			
<b>NCR Ref #</b>	1817083-201908-M3	<b>Date Issued</b>	30/8/2019
<b>Due Date</b>	29/8/2020	<b>Date of nonconformity Closure</b>	14/8/2020
<b>Clause &amp; Category (Critical / Minor)</b>	Indicator 2.1.1 Major		
<b>Statement of Nonconformity:</b>	<ol style="list-style-type: none"> <li>1. Migrant worker without valid work permit and absconded / missing migrant worker not reported to local authority in accordance with "Immigration Department Recruitment Terms and Condition of Foreign Workers" &amp; Employment (Restriction) Act 1968, (Act 353), Part II – Restriction of Employment of Person Not being Citizens of Malaysia, Section 5 – Restrictions of Employment of Non- Citizens, Subsection (1)(a) and Immigration Act 155, Section 6 – Control of Entry into Malaysia.</li> <li>2. Workers working hours exceeded 12 hours per day violating Employment Act 1955 (Act 625) Part XII Rest day, Hours of Work, Holiday and Other Condition of Service. Section 60A. Hours of Work: (7).</li> <li>3. Overtime hours exceeding 104 hours per month; violating Employment (limitation of Overtime Work) Regulation 1980; (2) Limit of overtime work: The limit of overtime work for the purpose of Section 60A (4) (a) of the Employment Act 1955 (Act 625)</li> <li>4. Total overtime hours worked per month does not reflected in the pay slip furnished to workers violating the Employment Regulation 1957; Section 9 Employer to furnish particulars under regulation 5 (c).</li> <li>5. Estates migrant workers found not contributing the SOCSO in accordance to 'Akta Keselamatan Social Pekerja 1969 (Akta 4)'.</li> <li>6. No approval letter obtained for deduction such as electricity, water, 'hutang kedai' / sundry shop debt and 'other', violating Employment Act 1955 (Act265); Part IV Deduction from Wages; Section 24 – Lawful Deduction.</li> <li>7. Foreign workers passports are currently kept/hold by the estate management and labour contractor, violating Passport Act 1966 (Act 1950) – Regulation 12 (1) (f)</li> </ol>		
<b>Requirement Reference:</b>	Evidence of compliance with relevant legal requirements shall be available.		
<b>Objective Evidence:</b>	<ol style="list-style-type: none"> <li>1. Kulai Young Estate- 2 selected foreign workers found with details as below. i.e.               <ul style="list-style-type: none"> <li>- expired work permit (Passport B3629153 / Indonesia, Work Permit: PE7149696, Valid up to: 19.07.2019); and,</li> <li>- absconded migrant worker not being made informed to the local authority according to "Immigration Department – Recruitment Terms and Condition of Foreign Workers"; ref: <a href="https://www.imi.gov.my/index.php/en/foreign-worker.html">https://www.imi.gov.my/index.php/en/foreign-worker.html</a></li> <li>- (Passport AS575396 / Indonesia (Passport Expired on 10.03.2019), Work Permit: PD8711809, Valid up to: 04.08.2018)</li> </ul> </li> </ol> <p>Chamek Estate</p> <p>3 foreign worker / India nationality found without work permit. VDR (Permohonan Visa Dengan Rujukan) Application letter issued by the Immigration Department evidenced that the 3 affected workers are newly hired and in progress of permit application. Immigration Letter Ref. BPA/FWCMS/JFBE1036151814 &amp;</p>		

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BPA/FWCMS/JFBE1105191702 dated 01.07.2019 clause 2.3 requires the new migrant workers to undergo medical check (FOMEMA) latest 3 days upon arrival. However, the medical check conducted on 24.08.2019 although their arrival is on 09.08.2019.

Telok Sengat Estate – 2 selected Bangladesh worker work permit found expired on 21.11.2018; permit renewal initiated on 08.11.2018 through government agency – MyEG Services Bhd; however no permit issued despite several follow up carried out with MyEG. i.e.

- Passport BM0790470 / Bangladesh, work permit PE1344608, Valid up to: 15.07.2019, Special Pass obtained: J18K97MBBB1G expired on 19.08.2019.
- Passport BQ0285988 / Bangladesh, work permit PD9644910, Valid up to: 21.11.2018.

2. Sighted 3 months selected record (payslip and punch card attendance record) confirmed that Workers in Telok Sengat POM found working more than 12 hours per day;

June 2019

- Emp. No.: 0694A – 01 day, 23 hours per day
- Emp. No.: 0665I – 05 days, averagely 14~22 hours / day
- Emp. No.: 1042C – 03 days, averagely 13~16 hours / day
- Emp. No.: 0294G – 05 days, averagely 13~16 hours / day
- Emp. No.: 0550J – 02 days, averagely 14~15 hours / day
- Emp. No. 1042C – 03 days, averagely 13~24 hours / day

July 2019

- Emp. No. 055J – 04 days; averagely 13~15 hours / day
- Emp. No. 0665I – 11 days; averagely 16~24 hours / day
- Emp. No. 1045D – 05 days; averagely 13~15 hours / day
- Emp. No. 0694A – 09 days, averagely 14~24 hours / day

Dec 2018

- Emp. No.1045D – 02 days, averagely 13~15 hours / day
- Emp. No.0550J – 03 days, averagely 15~23 hours / day
- Emp. No. 0665I – 12 days, averagely 13~23 hours / day
- Emp. No. 0363B – 10 days, averagely 13~16 hours / day

3. Telok Sengat POM - 3 randomly selected month pay-slip, punch cards and Checkroll Advance & Overtime Underpaid record sighted with detail as below.

- Dec 2018 - Emp. No. 0665I – 121 overtime hours
- June 2019 - Emp. No. 0694A – 122 overtime hours
- July 2019 - Emp. No. 0665I – 134 overtime hours

4. Telok Sengat POM – Overtime wages are paid in 2 payment cycle, i.e. (a) on the 7th day of the last day of the wage period including maximum 104 hours of overtime wage & (b) the balance of overtime wage (which exceed 104 hours) paid on 15th day of the last day of the wage period along with Checkroll advance. Payslip furnished to workers were found indicating 104 hours of overtime instead

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	<p>of actual overtime hours worked during the month. Sighted the amount of overtime wage paid on 15th appeared in pay-slip as Income - 'overtime underpaid', at the same time in Deduction - 'overtime payment' since the overtime wage is collected on 15th.</p> <p>5. SOCSO Contribution Form 8A sighted; no SOCSO contribution made by the employer for migrant workers. Sampled migrant workers as listed below. Kulai Young Estate; Khairul Wadi, Sulistyowati, Abdul Hamid, Muhd Hudri Chamek Estate; Asippudin, Jum, Tarzan, Mohammad Amin, Bambang Puwanto, Upriadi, Zikri Hakim, Saepul Bahri. Telok Sengat Estate; Anisa Kamal, Amaq Mudahan, Darmaji Bin Amak Badrun; Padil.</p> <p>6. Kulai Young Estate &amp; Chamek Estate Foreign workers payslip sighted there are deduction made for electricity charges and sundry shop debt without prior approval obtained from the labour office. E.g.</p> <ul style="list-style-type: none"> <li>• Kulai Young Estate Harvester – Abdul Hakim; June 2019 payslip, deduction made on electricity amounting MYR25.50 and sundry shop debt amounting MYR297.80.</li> <li>• Chamek Estate Harvester – PMH contractor - Darmono and 5 other workers (group wages); payslip for month of July 2019, deduction made on electricity amounting MYR139.45 and water bill of MYR140.80 &amp; MYR153.60. (the amount for water bill authorized by labour office is Maximum MYR30 only)</li> <li>• LKB contractor's worker – payslip for month of June 2019, deduction made on 'other' amounting MYR237.00.</li> </ul> <p>7. Migrant workers passports found kept by Boustead management at Chamek Estate, Kulai Young Estate and Telok Sengat Estate. As at time of audit, passports of the migrant workers found kept at the Chief Clerk's desk drawer at Kulai Young Estate; fire proof safe in the Chamek Estate Manager room and Safe Cabinet at Telok Sengat Estate. Migrant worker interview states that they have no access to their passport. No letter of consent, procedure of passport safe-keeping and effective withdrawal passport mechanism / process is established to evidence that passport retention is meant for safe-keeping purposes.</p>
<b>Corrections:</b>	<p>Correction:</p> <ol style="list-style-type: none"> <li>1. Immediate renewal of expired worker's permit &amp; report to police for absconded workers</li> <li>2. Immediate stop of extra overtime work</li> <li>3. Immediate registration of SOCSO to new/expired FWCS foreign workers</li> <li>4. Immediate stop unauthorized deduction in payslip</li> <li>5. Prepare and issue documented letter of consent to keep/hold workers' passport that were verbally agreed by them</li> </ol>
<b>Root Cause Analysis:</b>	<ol style="list-style-type: none"> <li>1. No thorough monitoring of passport/work permit expiry for contractors' workers by management &amp; newly joined workers' permit was delayed due to awaiting FOMEMA results</li> <li>2. No control and monitoring by management of workers overtime and payment</li> <li>3. SOCSO contribution was not done since FWCS was still valid until December 2019</li> </ol>

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	<ol style="list-style-type: none"> <li>4. Manual pay-slip used as secondary document to show actual payment</li> <li>5. No documented letter of consent to keep/hold workers' passport that were verbally agreed by them</li> </ol>
<p><b>Corrective Actions:</b></p>	<ol style="list-style-type: none"> <li>1. Implementation of monitoring through table &amp; pigeon hole of passport &amp; work permit expiry date</li> <li>2. Reminder and briefing of overtime rule according to Employment Act 1955</li> <li>3. Immediate registration of SOCSO to new/expired FWCS foreign workers</li> <li>4. Use and issuance of single computerized system payslip to workers</li> <li>5. Use of form as following:             <ul style="list-style-type: none"> <li>• Form of consent passport holding</li> <li>• Form of passport taking for use by FW</li> <li>• Form of passport return to office</li> </ul> </li> </ol>
<p><b>Assessment Conclusion:</b></p>	<p>Major NC Close Out Evidence Verification:</p> <ul style="list-style-type: none"> <li>- Evidence of renewal on July 2019– passport new expiry date: 10/12/2020 and subsequently renewed until 10/12/2020</li> <li>- Renewal on September 2019– passport new expiry date: 19/7/2020</li> <li>- Records of work permit applied (MyEG) 3 months before expired date</li> <li>- Records of police report for absconded workers</li> <li>- Monitoring table &amp; pigeon hole of expiry date for workers' passport &amp; work permit</li> <li>- Payment done within same month for all unpaid overtime</li> <li>- Re-briefing to employee &amp; monitoring of hours to ensure no overtime exceed limit</li> <li>- SOCSO contribution done on monthly basis as per consecutive months' SOCSO Form 8A</li> <li>- New computerized system payslip issued</li> <li>- Form of consent for FW passport holding</li> <li>- Form of passport taking for use by FW</li> <li>- Form of passport return by FW to office</li> </ul> <p>Evidence shown the CAP was found to be effective thus the major NC was closed on 14/8/2020. Continuous implementation will be further verified in the next audit.</p>
<p><b>ASA1 Verification</b></p>	<p>Evidence of equal pay for the same work scope, the passport, SOCSO record was available as per sample documents of pay including work agreement, payslips, checkroll &amp; attendance Of December 2020 &amp; May 2021 sighted for workers as following:</p> <p>Telok Sengat POM:</p> <ul style="list-style-type: none"> <li>- Mohamad Shari Bin Ishak; M; GW</li> <li>- Tamilselvan A/L Raja Gopal; M; GW</li> <li>- Sarifah Binti A. Ghafar @ Mustafa; F; GW</li> <li>- Sakuntala A/P Chandran Pillai; F; GW</li> </ul> <p>Telok Sengat Estate:</p> <ul style="list-style-type: none"> <li>- Abu Bin Omarang; M</li> <li>- Jalizah Binti Jepon; F</li> </ul>

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	<ul style="list-style-type: none"> <li>- Mariappan A/L Perumal Ramoo; M</li> <li>- S. Mangesfri A/P K. Sambathu; F</li> </ul> <p>Kulai Young Estate:</p> <ul style="list-style-type: none"> <li>- Mohd Syazwan Bin Daud; M; Watchmen</li> <li>- Rohana Binti Tohiran; F; Nursery</li> <li>- Hasnah Binti Said; F; Gardener</li> <li>- Jefri Bin Mohd. Nor; M; GW</li> </ul> <p>Chamek Estate:</p> <ul style="list-style-type: none"> <li>- Mohd Faizal Bin Ab. Hadi; M; GW</li> <li>- Deivanai A/P Govindasamy; F; GW</li> <li>- Raj Kumar; FW; GW</li> <li>- Santosh Kumar; FW; GW</li> </ul> <p>Thus the Major NC remain closed</p>
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Non-conformity			
<b>NCR Ref #</b>	1817083-201908-M4	<b>Date Issued</b>	30/8/2019
<b>Due Date</b>	29/8/2020	<b>Date of nonconformity Closure</b>	14/8/2020
<b>Clause &amp; Category (Critical / Minor)</b>	Indicator SCCS 5.3.2 Major		
<b>Statement of Nonconformity:</b>	The established procedure for internal audit was not implemented.		
<b>Requirement Reference:</b>	<p>The site shall have a written procedure to conduct annual internal audit to determine whether the organization;</p> <ul style="list-style-type: none"> <li>i) Conforms to the requirements in the RSPO Supply Chain Certification Standard and the RSPO Market Communications and Claims Documents.</li> <li>ii) Effectively implements and maintains the standard requirements within its organization</li> </ul>		
<b>Objective Evidence:</b>	At Telok Sengat POM, the SC internal audit yet to be conducted.		
<b>Corrections:</b>	Conduct the internal audit immediately by trained internal auditor		
<b>Root Cause Analysis:</b>	RSPO SCCS Internal audit training was not yet conducted to the available internal auditor. Trained internal auditor not available prior to external audit		
<b>Corrective Actions:</b>	To plan for annual RSPO/MSPO internal audit to be conducted by trained internal auditor prior to external audit while awaiting all internal auditors fully trained		
<b>Assessment Conclusion:</b>	<p>Major NC Close Out Evidence Verification:</p> <ul style="list-style-type: none"> <li>- Records of RSPO SCCS internal audit dated 2/10/2019</li> <li>- Annual sustainability internal audit plan to be conducted by trained internal auditors</li> </ul> <p>Evidence shown the CAP was found to be effective thus the major NC was closed on 14/8/2020. Continuous implementation will be further verified in the next audit</p>		

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<b>ASA1 Verification</b>	From the record annual internal audit conducted by sustainability personnel from HQ which was latest done on 1- 4/6/2021, the record showed that management implementation of CAP accordingly thus Major NC remained closed.
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Non-conformity			
<b>NCR Ref #</b>	1817083-201908-M5	<b>Date Issued</b>	30/8/2019
<b>Due Date</b>	29/8/2020	<b>Date of nonconformity Closure</b>	14/8/2020
<b>Clause &amp; Category (Critical / Minor)</b>	Indicator SCCS 5.5.1 Major		
<b>Statement of Nonconformity:</b>	The evidence of the mill ensuring the independent third party complies with the requirements of the RSPO Supply Chain Certification Standard was not evident.		
<b>Requirement Reference:</b>	In cases where an operation seeking or holding certification outsources activities to independent third parties (e.g. subcontractors for storage, transport or other outsourced activities), the operation seeking or holding certification shall ensure that the independent third party complies with the requirements of the RSPO Supply Chain Certification Standard. A CPO mill and independent mil cannot outsource processing activities like refining or crushing.		
<b>Objective Evidence:</b>	No communication between the mill and the transporter (Yewtan Enterprise Sdn Bhd) with regards to the mill shall ensure the transporter complies with the requirement of RSPO supply chain certification standard.		
<b>Corrections:</b>	Communication to transporter conducted on 2/10/2020 to following transporter: - Aik Heng Hung Sdn. Bhd. - Sing Rubber & Transport Sdn. Bhd. - Yewtan Enterprise Sdn. Bhd.		
<b>Root Cause Analysis:</b>	Document of communication to transporter not available during the audit for the sampled transporter		
<b>Corrective Actions:</b>	Mill give a copy of supplementary document to transporter as reference. Communication also done in stakeholder consultation meeting.		
<b>Assessment Conclusion:</b>	Major NC Close Out Evidence Verification: - Provision of outsourced activities form to contractor (transporter) - Records of briefing dated 2/10/2019 Evidence shown the CAP was found to be effective thus the major NC was closed on 14/8/2020. Continuous implementation will be further verified in the next audit.		
<b>ASA1 Verification</b>	From the record company has outsourced the transportation for CPO and PK delivery to third parties and own company transporter. Transporter Agreements were verified as below: i) Sing Rubber & Transport Sdn Bhd valid for 3 years since 26/8/2019 for CPO and PK. Requirement to adhere to RSPO supply chain standard is clearly defined in the agreement supplementary and the contractors have acknowledged on the requirements to be complied. There was a briefing of the RSPO SCCS requirements		

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	to the PK and CPO transporters and attendance list was sighted dated 2/10/2020 thus Major NC remained closed.
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Non-conformity			
<b>NCR Ref #</b>	1817083-201908-M6	<b>Date Issued</b>	30/8/2019
<b>Due Date</b>	29/8/2020	<b>Date of nonconformity Closure</b>	14/8/2020
<b>Clause &amp; Category (Critical / Minor)</b>	Indicator SCCS 5.8.1 Major		
<b>Statement of Nonconformity:</b>	No training for RSPO supply chain being conducted.		
<b>Requirement Reference:</b>	The organization shall have a training plan on RSPO Supply Chain Standards requirements, which is subject to on-going review and is supported by records of the training provided to staff.		
<b>Objective Evidence:</b>	There was no training related to RSPO supply chain being conducted at Telok Sengat POM.		
<b>Corrections:</b>	Conduct RSPO SCCS training to mill employee immediately on 2/10/2019		
<b>Root Cause Analysis:</b>	Changes in mill management team cause delay of training		
<b>Corrective Actions:</b>	Establishment of training schedules on annual basis to include RSPO SCCS.		
<b>Assessment Conclusion:</b>	Major NC Close Out Evidence Verification: <ul style="list-style-type: none"> <li>- Records of RSPO SCCS training conducted on 2/10/2020 to relevant staff and employees</li> <li>- Records of annual training program</li> </ul> Evidence shown the CAP was found to be effective thus the major NC was closed on 14/8/2020. Continuous implementation will be further verified in the next audit.		
<b>ASA1 Verification</b>	From the record of training on SCCS dated 2/10/2020 and training need and plan showed that the management plan to conduct the SCCS on November 2021, thus Major NC remained closed.		

Non-conformity			
<b>NCR Ref #</b>	1817083-201908-M7	<b>Date Issued</b>	30/8/2019
<b>Due Date</b>	29/8/2020	<b>Date of nonconformity Closure</b>	14/8/2020
<b>Clause &amp; Category (Critical / Minor)</b>	Indicator SCCS 5.8.1 Major		
<b>Statement of Nonconformity:</b>	Management review meeting to discuss the issues related to the supply chain was not conducted.		
<b>Requirement Reference:</b>	The organization is required to hold management reviews annually at planned intervals, appropriate to the scale and nature of the activities undertaken.		



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<b>Objective Evidence:</b>	Management review yet to be conducted by Telok Sengat POM
<b>Corrections:</b>	Additional management review conducted on 2/10/2019 to cover the missing RSPO SCCS elements.
<b>Root Cause Analysis:</b>	Previous management review was not included the RSPO SCCS discussion
<b>Corrective Actions:</b>	Management review to include the RSPO SCCS discussion
<b>Assessment Conclusion:</b>	Major NC Close Out Evidence Verification: <ul style="list-style-type: none"> <li>- Minutes of meeting records for additional management review conducted on 2/10/2019</li> <li>- Notice of management review meeting included with RSPO SCCS agenda Evidence shown the CAP was found to be effective thus the major NC was closed on 14/8/2020. Continuous implementation will be further verified in the next audit.</li> </ul>
<b>ASA1 Verification</b>	From the record Internal audit was done on 1-4/6/2021 by company internal auditor. There are 1 NC for SCCS. The corrective action plan was available and verified during this assessment. The management review was done on 4/6/2021. This management review meeting conducted yearly basis, thus Major NC remained closed.

Non-conformity			
<b>NCR Ref #</b>	1817083-201908-N1	<b>Date Issued</b>	30/8/2019
<b>Due Date</b>	8/7/2021	<b>Date of nonconformity Closure</b>	8/7/2021
<b>Clause &amp; Category (Critical / Minor)</b>	Indicator 5.3.3 Minor		
<b>Statement of Nonconformity:</b>	The waste management and disposal plan to avoid or reduce pollution was not effectively implemented		
<b>Requirement Reference:</b>	A waste management and disposal plan to avoid or reduce pollution shall be documented and implemented.		
<b>Objective Evidence:</b>	Based on specific Boustead Sustainability Guideline – Scheduled Waste Procedure; Ref. # BEA SUS/SW/EQA (SW); Date: 22/12/2014, all identified scheduled wastes generated by mill and estates shall be handled in accordance with legal requirement Environmental Quality (Scheduled Waste) Regulations 2005. However, based on the evidence from site visit and documented information, it was found that the procedure was not implemented effectively in following sites: <ul style="list-style-type: none"> <li>- Scheduled wastes in Kulai Young Estate were stored more than 180 days period without DOE approval for following wastes: Battery (SW 110) since 9/6/2016; Oil filters (SW 410) since 2/7/2015, Used lubricants oil ((2/7/2015), empty fertilizer bag (29/5/2015), empty chemical container (1/1/2018)</li> <li>- Scheduled wastes were found being dumped at field PR18A near pocket forest CV in Telok Sengat Estate</li> </ul>		
<b>Corrections:</b>	Clear and keep the waste to the store and manage according to the scheduled waste handling procedure		

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<b>Root Cause Analysis:</b>	No training conducted for Person in-charge of management of scheduled waste
<b>Corrective Actions:</b>	To conduct training as per annual training plan
<b>Assessment Conclusion:</b>	The submitted CAP detailing on proposed actions to be taken to address the nonconformity based on the root cause determined were being reviewed by auditors deemed to be appropriate. Thus, the evidence of effectiveness of CAP will be verify during next coming surveillance assessment.
<b>ASA1 Verification</b>	Minor NC Close Out Evidence Verification: - The management conducted training SW on 21/9/2021, from the implementation SW inventory record dated 2/6/2021 and empty container disposal record 19/4/2021 was same as per record of chemical issuance. The picture of line site also showed that the evidence shown the CAP was found to be effective thus the minor NC was closed 8/7/2021.

