

**RSPO PRINCIPLE AND CRITERIA  
PUBLIC SUMMARY REPORT**

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

<b>Client Company name (Parent Company): Kulim (M) Berhad (Johor Corporation)</b>
Client company Address: Level 16, Menara Komtar, Johor Bahru City Centre, 80000 Johor Bahru, Johor, Malaysia
Certification Unit: <b>Kulim (M) Berhad- Pasir Panjang Palm Oil Mill</b>
Location of Certification Unit: KM 30, Jalan Jemaluang, Kota Tinggi, 81900 Johor, Malaysia.
Date of Final Report: 12/04/2022

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## Section 1: Scope of the Assessment

1. Company Details			
<b>Parent Company</b>	Johor Corporation		
<b>RSPO Membership Number</b>	1-0080-09-000-00	<b>Membership Approval Date</b>	15/06/2009
<b>Address</b>	Level 16, Menara Komtar, Johor Bahru City Centre, 80000 Johor Bahru, Johor, Malaysia		
<b>Palm Oil Mill / Group Manager / Estate (Certification Unit)</b>	Kulim (M) Berhad- Pasir Panjang Palm Oil Mill		
<b>Location / Address</b>	KM 30, Jalan Jemaluang, Kota Tinggi, 81900 Johor, Malaysia.		
<b>Website</b>	<a href="http://www.kulim.com.my/">http://www.kulim.com.my/</a>		
<b>Management Representative</b>	Salasah Elias	<b>E-mail</b>	<a href="mailto:salasah@kulim.com.my">salasah@kulim.com.my</a>
<b>Telephone</b>	+607-8611611	<b>Facsimile</b>	+607-8631084

2. Certification Information			
<b>Certificate Number</b>	RSPO 657192	<b>Certificate Start Date</b>	09/03/2022
<b>Date of First Certification</b>	09/03/2017	<b>Certificate Expiry Date</b>	08/03/2027
<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.		
<b>Assessment Cycle</b>	<input type="checkbox"/> Pre Assessment (Choose an item.) <input type="checkbox"/> Initial Assessment <input type="checkbox"/> Annual Surveillance Assessment (ASA Choose an item.) <input checked="" type="checkbox"/> Recertification Assessment (RA 1) <input type="checkbox"/> Scope Extension		
<b>Applicable Standards / Normative Reference</b>	RSPO Certification System for P&C and RSPO ISH 2020 <input checked="" 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 checked="" type="checkbox"/> Identity Preserved; <input type="checkbox"/> Mass Balance	<b>Mill Capacity</b>	60 mt/h
<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>
EU-ISCC-Cert-PL214-60960621	ISCC EU / ISCC PLUS	ASG CERT	13/6/2022
A148857	MS 1500 : 2009	JAKIM	15/9/2023
MSPO 696199	MS 2530-4:2013	BSI Services Malaysia Sdn Bhd	07/03/2024
MSPO 696200	MS 2530-3:2013		07/03/2024
BVC-MSPO/SC-0030	MSPO SCCS	BV	10/03/2025