Non-conformity			
<b>NCR Ref #</b>	1817083-201908-N2	<b>Date Issued</b>	30/8/2019
<b>Due Date</b>	8/7/2021	<b>Date of nonconformity Closure</b>	8/7/2021
<b>Clause &amp; Category (Critical / Minor)</b>	Indicator 1.3.1 Minor		
<b>Statement of Nonconformity:</b>	Code of ethical conduct and integrity in all operations and transactions not communicated to all level of workforce and operation.		
<b>Requirement Reference:</b>	There shall be a written policy committing to a code of ethical conduct and integrity in all operations and transactions, which shall be documented and communicated to all levels of the workforce and operations.		
<b>Objective Evidence:</b>	Code of Ethics and Conduct handbook that contains the code of ethical elements such as respect for fair conduct of business; prohibition of all forms of corruption, bribery and fraudulent use of funds and resources; and proper disclosure of information in accordance with applicable regulations and accepted industry practices; is only made available to the manager levels. No objective evidence sighted that the code of ethical conduct and integrity communicated to all levels of workforce and operations. Internal and external stakeholder interview confirmed that they are not being communicated and not aware of the policy.		
<b>Corrections:</b>	Communication conducted to all mill employees on 17/11/2019 (POM); Telok Sengat Estate (17 & 24/9/2019) – and by Contract & Compliance Manager (CCM) on 25/11/2019.		
<b>Root Cause Analysis:</b>	Changes in mill management team cause delay of training/ briefing/ communication to all employees.		
<b>Corrective Actions:</b>	To conduct training as per annual training plan		
<b>Assessment Conclusion:</b>	The submitted CAP detailing on proposed actions to be taken to address the nonconformity based on the root cause determined were being reviewed by auditors deemed to be appropriate. Thus, the evidence of effectiveness of CAP will be verify during next coming surveillance assessment.		
<b>ASA1 Verification</b>	Minor NC Close Out Evidence Verification:		

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	<p>Policies were communicated frequently through direct meeting or weekly assembly such as conducted by the management on 6/4/2021 in Telok Sengat POM, 11/1/2021 in Telok Sengat Estate, 20/5/2021 in Chamek Estate and 13/12/2020 in Kulai Young Estate. Seen the training attendance list where all the workers from different stations were participated in the training, photo evident and training materials. Besides, the policy was publicly displayed at the notice board outside the office, the CAP was found to be effective implemented thus the minor NC was closed 8/7/2021.</p>
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Non-conformity			
<b>NCR Ref #</b>	1817083-201908-N3	<b>Date Issued</b>	30/8/2019
<b>Due Date</b>	8/7/2021	<b>Date of nonconformity Closure</b>	8/7/2021
<b>Clause &amp; Category (Critical / Minor)</b>	Indicator 2.1.3 Minor		
<b>Statement of Nonconformity:</b>	<ol style="list-style-type: none"> <li>1. No mechanism in place to ensure deployment of contract migrant workers by the labour contractor to the estate carries a legal work permit; to prevent violation of Employment (Restriction) Act 1968, (Act 353), Part II – Restriction of Employment of Person Not being Citizens of Malaysia, Section 5 – Restrictions of Employment of Non-Citizens, Subsection (1)(a) and Immigration Act 155, Section 6 – Control of Entry into Malaysia</li> <li>2. No mechanism in place to maintain and monitor accuracy of wages paid to migrant workers by the labour contractor, based on the information furnished by the labour contractors. E.g. payslip; to prevent violation of Employment Regulation 1957, Section 9 Employer to furnish particulars under regulation 5 (c).</li> <li>3. No adequate mechanism in place to monitor and ensuring the migrant worker work permit remain valid at all time by initiating renewal of work permit with sufficient period of time prior to the expiry date of the permit; to prevent violation of Employment (Restriction) Act 1968, (Act 353), Part II – Restriction of Employment of Person Not being Citizens of Malaysia, Section 5 – Restrictions of Employment of Non-Citizens, Subsection (1)(a) and Immigration Act 155, Section 6 – Control of Entry into Malaysia.</li> </ol>		
<b>Requirement Reference:</b>	A mechanism for ensuring compliance shall be implemented.		
<b>Objective Evidence:</b>	<ol style="list-style-type: none"> <li>1. Based on Contractor interview, it is agreed that all task assigned by the Boustead Estate shall be completed with adequate workforce deployed. All migrant workers with Boustead work permit will be prioritized in job scheduling in the estate and should there be any shortage of workforce, the labour contractor will deploy other harvester / workers to complete the task assigned to them by the estate management. However, the estate management does not have a mechanism for ensuring all workers supplied by the workforce contractor are carrying a valid work permit, category of industry, passport validity and only deploying worker that registered with Boustead. Issues found e.g.               <ul style="list-style-type: none"> <li>- Sighted, 2 out of 3 randomly selected migrant workers at the Chamek Estate housing tenant found not in the employee list furnished to the auditor as at time of audit. Labour contractor interview states that there</li> </ul> </li> </ol>		

	<p>are 9 migrant workers under Perusahaan Mewah Hijau (PWH) and 5 migrant workers under Lokman Khalid Baba Resources (LKB). Employee List furnished to auditor has 8 migrant workers under PMH and 5 under LKB.</p> <ul style="list-style-type: none"> <li>- 1 out of the 3 migrant worker at Chamek Estate is holding work permit, neither belongs to Boustead Estate Agency Sdn Bhd nor labour contractor’s permit (Perusahaan Mewah Hijau). i.e. EPA Management Sdn Bhd, Ulu Tiram.</li> </ul> <p>2. Kulai Young Estate management provided with copy of payslip from labour contractor as evidence of monthly wage paid. Sighted copy of the payslip not consistent and accurate against the actual payslip received by the migrant workers. Amount of wages earned based on piece rates and amount of deductions appeared in both payslip found not tallied. Slip presented for review Payslip received by migrant worker:-</p> <table border="0"> <tr> <td>Income</td> <td>Deduction</td> <td>Income</td> <td>Deduction</td> </tr> <tr> <td>95A 733.95</td> <td>Advance 150.00</td> <td>95A 399.15</td> <td>Advance 0</td> </tr> <tr> <td>95C 629.40</td> <td>95C 602.40</td> <td>Elec</td> <td>25.50</td> </tr> <tr> <td>96A 201.00</td> <td>96A 411.60</td> <td>Shop Debt</td> <td>297.80</td> </tr> <tr> <td>97A 1157.76</td> <td>97A 1253.76</td> <td>Unripe</td> <td>5.00</td> </tr> <tr> <td>Allow</td> <td>100.00</td> <td>Kong</td> <td>35.00</td> </tr> <tr> <td>SGP</td> <td>200.00</td> <td>Allow</td> <td>100.00</td> </tr> <tr> <td>SGP</td> <td>200.00</td> <td></td> <td></td> </tr> <tr> <td>Total</td> <td>3022.11</td> <td>Total</td> <td>150</td> </tr> <tr> <td>Total</td> <td>3001.91</td> <td>Total</td> <td>323.30</td> </tr> </table> <p>Chamek Estate management received copies of payslip paid to the workers by PMH contractor as evidence of wages paid respectively. 1 randomly selected migrant worker occupied 1 of the housing in Chamek Estate found attached to PMH contractor, work as harvester but not found in the employee list furnished by the Chamek Estate. The payslip furnished by the selected worker found to be in hand-written detailing information of harvested fruit, amount of pay and deduction of water and electricity bill. As estate management has no pay record for the affected worker, verification of the payslip against other harvester payslip available found not consistent.</p> <p>3. Approx. 47 migrant workers passport found expired (averagely since 15.07.2019). Sighted renewal receipt and invoice issued by government agency – MYEG Services Bhd done several weeks prior expiry date of the permit. E.g. BM0790470 – Sahudullah expired on 15.07.2019 but renewal initiated on 12.07.2019.</p>	Income	Deduction	Income	Deduction	95A 733.95	Advance 150.00	95A 399.15	Advance 0	95C 629.40	95C 602.40	Elec	25.50	96A 201.00	96A 411.60	Shop Debt	297.80	97A 1157.76	97A 1253.76	Unripe	5.00	Allow	100.00	Kong	35.00	SGP	200.00	Allow	100.00	SGP	200.00			Total	3022.11	Total	150	Total	3001.91	Total	323.30
Income	Deduction	Income	Deduction																																						
95A 733.95	Advance 150.00	95A 399.15	Advance 0																																						
95C 629.40	95C 602.40	Elec	25.50																																						
96A 201.00	96A 411.60	Shop Debt	297.80																																						
97A 1157.76	97A 1253.76	Unripe	5.00																																						
Allow	100.00	Kong	35.00																																						
SGP	200.00	Allow	100.00																																						
SGP	200.00																																								
Total	3022.11	Total	150																																						
Total	3001.91	Total	323.30																																						
<p><b>Corrections:</b></p>	<ol style="list-style-type: none"> <li>1. Immediate renewal of expired worker’s permit &amp; report to police for absconded workers</li> <li>2. Reimbursement of unpaid wages</li> <li>3. Immediate renewal of expired worker’s permit &amp; report to police for absconded workers</li> </ol>																																								
<p><b>Root Cause Analysis:</b></p>	<ol style="list-style-type: none"> <li>1. No thorough monitoring of passport/work permit expiry for contractors’ workers by management &amp; newly joined workers’ permit was delayed due to awaiting FOMEMA results</li> <li>2. Manual pay-slip used as secondary document to show actual payment</li> </ol>																																								

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	3. No thorough monitoring of passport/work permit expiry for contractors' workers by management & newly joined workers' permit
<b>Corrective Actions:</b>	<ol style="list-style-type: none"> <li>1. Implementation of monitoring through table &amp; pigeon hole of passport &amp; work permit expiry date</li> <li>2. Use and issuance of single computerized system payslip to workers</li> <li>3. Implementation of monitoring through table &amp; pigeon hole of passport &amp; work permit expiry date</li> </ol>
<b>Assessment Conclusion:</b>	The submitted CAP detailing on proposed actions to be taken to address the nonconformity based on the root cause determined were being reviewed by auditors deemed to be appropriate. Thus, the evidence of effectiveness of CAP will be verify during next coming surveillance assessment.
<b>ASA1 Verification</b>	<p>Minor NC Close Out Evidence Verification:</p> <p>Sampling in Kulai Young estate, Contractor for Harvesting (Cipta Melati Enterprise). The contract agreement made on 1/1/2021 between Boustead Plantation Berhad and Cipta Melati Enterprise was available and valid until 31/12/2021. As per verification on record of foreign workers payslips, permit and passport as per below;-</p> <ul style="list-style-type: none"> <li>- Passport no. B3629153</li> <li>- Passport no. B5783219</li> </ul> <p>Showed that the contractor was comply with the regulation and criteria. There also passport checklist/monitoring to ensure all contractor workers passport valid and renew accordingly, the CAP was found to be effective implemented thus the minor NC was closed 8/7/2021.</p>

<b>Non-conformity</b>			
<b>NCR Ref #</b>	1817083-201908-N4	<b>Date Issued</b>	30/8/2019
<b>Due Date</b>	8/7/2021	<b>Date of nonconformity Closure</b>	8/7/2021
<b>Clause &amp; Category (Critical / Minor)</b>	Indicator 6.5.3 Minor		
<b>Statement of Nonconformity:</b>	<ol style="list-style-type: none"> <li>1. No approval letter obtained from the local authority (JTK) for the use of alternative source of water (tube well) to the housing area for Kulai Young Estate, in accordance with AKTA STANDARD-STANDARD MINIMUM PERUMAHAN DAN KEUDAHAN PEKERJA, 1990, Akta 446, BAHAGIAN II, PERUMAHAN DAN KEMUDAHAN-KEMUDAHAN LAIN, Seksyen 6. Bekalan air dan elektrik dan penyenggaraan rumah-rumah, Para 1 (a)</li> <li>2. Water supplied to the Kulai Young Estate's workers housing found not clean as at time of audit; although there is water filter system installed below the reservoir/tank and water pump. Line-site inspection and workers interview onsite states that the water supplied is not clean and only used for cleaning purposes. According to the estate management, the water quality has deteriorated recently.</li> <li>3. Line-site inspection was found inconsistently being carried out at Kulai Young Estate, based on AKTA STANDARD-STANDARD MINIMUM PERUMAHAN DAN KEUDAHAN PEKERJA, 1990, Akta 446, BAHAGIAN III, KESIHATAN, HOSPITAL,</li> </ol>		

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	RAWATAN PERUBATAN DAN KEBERSIHAN, Seksyen 23. Pemeriksaan mingguan ke atas perumahan pekerja, Para 2 & 3
<b>Requirement Reference:</b>	Growers and millers shall provide adequate housing, water supplies, medical, educational and welfare amenities to national standards or above, where no such public facilities are available or accessible.
<b>Objective Evidence:</b>	<ol style="list-style-type: none"> <li>1. All housing provided to estate workers are supplied with adequate water supply from natural resources – underground / tubed well. However, no written approval from the local authority is obtained for such arrangement.</li> <li>2. Line site visit observed that the underground water extracted thru tubed well are channelled to the filtration system before it is pumped to each houses in the estate. As at time of audit, the filtration system was found not effective as water supplied to the houses are not clean. Worker interview confirmed that the supplied water is not edible except for cleaning purposes.</li> <li>3. Line-site inspection report is documented in "Line Site Inspection Log book". Sighted last inspection is carried out by Hospital Assistant – Mr. Zayuri Mohd Noor on 18.04.2019.</li> </ol>
<b>Corrections:</b>	<ol style="list-style-type: none"> <li>1. To submit application to JTK</li> <li>2. To conduct water treatment as per procedure</li> <li>3. To conduct weekly inspection by appointed person in-charge</li> </ol>
<b>Root Cause Analysis:</b>	<ol style="list-style-type: none"> <li>1. Submission not made since the estate applied for public water supply</li> <li>2. Water sampling analysis was done in-house only</li> <li>3. Estate Hospital Assistant (EHA) was resigned since April 2019</li> </ol>
<b>Corrective Actions:</b>	<ol style="list-style-type: none"> <li>1. To follow-up with SAJ on application to get public water supply</li> <li>2. To conduct external sampling analysis and Health Department sampling</li> <li>3. To recruit new EHA</li> </ol>
<b>Assessment Conclusion:</b>	The submitted CAP detailing on proposed actions to be taken to address the nonconformity based on the root cause determined were being reviewed by auditors deemed to be appropriate. Thus, the evidence of effectiveness of CAP will be verify during next coming surveillance assessment.
<b>ASA1 Verification</b>	<p>Minor NC Close Out Evidence Verification:</p> <p>Estate management already install RO water in estate, they also follow up record with JTK dated 11/1/2021 as per letter for license application. Kulai young estate also already appoint HA as per appointment letter 4/11/2020 to ensure weekly inspection of linesite been done. The latest record of weekly inspection was on 27/6/2021 and previously record was on 18/6/2021 and 11/6/2021. The evidence showed that the CAP was found to be effective implemented thus the minor NC was closed 8/7/2021.</p>

Non-conformity			
<b>NCR Ref #</b>	1817083-201908-N5	<b>Date Issued</b>	30/8/2019
<b>Due Date</b>	8/7/2021	<b>Date of nonconformity Closure</b>	8/7/2021

<b>Clause &amp; Category (Critical / Minor)</b>	Indicator 6.12.2 Minor																								
<b>Statement of Nonconformity:</b>	Substitution of contract sighted for sampled migrant workers used at the estates. The labour contractors used by the estate management uses Boustead’s migrant workers quota to employ and supply migrant workers in estate works.																								
<b>Requirement Reference:</b>	Where applicable, it shall be demonstrated that no contract substitution has occurred.																								
<b>Objective Evidence:</b>	<p>Migrant workers holding Boustead work permit is managed by labour contractors; who will be disbursing / paying the migrant workers monthly salary based on the rate as agreed between the labour contractor and migrant workers, manages their day to day works and deployment to the estates.</p> <p>Employment contract sighted at estate; i.e. signed between worker and Boustead.</p> <p>Kulai Young Estate</p> <ul style="list-style-type: none"> <li>- Passport B5782219 / Indonesia Passport B2901610 / Indonesia</li> <li>- Passport B3624666 / Indonesia Passport B9251523 / Indonesia</li> <li>- Passport B5783196 / Indonesia Passport B5793761 / Indonesia</li> <li>- Passport B3629153 / Indonesia Passport B7654594 / Indonesia</li> </ul> <p>Chamek Estate</p> <ul style="list-style-type: none"> <li>- Passport C2490376 / Indonesia Passport C0695112 / Indonesia</li> <li>- Passport C1960362 / Indonesia Passport AU227579 / Indonesia</li> <li>- Passport P3030018 / India Passport M2638018 / India</li> <li>- Passport S8021633 / India</li> </ul> <p>Generally, there is substitution of contract sighted for all migrant workers used at the estates. Interview with labour contractors states that:-</p> <ul style="list-style-type: none"> <li>- They are taking charge of the migrant workers task and assigning their daily job deployment, including deployment to other estate if necessary.</li> <li>- Receiving worked payment from Boustead estate management</li> <li>- Paying monthly salary / wage to all migrant workers on every 7th of the month in cash.</li> <li>- Issuing pay-slip to all migrant workers once their salary is paid.</li> <li>- Had an agreement / contract sign with migrant workers; and knows that there is a contract signed between workers and Boustead.</li> <li>- Used Boustead migrant workers quota since they have limited quota on hiring migrant workers.</li> </ul> <p>Sighted there is inconsistent pay-slip received by the migrant worker from labour contractor against copy of pay-slip furnished to the Kulai Young estate management. E.g. as below.</p> <p>Slip presented for review Payslip received by migrant worker</p> <table border="0"> <tr> <td>Income (RM)</td> <td>Deduction (RM)</td> <td>Income (RM)</td> <td>Deduction (RM)</td> </tr> <tr> <td>95A 733.95</td> <td>Advance 150.00</td> <td>95A 399.15</td> <td>Advance 0</td> </tr> <tr> <td>95C 629.40</td> <td>95C 602.40</td> <td>Elec 25.50</td> <td></td> </tr> <tr> <td>96A 201.00</td> <td>96A 411.60</td> <td>Shop Debt 297.80</td> <td></td> </tr> <tr> <td>97A 1,157.76</td> <td>97A 1,253.76</td> <td>Unripe FFB 5.00</td> <td></td> </tr> <tr> <td>Allow 100.00</td> <td>Kong 35.00</td> <td></td> <td></td> </tr> </table>	Income (RM)	Deduction (RM)	Income (RM)	Deduction (RM)	95A 733.95	Advance 150.00	95A 399.15	Advance 0	95C 629.40	95C 602.40	Elec 25.50		96A 201.00	96A 411.60	Shop Debt 297.80		97A 1,157.76	97A 1,253.76	Unripe FFB 5.00		Allow 100.00	Kong 35.00		
Income (RM)	Deduction (RM)	Income (RM)	Deduction (RM)																						
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Allow 100.00	Kong 35.00																								

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	SGP 200.00 Allow 100.00 SGP 200.00 Total 3,022.11 Total 150.00 Total 3,001.91 Total 323.30
<b>Corrections:</b>	- Include contract workers in checkroll system - Immediate stop unauthorized deduction in payslip
<b>Root Cause Analysis:</b>	- No specific employment contract agreement template forms use before - Manual pay-slip used as secondary document to show actual payment
<b>Corrective Actions:</b>	- Use of single employment contract agreement - Use and issuance of single computerized system payslip to workers
<b>Assessment Conclusion:</b>	The submitted CAP detailing on proposed actions to be taken to address the nonconformity based on the root cause determined were being reviewed by auditors deemed to be appropriate. Thus, the evidence of effectiveness of CAP will be verify during next coming surveillance assessment.
<b>ASA1 Verification</b>	Minor NC Close Out Evidence Verification: As per verification on employment contract, payslip, permit and passport below:- - Kulai Young estate: B5783196, B3629153, B5783219 - Chamek estate: C3813438, C1865812, C0816785 Showed that the CAP was found to be effective implemented thus the minor NC was closed 8/7/2021.

Opportunity for Improvement	
OFI#	Description
<b>OFI 1</b>	<b>OFI Statement:</b> Nil <b>Verification / Follow-up actions:</b> Nil

**3.3.2 Summary of the Nonconformities and Status**

CAR Ref.	Category (Critical / Minor)	P&C Indicator	Issued Date	Status & Date (Closure)
1817083-201908-M1	Major	5.2.2	30/8/2019	14/8/2020
1817083-201908-M2	Major	6.1.3	30/8/2019	14/8/2020
1817083-201908-M3	Major	2.1.1	30/8/2019	14/8/2020
1817083-201908-M4	Major	SCCS 5.3.2	30/8/2019	14/8/2020
1817083-201908-M5	Major	SCCS 5.5.1	30/8/2019	14/8/2020
1817083-201908-M6	Major	SCCS 5.8.1	30/8/2019	14/8/2020
1817083-201908-M7	Major	SCCS 5.13.1	30/8/2019	14/8/2020
1817083-201908-N1	Minor	5.3.3	30/8/2019	8/7/2021



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1817083-201908-N1	Minor	1.3.1	30/8/2019	8/7/2021
1817083-201908-N1	Minor	2.1.3	30/8/2019	8/7/2021
1817083-201908-N1	Minor	6.5.3	30/8/2019	8/7/2021
1817083-201908-N1	Minor	6.12.2	30/8/2019	8/7/2021
2077371-202107-M1	Major (Critical)	3.8.9	8/7/2021	24/9/2021
2150250-202112-N1	Minor	7.3.3	17/1/2022	Open

### 3.4 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 *Boustead Telok Sengat POM* Certification Unit’s environmental and social performance, legal and any known dispute issues.

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

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

Stakeholders contacted		
Type of Stakeholder (e.g. Internal, Union, Contractor, Governmental Department, NGO, External, Communities)	Stakeholder name / organization	Means of communication (e.g. face to face interview, email, phone interview, comment from public notice)
Estate Auxiliary Police (AP) In-Charge	Chamek Estate AP Corporal	Face to face interview
Local Community Representative	KPPIK Mukim Niyor	Face to face interview
Estate NUPW Representative	Chamek Estate NUPW Secretary	Face to face interview
Foreign Workers’ Representative	Kulai Young Estate	Face to face interview
Estate Gender Committee Representative	Kulai Young Estate	Face to face interview
Estate Vendors	Kulai Young Estate & Telok Sengat Estate Contractors & Suppliers: - Abu Bakar Contractor - Chop Teck Lee - Seng Hong Quarry Sdn. Bhd.	Face to face interview
Mill Vendors	Telok Sengat POM Contractors & Suppliers:	Face to face interview

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	- Binsho Solutions - VSS Supply	
Mill NUPW Representative	Telok Sengat POM	Face to face interview
Mill Foreign Workers' Representative	Telok Sengat POM	Face to face interview
Mill Gender Committee Representative	Telok Sengat POM	Face to face interview

Stakeholders comment	
<b>1</b>	<p><b>Feedbacks:</b> Chamek Estate AP Corporal:            Been work in estate since the past 26 years. Estate security always been prioritized by management. No negative social issue among both local and foreign workers. Having good relationship with neighbour village security committee and local police to co-operate when there's issue related to security.</p> <p><b>Audit Team verification and response:</b>            No further issue.</p>
<b>2</b>	<p><b>Feedbacks:</b> KPPIK Mukim Niyor            No issue of negative social impacts from estate operation instead provide good opportunity among villagers for employment within company. Have good relationship with estate management whom always participate and contribute towards village programs or events. No issues of boundaries between estate and villagers land.</p> <p><b>Audit Team verification and response:</b>            No further issue.</p>
<b>3</b>	<p><b>Feedbacks:</b> NUPW representatives            No restrictions by management to all mill and estate employees to join union. Almost all local workers associated with NUPW while more than 50% foreign workers become member. Required fees paid by company with no issue.</p> <p><b>Audit Team verification and response:</b>            No further issue.</p>
<b>4</b>	<p><b>Feedbacks:</b> Mill &amp; Estate vendors (contractors &amp; suppliers)            No issue in contractual matters since company always give priority to locals and/or long-served contractor to provide service/contract work. Contract pricing fair to both parties for direct award contract unless involve tendering that need to be negotiated. Nevertheless, negotiated price for specific contract/tender work if awarded still fair to both parties.</p> <p><b>Audit Team verification and response:</b>            No further issue.</p>
<b>5</b>	<p><b>Feedbacks:</b> Gender committee representatives            No new mothers at any of the Estates and Mill within Telok Sengat Business Unit. In case of any, the committee representative will take actions to address any needs that have been identified.</p> <p><b>Audit Team verification and response:</b>            No further issue.</p>

List of land owner / user contacted					
Name	Years of ownership / used	Land area (ha)	Agreement (Yes / No)	Agreement base on FPIC (Yes/No)	Compliance on the agreement terms and conditions
The plantation was planted with oil palm since 1979 and already 2 <sup>nd</sup> cycle planting.					



Previous land owner / user comment	
	<b>Feedbacks:</b>
	<b>Audit Team verification and response:</b>

### 3.5 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.

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

<p>The audit objectives have been achieved and the certificate scope is appropriate. Based on the results of this audit, it is concluded that Boustead Telok Sengat POM and Supply base has complied with the Malaysia National Interpretation 2019 of the RSPO P&amp;C 2018 and audit criteria identified within the audit report. It is deemed that the management system has achieved its intended outcomes. Therefore, it is recommended that Boustead Telok Sengat POM and Supply base is remain certified.</p>	
Report prepared by	Acceptance of Assessment Conclusion
<p><b>Name:</b>  <b>Muhamad Naquiuddin Mazeli</b></p>	<p><b>Name:</b>            MUHD HAFIZ BIN MAMAT</p>
<p><b>Company Name:</b>  <b>BSI Services (M) Sdn Bhd</b></p>	<p><b>Company Name:</b>            BOUSTEAD PLANTATION</p>
<p><b>Title:</b>  <b>Lead Auditor</b></p>	<p><b>Title:</b>            SUSTAINABILITY OFFICER</p>
<p><b>Signature:</b></p> 	<p><b>Signature:</b>  <i>(I the undersigned, being the most senior relevant management representative of the operation seeking or holding certification, agree with the contents of this report and accept the liability in execution of the procedure in the report.)</i></p> 
<p><b>Date:</b> 10/3/2022</p>	<p><b>Date:</b> 10/3/2022</p>

**Appendix A: Summary of Findings**

Criterion / Indicator	Assessment Findings	Compliance	
<b>Principle 1: Behave ethically and transparently</b>			
<b>Criterion 1.1:</b> The unit of certification provides adequate information to relevant stakeholders on environmental, social and legal issues relevant to RSPO Criteria, in appropriate languages and forms to allow for effective participation in decision making.			
1.1.1	<p><b>(C)</b> Documents that are specified in the RSPO P&amp;C are made available to the public.</p> <p>- Critical (Major) compliance -</p>	<p>Adequate information covering on environmental, social and legal issues which are relevant to RSPO Criteria and relevant to stakeholders is shared for effective participation and decision making. Information on environmental, social and legal issues relevant to RSPO Criteria was made available by Boustead POM and Estates certification units (Boustead Telok Sengat Business Unit - TSBU) to relevant stakeholders for effective participation in decision making.</p> <p>Public documents available in mill including Telok Sengat Palm Oil Mill OER Performance 2016-2021 and KER Performance 2016-2021. In Telok Sengat Estate, Chamek Estate and Kulai Young Estate public documents available such as land title, OSH plan, HCV documents, negotiation procedure, complaint records, RSPO public summary reports and EIA. Management Plans &amp; Continuous Improvement Plans and company policies also available publicly.</p> <p>Latest external stakeholder meeting planned to be conducted for year 2021 was cancelled due to the COVID-19 pandemic. In place of meeting, Telok Sengat Business Unit consult external stakeholders via email and letters to seek for feedbacks. No negative feedbacks received. Previous external stakeholders meeting was conducted on 8/7/2020.</p> <p>Internal stakeholder meeting among workers was conducted on 18/5/2021 attended by all staff and employees. The meeting</p>	Complied

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		conducted together with refresher briefing and training of company's sustainable policies.	
1.1.2	Information is provided in appropriate languages and accessible to relevant stakeholders. - Minor compliance -	From the verification the information that available at board in operation unit area was in appropriate language. From the interview with stakeholder and workers the information was accessible to them.	Complied
1.1.3	<b>(C)</b> Records of requests for information and responses are maintained. - Critical (Major) compliance -	Records of request for information and responses are maintained by Boustead Telok Sengat as per sample sighted as following: - DOE Inspection Log Book: Field Citation S/n: 002036 & Borang Selongkar S/n: 000842; Date: 15/11/2019 - DOSH Machinery Inspection Log Book: Pemeriksaan Ulangan Kilang & Jentera Berperakuan Kelayakan Telok Sengat POM H/K/0294; Date: 29/4/2019 Borang Aduan/Pendapat Pekerja Kilang, Ladang, Orang Awam, Masyarakat Sekitar & Lain-lain # SRM-ADUAN/OFC 0079; Date: 8/1/2020 from Mill Workers housing defect complaint	Complied
1.1.4	<b>(C)</b> Consultation and communication procedures are documented, disclosed, implemented, made available, and explained to all relevant stakeholders by nominated representative. - Critical (Major) compliance -	Boustead Plantations Berhad has developed a Communication Procedure. The procedure is to handle communication for internal and external stakeholders. The methods of communication such as formally write in, through phone call, discussion or meeting and etc. External Communication Form (PKSJ-001) and Communication Record (PKSJ-002) was implemented.	Complied
1.1.5	There is a current list of contact and details of stakeholders and their nominated representatives. - Minor compliance -	Current list of stakeholders containing their nominated representatives contact and details available for internal and external stakeholders among local communities, authorities, vendors, neighbours and etc.	Complied
<b>Criterion 1.2:</b> The unit of certification commits to ethical conduct in all business operations and transactions.			

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<p>1.2.1</p>	<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>Boustead Plantations Berhad has established a handbook of Code of Ethics &amp; Conduct where the company was committed to maintain the highest standards of integrity and professionalism in its business dealings. The company will ensure they do business in a transparent, appropriate and fair manner. There were 6 principles that all the employees must observe in the Code of Conduct as below:</p> <ul style="list-style-type: none"> <li>- To avoid conflict of interest.</li> <li>- To avoid misuse of position.</li> <li>- To prevent misuse of information gained through the Group’s operation, either for personal gain or for any purpose other than that intended by the Group.</li> <li>- To ensure confidentiality of information, communication and transactions conducted by the Group.</li> <li>- To ensure transparency and justice.</li> <li>- To create a respectful workplace environment and culture.</li> </ul> <p>Policies were communicated frequently through direct meeting or weekly assembly such as conducted by the management on 6/4/2021 in Telok Sengat POM, 11/1/2021 in Telok Sengat Estate, 20/5/2021 in Chamek Estate and 13/12/2020 in Kulai Young Estate. Seen the training attendance list where all the workers from different stations were participated in the training, photo evident and training materials. Besides, the policy was publicly displayed at the notice board outside the office.</p>	<p>Complied</p>
<p>1.2.2</p>	<p>A system is in place to monitor compliance and the implementation of the policy and overall ethical business practice.</p> <p>- Minor compliance -</p>	<p>All employees of mill and estates within Boustead Telok Sengat were given the Code of Ethics &amp; Conduct handbook and signed the letter of declaration to comply with the requirements. Individual performance for compliance of policy implementation were</p>	<p>Complied</p>

		<p>monitored by immediate superior and assessed during annual appraisal program.</p> <p>Monitoring also conducted through annual internal audit conducted by sustainability personnel from HQ which was latest done on 1<sup>st</sup> to 4<sup>th</sup> June 2021.</p>	
<p><b>Principle 2: Operate legally and respect rights</b></p>			
<p><b>Criterion 2.1:</b> There is compliance with all applicable local, national and ratified international laws and regulations.</p>			
2.1.1	<p><b>(C)</b> The Unit of Certification complies with legal requirements            - Critical (Major) compliance -</p>	<p>The management already updated the LORR dated 2/5/2021. The list of permit and license required for the operations of the certification unit were sighted. The sample of permit and license:</p> <p>Chamek estate            License for Diesel from KPDNKK BPGK JH (KLU) 2321 SK for Diesel total 7,280 liter valid until 9/3/2023.            MPOB license 6133906002000 for total planted 816.9 ha valid until 31/7/2022            Weighbridge already been calibrated by De Metrology Sdn Bhd dated 21/12/2020 valid for 1 year.            License from JTK for wages deduction for water consumption referred PP3/29/254/2006 dated 1/8/2006</p> <p>Kulai Young Estate            MPOB license 616050002000 valid until 31/12/2021            PMT License for air receiver JH PMT 15121 valid until 8/6/2021, management already get extension from JKPP as per letter JH/ML/21/30953 dated 3/6/2021 for another 6 month.</p>	Complied



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		<p>License from KPDNKK (KPDNKK.J-JB/26/5A/11/1410(P/D)(B) available with permission to store 10,000liter diesel.</p> <p>Telok Sengat Estate</p> <p>MPOB license referred license no 615231002000 for sell and transfer FFB available valid until 30/9/2021.</p> <p>JTK license for wages deduction for water bill was available referred TK(NJ)U-21 dated 21/8/2018</p> <p>Diesel storage license from KPDNKK, referred KPDNKK.J.KTG/PERMIT 0298 (PD) valid until 20/2/2022</p> <p>License for JH PMT 17734 from DOSH for air compressor was valid until 21/1/2022</p>	
2.1.2	<p>A documented system for ensuring legal compliance is in place. This system has a means to track changes to the laws and regulations.</p> <p>- Minor compliance -</p>	<p>Tracking system available to identify changes in the relevant regulations through head office, sustainability team, website information and the information are communicated from the Head Office (Sustainability Section). Boustead Plantations Berhad have centralized system for tracking any changes in the law and subscribe into Lawnet. The latest communication was done on 1/7/2021 by Amrul Nizam Bin Abdul Ghani. The changes included Employees Minimum Standard of Housing, Accommodations and Amenities Regulations 2021 and Pesticide Order 2021 (Amendment of First Scheduled).</p>	Complied
2.1.3	<p>Legal or authorised boundaries are clearly demarcated and visibly maintained, and there is no planting beyond these legal or authorised boundaries.</p> <p>- Minor compliance -</p>	<p>From the site verification the boundaries was clearly demarcated using canal and boundary marker. Sighted no planting beyond the legal boundary of Boustead Telok sengat operating unit verified during site visit. Sampling in Kulai Young estate, field 1PJ2013B boundary with Hanchang Construction.</p>	Complied
<p><b>Criterion 2.2:</b> All contractors providing operational services and supplying labour, and Fresh Fruit Bunch (FFB) suppliers, comply with legal requirements.</p>			

2.2.1	<p>A list of contracted parties is maintained.</p> <p>- Minor compliance -</p>	<p>The management updated the list as per version 5/2021, there are 9 contractors under this list sample in Kulai Young estate. This maintain updated every year by management.</p>	Complied
2.2.2	<p>All contracts, including those for FFB supply, contain specific clauses on meeting applicable legal requirements, and this can be demonstrated by the third party.</p> <p>Evidence of legal due diligence of all contracted third parties, recruitment agencies (licensed/ accredited) for migrant workers, service providers and labour contractors, is available.</p> <p>- Minor compliance -</p>	<p>Sampling in Kulai Young estate, Contractor for Harvesting (Cipta Melati Enterprise). The contract agreement made on 1/1/2021 between Boustead Plantation Berhad and Cipta Melati Enterprise was available and valid until 31/12/2021. As per verification on record of foreign workers payslips, permit and passport as per below;-</p> <ul style="list-style-type: none"> <li>- Passport no. B36291XX</li> <li>- Passport no. B57832XX</li> </ul> <p>Showed that the contractor was comply with the regulation and criteria.</p>	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>Clauses disallowing child, forced and trafficked labour are covered under Clause 8 of the contract agreement quote The contractor must employ only legal workers with proper permits. As per verification foreign workers as per below;-</p> <ul style="list-style-type: none"> <li>- Passport no. B3629153</li> <li>- Passport no. B5783219</li> </ul>	Complied
<b>Criterion 2.3:</b> All FFB supplies from outside the unit of certification are from legal sources.			
2.3.1	<p><b>(C)</b> For all directly sourced FFB, the mill requires:</p> <ul style="list-style-type: none"> <li>• Information on geo-location of FFB origins</li> <li>• Evidence of the ownership status or the right/claim to the land, or valid use of land by the grower/smallholder</li> <li>• One or more supporting documents for claims</li> <li>• Valid MPOB license</li> </ul> <p>- Critical (Major) compliance -</p>	<p>A list of all directly sourced FFB is available. It has the information about names of the suppliers, MPOB License number, geo-location, address, hectarage and certification status. So far the suppliers were registered as per list of smallholder updated until March 2021. The supporting document(s) to show the status of the third party FFB suppliers land ownership such as Land Application (LA); letter from Land &amp; Survey Department; Temporary Occupation Lease</p>	Complied

		(TOL); Provisional Lease; Alienated Land was available for verification.	
2.3.2	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. - Minor compliance -	A list of all indirectly sourced FFB is available. It has the information about names of the suppliers, MPOB License number, geo-location, address, hectareage and certification status. So far the suppliers were registered as per list of smallholder updated until Nov 2021.	Complied
<b>Principle 3: Optimise productivity, efficiency, positive impacts and resilience</b>			
<b>Criterion 3.1:</b> There is an implemented management plan that aims to achieve long-term economic and financial viability.			
3.1.1	<b>(C)</b> A business or management plan (minimum three years) is documented that includes, where applicable, a jointly developed business case for Scheme Smallholders. - Critical (Major) compliance -	Telok Sengat Business Unit have established and implemented its commitment to long term sustainability and improvements through a capital expenditure program e.g.: Consist of area statement, capital expenditures, vehicle and heavy plan running schedule, upkeep and cultivation, harvesting, nursery, production cost etc. Budget 2021 and Boustead Group of Estate Five (5) Years Planning Horizon (projections 2021- 2025) was verified during the audit. Similarly, the Chamek estate possessed a similar budget format. Inclusive there is also a 5-year budget/forecast financial plan 2021-2025 allocating categories among others such as harvesting, transportation, manuring and others. The business plan comprises established for financial from 2021- 2025. a) Crop intake. b) Processing cost RM/mt c) Extraction rates. d) CAPITAL expenditures.	Complied

3.1.2	<p>An annual replanting programme projected for a minimum of five years with yearly review, is available.</p> <p>- Minor compliance -</p>	<p>The revised replanting program was established which was updated on Jan 2021. The replanting programmed sighted as follow:</p> <table border="1" data-bbox="1137 443 1930 1040"> <thead> <tr> <th>Year</th> <th>Ha</th> <th>Estate</th> </tr> </thead> <tbody> <tr> <td>2021</td> <td>116.20</td> <td rowspan="5">Chamek Estate</td> </tr> <tr> <td>2022</td> <td>98.30</td> </tr> <tr> <td>2023</td> <td>27.30</td> </tr> <tr> <td>2024</td> <td>30.70</td> </tr> <tr> <td>2025</td> <td>39.50</td> </tr> <tr> <td>Nil</td> <td>Nil</td> <td>Kulai Young Estate</td> </tr> <tr> <td>2022</td> <td>157.10</td> <td rowspan="5">Telok Sengat Estate</td> </tr> <tr> <td>2023</td> <td>210</td> </tr> <tr> <td>2024</td> <td>102.4</td> </tr> <tr> <td>2025</td> <td>-</td> </tr> <tr> <td>2026</td> <td>143.60</td> </tr> </tbody> </table>	Year	Ha	Estate	2021	116.20	Chamek Estate	2022	98.30	2023	27.30	2024	30.70	2025	39.50	Nil	Nil	Kulai Young Estate	2022	157.10	Telok Sengat Estate	2023	210	2024	102.4	2025	-	2026	143.60	Complied
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3.1.3	<p>The unit of certification holds management reviews at planned intervals appropriate to the scale and nature of the activities undertake.</p> <p>- Minor compliance -</p>	<p>The management conducted management review on 4/6/2021. The management will be conducted yearly basis.</p>	Complied																												
<p><b>Criterion 3.2:</b> The unit of Certification regularly monitors and reviews their economic, social and environmental performance and develops and implements action plans that allow demonstrable Continuous improvement in key operations.</p>																															
3.2.1	<p><b>(C)</b> The action plan for continuous improvement is implemented, based on consideration of the main social and environmental impacts and opportunities of the unit of certification.</p>	<p>The continuous improvement plan was available for Boustead Chamek and Boustead Telok Sengat estate dated 18/3/2021, this</p>	Complied																												

	- Critical (Major) compliance -	<p>plan included social, environment impact and other opportunities such as per sample below:-</p> <ul style="list-style-type: none"> <li>- To substitute chemical to cultural and biological practices (using beneficial plant)</li> <li>- To ensure the soil erosion reduced</li> <li>- To installed water machine to supply water for domestic used</li> <li>- To provide milk, toys and play equipment at creche</li> </ul> <p>The record of implementation was available at site.  Verification as per bill dated 26/4/2021 on toys and play equipment buying by Chamek estate</p>	
3.2.2	<p>As part of the monitoring and continuous improvement process, annual reports are submitted to the RSPO Secretariat using the [RSPO metrics template].</p> <p><b>PROCEDURAL NOTE:</b>  The RSPO metrics template is awaiting decision/agreement by RSPO and the issue is still being discussed.  Until such metrics is agreed and developed, companies will carry on with existing reporting e.g. PalmGHG, Annual Communication of Progress (ACOP) reporting, and information provided to Certification Body and feedback via RSPO Secretariat is required.</p> <p>- Minor Compliance -</p>	<p>The RSPO metric was available using edition 2.1, the data that been verified such as record of LTA, complaint record was accurate as per verification.</p>	Complied
<b>Criterion 3.3:</b> Operating procedures are Appropriately documented, consistently implemented and monitored.			
3.3.1	<p><b>(C)</b> Standard Operating Procedures (SOPs) for the unit of certification are in place.</p> <p>- Critical (Major) compliance -</p>	<p>Quality Assurance Manual (QAM, Rev:01, Date:2/11/09), Mill operation Manual (MOM, Issue 2, Date: June 2002) and Standard Operating Procedure for SPOM was established to cover all the station. Sighted some of the procedure related to loading ramp, sterilization station, threshing and press station, clarification station, kernel station, depericarper station, kernel station, effluent</p>	Complied

		<p>treatment plant, boiler house, power house, water treatment plant and etc. Work Instructions have been derived from SOPs and it were displayed at work stations at the mill and at certain locations at the estates, such as the Muster Notice Boards. Eg: WI Sterilizer, WI Boiler, WI Engine room and WI store.</p> <p>Boustead Plantations Bhd has established the agriculture manual (Oil Palm Circular) covers felling and clearing, planting material, weeding, manuring, pest &amp; disease, census &amp; thinning out, drains, road &amp; bridges, soil/water conservation, boundaries, fences &amp; survey, supplying, pruning, collection (harvesting), external transport and etc.</p> <p>SWP - Safe work procedure including SOP for Reception &amp; dispatch, Fruit Handling, Sterilisation, Threshing, Pressing, Boiler House, RWT, Workshop, Laboratory, Mill Store, Working at height and Confined Space.</p>	
3.3.2	<p>A mechanism to check consistent implementation of procedures is in place.</p> <p>- Minor Compliance -</p>	<p>There is mechanism in operating unit to ensure consistent of implementation of procedure. Verified as per below:-</p> <p>Internal Audit in Kulai Young Estate conducted on 7/7/2021.</p> <p>Group Internal audit report (No. PW21-TSE-SAM-R-XXX) in Telok Sengat estate conducted on 22-26/2/2021.</p> <p>Agronomist report dated 6/1/2022. This report establish by Applied Agricultural Resources Sdn Bhd</p>	Complied
3.3.3	<p>Records of monitoring and any actions taken are maintained and available.</p> <p>- Minor Compliance -</p>	<p>The monitoring of the SOP implementation was closely made by the all levels of the supervisory personnel with records maintained and Checked. Among others the records are;</p> <p>a) Daily production/work records for the core activities at the estates/mill</p> <p>b) field cost book for Telok Sengat estate</p>	Complied

		<p>c) Chemical consumption record in Kulai Young estate</p> <p>d) PA Visit record available dated 26/2/2021 in Kulai Young estate.</p> <p>e) Internal audit at Chamek record dated 1-4 June 2021 available at site.</p>	
<p><b>Criterion 3.4:</b> A comprehensive Social and Environmental Impact Assessment (SEIA) is undertaken prior to new plantings or operations, and a social and environmental management and monitoring plan is implemented and regularly updated in ongoing operations.</p>			
3.4.1	<p><b>(C)</b> In new plantings or operations including mills, an independent SEIA, undertaken through a participatory methodology involving the affected stakeholders and including the impacts of any smallholder/out-grower scheme, is documented.</p> <p>- Critical (Major) compliance -</p>	<p>There's no new planting in all estates within Boustead TSBU. For existing plantation, the social part documented as Social Impact Assessment (SIA) Boustead Plantations Berhad; Telok Sengat Palm Oil Mill; Telok Sengat Estate; Kulai Young Estate; Chamek Estate; Eldred Estate; Bekoh Estate; Johor. Malaysia; June 2018; Date of Assessment: 2<sup>nd</sup> – 10<sup>th</sup> April 2018; Date of delivery of SIA findings: 20<sup>th</sup> April 2018; Date of Stakeholder Consultations: 21<sup>st</sup> – 22<sup>nd</sup> May 2018; Date of Report: 29<sup>th</sup> June 2018 by Malaysia Environmental Consultant (MEC). The assessment undertaken by professionals through participatory methodology involving affected stakeholders of all operating units assessed.</p> <p>For environmental part, the aspect and impact of environmental already include stakeholder on EFB implementation. The update assessments are conducted internally by Sustainability team and to assess the current impact to the surrounding communities.</p>	Complied
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>For social part, SIA is available and been reviewed periodically, latest during the previous external multi-stakeholders meeting conducted on 11/7/2019 for progress and updates of management plan. Latest review of management action plan for social and environmental impacts was done through feedbacks letter sent to external stakeholders for 2021 since face to face meeting was unable to be conducted due to COVID-19 pandemic. No feedbacks received from external stakeholders.</p>	Complied

		<p>Notwithstanding, individual operating units managed to conduct the review with individual stakeholders through multiple meetings conducted as per sample sighted as following:</p> <ul style="list-style-type: none"> <li>- Telok Sengat POM External FFB suppliers meeting date: 11/3/2021</li> <li>- Telok Sengat Estate external stakeholder (grocery shop owner &amp; neighbours) meeting date: 10/6/2021</li> <li>- Kulai Young Estate contractors meeting date: 21/6/2021</li> <li>- Kulai Young Estate Trade Union (NUPW) meeting date: 30/4/2021</li> <li>- Kulai Young Estate internal stakeholder (workers) meeting date: 18/5/2021</li> <li>- Chamek Estate internal stakeholder (workers) meeting date: 17/6/2021</li> </ul>	
3.4.3	<p><b>(C)</b> The social and environmental management and monitoring plan is implemented, reviewed and updated regularly in a participatory way.</p> <p>- Critical (Major) compliance -</p>	<p>Based on the initial assessment findings, the social and environmental management and monitoring plan was implemented, reviewed and updated regularly in a participatory way through meetings conducted with respective stakeholders. Among aspects and impacts identified to be taken action were as following:</p> <ul style="list-style-type: none"> <li>- Employees living &amp; worker infrastructure (housing, clean water etc.) conditions</li> <li>- Employees' children education facilities availability and conditions</li> <li>- Health and general facilities availability and conditions</li> <li>- Employee welfare and wages</li> <li>- Waste management &amp; pollution prevention</li> </ul>	Complied

**Criterion 3.5:** A system for managing human resources is in place.



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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>Boustead Telok Sengat has established the Procedure of New Local Staff/Workers Hiring; Rev. # 1; Effective date: Feb 2020 and Foreign Workers Procedure; Rev. # 1; Issue date: Jan 2016 which documented the procedure for recruitment, selection, hiring, promotion, retirement and termination of both local and foreign workers. The procedures were made available to the workers upon request.</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
<p><b>Criterion 3.6:</b> An occupational health and safety (H&amp;S) plan is documented, effectively communicated and implemented.</p>			
3.6.1	<p><b>(C)</b> All operations are risk assessed to identify H&amp;S issues. Mitigation plans and procedures are documented and implemented.</p> <p>- Critical (Major) compliance -</p>	<p>SOP for HIRARC has been established. Last reviewed was done on 23/5/2021 (Telok Sengat POM) and Feb 2021 (Kulai Young Estate) to include EFB Hopper, workshop, chemical store, WTP station, Kernel Plant, Confined Space, Boiler Station, Ramp, Pressing Station, Clarification Station, Sterilizer Station, Harvesting, Manuring, Spraying, Nursery, Replanting, to name a few.</p> <p>The risk assessment for chemical (CHRA) in Chamek estate already been conducted by Mr Yeow Liang Ming refer report HQ/14/ASS/00/350-2020/070 dated 3 Nov 2020.</p> <p>For all operation in Chamek estate, the risk and hazard already been assessed and recorded under HIRARC. Latest was done on 28/12/2020 on grass cutting area. The noise risk been updated in the latest HIRARC with action plan and their hazard/severity.</p> <p>In Boustead Telok Sengat POM , HIRARC already been reviewed by management dated 23/5/2021. The management also has establish the guidelines regarding to Covid 19 under title Covid 19 Emergency Preparedness and Response Guidelines</p>	Complied

<p>3.6.2</p>	<p><b>(C)</b> The effectiveness of the H&amp;S plan to address health and safety risks to people is monitored.          - Critical (Major) compliance -</p>	<p>An annual Safety and Health Program for year 2021 had been developed at each Operating Unit. A table Program by month was sighted. It is grouped as follows into</p> <p>(a) OSHA 1994 where</p> <ul style="list-style-type: none"> <li>i. 3-monthly Safety and Health Committee,</li> <li>ii. Workplace Inspection,</li> <li>iii. Workers Medical Surveillance (by OHD) before commencement of work and at 12-monthly interval,</li> <li>iv. Chemical Health Risk Assessment, 5 yearly,</li> <li>v. Chemical Exposure Monitoring,</li> <li>vi. Audiometric test</li> <li>vii. Chemical Register</li> <li>viii. submission of accident form to DOSH JKPP 8 before 31st January of the following year and JKPP 6 depends on the type accident as per NADOOPOD Regulations 2004 and</li> <li>ix. Permit To Work, before start of dangerous work</li> </ul> <p>(b) Emergency Response Plan</p> <ul style="list-style-type: none"> <li>i. Annual Emergency Response Team Training</li> <li>ii. Annual Emergency / Fire drill</li> <li>iii. Annual First Aider Training</li> <li>iv. Monthly Fire Fighting Equipment Inspection, and</li> <li>v. Monthly First Aid Box Inspection and Replenishment</li> </ul> <p>(c) Building and Structure</p> <ul style="list-style-type: none"> <li>i. Monthly Earth Leakage Circuit Breaker (ELCB) Inspection</li> </ul>	<p>Complied</p>
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		<ul style="list-style-type: none"> <li>ii. Weekly inspection of workers housing</li> </ul> <p>(d) Safety &amp; Health Department</p> <ul style="list-style-type: none"> <li>i. Annual SHE Audit</li> <li>ii. Monthly Accident Frequency Rate (AFR) Report</li> </ul> <p>(e) Vehicle, Machinery and Equipment Safety</p> <ul style="list-style-type: none"> <li>i. Daily Vehicle Inspection</li> <li>ii. Yearly Vehicle Maintenance Training</li> <li>iii. Machinery Certificate of Fitness Renewal by DOSH – every 15 month</li> <li>iv. Monthly LEV Inspection (Internal)</li> <li>v. Yearly LEV Inspection (External)</li> </ul> <p>(f) Estate / Mill Training Program Mill –</p> <ul style="list-style-type: none"> <li>i. Annual SOP training for each Work station</li> <li>ii. Hearing Conservation Training – yearly</li> <li>iii. Confined Space Entry – Yearly</li> <li>iv. Working at height – yearly</li> <li>v. PPE training - yearly</li> </ul> <p>Estate –</p> <ul style="list-style-type: none"> <li>i. Annual SOP training by each Job Position / Task performed</li> <li>ii. PPE training - yearly</li> </ul>	
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**Criterion 3.7:** All staff, workers, Scheme Smallholders, out-growers, and contract workers are appropriately trained.