<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>
Pasir Panjang POM	KM 30, Kota Tinggi, Jalan Jemaluang, 81900, Kota Tinggi, Johor, Malaysia.	2° 01' 04.85"N	103° 56' 54.87"E
Pasir Panjang Estate	KM 30 Kota Tinggi/ KM 63 Mersing, Jalan Jemaluang, 81900, Kota Tinggi, Johor, Malaysia	2° 00' 34.76"N	103° 57' 15.93"E
Tunjuk Laut Estate	KM 30 Kota Tinggi/ KM 63 Mersing, Jalan Jemaluang, 81900, Kota Tinggi, Johor, Malaysia	1° 57' 41.69"N	103° 59' 09.52"E
Siang Estate	KM 3 Tg. Balau / 87 Johor Bahru, Jalan Ladang Siang – Tanjung Balau, 82200, Bandar Penawar, Johor, Malaysia	1° 39' 10.15"N	104° 12' 40.23"E
Bukit Kelompok Estate	KM 30 Kota Tinggi/ KM 63 Mersing, Jalan Jemaluang, 81900, Kota Tinggi, Johor, Malaysia	2° 00' 24.31"N	103° 59' 54.39"E
Pasir Logok Estate	KM 30 Kota Tinggi/ KM 63 Mersing, Jalan Jemaluang, 81900, Kota Tinggi, Johor, Malaysia	2° 01' 53.38"N	104° 02' 20.35"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>
Pasir Panjang Estate *	3,372.08	424.56	216.99	4,013.63	84.02
Tunjuk Laut Estate	2,648.79	29.23	189.78	2,867.80	92.36
Siang Estate	3,204.69	71.11	167.30	3,443.10	93.08
Bukit Kelompok Estate	2,437.75	41.19	134.86	2,613.80	93.26
Pasir Logok Estate**	1,992.68	17.40	87.13	2,097.73	95.25
<b>Total</b>	<b>13,655.99</b>	<b>583.49</b>	<b>796.06</b>	<b>15,036.06</b>	<b>90.86</b>

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Note:

\*Bukit Payung Division already merged with Pasir Panjang estate since Jan 2021 due to corporate direction.

\*\*Changes of land hectarage in Pasir Logok estate due to resurvey on 18/2/2021.

6. Plantings & Cycle							
Estate / Smallholders	Age (Years)					Mature	Immature
	0 - 3	4 - 10	11 - 20	21 - 25	26 - 30		
Pasir Panjang Estate*	1,253.61	2118.47	0	0	0	2,118.47	1,253.61
Tunjuk Laut Estate	0	1715.48	933.31	0	0	2,648.79	0
Siang Estate	0	889.79	2,314.9	0	0	3,204.69	0
Bukit Kelompok Estate	0	1132.23	1,281.72	23.8	0	2,437.75	0
Pasir Logok Estate	140.91	509.78	1,341.99	0	0	1,851.77	140.91
<b>Total (ha)</b>	<b>1,394.52</b>	<b>6,365.75</b>	<b>5,871.92</b>	<b>23.8</b>	<b>0</b>	<b>12,261.47</b>	<b>1,394.52</b>

Note:

\*Bukit Payung Division already merged with Pasir Panjang estate since Jan 2021 due to corporate direction.

7. Summary of Certified Tonnage of FFB (Own Certified Scope)				
Estate / Smallholders	Tonnage / year			
	Estimated last year (Mar 21 – Feb 22)	Actual (Dec 2020 - Dec 2021)		Forecast (Mar 22 – Feb 23)
		Previous license period (Dec 2020 – Feb 2021)	Current license period (Mar 2021 – Dec 2021)	
Pasir Panjang Estate	56,009	6358.41	39011.42	62,123
Tunjuk Laut Estate	65,453	8765.10	49980.35	63,425
Siang Estate	90,887	12654.49	54510.42	80,831
Bukit Kelompok Estate	68,071	10318.78	42626.33	63,370
Pasir Logok Estate	55,276	8640.61	35082.11	50,630
<b>Total</b>	<b>335,696</b>	<b>267,948.02</b>		<b>320,379</b>

Note: There are volume extension for estimated as per below:-

FFB: 40,000 mt

8. Summary of Certified Tonnage of FFB (from other certified unit(s))			
Estate / Smallholders	Tonnage / year		
	Estimated last year (Mar 21 – Feb 22)	Actual (Dec 2020 - Dec 2021)	Forecast (Mar 22 – Feb 23)

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	<i>Previous license period (Dec 2020 – Feb 2021)</i>	<i>Current license period (Mar 2021 – Dec 2021)</i>
Basir Ismail Estate	2,959.30	689.23
REM Estate	0	297.07
Sungai Papan Estate	5,636.89	40,204.80
Ulu Tiram Estate	0	55.28
<b>Total</b>	<b>49,842.57</b>	