3.7.1	<p><b>(C)</b> A documented programme that provides training is in place, which is accessible to all staff, workers, Scheme Smallholders and out-growers, taking into account gender-specific needs, and which covers applicable aspects of the RSPOP&amp;C, in a form they understand, and which includes assessments of training.</p> <p>- Critical (Major) compliance -</p>	<p>In Chamek estate, the staff and workers training need analysis was conducted to determined type of training needed. The record dated Jan 2021 analysis was include sprayer, harvester, welding, contractor, store keeper and others. Under this plan also included Woman committee meeting training on sexual harassment and others gender involve.</p> <p>For Boustead Telok Sengat POM, the training needs and plan was available for each section and verified dated 18/2/2021. This training plan included safety, environment, supply chain, social and work specialist needed.</p>	Complied												
3.7.2	<p>Records of training are maintained.</p> <p>- Minor Compliance -</p>	<p>The training record was available in record, sampling the record of training as per below:-</p> <p>Chamek Estate</p> <table border="1" data-bbox="1151 831 1899 1264"> <thead> <tr> <th>Date</th> <th>Training</th> </tr> </thead> <tbody> <tr> <td>9/7/2020</td> <td>Soil erosion, buffer zone and HCV Training</td> </tr> <tr> <td>21/9/2020</td> <td>Scheduled waste Training</td> </tr> <tr> <td>27/3/2020</td> <td>Policy Training</td> </tr> <tr> <td>22/1/2021</td> <td>Spraying and chemical handling training</td> </tr> <tr> <td>25/12/2020</td> <td>First aid Training</td> </tr> </tbody> </table> <p>Telok Sengat Oil Mill</p>	Date	Training	9/7/2020	Soil erosion, buffer zone and HCV Training	21/9/2020	Scheduled waste Training	27/3/2020	Policy Training	22/1/2021	Spraying and chemical handling training	25/12/2020	First aid Training	Complied
Date	Training														
9/7/2020	Soil erosion, buffer zone and HCV Training														
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22/1/2021	Spraying and chemical handling training														
25/12/2020	First aid Training														

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Date	Training
12/1/2021	Covid 19 procedure training
16/2/2021	PPE training
16/3/2021	Noise Exposure training
6/4/2021	Scheduled waste training
6/4/2021	Stakeholder briefing on RSPO and RSPO

Kulai Young estate

Date	Training
11/5/2021	Recycle programme awareness
1/6/2021	Rat Bait application and handling training
30/6/2021	MTG driver training
27/5/2021	Safety Work procedure training
3/4/2021	Spraying and chemical handling training

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3.7.3	<p>Appropriate training is provided for personnel carrying out the tasks critical to the effective implementation of the Supply Chain Certification Standard (SCCS). Training is specific and relevant to the task(s) performed.</p> <p>- Minor Compliance -</p>	<p>The appropriate training for personnel that carrying out the tasks critical area in mill to ensure the effective of implementation in supply chain. Training verified as per below record:-</p> <ul style="list-style-type: none"> <li>- SCCS training on 27/1/2020 for staff</li> <li>- SCCS training for assistant dated 10/9/2019.</li> </ul>	Complied
<p><b>Criterion 3.8:</b> Supply chain requirement for mills (note: All supply chain requirements are considered as <b>Critical (C)</b>. However it will not contribute to suspension if there is more than 5 non-compliance within a principle)</p>			
3.8.1	<p>Identity Preserved Module</p> <p>A mill is deemed to be Identity Preserved (IP) if the FFB processed by the mill are sourced from plantations/estates that are certified against the RSPO Principles and Criteria (RSPO P&amp;C), or against the Group Certification scheme.</p> <p>Certification for CPO mills is necessary to verify the volumes and sources of certified FFB entering the mill, the implementation of any processing controls (for example, if physical separation is used), and volume sales of RSPO certified products. If a mill process certified and uncertified FFB without physically separating them, then only Mass Balance Module is applicable.</p>	Not Applicable because this mill was mass balance module	Not Applicable
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>Boustead Telok Sengat POM receives and process both certified and noncertified FFB (Own estate 80% and outsider (20%)). Therefore, it uses the Mass Balance supply chain system and module. During the P&amp;C 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&amp;C certification report. This figure</p>	<p>The estimated tonnage of CPO and PK products that could potentially be produced by the certified mill is recorded in Table 10 of this public summary report.</p>	Complied

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	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.		
3.8.4	The mill shall also meet all registration and reporting requirements for the appropriate supply chain through the RSPO IT platform.	Based on verification of transaction records extracted from RSPO Palmtrace, the registration and reporting requirements found to be met.	Complied
3.8.5	<p>Documented procedures</p> <p>The mill shall have written procedures and/or work instructions or equivalent to ensure the implementation of all elements of the applicable supply chain model specified. This shall include at minimum the following:</p> <ul style="list-style-type: none"> <li>a) Complete and up to date procedures covering the implementation of all the elements of the supply chain model requirements.</li> <li>b) Complete and up to date records and reports that demonstrate compliance with the supply chain model requirements (including training records).</li> <li>c) Identification of the role of the person having overall responsibility for and authority over the implementation of these requirements and compliance with all applicable requirements. This person shall be able to demonstrate awareness of the mill’s procedures for the implementation of this standard.</li> <li>d) The mill shall have documented procedures for receiving and processing certified and non-certified FFBS including ensuring no contamination in the IP mill.</li> </ul>	<p>Telok Sengat Palm Oil Mill implemented the supply chain program based on Boustead Plantations Supply Chain (SCC) Procedures; Issue 1; Issue date: July 2016; Rev. # 8; Rev. date: December 2019. The procedure was prepared by Sustainability Unit and approved by Sustainability Chairman which covering the implementation of all supply chain requirements. No changes as per verification. Up-to-date records available including the following:</p> <ul style="list-style-type: none"> <li>- Telok Sengat Palm Oil Mass Balancing Record for Oil Mills FY 2020/21</li> <li>- Certified CPO sales contract</li> <li>- Certified PK sales contract</li> <li>- Dispatch records</li> </ul> <p>The procedure also specified the RSPO Chairman shall have the overall responsibility for the implementation of the procedure with assignment of relevant personnel from various departments to assist in the implementation.</p> <p>The Mill Manager to appoint responsible employees to implement and maintain the Supply Chain and Traceability System. Office Clerk has been appointed as the person-in-charge for Supply Chain, Traceability and Mass Balance requirements of RSPO, ISCC and RSPO Sustainability Standards. Interview with the PIC showed</p>	Complied

		that she was able to demonstrate the implementation of their procedures in accordance to the standard.	
3.8.6	<p>Internal Audit</p> <p>i) The mill shall have a written procedure to conduct annual internal audit to determine whether the mill:</p> <p>a. Conforms to the requirements in the RSPO Supply Chain Certification Standard and the RSPO Market Communications and Claims Documents.</p> <p>b. Effectively implements and maintains the standard requirements within its organisation.</p> <p>ii) Any non-conformities found as part of the internal audit shall be issued corrective action. The outcomes of the internal audits and all actions taken to correct non-conformities shall be subject to management review at least annually. The mill shall maintain the internal audit records and reports.</p>	<p>Telok Sengat Palm Oil Mill implemented the supply chain program based on Boustead Plantations Supply Chain (SCC) Procedures; Issue 1; Issue date: July 2016; Rev. # 8; Rev. date: December 2019. There also establish Internal audit procedure dated July 2016 revised dated: Oct 2018 which covered the internal audit. The internal audit will be planning to be conducted once a year.</p> <p>Internal audit was done on 1-4/6/2021 by company internal auditor. There are 1 NC for SCCS. The corrective action plan was available and verified during this assessment. The management review was done on 4/6/2021. This management review meeting conducted yearly basis.</p>	Complied
3.8.7	<p>Purchasing and Goods In</p> <p>i) The mill shall verify and document the tonnage and sources of certified and the tonnage of non-certified FFBS received.</p> <p>ii) The mill shall inform the CB immediately if there is a projected overproduction of certified tonnage.</p> <p>iii) The mill shall have a mechanism in place for handling non-conforming FFB and/or documents.</p>	<p>The accompanying documents of incoming FFB from own estate are estate's weighing bridge tickets which has the info about name of estate, RSPO certificate number, weighbridge ticket number, date of delivery, field number, number of bunches. Upon arrival at the mill, the mill issues its weighbridge ticket as confirmation of receipt. The estate's ticket number is recorded in the mill's ticket number.</p> <p>There has been no projected overproduction as per record monitoring and palm trace record.</p> <p>Boustead Aldred Sdn Bhd Estate  Weighbridge Ticket: 124913  Date: 28/6/2021</p>	Complied



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		<p>Field: PM09B, PM16A, PM97C  Tonnage:33.48 mt  Transporter: JHD3384</p> <p>UM Plantation Sdn Bhd Estate  Weighbridge Ticket: 121397  Date: 31/3/2021  Field: 00  Tonnage:15.07 mt  Transporter: JEE 3752</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"> <li>a) The name and address of the buyer;</li> <li>b) The name and address of the seller;</li> <li>c) The loading or shipment / delivery date;</li> <li>d) The date on which the documents were issued;</li> <li>e) RSPO certificate number;</li> <li>f) A description of the product, including the applicable supply chain model (Identity Preserved or Mass Balance or the approved abbreviations);</li> <li>g) The quantity of the products delivered;</li> </ul>	<p>All the information required by the standard was available in various shipping documents such as transporter's delivery order, mill's weighbridge, buyer's receiving notes, to name a few. The following contracts were verified:</p> <p>Crude Palm Oil  Ticket no: 123936  Buyers: Pxxxxxxx Sdn Bhd  Date : 3/6/2021  Lorry No: BHH7523/T/JJ4499  Product: CPO RSPO MB  RSPO Cert no: RSPO 22  Quantity: 34.65MT</p> <p>Sighted from CPO ticket weighbridge as per above detail and Delivery order (No; CPO123202100301) dated 3/6/2021 was not</p>	<p>Non-compliance</p>

	<ul style="list-style-type: none"> <li>h) Any related transport documentation;</li> <li>i) A unique identification number.</li> </ul>	using RSPO certificate no (RSPO 697033) thus Major NC been raised.	
3.8.9	<p>Outsourcing Activities</p> <ul style="list-style-type: none"> <li>i) The mill shall not outsource its milling activities. In cases where he mill outsources activities to independent third parties (e.g. subcontractors for storage, transport or other outsourced activities), the mill holding the certificate shall ensure that the independent third party complies with relevant requirements of this RSPO Supply Chain Certification</li> <li>ii) The mill shall ensure the following: <ul style="list-style-type: none"> <li>a) The mill has legal ownership of all input material to be included in outsourced processes</li> <li>b) The mill has an agreement or contract covering the outsourced process with each contractor through a signed and enforceable agreement with the contractor. The onus is on the mill to ensure that certification body (CB) has access to the outsourcing contractor or operation if an audit is deemed necessary.</li> <li>c) The mill has a documented control system with explicit procedures for the outsourced process which is communicated to the relevant contractor.</li> <li>d) The mill shall furthermore ensure (e.g. through contractual arrangements) that independent third parties engaged provide relevant access for duly accredited CBs to their respective operations, systems, and all information, when this is announced in advance.</li> </ul> </li> </ul>	<p>The company has outsourced the transportation for CPO and PK delivery to third parties and own company transporter. Transporter Agreements were verified as below:</p> <ul style="list-style-type: none"> <li>i) Sing Rubber &amp; Transport Sdn Bhd valid for 3 years since 26/8/2019 for CPO and PK.</li> </ul> <p>Requirement to adhere to RSPO supply chain standard is clearly defined in the agreement and the contractors have acknowledged on the requirements to be complied. There was a briefing of the RSPO SCCS requirements to the PK and CPO transporters and attendance list was sighted.</p> <p>Sighted from CPO ticket weighbridge and Delivery order (No; CPO123202100301) dated 3/6/2021 was not using RSPO certificate no (RSPO 697033) thus Major NC is raised during this audit.</p>	Non-compliance
3.8.10	The mill shall record the names and contact details of all contractors used for the physical handling of RSPO certified oil palm products.	The mill updated the list of contractor who is physical handling of RSPO certified oil palm products under stakeholder list with contact detail.	Complied

3.8.11	The mill shall inform its CB in advance prior to conduct of its next audit of the names and contact details of any new contractor used for the physical handling of RSPO certified oil palm products.	No changes as per previous report. The contractor been using was same as per previous year.	Complied
3.8.12	<p>Record keeping</p> <ul style="list-style-type: none"> <li>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.</li> <li>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.</li> <li>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.</li> <li>iv) For Mass Balance Module, the mill: <ul style="list-style-type: none"> <li>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.</li> <li>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.</li> <li>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.</li> </ul> </li> </ul>	<p>Telok Sengat POM has maintained the accurate, complete, up-to-date and accessible records and reports covering all aspects of these RSPO Supply Chain Certification requirements.</p> <p>Sampled records of FFB weighbridge tickets, daily production records and mass balance accounting for last 2 years were still in place for verification.</p> <p>The facility opted for three monthly basis record and balance. Excel format is used for the mass balance calculation. Among the information available in the format is month, FFB processed, OER, CPO amount [opening, produced and closing], dispatch of CPO &amp; PK and balance of CPO &amp; PK both in virtual and physical.</p>	Complied
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</p>	Conversion factor of CPO and PK production is depending on the actual OER and KER. The previous actual OER & KER can be seen in Table 10 of this report.	Complied

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	PK from the associated inputs. Mill shall determine and set their own extraction rates based upon past experience, documented and applied it consistently.		
3.8.14	Extraction rates shall be updated periodically to ensure accuracy against actual performance or industry average if appropriate.	Conversion factor of CPO and PK production is depending on the actual OER and KER. The previous actual OER & KER can be seen in Table 10 of this report.	Complied
3.8.15	Processing 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.	NA. The facility opted for mass balance model.	Complied
3.8.16	Registration of Transactions 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. 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.	The actor is a palm oil mill and its products are CPO and PK which are covered under Figure 2 and 3, Annex 1 of the RSPO SCCS Standard. Based on the downloaded transactions register from the certification unit's PalmTrace, the company was able to demonstrate that it has been registering its transactions in the PalmTrace accordingly. Since the last assessment there were 31 announcements made.	Complied
3.8.17	Claims 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.	RSPO trademark was not in use. Nonetheless, the facility is aware with the requirements of the RSPO Rules on Market Communications and Claims.	Complied
<b>General corporate communications</b>			

4.1	A corporate communication is one made by any RSPO member that highlights its membership of the RSPO and/or its commitment to the principles of the RSPO. Corporate communication is an 'off-product' claim.	Telok Sengat POM does not use any RSPO trademark or logo in any general corporate communication. This was evident through verification of the company website, invoices, letter head, contract with customers and others relevant records.	Complied
4.2	<p>In corporate communications a member is allowed to:</p> <ul style="list-style-type: none"> <li>a. Display its RSPO membership status</li> <li>b. Display the RSPO web address (<a href="http://www.rspo.org">www.rspo.org</a>)</li> <li>c. State that the member supports the work of the RSPO</li> <li>d. State the member's history with regard to the RSPO.</li> <li>e. Use the RSPO trademark to promote its membership of the RSPO.</li> </ul> <p>Additionally, where an RSPO member displays the RSPO trademark in digital format this must be accompanied by the text 'Check our progress at <a href="http://www.rspo.org">www.rspo.org</a>' where the link must lead to the member's profile page.</p>	Telok Sengat POM does not use any RSPO trademark or logo in any general corporate communication. This was evident through verification of the company website, invoices, letter head, contract with customers and others relevant records.	Complied
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.	Telok Sengat POM does not use any RSPO trademark or logo in any general corporate communication. This was evident through verification of the company website, invoices, letter head, contract with customers and others relevant records.	Complied
4.4	Members must ensure that all communication is consistent, clear and cannot mislead consumers or other stakeholders as to the certified content of oil palm products in the member's own products.	Telok Sengat POM does not use any RSPO trademark or logo in any general corporate communication. This was evident through verification of the company website, invoices, letter head, contract with customers and others relevant records.	Complied
4.5	Members are not allowed to use the RSPO corporate logo as shown in the RSPO Rules on Market Communications & Claims document. This is for the sole use of the RSPO secretariat.	Telok Sengat POM does not use any RSPO trademark or logo in any general corporate communication. This was evident through verification of the company website, invoices, letter head, contract with customers and others relevant records.	Complied

**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.	Business to business communication is demonstrated via shipping documentation and invoices to the next supply chain actor or buyer. No claims have been made.	Complied
5.2	When confirming the sale of certified oil palm products, members must adhere to the requirements of the RSPO SCCS. This includes stating the supply chain model and certificate number under which the claim is being made.	Verification of shipping documents such as weighbridge tickets and delivery orders showed that the requirements of RSPO SCCS were adhered which included the information about certificate number stated.	Complied
5.3	Where a distributor or wholesaler takes title to products containing certified sustainable oil palm products, the requirements of the RSPO SCCS can follow either of two options: a. If the distributor or wholesaler holds only a Distributor license, it may only communicate RSPO-certified oil palm products by linking the product to the manufacturer using the manufacturer’s SCCS certificate number. This covers both brand and own brand products. However, in the case of own brand products it is essential that customers are aware that the product has been made on behalf of the distributor or wholesaler, with specific evidence either through on-pack claims or documentation. b. If the distributor or wholesaler is supply chain-certified they should follow the requirements outlined in section 5.2.	Telok Sengat POM is not under distributor or wholesaler category. Thus, this requirement is not applicable.	Not Applicable
<b>Business to consumer communication</b>			
6.1	Only RSPO members that have supply chain certification are allowed to make business to consumer claims about the certified sustainable oil palm products contained within product(s), which are known as ‘product-specific’ claims. Product-specific claims are voluntary.	No business to consumer communication on product specific claim made by Telok Sengat POM and only produce crude and unfinished product. This is not applicable for POM.	Not Applicable
6.2	Only RSPO members who have supply chain certification are authorised to use the RSPO trademark and/or RSPO label, with the exception of RSPO Credits and of retailers in accordance with 6.8 below.	No business to consumer communication on product specific claim made by Telok Sengat POM and only produce crude and unfinished product. This is not applicable for POM.	Not Applicable

6.3	When on-pack claims on RSPO-certified sustainable oil palm products are used, the RSPO trademark and associated identification number must be present.	No business to consumer communication on product specific claim made by Telok Sengat POM and only produce crude and unfinished product. This is not applicable for POM.	Not Applicable
6.4	Business to consumer communication shall not include information about the claimant's RSPO membership status.	No business to consumer communication on product specific claim made by Telok Sengat POM and only produce crude and unfinished product. This is not applicable for POM.	Not Applicable
6.5	Members shall not communicate to consumers' information about their suppliers' RSPO membership status.	No business to consumer communication on product specific claim made by Telok Sengat POM and only produce crude and unfinished product. This is not applicable for POM.	Not Applicable
6.6	Use of the RSPO trademark is restricted to claims about RSPO-certified sustainable palm oil products and it is not authorised for use in relation to any other ingredient.	No business to consumer communication on product specific claim made by Telok Sengat POM and only produce crude and unfinished product. This is not applicable for POM.	Not Applicable
6.7	Use of any other trademark or logo to highlight the presence of RSPO-certified sustainable oil palm products is an unauthorised product-specific claim.	No business to consumer communication on product specific claim made by Telok Sengat POM and only produce crude and unfinished product. This is not applicable for POM.	Not Applicable
6.8	RSPO members who are retailers or food service companies can apply for an RSPO trademark license for use in business to consumer communications, provided they can demonstrate the validity of these claims to an RSPO-accredited certification body (CB). This will be undertaken via a remote audit, prior to the trademark use, during which the retailer or food service company will need to demonstrate that the use of the trademark is in compliance with the rules contained within this document and that the claim itself can be supported through a certified supply chain. Any other palm oil claims, including those highlighting the absence of palm oil, must be highlighted to the CB during the audit to ensure that all claims comply with the requirements of these rules. The CB will confirm the outcome of these audits, to be conducted annually, to RSPO who may continue to grant a trademark license or withdraw permission based upon the audit findings. This is in keeping with the rules	No business to consumer communication on product specific claim made by Telok Sengat POM and only produce crude and unfinished product. This is not applicable for POM.	Not Applicable

	applying to RSPO supply chain certified members. The guidance document for audits is available on <a href="http://www.rspo.org">www.rspo.org</a> .		
<b>MODULE B – MASS BALANCE SPECIFIC RULES</b>			
<b>Minimum Mass Balance content</b>			
	95% or above of the oil palm content must be RSPO MB-certified.	Based on the excel sheet mass balance accounting of the mill, production of certified products was calculated correctly according to fractions of FFB received from both certified and non-certified suppliers. Therefore, 95% of certified oil palm content in the products can be achieved.	Complied
	Where there is any percentage of non-certified oil palm within the product, the reason for this must be fully justified and an action plan for moving to fully certified oil palm must be in place, in accordance with the requirements of the RSPO SCCS. In addition, the non-certified volume must be covered by equivalent volume of RSPO Credits.	Based on the excel sheet mass balance accounting of the mill, production of certified products was calculated correctly according to fractions of FFB received from both certified and non-certified suppliers.	Complied
<b>Labelling and trademark (MB)</b>			
	<p>Members are allowed to use the RSPO label in one of the following ways:</p> <ul style="list-style-type: none"> <li>Surrounded by the text: 'Certified sustainable palm oil'.</li> <li>The RSPO label MUST contain the tag 'MIXED'. The tag MIXED designates oil palm products sourced under the Mass Balance (MB) supply chain system, which administratively balances inputs and outputs of certain palm oil volumes. The tag 'MIXED' on a product does not guarantee that the product itself contains the certified material; some or all of it may reside in a product that does not carry a claim.</li> <li>The RSPO label can also include the statement: '[The palm oil contained in this product] contributes to the production of certified sustainable palm oil'.</li> </ul>	Telok Sengat POM is producing crude palm products and does not involve in any labelling of end product.	Not Applicable



	<ul style="list-style-type: none"> <li>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).</li> <li>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 &amp; Claims document.</li> </ul>		
<b>Messaging (MB)</b>			
	<p>Messaging ALLOWED in storytelling in product-related communications includes:</p> <ul style="list-style-type: none"> <li>[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.</li> <li>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.</li> </ul> <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> <ul style="list-style-type: none"> <li>Anything that can lead consumers to believe that RSPO-certified palm products are (certified to be) part of the product.</li> </ul>	<p>Telok Sengat POM is producing crude palm products and does not involve in any labelling of end product.</p>	<p>Not Applicable</p>
<b>Principle 4: Respect community and human rights and deliver benefits</b>			
<b>Criterion 4.1:</b> The unit of Certification respects human rights, which includes respecting the rights of Human Rights Defenders.			
4.1.1	<b>(C)</b> A policy to respect human rights, including prohibiting retaliation against Human Rights Defenders (HRD), is documented and	Boustead Telok Sengat implemented Boustead Plantations Berhad Human Rights Policy; Signed by Ibrahim Bin Abdul Majid; Date:	Complied

	<p>communicated to all levels of the workforce, operations, FFB suppliers and local communities and prohibits intimidation and harassment by the unit of certification and contracted services, including contracted security forces.</p> <p>- Critical (Major) compliance -</p>	<p>2/12/2019. The company is committed to ensure every individual are treated with fairness, dignity and respect. The company will respect the rights of every individual. They also recognize their responsibilities to respect human rights and avoid complicity in human rights abuses.</p> <p>Policy was communicated directly during various meeting with both internal and external stakeholders of mill and estate within Boustead Telok Sengatand indirectly via website as per link as following:</p> <p><a href="http://www.bousteadplantations.com.my/sustain_policy.html">http://www.bousteadplantations.com.my/sustain_policy.html</a></p>	
4.1.2	<p>The unit of certification does not instigate violence or use any form of harassment in their operations.</p> <p>- Minor compliance -</p>	<p>Based on the interview of internal stakeholders among workers as well relevant external stakeholders, the mill and estates within Telok Sengat Business Unit do not instigate violence or use any form of harassment in their operations.</p>	Complied
<p><b>Criterion 4.2:</b> There is a mutually agreed and documented system for dealing with complaints and grievances, which is implemented and accepted by all affected parties</p>			
4.2.1	<p><b>(C)</b> The mutually agreed system, open to all affected parties, resolves disputes in an effective, timely and appropriate manner, ensuring anonymity of complainants, HRD, community spokespersons and 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>	<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.</p>	Complied
4.2.2	<p>Procedures are in place to ensure that the system is understood by the affected parties, including by illiterate parties.</p> <p>- Minor compliance -</p>	<p>Procedures are in place in respective operating units within Boustead Telok Sengatas Complaint &amp; Grievance Flowchart. The system involved the use of forms for Continuous Improvement/Grievance/Complaint made available directly for both internal and external stakeholders in respective operating units sites.</p>	Complied