<b>9. Summary of Non-Certified Tonnage of FFB (outside supplier – excluded from certificate)</b>			
Out growers / smallholders	Tonnage / year		
	Estimated last year (Mar 21 – Feb 22)	Actual (Dec 2020 - Dec 2021)	Forecast (Mar 22 – Feb 23)
		<i>Previous license period (Dec 2020 – Feb 2021)</i>	<i>Previous license period (Dec 2020 – Feb 2021)</i>
Nil			
<b>Total</b>			

<b>9A. Monthly Records of Certified and Uncertified FFB Received since the last audit</b>				
No.	Month - Year	Volume of FFB from certified supply base (mt)	Volume of FFB from uncertified supply base (mt)	Total FFB/Month (mt)
1	Dec 2020	19,515.40	0	19,515.40
2	Jan 2021	13,937.68	0	13,937.68
3	Feb 2021	21,880.50	0	21,880.50
4	Mar 2021	19,104.97	0	19,104.97
5	Apr 2021	23,028.77	0	23,028.77
6	May 2021	24,486.69	0	24,486.69
7	Jun 2021	25,284.94	0	25,284.94
8	Jul 2021	24,825.25	0	24,825.25
9	Aug 2021	34,368.56	0	34,368.56
10	Sep 2021	28,920.95	0	28,920.95
11	Oct 2021	26,326.23	0	26,326.23
12	Nov 2021	28,629.14	0	28,629.14
13	Dec 2021	27,481.51	0	27,481.51
<b>TOTAL</b>		<b>317,790.59</b>	<b>0</b>	<b>317,790.59</b>

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<b>10. Summary of Certified Tonnage (not applicable for ISS)</b>			
<b>Estimated last year (Mar 21 – Feb 22)</b>	<b>Actual (Dec 2020 - Dec 2021)</b>		<b>Forecast (Mar 22 – Feb 23)</b>
	<i>Previous license period (Dec 2020 – Feb 2021)</i>	<i>Current license period (Mar 2021 – Dec 2021)</i>	
<b>FFB</b>	<b>FFB</b>		<b>FFB</b>
350,330.15 mt	55,333.58	262,457.01	320,379 mt
	317,790.59 mt		
<b>CPO (OER: 22.59%)</b>	<b>CPO (OER: 21.7%)</b>		<b>CPO (OER: 22.80%)</b>
78,827.00 mt	12,193.43	56,966.55	73,046 mt
	69,159.98 mt		
<b>PK (KER: 5.3%)</b>	<b>PK (KER: 5.5%)</b>		<b>PK (KER: 5.50%)</b>
18,648.88 mt	3,041.69	14,529.69	17,621 mt
	17,571.38 mt		
Note:			

<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	Dec 2020	4,314.65	1,069.59
2	Jan 2021	2,896.43	739.07
3	Feb 2021	4,980.35	1,233.03
4	Mar 2021	4,284.97	1,128.24
5	Apr 2021	5,126.88	1,351.86
6	May 2021	5,403.41	1,349.01
7	Jun 2021	5,616.83	1,268.14
8	Jul 2021	5,409.49	1,299.59
9	Aug 2021	7,325.49	2,035.49
10	Sep 2021	6,051.31	1,676.57
11	Oct 2021	5,767.89	1,380.04
12	Nov 2021	6,081.63	1,478.61
13	Dec 2021	5,900.65	1,562.14
	<b>TOTAL</b>	<b>69,159.98</b>	<b>17,571.38</b>

<b>11. Summary of Actual Volume sold</b>
<b>Current License period (March 2021 - Dec 2021)</b>

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	RSPO Certified	Other Schemes Certified		Conventional	Total
		ISCC	Others		
<b>CPO (MT)</b>	43,696.69	2,142.74	0	12,103.14	57,942.57
<b>PK (MT)</b>	14,187.44	0	0	0	14,187.44
<b>Credits</b>	0	0	0	0	0
<b>Previous License period (Dec 2020 - Feb 2021)</b>					
<b>CPO (MT)</b>	5,491.79	0	0	6,059.73	11,551.52
<b>PK (MT)</b>	3,115.81	0	0	0	3,115.81
<b>Credits</b>	9,000	0	0	0	9,000

<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)
1	Mewaholeo Industries Sdn Bhd	TR-afd2fdb4-7ddc TR-96379283-7b32	930.50	
2	Intercontinental Specialty Fats Sdn Bhd	TR-0d06bc10-fab5 TR-822e76cf-172c TR-1df9ff49-dda2 TR-333b5abf-ecf6 TR-bc6bc221-d9c9 TR-88984163-2d44 TR-f30663e0-9305 TR-64cff63c-1cbb TR-2bb84f82-f740 TR-ce152f53-2276 TR-46cd4614-fb04 TR-c65a2ac6-131c TR-f3bece07-642e TR-70ec47e0-f0de TR-b85ed6f3-9962 TR-e11bcc18-9427 TR-0624b68e-4039 TR-e61e98f1-1411 TR-2c337170-d1e4	7,847.94	
3	KL-KEPONG EDIBLE OILS SDN BHD	TR-2ca6eaf3-6af6 TR-a5530181-1d0b TR-cfb79c40-178a TR-87135895-eafc TR-03b70d5c-9855 TR-47969e61-da07 TR-2b782917-0d74	7,444.50	



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		TR-d4ed6de3-6434 TR-23ec996a-16fe TR-c12fcdba-5ed6 TR-e2ec8757-e5c0 TR-2ce7e847-f54d TR-63a547c1-e2a2 TR-43a48b8d-aa4e TR-f4629fcb-3ce6 TR-ac7cb75f-9f7e TR-359f4c52-d2d7 TR-76194775-568c		
4	Pal maju Edible Oil Sdn Bhd	TR-8e05817a-cc9f TR-a3950854-aa7d TR-159ee37b-1377 TR-b5493a57-aae9 TR-59f0c756-b140 TR-00bb4b1c-b916 TR-4af1c18d-69ac TR-7d193741-484f TR-b7901663-6fcf TR-b31861d1-ef7d TR-f2a35304-6126 TR-463d42d9-b651 TR-fa4a9156-d485 TR-c64615a9-3f6f TR-e1b92104-3c15 TR-efa0b953-221a TR-1b747edd-3157 TR-d6a0138e-53e4 TR-97fab108-e00c TR-13eadecc-902e TR-ef8a1ee1-0df7 TR-d68c0d0d-b7b2 TR-4b37aa8a-29fb	24,944.65	
5	PGEO Edible Oils SDN BHD	TR-1b288673-8d39 TR-cbced9fb-cac4 TR-2a717376-753d TR-31d3b42e-cbac TR-42bbede0-f67f TR-da5709a4-1217 TR-5ab9cca9-5898 TR-86a47c50-557e TR-4e808b65-0770 TR-3ff83456-031a TR-b28c492a-f0c2	6,154.07	

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		TR-53782787-5423 TR-2b08e47a-c78c TR-004ebb12-6727 TR-dfc0f621-b901 TR-f41ecdcf-f789 TR-a275d891-2ad9		
6	Carotino Sdn Bhd	TR-73681f8d-c365 TR-2f11854a-2cbe	1,301.74	
7	PACIFIC OILS & FATS INDUSTRIES SDN BHD	TR-c0edd98d-5984 TR-51e8942b-82aa TR-4678393c-8b1e TR-98a64ea4-0b45 TR-512d853d-8aac TR-7d32b399-14ac	565.08	
8	PGEO OIL MILL SDN BHD	TR-2d52e227-d570 TR-0a12401b-18e2 TR-67104cb5-0a89 TR-30969a79-582a TR-ad786298-5dcf TR-160f4e5a-a1a1 TR-6840762e-b3e7 TR-96822bd6-67fe TR-1b954dd5-d1e2 TR-a59f8200-deb7 TR-d3978254-68d9 TR-44abfec4-fe7f TR-9c1f131d-0e8c TR-067e9f82-788a TR-d19284cb-8121 TR-7c37234f-c295 TR-deb7b450-36e3 TR-481a1774-3270 TR-4b118f08-e8cb TR-cdbacfdc-3682 TR-5f173154-186c TR-62fed68d-e3c4 TR-7be2e06e-c128 TR-27853e48-d861 TR-3de6f684-b9d0 TR-c43903b0-526f TR-01d47f7b-bbbc TR-fba72290-78ee TR-1a1c9f1f-9a1b		5,680.62
10	JIN LEE (OIL MILLS) SDN BHD	TR-5c93fa14-0fd7		11,622.63