4.2.3	<p>The unit of certification keeps parties to a grievance informed of its progress, including against agreed timeframe and the outcome is available and communicated to relevant stakeholders.</p> <p>- Minor compliance -</p>	<p>All requests were responded back to grievance parties within agreed timeframe as per sample records of communication by Telok Sengat POM with internal stakeholders during meeting of Clarification of Late Action on Complaint; date: 6/7/2021 where all internal stakeholders among workers and staff were explained on the late action of their respective housing repair complains due to limitation of repair contractors movement subject to the Covid-19 MCO.</p> <p>Minutes of meeting records indicated all parties agreed on the timeframe of complain resolution.</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 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>Neither any complaints nor land dispute occurred in Boustead Telok Sengatat the time of audit that require 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>	Complied
<b>Criterion 4.3:</b> The unit of Certification contributes to local sustainable development as agreed by local communities.			
4.3.1	<p>Contributions to community development that are based on the results of consultation with local communities are demonstrated.</p> <p>- Minor compliance -</p>	<p>The estate management made contribution to the local communities and workers such as donation to the school and temple activities upon request by the stakeholders. Besides, the company has donated paint material to local authority. The company also provided job opportunity to the local communities.</p> <p>The mill management has allocated RM 63/ month allowance for the workers' children who are studying secondary school. Besides, the management has provided the opportunity for the university students to have the field trip to the mill and explained to the students on the mill process. The mill management has organized activities with the workers such as family day, Indian temple prayers, health check and bowling competition. All the activities organized was sighted with the photo evident.</p>	Not Applicable

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.			
4.4.1	<p><b>(C)</b> Documents showing legal ownership or lease, or authorised use of customary land authorised by customary landowners through a Free, Prior and Informed Consent (FPIC) process. Documents Related to the history of land tenure and the actual legal or customary use of the land are available.</p> <p>- Critical (Major) compliance -</p>	<p>Documents showing legal ownership available as per sample sighted at respective estate.</p> <p>Telok Sengat Estate hold 66 land titles as per following samples:</p> <ol style="list-style-type: none"> <li>1. Grant (Form 5BK) # 83578; Lot # 1357; Area: 499.9891ha; Registered date: 16/7/2002 (Freehold)</li> <li>2. Grant (Form 5BK) # 83681; Lot # 337; Area: 2.6608ha; Registered date: 21/11/2002 (Freehold)</li> <li>3. Grant (Form 5BK) # 84186; Lot # 63; Area: 33.9683ha; Registered date: 27/11/2002 (Freehold)</li> <li>4. Grant (Form 5BK) # 86131; Lot # 62; Area: 32.0207ha; Registered date: 24/11/2002 (Freehold)</li> <li>5. Grant (Form 5BK) # 86866; Lot # 230; Area: 5.1876ha; Registered date: 13/9/2006 (Freehold)</li> </ol> <p>Kulai Young Estate hold 5 land titles as following:</p> <ol style="list-style-type: none"> <li>1. Provisional Ownership (Form 11AK) # HSD 64797; Lot # PTD 109034; Area: 0.05ha; Registered date: 15/3/2016 (Freehold)</li> <li>2. Provisional Ownership (Form 11AK) # HSD 64784; Lot # PTD 109021; Area: 0.19ha; Registered date: 15/3/2016 (Freehold)</li> <li>3. Grant (Form 5BK) # 229629; Lot # 3564; Area: 103.3465ha; Registered date: 2/1/2016 (Freehold)</li> <li>4. Provisional Ownership (Form 11AK) # HSD 64789; Lot # PTD 109026; Area: 0.28ha; Registered date: 15/3/2016 (Freehold)</li> <li>5. Provisional Ownership (Form 11AK) # HSD 64796; Lot # PTD 109033; Area: 562.33ha; Registered date: 15/3/2016 (Freehold)</li> </ol>	Complied

		<p>Chamek Estate hold 5 land titles as following:</p> <ol style="list-style-type: none"> <li>1. Grant (Form 5BK) # GRN 96683; Lot # 72; Area: 601.9689ha; Registered date: 11/5/2006 (Freehold)</li> <li>2. Grant (Form 5BK) # GRN 89011; Lot # 266; Area: 66.1155ha; Registered date: 12/7/2002 (Freehold)</li> <li>3. Grant (Form 5BK) # GRN 89006; Lot # 132; Area: 53.292ha; Registered date: 18/1/2006 (Freehold)</li> <li>4. Grant (Form 5BK) # GRN 90629; Lot # 181; Area: 84.731ha; Registered date: 11/5/2006 (Freehold)</li> <li>5. Grant (Form 5BK) # GRN 90630; Lot # 183; Area: 26.431ha; Registered date: 11/5/2006 (Freehold)</li> </ol>	
4.4.2	<p>Copies of documents evidencing agreement-making processes and negotiated agreements detailing the FPIC process are available and include:</p>	<p>Evidence of documentations and stakeholder consultation shown that no customary land within Telok Sengat Business Unit. The lands are owned by the company as per sighted the land titles sample in indicator 4.4.1 above. The surrounding areas owned by smallholders and other plantation's companies. There's no evidence of land encroachment by the mill and all estates within Telok Sengat Business Unit.</p>	Complied
4.4.2a	<p>Evidence that a plan has been developed through consultation and discussion in good faith with all affected groups in the communities, with particular assurance that vulnerable, minorities' and gender groups are consulted, and that information has been provided to all affected groups, including information on the steps that are taken to involve them in decision making.</p> <p>- Minor compliance -</p>	<p>Evidence of documentations and stakeholder consultation shown that no customary land within Telok Sengat Business Unit. The lands are owned by the company as per sighted the land titles sample in indicator 4.4.1 above. The surrounding areas owned by smallholders and other plantation's companies. There's no evidence of land encroachment by the mill and all estates within Telok Sengat Business Unit.</p>	Complied

4.4.2b	<p>Evidence that the unit of certification has respected communities' decisions to give or withhold their consent to the operation at the time that these decisions were taken.</p> <p>- Minor compliance -</p>	<p>Evidence of documentations and stakeholder consultation shown that no customary land within Telok Sengat Business Unit. The lands are owned by the company as per sighted the land titles sample in indicator 4.4.1 above. The surrounding areas owned by smallholders and other plantation's companies. There's no evidence of land encroachment by the mill and all estates within Telok Sengat Business Unit.</p>	Complied
4.4.2c	<p>Evidence that the legal, economic, environmental and social implications of permitting operations on their land have been understood and accepted by affected communities, including the implications for the legal status of their land at the expiry of the unit of certification's title, concession or lease on the land.</p> <p>- Minor compliance -</p>	<p>Evidence of documentations and stakeholder consultation shown that no customary land within Telok Sengat Business Unit. The lands are owned by the company as per sighted the land titles sample in indicator 4.4.1 above. The surrounding areas owned by smallholders and other plantation's companies. There's no evidence of land encroachment by the mill and all estates within Telok Sengat Business Unit.</p>	Complied
4.4.3	<p><b>(C)</b> Maps of an appropriate scale showing the extent of recognised legal, customary or user rights are developed through participatory mapping involving affected parties (including neighbouring communities where applicable, and relevant authorities).</p> <p>- Critical (Major) compliance -</p>	<p>There was no land dispute in all estates within Boustead Telok Sengat since last audit. The land belongs Boustead Plantation Berhad (except Kulai Young where title of the land carries the bank trustee CIMB) and land ownership documents verified. The surroundings were owned by smallholders and other plantation's companies. There was no encroachment of land by Boustead Telok Sengat reported.</p>	Complied
4.4.4	<p>All relevant information is available in appropriate forms and languages, including assessments of impacts, proposed benefit sharing, and legal arrangements.</p> <p>- Minor compliance -</p>	<p>Evidence of documentations and stakeholder consultation shown that no customary land within Telok Sengat Business Unit. The lands are owned by the company as per sighted the land titles sample in indicator 4.4.1 above. The surrounding areas owned by smallholders and other plantation's companies. There's no evidence of land encroachment by the mill and all estates within Telok Sengat Business Unit.</p>	Complied

4.4.5	<p><b>(C)</b> Evidence is available to show that communities are represented through institutions or representatives of their own choosing, including by legal counsel if they so choose.</p> <p>- Critical (Major) compliance -</p>	<p>Evidence of documentations and stakeholder consultation shown that no customary land within Telok Sengat Business Unit. The lands are owned by the company as per sighted the land titles sample in indicator 4.4.1 above. The surrounding areas owned by smallholders and other plantation's companies. There's no evidence of land encroachment by the mill and all estates within Telok Sengat Business Unit.</p>	Complied
4.4.6	<p>There is evidence that implementation of agreements negotiated through FPIC is annually reviewed in consultation with affected parties.</p> <p>- Minor compliance -</p>	<p>Evidence of documentations and stakeholder consultation shown that no customary land within Telok Sengat Business Unit. The lands are owned by the company as per sighted the land titles sample in indicator 4.4.1 above. The surrounding areas owned by smallholders and other plantation's companies. There's no evidence of land encroachment by the mill and all estates within Telok Sengat Business Unit.</p>	Complied
<p><b>Criterion 4.5:</b> No new plantings are established on local peoples' land where it can be demonstrated that there are legal, customary or user rights, without their FPIC. This is dealt with through a documented system that enables these and other stakeholders to express their views through their own representative institutions.</p>			
4.5.1	<p><b>(C)</b> Documents showing identification and assessment of demonstrable legal, customary and user rights are available.</p> <p>- Critical (Major) compliance -</p>	<p>Evidence of documentations and stakeholder consultation shown that no customary land within Telok Sengat Business Unit. The lands are owned by the company as per sighted the land titles sample in indicator 4.4.1 above. The surrounding areas owned by smallholders and other plantation's companies. There's no evidence of land encroachment by the mill and all estates within Telok Sengat Business Unit.</p>	Complied
4.5.2	<p><b>(C)</b> FPIC is obtained for all oil palm development through a comprehensive process, including in particular, full respect for their legal and customary rights to the territories, lands and resources via local communities' own representative institutions, with all the relevant information and documents made available, with option of resourced</p>	<p>As above, evidence of documentations and stakeholder consultation shown that no customary land within Telok Sengat Business Unit. However, in case of FPIC required, the process will be manage based on the procedure of Fair Compensation; Ref. # 1; Issue date: 4/2/2015; Version # 01 to ensure the implementation of a fair compensation for any issue/disputes related to land power to claim</p>	Complied

	<p>access to independent advice through a documented, long-term and two-way process of consultation and negotiation.</p> <p>- Critical (Major) compliance -</p>	<p>rights, ownership and access to land between parties involved in considering differences in ethnic group, gender differences and etc. if any.</p> <p>The procedure is also to ensure that any negotiation concerning indigenous people, local communities and other stakeholders are treated fairly and to have mutual benefit of the company and the parties involved.</p>	
4.5.3	<p>Evidence is available that affected local peoples understand they have the right to say 'no' to operations planned on their lands before and during initial discussions, during the stage of information gathering and associated consultations, during negotiations, and up until an agreement with the unit of certification is signed and ratified by these local peoples. Negotiated agreements are non-coercive and entered into voluntarily and carried out prior to new operations.</p> <p>- Minor compliance -</p>	<p>As above, evidence of documentations and stakeholder consultation shown that no customary land and disputes occurred within Telok Sengat Business Unit.</p>	Complied
4.5.4	<p>To ensure local food and water security, as part of the FPIC process, participatory SEIA and participatory land-use planning with local peoples, the full range of food and water provisioning options are considered. There is transparency of the land allocation process.</p> <p>- Minor compliance -</p>	<p>As above, evidence of documentations and stakeholder consultation shown that no customary land and disputes occurred within Telok Sengat Business Unit.</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>As above, evidence of documentations and stakeholder consultation shown that no customary land and disputes occurred within Telok Sengat Business Unit.</p>	Complied



4.5.6	Evidence is available that the communities (or their representatives) gave consent to the initial planning phases of the operations prior to the issuance of a new concession or land title to the operator. - Minor compliance -	As above, evidence of documentations and stakeholder consultation shown that no customary land and disputes occurred within Telok Sengat Business Unit.	Complied
4.5.7	New lands are not acquired for plantations and mills after 15 November 2018 as a result of recent (2005 or later) expropriations without consent under the right of eminent domain of the federal and state land acquisition legislations. - Minor compliance -	There's no new land acquired for plantations and mills after 15/11/2018 within Telok Sengat Business Unit. Evidence of documentations and stakeholder consultation shown that the existing land was owned by the company as per sighted the land titles sample in indicator 4.4.1 above.	Complied
4.5.8	<b>(C)</b> New lands are not acquired in areas inhabited by communities in voluntary isolation. - Critical (Major) compliance -	There's no new land acquired for plantations and mills after 15/11/2018 within Telok Sengat Business Unit. Evidence of documentations and stakeholder consultation shown that the existing land was owned by the company as per sighted the land titles sample in indicator 4.4.1 above.	Complied
<b>Criterion 4.6:</b> Any negotiations Concerning compensation for loss of legal, customary or user rights are dealt with through a documented system that enables indigenous peoples, local communities and other stakeholders to express their views through their own representative institutions.			
4.6.1	<b>(C)</b> A mutually agreed procedure for identifying legal, customary or user rights, and a procedure for identifying people entitled to compensation, is in place. - Critical (Major) compliance -	Evidence of documentations and stakeholder consultation shown that no customary land and disputes occurred within Telok Sengat Business Unit. However, in case of any compensation required, the process will be manage based on the available procedure of Fair Compensation; Ref. # 1; Issue date: 4/2/2015; Version # 01 to ensure the implementation of a fair compensation for any issue/disputes related to land power to claim rights, ownership and access to land between parties involved in considering differences in ethic group, gender differences and etc. if any.  The procedure is also to ensure that any negotiation concerning indigenous people, local communities and other stakeholders are	Complied

		treated fairly and to have mutual benefit of the company and the parties involved.	
4.6.2	<p><b>(C)</b> A mutually agreed procedure for calculating and distributing fair compensation (monetary or otherwise) is established and implemented, monitored and evaluated in a participatory way, and corrective actions taken as a result of this evaluation.</p> <p>- Critical (Major) compliance -</p>	<p>Evidence of documentations and stakeholder consultation shown that no customary land and disputes occurred within Telok Sengat Business Unit. However, in case of any compensation required, the process will be manage based on the available procedure of Fair Compensation; Ref. # 1; Issue date: 4/2/2015; Version # 01 to ensure the implementation of a fair compensation for any issue/disputes related to land power to claim rights, ownership and access to land between parties involved in considering differences in ethic group, gender differences and etc. if any.</p> <p>The procedure is also to ensure that any negotiation concerning indigenous people, local communities and other stakeholders are treated fairly and to have mutual benefit of the company and the parties involved.</p>	Complied
4.6.3	<p>Evidence is available that equal opportunities are provided to both men and women to hold land titles for scheme small holdings.</p> <p>- Minor compliance -</p>	<p>Evidence of documentations and stakeholder consultation shown that no customary land and disputes occurred within Telok Sengat Business Unit. However, in case of any compensation required, the process will be manage based on the available procedure of Fair Compensation; Ref. # 1; Issue date: 4/2/2015; Version # 01 to ensure the implementation of a fair compensation for any issue/disputes related to land power to claim rights, ownership and access to land between parties involved in considering differences in ethic group, gender differences and etc. if any.</p> <p>The procedure is also to ensure that any negotiation concerning indigenous people, local communities and other stakeholders are treated fairly and to have mutual benefit of the company and the parties involved.</p>	Complied

4.6.4	<p>The process and outcomes of any negotiated agreements, compensation and payments are documented, with evidence of the participation of affected parties, and made publicly available to them.</p> <p>- Minor compliance -</p>	<p>Evidence of documentations and stakeholder consultation shown that no customary land and disputes occurred within Telok Sengat Business Unit. However, in case of any compensation required, the process will be manage based on the available procedure of Fair Compensation; Ref. # 1; Issue date: 4/2/2015; Version # 01 to ensure the implementation of a fair compensation for any issue/disputes related to land power to claim rights, ownership and access to land between parties involved in considering differences in ethic group, gender differences and etc. if any.</p> <p>The procedure is also to ensure that any negotiation concerning indigenous people, local communities and other stakeholders are treated fairly and to have mutual benefit of the company and the parties involved.</p>	Complied
<p><b>Criterion 4.7:</b> Where it can be demonstrated that local peoples have legal, customary or user rights, they are compensated for any agreed land acquisitions and relinquishment of rights, subject to their FPIC and negotiated agreements.</p>			
4.7.1	<p><b>(C)</b> A mutually agreed procedure for identifying people entitled to compensation is in place.</p> <p>- Critical (Major) compliance -</p>	<p>Evidence of documentations and stakeholder consultation shown that no customary land and disputes occurred within Telok Sengat Business Unit. However, in case of any compensation required, the process will be manage based on the available procedure of Fair Compensation; Ref. # 1; Issue date: 4/2/2015; Version # 01 to ensure the implementation of a fair compensation for any issue/disputes related to land power to claim rights, ownership and access to land between parties involved in considering differences in ethic group, gender differences and etc. if any.</p> <p>The procedure is also to ensure that any negotiation concerning indigenous people, local communities and other stakeholders are treated fairly and to have mutual benefit of the company and the parties involved.</p>	Complied

4.7.2	<p><b>(C)</b> A mutually agreed procedure for calculating and distributing fair and gender-equal compensation (monetary or otherwise) is established and implemented, monitored and evaluated in a participatory way, and corrective actions taken as a result of this evaluation.</p> <p>- Critical (Major) compliance -</p>	<p>Evidence of documentations and stakeholder consultation shown that no customary land and disputes occurred within Telok Sengat Business Unit. However, in case of any compensation required, the process will be manage based on the available procedure of Fair Compensation; Ref. # 1; Issue date: 4/2/2015; Version # 01 to ensure the implementation of a fair compensation for any issue/disputes related to land power to claim rights, ownership and access to land between parties involved in considering differences in ethic group, gender differences and etc. if any.</p> <p>The procedure is also to ensure that any negotiation concerning indigenous people, local communities and other stakeholders are treated fairly and to have mutual benefit of the company and the parties involved.</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>Evidence of documentations and stakeholder consultation shown that no customary land and disputes occurred within Telok Sengat Business Unit. However, in case of any compensation required, the process will be manage based on the available procedure of Fair Compensation; Ref. # 1; Issue date: 4/2/2015; Version # 01 to ensure the implementation of a fair compensation for any issue/disputes related to land power to claim rights, ownership and access to land between parties involved in considering differences in ethic group, gender differences and etc. if any.</p> <p>The procedure is also to ensure that any negotiation concerning indigenous people, local communities and other stakeholders are treated fairly and to have mutual benefit of the company and the parties involved.</p>	Complied
<p><b>Criterion 4.8:</b> The right to use the land is demonstrated and is not legitimately contested by local people who can demonstrate that they have legal, customary, or user rights.</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>Evidence of documentations and stakeholder consultation shown that no customary land and disputes occurred within Telok Sengat Business Unit. However, in case of any compensation required, the process will be manage based on the available procedure of Fair Compensation; Ref. # 1; Issue date: 4/2/2015; Version # 01 to ensure the implementation of a fair compensation for any issue/disputes related to land power to claim rights, ownership and access to land between parties involved in considering differences in ethic group, gender differences and etc. if any.</p> <p>The procedure is also to ensure that any negotiation concerning indigenous people, local communities and other stakeholders are treated fairly and to have mutual benefit of the company and the parties involved.</p>	Complied
4.8.2	<p><b>(C)</b> Land conflict is not present in the area of the unit of certification. Where land conflict exists, acceptable conflict resolution processes (see Criteria 4.2 and 4.6) are implemented and accepted by the parties involved. In the case of newly acquired plantations, the unit of certification addresses any unresolved conflict through appropriate conflict resolution mechanisms.</p> <p>- Critical (Major) compliance -</p>	<p>Evidence of documentations and stakeholder consultation shown that no customary land and disputes occurred within Telok Sengat Business Unit. However, in case of any compensation required, the process will be manage based on the available procedure of Fair Compensation; Ref. # 1; Issue date: 4/2/2015; Version # 01 to ensure the implementation of a fair compensation for any issue/disputes related to land power to claim rights, ownership and access to land between parties involved in considering differences in ethic group, gender differences and etc. if any.</p> <p>The procedure is also to ensure that any negotiation concerning indigenous people, local communities and other stakeholders are treated fairly and to have mutual benefit of the company and the parties involved.</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>Evidence of documentations and stakeholder consultation shown that no customary land and disputes occurred within Telok Sengat Business Unit. However, in case of any compensation required, the process will be manage based on the available procedure of Fair</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 -	Compensation; Ref. # 1; Issue date: 4/2/2015; Version # 01 to ensure the implementation of a fair compensation for any issue/disputes related to land power to claim rights, ownership and access to land between parties involved in considering differences in ethnic group, gender differences and etc. if any.  The procedure is also to ensure that any negotiation concerning indigenous people, local communities and other stakeholders are treated fairly and to have mutual benefit of the company and the parties involved.	
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 -	Evidence of documentations and stakeholder consultation shown that no customary land and disputes occurred within Telok Sengat Business Unit. However, in case of any compensation required, the process will be manage based on the available procedure of Fair Compensation; Ref. # 1; Issue date: 4/2/2015; Version # 01 to ensure the implementation of a fair compensation for any issue/disputes related to land power to claim rights, ownership and access to land between parties involved in considering differences in ethnic group, gender differences and etc. if any.  The procedure is also to ensure that any negotiation concerning indigenous people, local communities and other stakeholders are treated fairly and to have mutual benefit of the company and the parties involved.	Complied
<b>Principle 5: Support smallholder inclusion</b>			
<b>Criterion 5.1:</b> The unit of certification deals fairly and transparently with all smallholders (Independent and Scheme) and other local businesses.			
5.1.1	Current and previous period prices paid for FFB are publicly available and accessible by smallholders. - Minor compliance -	Price of current FFB price was prominently displayed at the mill outside the weighbridge counter and updated on monthly basis. Prices are mainly based on MPOB announcement. Previous FFB price was recorded in "Monthly FFB Purchase" file, based on "Telok Sengat Palm Oil Mill Own Estate – Boustead Estates Agency Sdn	Complied

		Bhd (Marketing Department)" letter issued by Marketing department on monthly basis. Calculation of FFB price is based on 'Kadar Perahan 1% (MPOB)' guideline. Each of the grower will be updated on the new price and issued with "Computation of Payment for FFB Purchased" for reference and cross –checking.	
5.1.2	<p><b>(C)</b> Evidence is available that the unit of certification explains the FFB pricing to smallholders on request from individual smallholders (at least once a year or upon request).</p> <p>- Critical (Major) compliance -</p>	<p>Evidence is available that the unit of certification explains the FFB pricing to smallholders available as per sample of latest done by Boustead Estates Agency Sdn Bhd (Marketing Department) personnel to all smallholder’s suppliers through purchase agreement as per samples as following:</p> <ul style="list-style-type: none"> <li>- FFB Purchase Agreement # 2020-0032; Date: 1/4/2020; between Boustead Telok Sengat Sdn. Bhd. and Asia Elmark Sdn. Bhd.; Term period: 1 year</li> <li>- FFB Purchase Agreement # 2020-0036; Date: 1/1/2020; between Boustead Telok Sengat Sdn. Bhd. and UM Plantations Sdn. Bhd.; Term period: 1 year</li> </ul>	Complied
5.1.3	<p><b>(C)</b> Fair pricing, calculated as a portion of the international CPO price less costs is provided to smallholders in the supply base and documented.</p> <p>- Critical (Major) compliance -</p>	FFB pricing and calculation was included in the FFB Purchase Agreement which was based on the MPOB prices as well as the FFB grading quality.	Complied
5.1.4	<p><b>(C)</b> Evidence is available that all parties, including women and independent representative organisations assisting smallholders where requested, are involved in decision-making processes and understand the contracts. These include those involving finance, loans/credits, and repayments through FFB price reductions for replanting and or other support mechanisms where applicable.</p> <p>- Critical (Major) compliance -</p>	<p>Evidence that the mill involved all parties available in the contract agreement as per sample sighted for the external FFB supplier by Boustead Estates Agency Sdn Bhd (Marketing Department) personnel to all smallholder’s suppliers through purchase agreement as per samples as following:</p> <ul style="list-style-type: none"> <li>- FFB Purchase Agreement # 2020-0032; Date: 1/4/2020; between Boustead Telok Sengat Sdn. Bhd. and Asia Elmark Sdn. Bhd.; Term period: 1 year</li> </ul>	Complied

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		- FFB Purchase Agreement # 2020-0036; Date: 1/1/2020; between Boustead Telok Sengat Sdn. Bhd. and UM Plantations Sdn. Bhd.; Term period: 1 year	
5.1.5	Contracts are fair, legal and transparent and have an agreed timeframe. - Minor compliance -	Contracts are fair, legal and transparent and have an agreed timeframe for external FFB suppliers as per sample sighted as following:  - FFB Purchase Agreement # 2020-0032; Date: 1/4/2020; between Boustead Telok Sengat Sdn. Bhd. and Asia Elmark Sdn. Bhd.; Term period: 1 year  - FFB Purchase Agreement # 2020-0036; Date: 1/1/2020; between Boustead Telok Sengat Sdn. Bhd. and UM Plantations Sdn. Bhd.; Term period: 1 year	Complied
5.1.6	<b>(C)</b> Agreed payments are made in a timely manner and receipts specifying price, weight, deductions and amount paid are given. - Critical (Major) compliance -	Payments are made in timely manner as per agreed term on the following month of FFB delivered after the MPOB monthly average price becomes available via Telegraphic Transfer or cheques.	Complied
5.1.7	Weighbridges used for determining payment to smallholders are verified by an independent third party on a regular basis (this can be government). - Minor compliance -	Weighbridges used by Telok Sengat POM for determining payment to FFB suppliers were verified by Metrology Corporation Malaysia Sdn. Bhd. as per latest records of calibration and stamping dated on 3/11/2020; Calibration certificate # B1820246; Weighbridge serial # 163650133/038957; Brand/Model: Avery ZM305; Limit: 70,000 kg.	Complied
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.	Complied