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		TR-8112dbd4-f47c TR-ae9a60ab-c709 TR-14747b24-c5bc TR-27da860f-a151 TR-86a09868-4a9f TR-783c4f81-31ab TR-4703d46e-50ee TR-33dea5b7-064b TR-ba7f89da-673f TR-2efea0ed-cebb TR-3bcfe8c5-8b3e TR-725268cf-483c TR-3e6f5e52-167b TR-2afd6767-96e6 TR-db37c5ce-3808 TR-f7b58eac-06d7 TR-8cd894a3-f21f TR-9014445c-0775 TR-edf57409-d2f0 TR-a4692c34-289f TR-1860bfd2-391c		
<b>TOTAL</b>			<b>49,188.48</b>	<b>17,303.25</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)
	ABC	ISCC	2,142.74	0
<b>TOTAL</b>			<b>2,142.74</b>	<b>0</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	ABC	18,162.87	0
<b>TOTAL</b>		<b>18,162.87</b>	<b>0</b>

<b>11D. Records of Certified CPO Sold under RSPO Credits since the last audit (if any)</b>			
No.	Buyers Name	PalmTrace Trading License Number	RSPO Credits of Certified CPO Sold (mt)
1	ACT COOMODITIES	ST-TR-8e1cb2ef-d57a ST-TR-ce158c6a-55a9	9,000
<b>TOTAL</b>			<b>9,000</b>

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

<b>13. Independent Smallholders Actual Sold Tonnage / Volume</b>						
	<b>FFB</b>	<b>FFB Conventional</b>	<b>FFB Other schemes</b>	<b>IS-CSPO</b>	<b>IS-CSPK</b>	<b>IS-CSPKE</b>
<b>Current License period (Not Applicable)</b>						
<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 4-6/1/2022. The audit programme is included as Section 2.3. Where applicable, prior to the initial certification and recertification audit, 30 days Public Notification was made through the RSPO and BSI website on 22/11/2021 as per link [12-01-rspo-public-notification\\_recertification\\_kulim-malaysia-pasir-panjang-palm-oil-mill--supply-base\\_english.pdf \(bsigroup.com\)](#)

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 (Re-Certification)	Year 2 (ASA 1_1)	Year 3 (ASA 1_2)	Year 4 (ASA 1_3)	Year 5 (ASA 1_4)
Pasir Panjang POM	√	√	√	√	√
Pasir Panjang Estate		√			√
Tunjuk Laut Estate	√		√	√	
Siang Estate			√		
Bukit Kelompok Estate		√			√
Pasir Logok Estate	√			√	

**Tentative Date of Next Visit: October 3, 2022 - October 6, 2022**

**Total Number of Mandays:** 12 mandays

**2.2 BSI Assessment Team**

Name	Role	Competency
Muhamad Naquiuddin Mazeli (MNM)	Team Leader	<p><b>Education:</b> Holds a Bachelor Science Horticulture from 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> Completed ISO 9001: 2015 LA Training(2019), ISO 14001: 2015 LA Training (2018), ISO 45001: 2018 LA Training (2018), HCV &amp; HCS Training (2019), Endorsed RSPO P&amp;C LA Training(2018), Endorsed RSPO SCCS LA (2018), SCCS Refresher Training (2019), MSPO LA Training (2018), 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, Smallholders inclusion, legal requirements, environment, RSPO supply chain and HCV.</p> <p><b>Language proficiency:</b> Fluent in in both verbal/written Bahasa Malaysia and English.</p>

<p>Mahzan B. Munap (MM)</p>	<p>Team Member</p>	<p><b>Education:</b> Holds a Bachelor of Science in Petroleum Engineering from University of Missouri, USA and Master of Business Administration from Ohio University</p> <p><b>Work Experience:</b> 38 years of working experience spanning the oil &amp; gas, chemicals and petrochemicals, power generation, cement plants, electronics, services, construction and general manufacturing industries, oil palm plantations and government sectors. Has extensive experience in developing and implementing Safety and Environmental Management System, preparing Emergency Response Procedures, conducting Safety and Environmental Audits, Quantified Risk Assessment, Loss Control and Prevention and HAZOP studies for the major petrochemical and chemical industries. Has been qualified to perform ISO9001, ISO14001, OHSAS18001 (now ISO45001), since year 2000 and later qualified to perform RSPO P&amp;C and MSPO P&amp;C audits.</p> <p><b>Training attended:</b> Completed Endorsed RSPO P&amp;C Lead Assessor Course in 2008, ISO 9001 IRCA accredited Lead Assessor training, ISO 14001 EMS RABQSA/IRCA Lead Assessor Course in 2008 and HCV &amp; HCS Training (2019)</p> <p><b>Aspect covered in this audit:</b> During this assessment, he assessed on the aspects of mill and estate best practices, waste management, HCV, environmental and occupational safety &amp; health.</p> <p><b>Language proficiency:</b> Fluent in in both verbal/written Bahasa Malaysia and English.</p>
<p>Rahayu Zulkifli (RZ)</p>	<p>Team Member</p>	<p><b>Education:</b> Holds a Law Degree from John Moores University, Liverpool, United Kingdom</p> <p><b>Work Experience:</b> She was a practicing lawyer before she joined several public listed companies as Head of Legal Department. In 2003 she joined an environmental NGO as a turtle conservationist, and in 2014 joined RSPO as Dispute Settlement Facility Manager. Rahayu is now a freelance auditor specializing in social aspects of the RSPO and MSPO standards, with audit experiences in Malaysia, Indonesia and Ghana. Additionally, Rahayu also assists in HCV assessments (in particular HCV 5 &amp; 6), as well as carry out Social Impact Assessments. Rahayu is also a trained and certified Mediator.</p> <p><b>Training attended:</b> Completed the Endorsed RSPO P&amp;C Lead Auditor course in 2014, ISO 14001 Lead Auditor course in 2016, the MSPO Awareness Training in 2016, and Endorsed RSPO P&amp;C Lead Auditor Refresher course in 2018.</p> <p><b>Aspect covered in this audit:</b> During this assessment, she assessed on the aspects of legal, social and stakeholder engagement requirements.</p> <p><b>Language proficiency:</b> Fluent in in both verbal/written Bahasa Malaysia and English.</p>
<p>Dr. Suhaili Sahari</p>	<p>Peer Reviewer</p>	<p><b>Education:</b> Graduated from University Technology Mara (UiTM), Malaysia in Diploma in Science in 1990. He furthers his first degree in B.Sc (Hons) in Chemistry with Industrial Chemistry in 1995 from Liverpool University, England. He later advances his study in Master in Business Administration (General) in 2002 and graduated in 2005 from University of Multimedia, Malaysia. Completed his PhD from University Science Islam Malaysia (Faculty of Economy and Muamalat - Management) under the supervision of previous University Vice Chancellor Dato' Mohd Muda.</p>