5.1.9	<p><b>(C)</b> The unit of certification has a grievance mechanism for smallholders and all grievances raised are dealt with in a timely manner.</p> <p>- Critical (Major) compliance -</p>	<p>Telok Sengat POM hold regular periodical meeting with external FFB suppliers to discuss any feedbacks or grievance as per sample latest meeting conducted on 11/3/2021 recorded in the minutes of meeting session 1/2021. No issue of grievance were raised among external FFB suppliers.</p>	Complied
<p><b>Criterion 5.2:</b> The unit of certification supports improved livelihoods of smallholders and their inclusion in sustainable palm oil value chains.</p>			
5.2.1	<p>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.</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.</p>	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.</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.</p>	Complied
5.2.4	<p><b>(C)</b> 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</p>	Complied

		certifications mainly in MSPO since it is mandatory for the smallholders.	
5.2.5	The unit of certification regularly reviews and publicly reports on the progress of the Smallholder support programme. - 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.	Complied
<b>Principle 6: Respect workers' rights and conditions</b>			
<b>Criterion 6.1:</b> Any form of discrimination is prohibited.			
6.1.1	<b>(C)</b> A publicly available non-discrimination and equal opportunity policy is implemented in such a way to prevent discrimination based on ethnic origin, caste, national origin, religion, disability, gender, sexual orientation, gender identity, union membership, political affiliation or age. - Critical (Major) compliance -	Boustead Telok Sengatimplemented Boustead Plantations Berhad Human Rights Policy; Signed by Ibrahim Bin Abdul Majid; Date: 2/12/2019. The company is committed to ensure every individual are treated with fairness, dignity and respect with no discrimination. There's also Boustead Plantations Berhad Equal Opportunities Policy; Signed by Ibrahim Bin Abdul Majid; Date: 2/12/2019 which emphasized the company's stand on providing and ensuring equal opportunities among all employees, customers, business partners and publics.  Both policies were communicated directly during various meeting with both internal and external stakeholders of mill and estate within Boustead Telok Sengatand indirectly via website as per link as following: <a href="http://www.bousteadplantations.com.my/sustain_policy.html">http://www.bousteadplantations.com.my/sustain_policy.html</a>	Complied
6.1.2	<b>(C)</b> Evidence is provided that workers and groups including local communities, women, and migrant workers have not been discriminated against including charging of recruitment fees for foreign workers. - Critical (Major) compliance -	Through document reviewed on the list of employees found that the composition of workers consisted of local, foreign workers, male and female workers. Interview conducted with the sampled female and male workers from different nationalities confirmed that no discrimination was happened. Overtime were given to all the	Complied

		workers without any prejudice based on caste, gender, race and nationalities. They are allowed to transfer work station by getting approval from management if they felt unfit on the work assigned.	
6.1.3	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. - Minor compliance -	Boustead Plantations Berhad has developed Foreign Workers Procedure with issue date: Jan 2016, revision no. 1 where the procedure is to ensure the estates/ mills follow the correct steps in employment of foreign workers as stipulated by the government agencies/ state government. The company will apply job order online at Labour Department website before recruiting foreign workers. Besides, the company has established the Foreign Workers Policy where the company will ensure all the workers recruited will be treated equally without discrimination based on nationalities, caste, religion and etc. Medical fitness will be checked prior to work to ensure fitness to the work.	Complied
6.1.4	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. - Minor compliance -	There is no evidence that pregnancy tests are being conducted as a discriminatory measure. Pregnancy test will be conducted by the Estate Hospital Assistant upon request by female employee. During this audit period, there is no record of any pregnant female workers.	Complied
6.1.5	<b>(C)</b> A gender committee is in place specifically to raise awareness, identify and address issues of concern, as well as opportunities and improvements for women. - Critical (Major) compliance -	Women committee was in place specifically to raise awareness, identify and address issues of concern, as well as opportunities and improvements for women. The committee was established with the members been appointed by all women employees through meetings. Sighted latest meeting was conducted as per records of Minit Mesyuarat Persatuan Wanita Kilang Sawit Telok Sengat Kali Pertama (1) Sesi 2021; Date: 22/1/2021.	Complied
6.1.6	There is evidence of equal pay for the same work scope. - Minor compliance -	Evidence of equal pay for the same work scope available as per sample documents of pay including work agreement, payslips, checkroll & attendance Of December 2020 & May 2021 sighted for workers as following:	Complied

		<p>Telok Sengat POM:</p> <ul style="list-style-type: none"> <li>- Mohamad Shari Bin Ishak; M; GW</li> <li>- Tamilselvan A/L Raja Gopal; M; GW</li> <li>- Sarifah Binti A. Ghafar @ Mustafa; F; GW</li> <li>- Sakuntala A/P Chandran Pillai; F; GW</li> </ul> <p>Telok Sengat Estate:</p> <ul style="list-style-type: none"> <li>- Abu Bin Omarang; M</li> <li>- Jalizah Binti Jepon; F</li> <li>- Mariappan A/L Perumal Ramoo; M</li> <li>- S. Mangesfri A/P K. Sambathu; F</li> </ul> <p>Kulai Young Estate:</p> <ul style="list-style-type: none"> <li>- Mohd Syazwan Bin Daud; M; Watchmen</li> <li>- Rohana Binti Tohiran; F; Nursery</li> <li>- Hasnah Binti Said; F; Gardener</li> <li>- Jefri Bin Mohd. Nor; M; GW</li> </ul> <p>Chamek Estate:</p> <ul style="list-style-type: none"> <li>- Mohd Faizal Bin Ab. Hadi; M; GW</li> <li>- Deivanai A/P Govindasamy; F; GW</li> <li>- Raj Kumar; FW; GW</li> <li>- Santosh Kumar; FW; GW</li> </ul>	
<p><b>Criterion 6.2:</b> Pay and conditions for staff and workers and for contract workers always meet at least legal or industry minimum standards and are sufficient to provide decent living wages (DLW).</p>			
6.2.1	<p><b>(C)</b> Applicable labour laws, union and/or other collective agreements and documentation of pay and conditions are available to the workers in</p>	<p>Details of payments and conditions of employment are stated and documented in the work agreement given to all employees in respective operating units of Boustead TSBU. The documents are</p>	Complied

	<p>national languages (English or Bahasa Malaysia) and explained to them in language they understand.</p> <p>- Critical (Major) compliance -</p>	<p>prepared in Bahasa Malaysia for local workers and dual-language, i.e. English and another language that the worker is conversant in (either Hindi, Bengali, or Bahasa). The contract stipulates terms of conditions of service such position, period of employment, types of work, responsibilities of employer, responsibilities of employee, salary payable, working hours, annual leave, sick leave and public holidays, mutual termination of contract, facilities, etc.</p> <p>The mill workers agreements are based on the MAPA/NUPW Palm Oil Mill Employees Agreement 2019 while estate workers agreements are based on MAPA/NUPW Agreement on the Wage of Harvesters, Harvesting Kanganies, Loaders and Other Loaders on Oil Palm Estates 2019 and MAPA/NUPW Field and Other General Employees and Fringe Benefits Agreement 2019.</p> <p>Both mill and estate workers collective agreements been included with MAPA/NUPW additional agreement in-line with Minimum Wage Order 2020.</p>	
<p>6.2.2</p>	<p><b>(C)</b> Employment contracts and related documents detailing payments and conditions of employment (e.g. regular working hours, deductions, overtime, sick leave, holiday entitlement, maternity leave, reasons for dismissal, period of notice, etc. in compliance with national legal requirements) and payroll documents give accurate information on compensation for all work performed. This includes a form of record for work done by family members.</p> <p>- Critical (Major) compliance -</p>	<p>Employment contracts detailing payments and conditions of employment available to the workers for sample employees sighted as per indicator 6.1.6 above. Regular working hours, deductions, overtime, sick leave, holiday entitlement, maternity leave, reasons for dismissal, period of notice, etc. in compliance with Employment Act and Minimum Wages Order.</p>	<p>Complied</p>
<p>6.2.3</p>	<p><b>(C)</b> There is evidence of legal compliance for regular working hours, deductions, overtime, sickness, holiday entitlement, maternity leave, reasons for dismissal, period of notice and other legal labour requirements.</p> <p>- Critical (Major) compliance -</p>	<p>Records of payslip and check-roll documents available to the workers for sample employees sighted as per indicator 6.1.6 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>	<p>Complied</p>

6.2.4	<p><b>(C)</b> The unit of certification provides adequate housing, sanitation facilities, water supplies, medical, educational and welfare amenities to national standards or above, where no such public facilities are available or accessible. National laws, or in their absence the ILO Guidance on Workers’ Housing Recommendation No. 115, are used. In the case of acquisitions of non-certified units, a plan is developed detailing the upgrade of infrastructure. A reasonable time (5years) is allowed to upgrade the infrastructure.</p> <p>- Critical (Major) compliance -</p>	<p>Based on the Workers' Minimum Standards Housing and Amenities (Amendment) Act 2019, line-site housing areas were inspected at least twice a month and inspection report were documented in "Line Site Inspection Log book". Sighted a sample latest inspection was carried out by Hospital Assistant – Mr. Zayuri Mohd Noor on 18/10/2021 in Telok Sengat Estate.</p>	Complied
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>The management ensured the access to adequate, sufficient and affordable food by providing signing a canteen and sundry shop facility to workers within estate area. Sighted the samples of canteen and sundry shop tenancy agreement as following:</p> <ul style="list-style-type: none"> <li>- Kulai Young Estate: Memorandum of Agreement Shop House/Canteen between Kulai Young Estate and Abu Bakar Bin Syed Alyallatas; Agreement validity period: 1/1/2021 – 31/12/2021</li> <li>- Kulai Young Estate: Memorandum of Agreement Shop House/Canteen between Kulai Young Estate and Abu Bakar Bin Syed Alyallatas; Agreement validity period: 1/1/2021 – 31/12/2021</li> </ul>	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><b>PROCEDURAL NOTE:</b>          STATEMENT FROM THE RSPO STANDARDS STANDING COMMITTEE REGARDING INDICATOR 6.2.6 ON DECENT LIVING WAGE</p> <p>With reference to procedural note of indicator 6.2.6, the RSPO has published a guidance on the DLW calculation in June 2019. The RSPO Secretariat will endeavour to carry out DLW country benchmarks for palm oil producing countries in which RSPO members operate and for which no Global Living Wage Coalition (GLWC) benchmarks exist (As of September 2019,</p>	<p>Boustead Telok Sengathas conducted the assessment of workers prevailing wages based on the annual wages in completed 12 months of year 2020 which resulted in the Total Value of Prevailing Wage as following:</p> <ul style="list-style-type: none"> <li>- Local workers: RM 10,130.00</li> <li>- Foreign workers: RM 10,630.00</li> </ul>	Complied

<p>GLWC has developed national benchmarks in Bangladesh, Belize, Brazil, China, Colombia, Costa Rica, Dominican Republic, Ecuador, Ethiopia, Ghana, Guatemala, India, Kenya, Malawi, Mexico, Nicaragua, Pakistan, South Africa, Sri Lanka, Uganda and Vietnam These benchmarks are developed based on banana, coffee, floriculture, textile, manufacturing, seafood processing and tea industry. The RSPO is in the process of commissioning benchmarks for Malaysia and Indonesia for the palm oil sector and will develop methods to calculate and/or define DLW applicability for all palm oil producing countries in which RSPO members operate).</p> <p><i>Where a GLWC living wage standard (benchmark), or one that fulfils the basic requirements of the RSPO-endorsed living wage methodology, has been established in the country or region of operation, the same should be used as benchmarks.</i></p> <p>In the absence of such benchmarks, the RSPO will collaborate with the GLWC and/or local experts on developing oil palm industry benchmarks (Benchmark in this context may include other approaches and/or methods to calculate the applicability of DLW in the country or region in accordance to the RSPO endorsed method for determining a DLW. Local applicability for benchmarks is important and it may differ based on the needs of each locality or country). These benchmarks will be developed in collaboration and consultation with relevant stakeholders such as palm oil industry members, workers’ union, authorities and/or relevant organisations.</p> <p><i>For countries where no living wage standard is established, until such time that an RSPO endorsed benchmark for the country is in place, national minimum wages shall be paid to all workers. In addition to the payment of minimum wages, the Unit of Certification (UoC) shall conduct an assessment of the prevailing wages and in-kind benefits provided to workers in the Unit of Certification aligned with the RSPO Guidance for Implementing a Decent Living Wage (RSPO Guidance for Implementing a Decent Living Wage. The RSPO will also develop further guidance and tools to calculate DLW in line with the RSPO endorsed methodology which may include independent studies by local experts in their respective region or country).</i></p> <p>Once these benchmarks are available, this procedural note is no longer applicable. UoC shall have an implementation plan towards the payment of a DLW with specific targets, and a phased implementation process including:</p> <ul style="list-style-type: none"> <li>• Updated assessment on prevailing wages and in-kind benefits</li> <li>• There is annual progress on the implementation of living wages</li> <li>• Where a minimum wage, based on equivalent of baskets of goods, is stipulated in Collective Bargaining Agreements (CBAs), this should be used as the foundation for the gradual implementation of the living wage payment</li> </ul>		
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	<ul style="list-style-type: none"> <li>The UoC may choose to implement the living wage payment in a specific section as a pilot project; the pilot will then be evaluated and adapted before eventual scale up of the living wage implementation.</li> </ul> <p>- Minor compliance -</p>		
6.2.7	<p>Permanent, full-time employment is used for all core work performed by the unit of certification. Casual, temporary and day labour is limited to jobs that are temporary or seasonal.</p> <p>- Minor compliance -</p>	<p>Based on documentation review, interviews and field observations, there is no evidence that the units within the Telok Sengat Business Unit employ any casual, temporary and day labour. All employees are employed on either permanent or contractual full-time basis.</p>	Complied
<p><b>Criterion 6.3:</b> The unit of Certification respects the rights of all personnel to form and join trade unions of their choice and to bargain collectively. Where the right to freedom of association and collective bargaining are restricted under law, the employer facilitates parallel means of independent and free association and bargaining for all such personnel.</p>			
6.3.1	<p><b>(C)</b> A published statement recognising freedom of association and right to collective bargaining in national languages (English and/or Bahasa Malaysia) is available and is explained to all workers, in language that they understand, and is demonstrably implemented.</p> <p>- Critical (Major) compliance -</p>	<p>Boustead Telok Sengat implemented Boustead Plantations Berhad Freedom of Association Policy; Signed by Ibrahim Bin Abdul Majid; Date: 2/12/2019. The policy emphasized that the company is committed to support employees' rights in freedom of association.</p> <p>The policy was communicated directly during various meeting with both internal and external stakeholders of mill and estate within Boustead Telok Sengat and indirectly via website as per link as following:</p> <p><a href="http://www.bousteadplantations.com.my/sustain_policy.html">http://www.bousteadplantations.com.my/sustain_policy.html</a></p>	Complied
6.3.2	<p>Minutes of meetings between the unit of certification with trade unions or workers representatives, who are freely elected, are documented in 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 available upon request as documented in national languages as per records of sample Telok Sengat Estate NUPW members meeting # 1 Session 2021; Date: 31/12/2021.</p>	Complied
6.3.3	<p>Management does not interfere with the formation or operation of registered unions/ labour organisations or associations, or other freely</p>	<p>Workers are free to elect their own representatives to sit in the Workers' Community. Interview conducted with the local and</p>	Complied



	<p>elected representatives for all workers including migrant and contract workers.</p> <p>- Minor compliance -</p>	<p>foreign worker representative confirmed that management does not interfere with the formation and operations of the committee.</p>	
<p><b>Criterion 6.4: Children are not employed or exploited.</b></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>Boustead Telok Sengat implemented Boustead Plantations Berhad Children Employment and Minimum Age Limit Policy; Signed by Ibrahim Bin Abdul Majid; Date: 2/12/2019. The policy emphasized that the company is committed to ensure all workers and children safety are protected and all employment are within minimum age limit and in compliance with national regulations and state ordinance. The policy too is subjected to the International Labour Organization (ILO) Convention 138 (1973).</p> <p>The policy was communicated directly during various meeting with both internal and external stakeholders of mill and estate within Boustead Telok Sengat and indirectly via website as per link as following:</p> <p><a href="http://www.bousteadplantations.com.my/sustain_policy.html">http://www.bousteadplantations.com.my/sustain_policy.html</a></p>	Complied
6.4.2	<p><b>(C)</b> There is evidence that minimum age requirements are met. Personnel files show that all workers are above the national minimum age or above company policy minimum age, whichever is higher. There is a documented age screening verification procedure.</p> <p>- Critical (Major) compliance -</p>	<p>The records of employment documentation verified including the Employee Master Lists and sample personal particulars confirmed that minimum age requirements of above 18 years old met for all the workers employed in all operating units within Boustead TSBU. The computerized HR database system able to verify and screen the age of employees upon data entry.</p>	Complied
6.4.3	<p><b>(C)</b> Young persons may be employed only for non- hazardous work, with protective restrictions in place for that work.</p> <p>- Critical (Major) compliance -</p>	<p>Based on documents sighted, interviews and observations, there was no evidence that the Estates and the Mill employ anyone below the age of 18 years. This was verified by examining the master lists of each operating unit where details of the workers' particulars and dates of birth are available. Interviews with workers and staff, as</p>	Complied

		well as observations made during field visits confirm that only those above 18 are employed.	
6.4.4	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. - Minor compliance -	Communication demonstrated as per stakeholder interview and records of stakeholder meeting sighted. Latest external stakeholder meeting planned to be conducted for year 2021 was cancelled due to the COVID-19 pandemic. In place of meeting, Telok Sengat Business Unit consult external stakeholders via email and letters to seek for feedbacks. No negative feedbacks received. Previous external stakeholders meeting was conducted on 8/7/2020.  Internal stakeholder meeting among workers was conducted on 18/5/2021 attended by all staff and employees. The meeting conducted together with refresher briefing and training of company's sustainable policies.	Complied
<b>Criterion 6.5:</b> There is no harassment or abuse in the workplace, and reproductive rights are protected.			
6.5.1	<b>(C)</b> A policy to prevent sexual and all other forms of harassment and violence is implemented and communicated to all levels of the workforce. - Critical (Major) compliance -	Boustead Telok Sengat implemented Boustead Plantations Berhad Sexual Harassment Policy; Signed by Ibrahim Bin Abdul Majid; Date: 2/12/2019. The policy emphasized that the company is committed to ensure prevention of sexual and all other forms of harassment and violence in the workplace and within company's premises with heavy disciplinary action will be impose to any perpetrator.  The policy was communicated directly during various meeting with both internal and external stakeholders of mill and estate within Boustead Telok Sengat and indirectly via website as per link as following:  <a href="http://www.bousteadplantations.com.my/sustain_policy.html">http://www.bousteadplantations.com.my/sustain_policy.html</a>	Complied
6.5.2	<b>(C)</b> A policy to protect the reproductive rights of all, especially of women, is implemented and communicated to all levels of the workforce. - Critical (Major) compliance -	Boustead Telok Sengat implemented Boustead Plantations Berhad Reproductive Rights Policy; Signed by Ibrahim Bin Abdul Majid; Date: 2/12/2019. The policy emphasized that the company is	Complied

		<p>committed to ensure the reproductive rights of all, especially women are protected.</p> <p>The policy was communicated directly during various meeting with both internal and external stakeholders of mill and estate within Boustead Telok Sengat and indirectly via website as per link as following:</p> <p><a href="http://www.bousteadplantations.com.my/sustain_policy.html">http://www.bousteadplantations.com.my/sustain_policy.html</a></p>	
6.5.3	<p>Management has assessed the needs of new mothers, in consultation with the new mothers, and actions are taken to address the needs that have been identified.</p> <p>- Minor compliance -</p>	<p>Interview conducted with women committee representatives confirmed that there are no new mothers at any of the Estates and Mill within Telok Sengat Business Unit. In case of any, the committee representative will take actions to address any needs that have been identified.</p>	Complied
6.5.4	<p>A grievance mechanism, which respects anonymity and protects complainants where requested, is established, implemented and communicated to all levels of the workforce.</p> <p>- Minor compliance -</p>	<p>Boustead has developed Complaint on Sexual Harassment Procedure and Flowchart on Actions to be Taken if any case reported. Latest communication of the mechanism was conducted in the meeting as per records of latest Minit Mesyuarat Persatuan Wanita Kilang Sawit Telok Sengat Kali Pertama (1) Sesi 2021; Date: 22/1/2021. No any reported case of complaints and grievances as per stakeholder interview conducted.</p>	Complied
<p><b>Criterion 6.6:</b> No forms of forced or trafficked labour are used.</p>			
6.6.1	<p><b>(C)</b> All workers have entered into employment voluntarily and the following are prohibited:</p> <ul style="list-style-type: none"> <li>• Retention of identity documents or passports (except for administration purposes including legalisation and renewal processes)</li> <li>• Charging the workers for recruitment fees.</li> <li>• Contract substitution</li> <li>• Involuntary overtime</li> <li>• Lack of freedom of workers to resign</li> </ul>	<p>Based on documentation review, interviews held with workers at the estate and mill, (gardeners, harvesters, mandores, lab workers, ramp operator, boiler man, drivers, etc) and observations, there is no evidence that workers are in a forced employment.</p> <p>Retention of documents: All foreign workers are given the option of whether to keep their own passports, or to keep them securely at the office. They have also signed a document each to confirm their request to place the passports in the locker.</p>	Complied

	<ul style="list-style-type: none"> <li>• Penalty for termination of employment</li> <li>• Debt bondage</li> <li>• Withholding of wages</li> </ul> <p>- Critical (Major) compliance -</p>	<p>Charging for recruitment fee: Workers do not pay any recruitment fee since all employment cost were borne by the company.</p> <p>Involuntary overtime: Based on interviews conducted, there is no evidence of involuntary overtime at either the Estates or Mill.</p> <p>Lack of freedom of workers to resign: There is no evidence observed of workers being prohibited from resigning. The Terms and Conditions of Employment Contracts signed by all workers contains a provision for early termination of the contract where workers can give 14-days termination notice.</p> <p>Penalty to workers for termination of employment: The Terms and Conditions of Employment Contracts signed by all workers states that no penalty will be imposed for premature termination of the employment contract.</p> <p>Debt bondage: Based on interviews with workers, there is no evidence of any form of debt bondage.</p> <p>Withholding of wages: Based on review of the employment contracts and workers' pay slips samples, there is no evidence of any wages being withheld from the workers.</p>	
6.6.2	<p><b>(C)</b> Where temporary or migrant workers are employed, a specific labour policy and/or procedures are established and implemented.</p> <p>- Critical (Major) compliance -</p>	<p>Boustead Telok Sengat implemented Boustead Plantations Berhad Foreign Workers Policy; Signed by Ibrahim Bin Abdul Majid; Date: 2/12/2019. The policy emphasized that the company is committed to ensure the foreign workers employment are subjected to Malaysia legal requirements.</p> <p>The policy was communicated directly during various meeting with both internal and external stakeholders of mill and estate within Boustead Telok Sengat and indirectly via website as per link as following:</p> <p><a href="http://www.bousteadplantations.com.my/sustain_policy.html">http://www.bousteadplantations.com.my/sustain_policy.html</a></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.

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6.7.1	<p><b>(C)</b> The responsible person(s) for H&amp;S is identified. There are records of regular meetings between the responsible person(s) and workers. Concerns of all parties about health, safety and welfare are discussed at these meetings, and any issues raised are recorded.</p> <p>- Critical (Major) compliance -</p>	<p>Responsible person for safety and health already identified as per OSH organization chart. Manager was the one that responsible as safety and health. Appointment letter for Mr Sharille Idzham as chairman for OSH community was available dated 1/6/2021.</p> <p>OSH Meeting in Chamek estate was done periodically, latest record was on 29/3/2021 and previously was on 28/9/2020 and 28/12/2020. This meeting regarding concern of all parties about health, safety, welfare and other issued. The workplace inspection been done and discuss during meeting accordingly.</p> <p>In Mill, OSH meeting conducted 3 monthly once and latest record was on 24/5/2021 and previously record was on 25/2/2021</p>	Complied
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>Emergency Response Plans are available for Emergency Contact Number, Emergency Evacuation, First Aid Locations, Fire Extinguisher Locations, Emergency Response Plan (Fire, Chemical Spillage, Chemical Contamination, Flood and Accident) and displayed at strategic locations around the mill, estate office and stores. The competent personals are appointed and trained to be part of the Emergency Response Team. Appointment letters were sighted in both mill and estate respectively. Accident record such as JKKP 8, JKKP 6 was available at estate and Mill.</p> <p>In estate, JKKP 8 record was available in Chamek estate, referred JKKP 8/87308/2020, no accident recorded for year 2020. JKKP 6 was available dated Feb 2021, the record of incident and investigation was available at site for reviewed.</p> <p>For Mill, JKKP 8 record was available referred record JKKP 8/66831/2021. There 7 incident happen in Mill for year 2020. The JKKP 6 record was available.</p>	Complied
6.7.3	<p><b>(C)</b> Workers use appropriate personal protective equipment (PPE), which is provided free of charge to all workers at the place of work to cover all</p>	<p>Appropriate PPE were given to workers based on HIRARC recommendations suitable for the job position or hazardous</p>	Complied

	<p>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>operation undertaken. This was verified in the PPE issuance records viewed.</p> <p>Checked during site visit that PPE given were worn correctly by the operators and the condition of each PPE item and their validity lifespan were found good. Interview of workers showed they know when to change to a new set, either by expiry date or when they are damaged or rendered ineffective to use.</p> <p>The operators had been given training on the use of PPE and SOP for the job they were assigned to work.</p>									
6.7.4	<p>All workers are provided with medical care and covered by accident insurance. Costs incurred from work- related incidents leading to injury or sickness are covered in accordance with Malaysian law.</p> <p>- Minor compliance -</p>	<p>Medical care and accident insurance are provided to all employees, both Local and Foreign workers under Employees’ Social Security Act 1969 (Act 4). Sighted the last three months payment made to SOCSO on Form A.</p>	Complied								
6.7.5	<p>Occupational injuries are recorded using Lost Time Accident (LTA) metrics.</p> <p>- Minor compliance -</p>	<p>The Lost Time Accident are recorded and maintained for FY 2020. The records available as per below:-</p> <table border="1" data-bbox="1137 912 1926 1114"> <thead> <tr> <th>Estate/ Mill</th> <th>LTI</th> </tr> </thead> <tbody> <tr> <td>Chamek estate</td> <td>0.00</td> </tr> <tr> <td>Telok Sengat Mill</td> <td>50.04</td> </tr> <tr> <td>Kulai Young estate</td> <td>0.0</td> </tr> </tbody> </table>	Estate/ Mill	LTI	Chamek estate	0.00	Telok Sengat Mill	50.04	Kulai Young estate	0.0	Complied
Estate/ Mill	LTI										
Chamek estate	0.00										
Telok Sengat Mill	50.04										
Kulai Young estate	0.0										
<p><b>Principle 7: Protect, conserve and enhance ecosystems and the environment</b></p>											
<p><b>Criterion 7.1:</b> Pests, diseases, weeds and invasive introduced species are effectively managed using appropriate Integrated Pest Management (IPM) techniques.</p>											
7.1.1	<p><b>(C)</b> IPM plans are implemented and monitored to ensure effective pest control.</p> <p>- Critical (Major) compliance -</p>	<p>Chamek estates in the CU continued to implement Integrated Pest Management (IPM) as per IPM plan dated 1/1/2021. The estates continued to manage pests, disease, weeds and invasive introduced species using appropriate IPM techniques guided – Pest And</p>	Complied								

		<p>Diseases The IPM program among others involved the following practices;</p> <ul style="list-style-type: none"> <li>• Minimize or possibly elimination of significant threats caused by pests to the palms growth health and safety of workers, staff and the public in general.</li> <li>• Prevention or minimize of loss or damage to palms and yield by pests.</li> <li>• Increases flora and fauna in the estate environment.</li> <li>• To ensure effective monitoring and early warning of pests incidence in the plantings.</li> <li>• To achieve insects biological equilibrium as possibly can.</li> </ul>	
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>Field visits did not find any species referenced in the Global Invasive Species Database and CABI.org.</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>The use of fire for pest control is not practised. Not sighted any open burning during site verification.</p>	Complied
<p><b>Criterion 7.2:</b> Pesticides are used in ways that do not endanger health of workers, families, communities or the environment.</p>			
7.2.1	<p><b>(C)</b> Justification of all pesticides used is demonstrated. Selective products and application methods that are specific to the target pest, weed or disease are prioritised.</p> <p>- Critical (Major) compliance -</p>	<p>Justification of pesticides applied is available in the Oil Palm Circular (Manual). Refer to OPC Weeding (01.c) and Lallang (02.a). The use of pesticide is specific to the target pest, weed and disease. Justification takes consideration to minimize effect on non-target species.</p> <p>The use of other Class 1 Chemicals (such as metamidophos and monocrotophos) approved by the Pesticides Board and included in the MPOB list of approved Pesticide for use in oil palm plantations</p>	Complied

		can only be carried out under strict supervision and in absolutely necessary circumstances such as severe outbreak and critical pest infestation, and, with special method of application specified in the Highly Toxic Pesticides Regulation 1996 of the Pesticides Act 1974, after authorization has been received from relevant authorities.													
7.2.2	<p><b>(C)</b> Records of pesticides use (including active ingredients used and their LD50, area treated, amount of active ingredients applied per ha and number of applications) are provided.</p> <p>- Critical (Major) compliance -</p>	Records of pesticides and their active ingredients used, LD50, area treated, amount of a.i. applied per ha, and number of applications was maintained as per chemical usage monitoring for 2021. The average of chemical usage per ha was 1.12.	Complied												
7.2.3	<p><b>(C)</b> Any use of pesticides is minimised as part of a plan, eliminated where possible, in accordance with IPM plans.</p> <p>- Critical (Major) compliance -</p>	<p>The pesticide reduction plan was available included pesticide for rat, weed, bagworm and etc.</p> <p>The IPM plan was available, from the programme record the beneficial been done was available for year 2021 as per below detail:-</p> <table border="1" data-bbox="1137 874 1832 1107"> <thead> <tr> <th>Type of Beneficial plant</th> <th>Plan (m)</th> <th>Actual (Todate) (m)</th> </tr> </thead> <tbody> <tr> <td>Cassia</td> <td>1294</td> <td>690</td> </tr> <tr> <td>Antigonan</td> <td>354</td> <td>235</td> </tr> <tr> <td>Turnera</td> <td>354</td> <td>205</td> </tr> </tbody> </table>	Type of Beneficial plant	Plan (m)	Actual (Todate) (m)	Cassia	1294	690	Antigonan	354	235	Turnera	354	205	Complied
Type of Beneficial plant	Plan (m)	Actual (Todate) (m)													
Cassia	1294	690													
Antigonan	354	235													
Turnera	354	205													
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>	Not applicable because there has been no prophylactic use of pesticides at the visited estates	Not Applicable												
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</p>	In sampling estate, sighted no record of using Paraquat in estate. The highest class pesticide using was class II, no record using 1A and 1B been sighted from record and site observation.	Complied												



	<p>by a due diligence process, or when authorised by government authorities for pest outbreaks.</p> <p>The due diligence refers to:</p> <ul style="list-style-type: none"> <li>a) Judgment of the threat and verify why this is a major threat</li> <li>b) Why there is no other alternative which can be used</li> <li>c) Which process was applied to verify why there is no other less hazardous alternative</li> <li>d) What is the process to limit the negative impacts of the application</li> <li>e) Estimation of the timescale of the application and steps taken to limit application to the specific outbreak.</li> </ul> <p>- Minor compliance -</p>	<p>As per Chamek estate, Kulai young estate and Telok sengat estate, as per chemical register and chemical usage record dated Jan 2021 showed no class 1A and 1 B been using in Chamek estate.</p>	
7.2.6	<p><b>(C)</b> Pesticides are only handled, used or applied by persons who have completed the necessary training and are always applied in accordance with the product label. All precautions attached to the products are properly observed, applied, and understood by workers (see Criteria 3.6). Personnel applying pesticides must show evidence of regular updates on the knowledge about the activity they carry out.</p> <p>- Critical (Major) compliance -</p>	<p>Pesticides were handled, used or applied by trained workers in accordance with the product label. The Pesticide operators were given training on the safe handling and application of the pesticides. All precautions attached to the products were explained to operators and noted during the interview with workers that they understood and properly observed them. PPE record was available for all workers.</p>	Complied
7.2.7	<p><b>(C)</b> Storage of all pesticides is in accordance with recognised best practices.</p> <p>- Critical (Major) compliance -</p>	<p>The 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.</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>Telok Sengat mill's supply base conducted the Triple Rinsing of Empty Chemical Container Training (Latihan 3 Kali Pembilasan Bekas Racun dan Bahan Kimia) to all sprayers gang for both divisions based on the guideline for used plastic pesticide container recycling program (UPPCR). Visit to estates confirmed that all</p>	Complied

		pesticides stored at chemical store where empty chemical containers have been triple-rinsed and punctured. The containers were collected by G-Planter for recycle purposes.	
7.2.9	<b>(C)</b> Aerial spraying of pesticides is prohibited, unless in exceptional circumstances where no other viable alternatives are available. This requires prior government authority approval. All relevant information is provided to affected local communities at least 48 hours prior to application of aerial spraying. - Critical (Major) compliance -	No aerial spraying conducted in sampling estate under Telok Sengat POM and Supply base.	Complied
7.2.10	<b>(C)</b> Specific annual medical surveillance for pesticide operators, and documented action to treat related health conditions, is demonstrated. - Critical (Major) compliance -	The Telok Sengat supply base have conducted the specific medical surveillance for pesticide operator, sampling in Kulai Young estate, Medical surveillance conducted at Klinik Moiz Sdn Bhd dated 2/11/2021.  In Telok Sengat, Medical surveillance by Dr Hussain Bin Moiz(HQ/17/DOC/00/00005) dated 21/10/2021 with total 6 person been send. From the result showed that all pesticide operator was fit to work with chemical.	Complied
7.2.11	<b>(C)</b> No work with pesticides is undertaken by persons under the age of 18, pregnant or breastfeeding women or other people that have medical restrictions and they are offered alternative equivalent work. - Critical (Major) compliance -	All chemical handlers at the estates assessed were above 18 years old as verified in the list of sprayers. Also no breast feeding women undertook work with pesticides.	Complied
<b>Criterion 7.3:</b> Waste is reduced, recycled, reused and disposed of in an environmentally and socially responsible manner.			
7.3.1	A waste management plan which includes reduction, recycling, reusing, and disposal based on toxicity and hazardous characteristics, is documented and implemented. - Minor compliance -	Documented waste management plan was available at Telok Sengat POM and Estate. Among the types of waste identified were scheduled wastes, domestic wastes and recyclable wastes. The scheduled wastes were disposed in accordance to EQA regulations, domestic wastes were landfilled in accordance to procedure and recyclable wastes were delivered to recycle wastes vendors.	Complied

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		Chamek estate also dumping the domestic waste at field, the scheduled was available and management using contractor ( Ramchandran A/L Kavery) twice a week. The record was available and accordance to procedure.	
7.3.2	Proper disposal of waste material, according to procedures that are fully understood by workers and managers, is demonstrated. - Minor compliance -	The proper disposal of waste material was accordance to procedure that been establish by the Boustead, In Kulai Young estate, the inventory of Scheduled waste was available in estate for Dec 2021 with declaration SW 305, 409 and 410. Previously the empty container of chemical disposed as recycle waste, disposed at SS Setia Teknologi Enterprise dated 2/2/2021 with total 1569 empty container.	Complied
7.3.3	The unit of certification does not use open fire for waste disposal. - Minor compliance -	A circular [O.P.C No. 51c, July 1999] stating when there were incidences of Basal Stem Rot [BSR] on the old stands or high risk of Oryctes infestation, then partial burning and pulverisation are to be carried out. Before commenced of burn, a permit should be obtained from DOE and burning strictly not allowed during July – November or whenever a “No Open Burning” circular from local authorities. From the Telok Sengat supply base record no issue regarding to Basal Stem Rot thus no sighted any open burning in estate however found open burning used for waste disposal in Mill workers housing area (MQ 24) verified during site visit thus minor NC been raised.	Non-compliance
<b>Criterion 7.4:</b> Practices maintain soil fertility at, or where possible improve soil fertility to, a level that ensures optimal and sustained yield.			
7.4.1	Good agriculture practices, as contained in SOPs, are followed to manage soil fertility to optimise yield and minimise environmental impacts. - Minor compliance -	In sampling estate manages and improves soil fertility to a level that ensures optimal and sustained yield by monitoring the fertilizer inputs through annual fertilizer applications. The sustaining of the soil fertility is guided by the organization OPC for Soil And Water Conservation (O.P.C. No. 08a.) dated April 1996	Complied

		and reviewed in August 2018. Therein containing information on the following a. The objectives as to why they should implement soil management practices. b. Ground cover establishment c. Soil Conservation Practices d. Mulching	
7.4.2	Periodic tissue and soil sampling is carried out by Companies to monitor and manage changes in soil fertility and plant health. - Minor compliance -	It was commonly used in the diagnosis of fertilizer requirements in oil palms. Foliar, soil and fertilizer recommendation report by AAR Sdn Bhd was sighted. Foliar and Soil analysis report were conducted annually by AAR Sdn Bhd.	Complied
7.4.3	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. - Minor compliance -	From the waste management plan, the EFB have been use as nutrient recycling for young palm in estate. EFB application was applied at 40mt/ha. However, no application of EFB at Kulai Young Estate and Chamek Estate.	Complied
7.4.4	Records of fertiliser inputs are maintained. - Minor compliance -	Fertilizers were applied as per agronomist recommendation 2020. Record shows application date, filed number, dosage applied per palm, type of fertilizer and number of applicators.	Complied
<b>Criterion 7.5:</b> Practices minimise and control erosion and degradation of soils.			
7.5.1	<b>(C)</b> Maps identifying marginal and fragile soils, including steep terrain, are available. - Critical (Major) compliance -	No fragile soil in Telok sengat supply base estate. The Soil maps or soil survey available for Chamek Estate dated October 2018. Major soil series in Chamek was Renggam series. The plans and operation followed as per procedure establish by management to sustain suitability of land for palm oil cultivation. No changes from previous report.  For Telok sengat estate, referred soil map AAR/09/01/2012. There are 5 type of soil series under Telok sengat estate, Harimau,	Complied

		Lanchange, Local alluvium, rengam and Taitak series. Major soil in this estate was Rengam Series.	
7.5.2	No replanting on steep slopes (above 25 degrees) unless approved by state governments. In case of replanting is permitted, no replanting in contiguous area of steep terrain (greater than 25 degrees) larger than 25 Ha within the Unit of Certification. - Minor compliance -	Boustead Plantations Bhd has established SOP related to planting on slope namely Soil Conservation/Water Management was sighted. All the strategy including soil conservation practices, type of vegetation, ground cover establishment were found implemented accordingly in the field however not sighted any steep slope been planting with palm oil.	Complied
7.5.3	There is no new planting of oil palm on steep terrain. - Minor compliance -	Not sighted any new planting of oil palm in estate during site visit, this verified with interview and document review.	Complied
<b>Criterion 7.6:</b> Soil surveys and topographic information are used for site planning in the establishment of new plantings, and the results are incorporated into plans and operations.			
7.6.1	<b>(C)</b> To demonstrate the long-term suitability of land for palm oil cultivation, soil maps or soil surveys identifying marginal and fragile soils, including steep terrain, are taken into account in plans and operations. - Critical (Major) compliance -	The Soil maps or soil survey available for Chamek Estate dated October 2018. Major soil series in Chamek was Renggam series. The plans and operation followed as per procedure establish by management to sustain suitability of land for palm oil cultivation. No changes from previous report. For Telok sengat estate, referred soil map AAR/09/01/2012. There are 5 type of soil series under Telok sengat estate, Harimau, Lanchange, Local alluvium, rengam and Taitak series. Major soil in this estate was Rengam Series.	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 -	For Telok sengat estate, referred soil map AAR/09/01/2012. There are 5 type of soil series under Telok sengat estate, Harimau, Lanchange, Local alluvium, rengam and Taitak series. Major soil in this estate was Rengam Series. There was no fragile soil in estates audited.	Complied

7.6.3	Soil surveys and topographic information guide the planning of drainage and irrigation systems, roads and other infrastructure. - Minor compliance -	Soil map (photocopy) at the visited estates, updated digitally was available and used to address the planning of infrastructure in the field.	Complied
<b>Criterion 7.7:</b> No new planting on peat, regardless of depth after 15 November 2018 and all peatlands are managed responsibly.			
7.7.1	<b>(C)</b> There is no new planting on peat regardless of depth after 15 November 2018 in existing and new development areas. - Critical (Major) compliance -	No new planting in sample estate. Soil series map available for all estates visited. No other soil categorised as problematic or fragile soil. Sighted the type of soil available at Telok Sengat and Soil analysis report were conducted annually by AAR Sdn Bhd. From the report, the soil series available in sample estate was benta series, colluvium series, Gajah Mati series and others.	Complied
7.7.2	Areas of peat within the managed areas are inventoried, documented and reported (effective from 15 November 2018) to RSPO Secretariat. <b>PROCEDURAL NOTE:</b> Maps and other documentation of peat soils are provided, prepared and shared in line with RSPO Peatland Working Group (PLWG) audit guidance (see Procedural Note for 7.7.5 below). - Minor compliance -	No Peat soil in sample estate under Boustead Telok Sengat CU.	Not Applicable
7.7.3	<b>(C)</b> Subsidence of peat is monitored, documented and minimised. - Critical (Major) compliance -	No Peat soil in sample estate under Boustead Telok Sengat CU.	Not Applicable
7.7.4	<b>(C)</b> A documented water and ground cover management programme is in place. - Critical (Major) compliance -	No Peat soil in sample estate under Boustead Telok Sengat CU.	Not Applicable
7.7.5	<b>(C)</b> For plantations planted on peat, drainability assessments are conducted following the RSPO Drainability Assessment Procedure, or other RSPO recognised methods, at least five years prior to replanting. The assessment result is used to set the timeframe for future replanting, as well as for phasing out of oil palm cultivation at least 40 years, or two	No Peat soil in sample estate under Boustead Telok Sengat CU.	Not Applicable

	<p>cycles, whichever is greater, before reaching the natural gravity drainability limit for peat. When oil palm is phased out, it is replaced with crops suitable for a higher water table (paludiculture) or rehabilitated with natural vegetation.</p> <p>This is subject to transitional (5 years: 2019 to 2024) arrangement stated in the Drainability Assessment Procedure.</p> <p>Within 12 months initial implementation period, company could submit other alternate methodologies to be considered by RSPO for recognition.</p> <p>- Critical (Major) compliance -</p>		
7.7.6	<p><b>(C)</b> All existing plantings on peat are managed according to the 'RSPO Manual on Best Management Practices (BMPs) for existing oil palm cultivation on peat', version 2 (2019) and associated audit guidance.</p> <p>- Critical (Major) compliance -</p>	No Peat soil in sample estate under Boustead Telok Sengat CU.	Not Applicable
7.7.7	<p><b>(C)</b> All areas of unplanted and set-aside peatlands in the managed area (regardless of depth) are protected as "peatland conservation areas"; new drainage, road building and power lines by the unit of certification on peat soils is prohibited; peatlands are managed in accordance with the 'RSPO BMPs for Management and Rehabilitation of Natural Vegetation Associated with Oil Palm Cultivation on Peat', version 2 (2019) and associated audit guidance.</p> <p>- Critical (Major) compliance -</p>	No Peat soil in sample estate under Boustead Telok Sengat CU.	Not Applicable
<p><b>Criterion 7.8:</b> Practices maintain the quality and availability of surface and groundwater.</p>			
7.8.1	<p>A water management plan is in place and implemented to promote more efficient use and continued availability of water sources and to avoid negative impacts on other users in the catchment. The plan addresses the following:</p> <p>a) The unit of certification does not restrict access to clean water or contribute to pollution of water used by communities.</p>	Boustead POM and estate has established its water management plan dated 4/2/2021. The objective of the plan is to conserve the potable water. Apart from that, in order to maintain the availability of surface and ground water, water management plan for peat area, flooded area, protection of water courses & wetlands, pollution prevention through establishment of riparian zones and	Complied

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	b) Workers have adequate access to clean water. - Minor compliance -	management of water table through installation of water gates. For workers in Mill and Telok Sengat estate they have adequate access to clean water for domestic usage, this water supply by Government (SAJ).	
7.8.2	<b>(C)</b> Water courses and wetlands are protected, including maintaining and restoring appropriate riparian and other buffer zones in line with 'RSPO Manual on BMPs for the management and rehabilitation of riparian reserves' (April 2017) or applicable National legislation or specific environmental permit. Smallholders may replant existing planted areas provided there is no evidence of environmental deterioration having occurred during the previous cycle. - Critical (Major) compliance -	Water analysis – conducted at Lotus Laboratory Services (M) Sdn Bhd (Report no; LS/W/K3291/91) dated 10/12/2021. Training been conducted in Kulai Young Estate dated 23/11/2021 regarding to water sampling. Previously water analysis conducted on 2/7/2021. Training on policy for buffer zone dated 18/12/2021 attended by 17 person.	Complied
7.8.3	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 -	Mill effluent discharge into river (Sg Layau), from the DOE approval the BOD must no more than 100mg/L. From the sampling result MABB 1603/21 dated 29/6/2021 showed BOD value 18 mg/L less than DOE license recommendation.	Complied
7.8.4	Mill water use per tonne of FFB is monitored and recorded. - Minor compliance -	Water usage per tonne FFB was available from Jan 2020 until Dec 2020 with total 72188 liter. The rate water consumption with FFB process was 2.63.	Complied
<b>Criterion 7.9:</b> 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 -	The plan for improving efficiency of the use of fossil fuel was available dated Jan 2020. The action was changes the old tractor and vehicle into the new one and also to have daily vehicle maintenance record were utilised to monitored the condition. The monitoring was done monthly by management and Diesel used per FFB was 1.00liter/tan ffb as per Dec 2020. FFB total 129,599.77 mt and diesel 129700 litter (turbine and engine only)	Complied



<p><b>Criterion 7.10:</b> Plans to reduce pollution and emissions, including greenhouse gases (GHG), are developed, implemented and monitored and new developments are designed to minimise GHG emissions.</p>			
7.10.1	<p><b>(C)</b> GHG emissions are identified and assessed for the unit of certification. Plans to reduce or minimise them are implemented, monitored through the Palm GHG calculator and publicly reported.</p> <p>- Critical (Major) compliance -</p>	<p>Significant pollutants identified are for GHG emission was verified as per GHG calculator such as fertiliser used, chemical used, diesel usage, petrol usage, POME treatment, EFB and others. These pollutants impact to GHG were calculated through the Palm GHG V3 calculator. The data was accurate as per verification with the record in estate and mill.</p>	Complied
7.10.2	<p><b>(C)</b> Starting 2014, the carbon stock of the proposed development area and major potential sources of emissions that may result directly from the development are estimated and a plan to minimise them prepared and implemented (following the RSPO GHG Assessment Procedure for New Development).</p> <p>- Critical (Major) compliance -</p>	<p>The was no proposed development area in the Boustead Telok Sengat Certification Unit noted. Hence, no New Planting.</p>	Complied
7.10.3	<p><b>(C)</b> Other significant pollutants are identified and plans to reduce or minimise them implemented and monitored.</p> <p>- Critical (Major) compliance -</p>	<p>The Boustead Telok Sengat Continuous Improvement Plan 2021 has documented the potential pollutants inclusive of GHG emissions especially from fossil fuel consumption, treatment of POME and fertilizer usage. Plans have been established with realistic timeline to reduce GHG emissions such as low-emission management practices for</p> <p>a. Mill, that is better management of POME, efficient boiler and sent EFB to estate for mulching;</p> <p>b. Plantations, that is, EFB application to reduce inorganic fertilizer use, energy efficient transportation (on-time servicing and maintenance), good water management and restitution of conservation areas.</p>	Complied
<p><b>Criterion 7.11:</b> Fire is not used for preparing land and is prevented in the managed area</p>			

7.11.1	<b>(C)</b> Land for new planting or replanting is not prepared by burning. - Critical (Major) compliance -	The management already establish SOP for Area/Field: Replanting; Serial # EAI/2018/09-01; Activity: Felling & Clearing; Aspect: Soil Erosion; Environmental Load Item: Oil palm tree removal (temporary bare ground/top surface); Control: Low Cover Crop (LCC) upon replanting. Management also release a memo A circular [O.P.C No. 51c, July 1999 updated August 2018]. No open burning was been sighted during site visit.	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 -	The emergency team for fire prevention was establish by each operating unit. This team already attend training for Fire drill and firefighting. The emergency contact no also been establish, thus emergency contact number was sighted during site visit.	Complied
7.11.3	The unit of certification engages with adjacent stakeholders on fire prevention and control measures. - Minor compliance -	The management each operating unit already engages with the adjacent stakeholder to inform regarding to fire prevention and control measure that been establish by Boustead. Sampling in Kulai Young Estate, inform regarding to fire prevention to adjacent stakeholder dated 20/10/2021. In Telok Sengat estate was on 9/11/2021.	Complied
<b>Criterion 7.12:</b> Land clearing does not cause deforestation or damage any area required to protect or enhance High Conservation Values (HCVs) or High Carbon Stock (HCS) forest. HCVs and HCS forests in the managed area are identified and protected or enhanced.			
7.12.1	<b>(C)</b> Land clearing since November 2005 has not damaged primary forest or any area required to protect or enhance HCVs. Land clearing since 15 November 2018 has not damaged HCVs or HCS forests. A historic Land Use Change Analysis (LUCA) is conducted prior to any new land clearing, in accordance with the RSPO LUCA guidance document. - Critical (Major) compliance -	Not applicable as no new development by the certification unit.	Not Applicable
7.12.2	<b>(C)</b> HCVs, HCS forests and other conservation areas are identified as follows:	Information available based on the High Conservation Value (HCV) Assessment Report (Multi-site) for Boustead Plantations Berhad	Complied

	<p>a) For existing plantations with an HCV assessment conducted by an RSPO-approved assessor and no new land clearing after 15 November 2018, the current HCV assessment of those plantations remains valid.</p> <p>b) Any new land clearing (in existing plantations or new plantings) after 15 November 2018 is preceded by an HCV-HCS assessment, using the HCSA Toolkit and the HCV-HCSA Assessment Manual. This will include stakeholder consultation and take into account wider landscape-level considerations.</p> <p><b>PROCEDURAL NOTE:</b>          Requirement is further clarified under the Interpretation of Indicator 7.12.2 and Annex 5 (approved by BOG on 12 June 2019).</p> <p>- Critical (Major) compliance -</p>	<p>covering Telok Sengat Estate, Kulai Young Estate, Chamek Estate, Eldred Estate and Bekoh Estate; July 2018.</p> <p>Assessment was conducted by Malaysian Environmental Consultants (MEC) on 2-11 April 2018 with public stakeholder consultations done on 21-22 May 2018.</p> <p>Results of assessment concluded that there were HCV presence within Telok Sengat certification unit as per following:</p> <ul style="list-style-type: none"> <li>- HCV 1: Mark and label boundaries of HCV areas (Present in Telok Sengat &amp; Chamek Estate)</li> <li>- HCV 2: Mark and label boundaries of HCV areas (Potentially present in Telok Sengat Estate)</li> <li>- HCV 3: Mark and label boundaries of HCV areas (Present in Telok Sengat Estate)</li> <li>- HCV 4: Mark and label boundaries of HCV areas (Present in all estates)</li> <li>- HCV 6: Mark and install signage for each HCV site (Present in all estates)</li> </ul>	
7.12.3	<i>Indicator is not applicable in Malaysia context</i>		Not Applicable
7.12.4	<p><b>(C)</b> Where HCVs, HCS forests after 15 November 2018, peatland and other conservation areas have been identified, they are protected and/or enhanced. An integrated management plan to protect and/or enhance HCVs, HCS forests, peatland and other conservation areas is developed, implemented and adapted where necessary, and contains monitoring requirements. The integrated management plan is reviewed at least once every five years. The integrated management plan is developed in consultation with relevant stakeholders and includes the directly managed area and any relevant wider landscape level considerations (where these are identified).</p>	<p>Documented in High Conservation Value (HCV) Management Plan - 5.5.2; the implementation was established as objectives, targets and action plan which were not fully in-line with recommendation from the HCV assessor.</p> <p>Based on the HCV report, few recommendations made by HCV assessor on management and monitoring. Sampling in Chamek the monitoring been done according to the HCV plan. The record sampling latest March 2021.</p>	Complied

	- Critical (Major) compliance -		
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 -	Based on the HCV report, no local communities in HCV area. Boustead Telok Sengat has developed a Communication Procedure. The procedure is to handle communication for internal and external stakeholders. The methods of communication such as formally write in, through phone call, discussion or meeting and etc. External Communication Form (PKSJ-001) and Communication Record (PKSJ-002) was implemented.	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 -	There is no RTE or high biodiversity value at sampling estate under Telok sengat supply base, there was an average of 82 species counted. There are 4 vulnerable (VU) species available or sighted are:- <ul style="list-style-type: none"> <li>• Pigtailed macaque,</li> <li>• Milky stork,</li> <li>• an otter – most likely the smooth otter, and</li> <li>• The White-vented myna.</li> </ul> The HCV management plan has been established. Latest review was conducted on Jan 2021 such as river riparian buffer zone Sungai Johor were clearly demarcated with red ring to show the distance of the buffer zone. Latest monitoring been done by estate was on 18/3/2021 and this monitoring was done 2 time per month.	Complied
7.12.7	The status of HCVs, HCS forests after 15 November 2018, other natural ecosystems, peatland conservation areas and RTE species is monitored. Outcomes of this monitoring are fed back into the management plan. - Minor compliance -	The HCV monitoring was conducted quarterly basis, from the latest record no RTE species was found during the monitoring been conducted. No encroachment and chemical activities in HCV area. This verified as per site verification.	Complied
7.12.8	<b>(C)</b> Where there has been land clearing without prior HCV assessment since November 2005, or without prior HCV-HCSA assessment since 15	No land clearing in sample estate verified as per hectarage record and land statement.	Complied

	November 2018, the Remediation and Compensation Procedure (RaCP) applies. - Critical (Major) compliance -		
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## Appendix B: GHG Reporting Executive Summary

The GHG emissions that were produced in **2020** for **Boustead Telok Sengat** 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 **Boustead Telok Sengat** and supply base are as following:

Emission per product	tCO <sub>2</sub> e/tProduct
CPO	0.83
PKO	0

Extraction	%
OER	21.2
KER	4.19

Production	t/yr
FFB Process	129,599.90
CPO Produced	27477.93
PKO Produced	0

Land Use	Ha
OP Planted Area	6545.50
OP Planted on peat	0
Conservation (forested)	0
Conservation (non-forested)	0
<b>Total</b>	<b>6545.50</b>

### Summary of Field Emission and Sink

	Own Crop*		Group		3 <sup>rd</sup> Party		Total	
	tCO <sub>2</sub> e	tCO <sub>2</sub> e / FFB	tCO <sub>2</sub> e	tCO <sub>2</sub> e / FFB	tCO <sub>2</sub> e	tCO <sub>2</sub> e / FFB	tCO <sub>2</sub> e	tCO <sub>2</sub> e / FFB
<b>Emission</b>								
Land Conversion	64647.47	0.55	0	0	0	0	64647.47	0.55
CO <sub>2</sub> Emission from fertilizer	2818.32	0.02	0	0	0	0	2818.32	0.02
NO <sub>2</sub> Emission	2538.76	0.02	0	0	0	0	2538.76	0.02
Fuel Consumption	389.19	0	0	0	0	0	389.19	0
Peat Oxidation	0	0	0	0	0	0	0	0
<b>Sink</b>								
Crop Sequestration	-60070.48	-0.52	0	0	0	0	-60070.48	-0.52
Conservation Sequestration	0	0	0	0	0	0	0	0
<b>Total</b>	<b>10323.26</b>	<b>0.09</b>	<b>0</b>	<b>0</b>	<b>14391.81</b>	<b>0</b>	<b>24715.07</b>	<b>0.09</b>

*\*Note: Includes both estates and smallholders*

**Summary of Mill Emission and Credit**

	tCO <sub>2</sub> e	tCO <sub>2</sub> e/tFFB
<b>Emission</b>		
POME	2192.71	0.02
Fuel Consumption	474.41	0
Grid Electricity Utilization	0	0
<b>Credit</b>		
Export of Grid Electricity	0	0
Sales of PKS	0	0
Sales of EFB	0	0
<b>Total</b>	<b>2667.12</b>	<b>0.02</b>

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

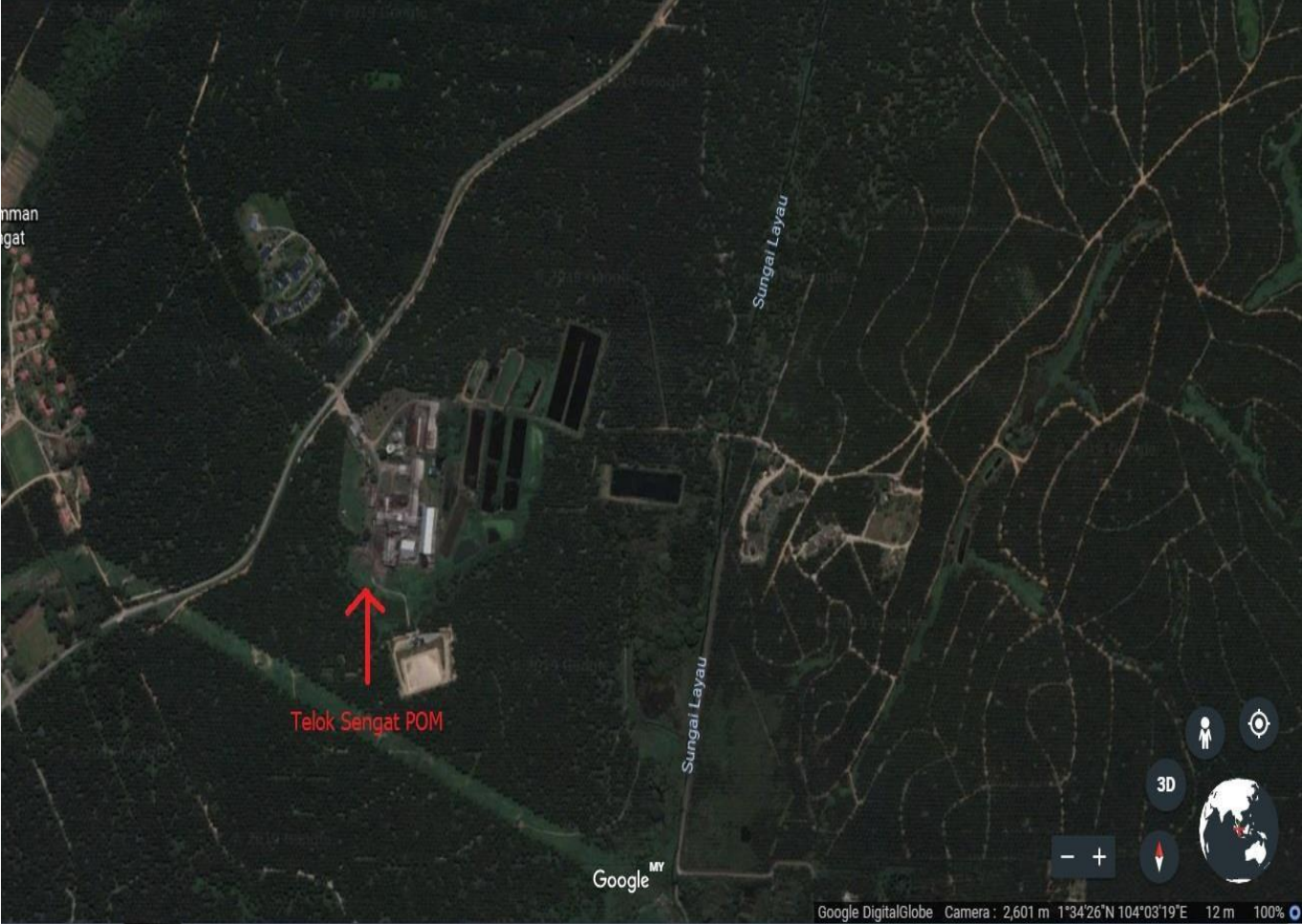
Emissions	tCO <sub>2</sub> e
PK from own mill	0
PK from other source	0
Fuel Consumptions	0
<b>Total Crusher emissions</b>	<b>0</b>

\*This mill has no kernel crusher operation.

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

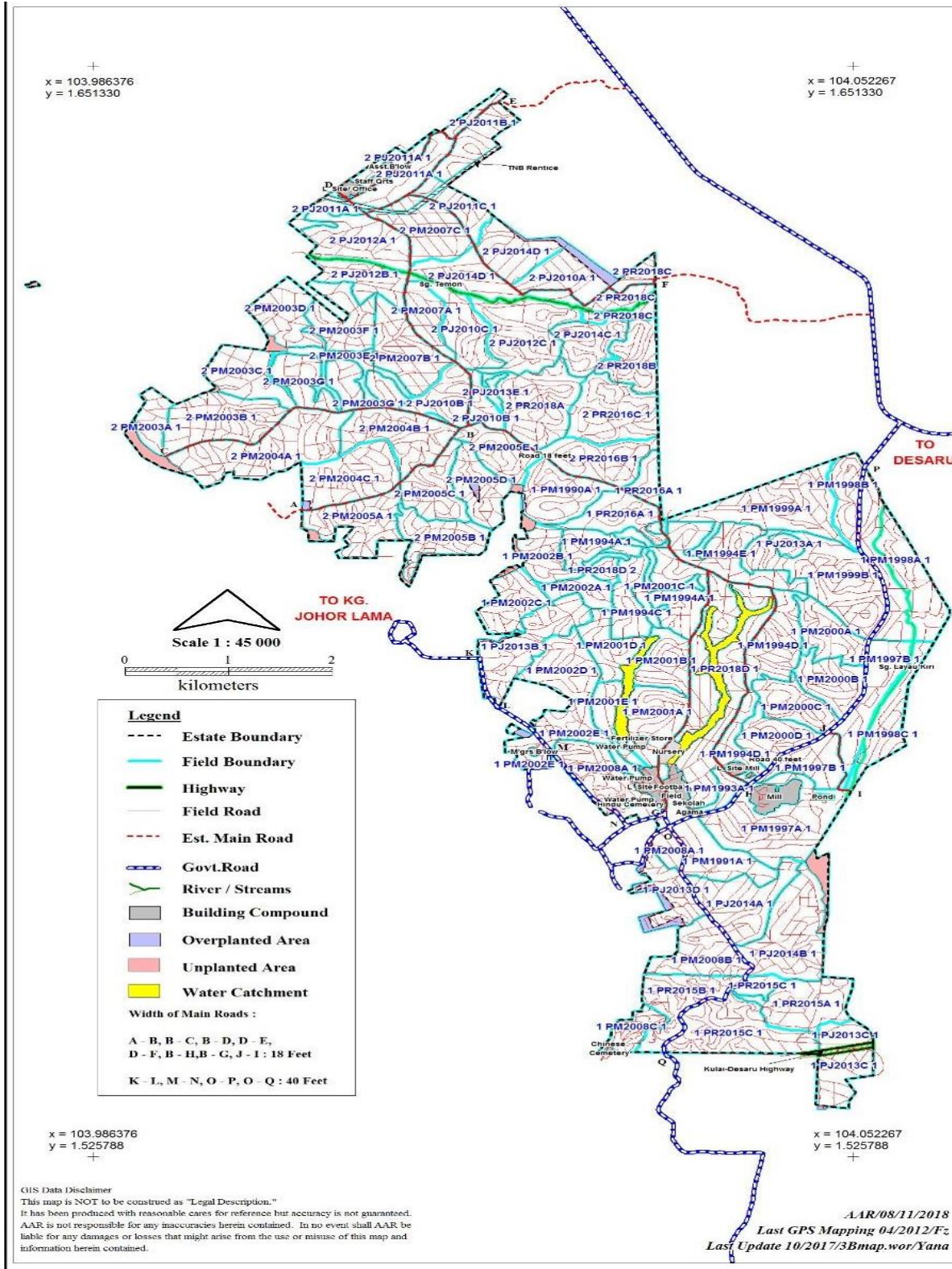
<b>POME Diverted to Anaerobic Digestion:</b>	
Divert to anaerobic pond (%)	0
Divert to methane captured (flaring) (%)	27
Divert to methane captured (energy generation) (%)	73

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



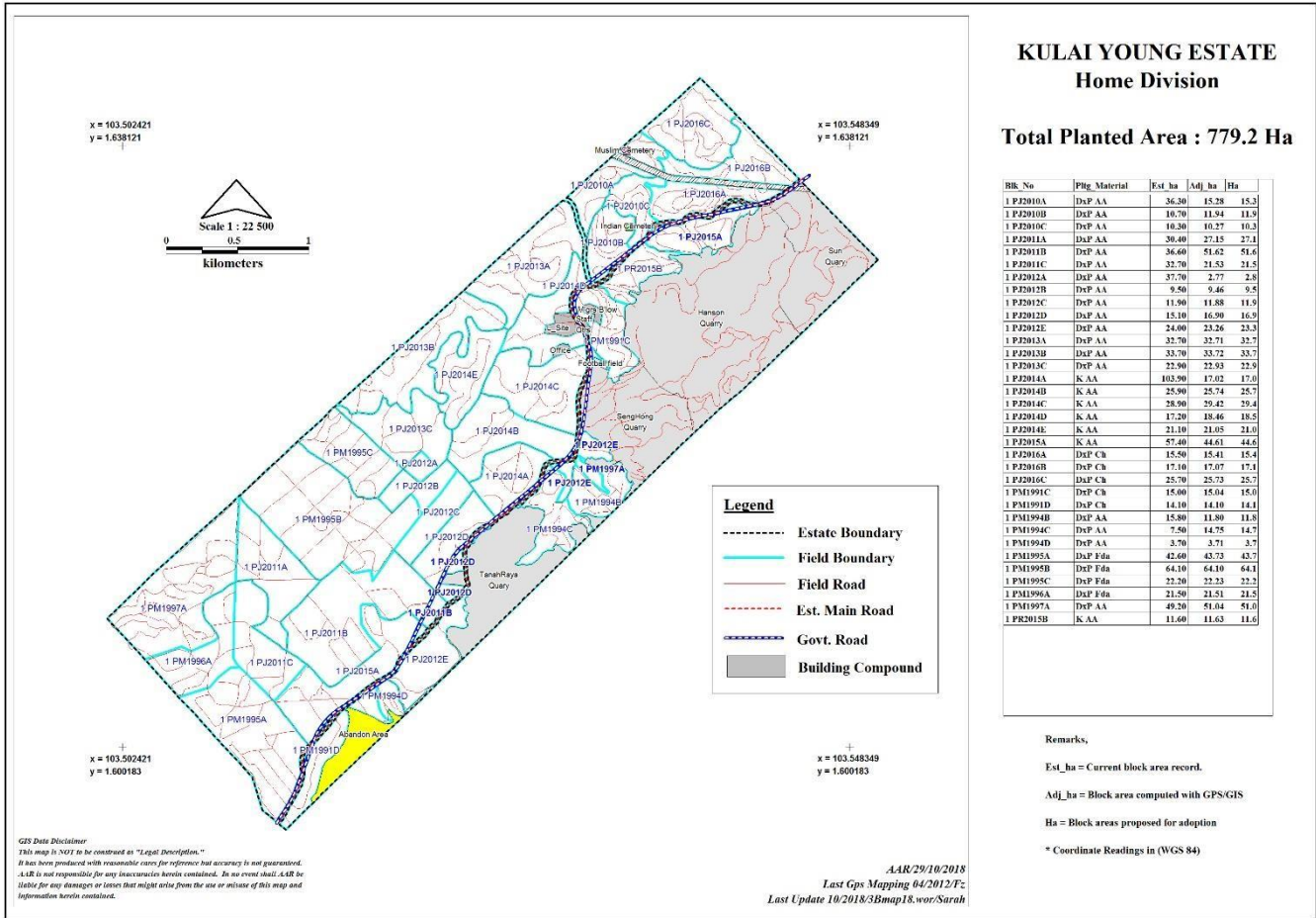


**Appendix D: Boustead Telok Sengat Estate**

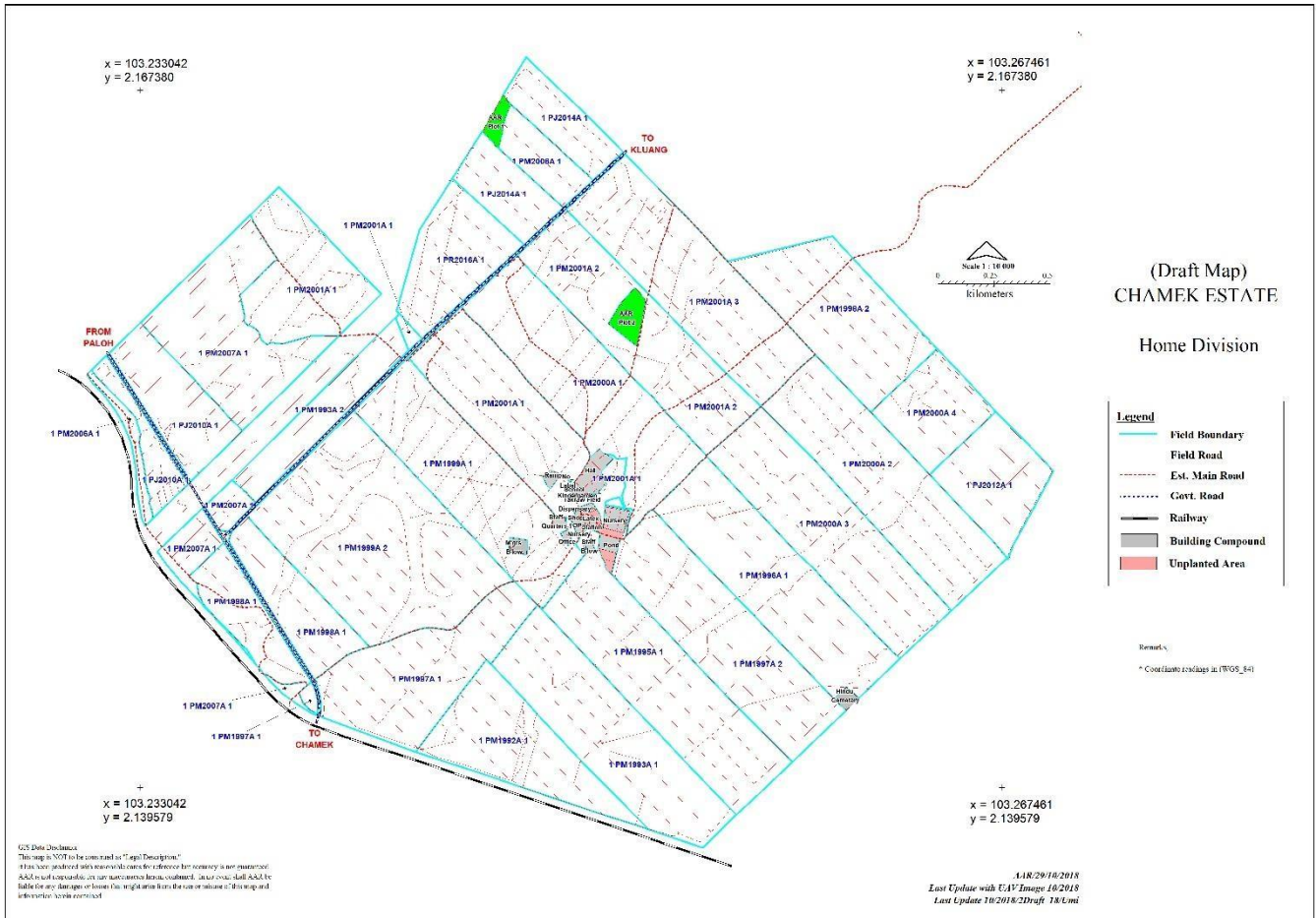


**RSPO P&C Public Summary Report**  
**Revision 12 (Jun 2021)**

Boustead Kulai Young Estate



Boustead Chamek Estate



**Appendix E: List of Smallholder Registered and sampled**

No	Name of farmer	Location	GPS Reference		Area Summary (Ha)		Forecasted annual FFB Production (MT)	Date of joining	Smallholder ID
			Latitude (N)	Longitude (E)	Total Certified Area	Planted Area			
	Nil								

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No	Name of farmer	Location	GPS Reference		Area Summary (Ha)		Forecasted annual FFB Production (MT)	Date of joining	Smallholder ID
			Latitude (N)	Longitude (E)	Total Certified Area	Planted Area			
<b>Total</b>									
Note: * are smallholders sampled in this audit.									

**Appendix F: List of Abbreviations**

a.i                    Active Ingredient  
 BOD                 Biochemical Oxygen Demand

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CB	Certification Bodies
CHRA	Chemical Health Risk Assessment
COD	Chemical Oxygen Demand
CPO	Crude Palm Oil
CSPO	Certified Sustainable Palm Oil
CSPKO	Certified Sustainable Palm Kernel Oil
EFB	Empty Fruit Bunch
EHS	Environmental, Health and Safety
EIA	Environmental Impact Assessment
EMS	Environmental Management System
FFB	Fresh Fruit Bunch
FPIC	Free, Prior, Informed and Consent
GAP	Good Agricultural Practice
GHG	Greenhouse Gas
GMP	Good Manufacturing Practice
GPS	Global Positioning System
HCV	High Conservation Value
IPM	Integrated Pest Management
IP	Identity Preserved
IS - CSPO	Independent Smallholder Certified Sustainable Palm Oil
IS – CSPKO	Independent Smallholder Certified Sustainable Palm Kernel Oil
IS – CSPKE	Independent Smallholder Certified Sustainable Palm Kernel Expeller
ISCC	International Sustainable Carbon Certification
ISS	Independent Smallholder Standard
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