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		<p><b>Work Experience:</b> Worked with Hong Leong Group of Companies as a production executive cum TQM facilitator and continues to advance in his career as a manager and senior manager in management, production, training and quality for more than 11 years. During his tenure with Hong Leong Group of Companies, he heavily involved in strategic management decision issues such as developing SWOT analysis, Vision, Mission, Business and Corporate Strategy formulation, Acquisition and restructuring strategies. Strategic actions and implementation etc. Then he joint Kumpulan Guthrie and Sime Darby Group of Companies for more than 7 years as a manager, heads of department and Assistant Vice President in management, quality and training. Part of his duty is to strategies the departmental vision; mission, critical success factors and action plan into actions and support the corporate strategic plan.</p> <p><b>Training attended:</b></p> <ol style="list-style-type: none"> <li>1. ISO 9001:2015 Lead Auditor and Internal Auditor</li> <li>2. ASI reviewer training</li> <li>3. Safety and Health</li> <li>4. ISO 14001:2015 Standard</li> <li>5. RSPO Standards: RSPO P&amp;C 2018 MY-NI 2019</li> <li>6. MSPO Standards : MS 2530 : 2013 part 1, 2 , 3 and 4</li> <li>7. Problem Solving Technique : 8 D, ICC, QCC, Systematic PS</li> <li>8. HACCP MS 1480:2019</li> <li>9. GAP Standard : Global GAP, Euru GAP</li> </ol>
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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.

Date	Time	Subjects	MNM	MM	RZ
Monday, 03/01/2022	PM	Audit Team Travelling to Johor Bahru	√	√	√
Tuesday, 04/01/2021	08.30 – 09.00	Opening Meeting: <ul style="list-style-type: none"> <li>• Opening Presentation by Audit team leader.</li> <li>• Confirmation of assessment scope and finalize Audit plan</li> </ul>	√	√	√
Pasir Logok Estate	09.00 – 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, Schedule waste management, worker housing, clinic, Landfill etc.	√	√	√
	09.30 – 12.30	Meeting with stakeholders (Government, village rep, smallholders, Union Leader, contractor etc.)			√



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Date	Time	Subjects	MNM	MM	RZ
	12.30 – 13.30	Lunch	√	√	√
	13.30 – 16.30	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.)	√	√	√
	16.30 - 17.00	Interim Closing briefing.	√	√	√
Wednesday 05/01/2022 Pasir Panjang Palm Oil Mill	08.30 – 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, etc.	√	√	√
	09.00 – 13.30	Meeting with stakeholders (Government, village rep, smallholders, Union Leader, contractor etc.)			√
	12.30 – 13.30	Lunch	√	√	√
	13.30 - 16.30	Lab, weighbridge and palm product storage area. Document Review P1 – P7: SOPs, Supply chain for CPO mill, Review on SEIA documents and records, wage records, employee data, training records, legal permits, mill inspection and internal monitoring records, CIP & implementation.  RSPO SCC general requirements, internal audit, management review, sales and purchasing documents, mass balance accounting and other relevant documents and records.	√	√	√
	16.30 - 17.00	Interim Closing briefing.	√	√	√
Thursday 06/01/2022 Tunjuk Laut estate	09.00 – 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, Schedule waste management, worker housing, clinic, Landfill etc.	√	√	√
	09.30 – 12.30	Meeting with stakeholders (Government, village rep, smallholders, Union Leader, contractor etc.)			√
	12.30 – 13.30	Lunch	√	√	√

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Date	Time	Subjects	MNM	MM	RZ
	13.30 – 16.30	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.)	√	√	√
	16.30 – 17.00	Preparation of audit report	√	√	√
	17.00 – 17.30	Closing Meeting	√	√	√
Friday 07/01/2022		Audit team travelling to Kuala Lumpur	√	√	√

### 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, the plan includes all current subsidiaries, estates and mills that is under management control.	Complied.
Have all the estates and mills certified within five (5) years after obtaining RSPO membership?	Yes, all the estates and mills certified within 5 years after obtaining RSPO membership. Only Indonesian units, PT RAJ & PT TPR have not been certified yet and is proposed to be certified in 2023 this verified as per document review and interview with management.	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.	No. There is no new acquisitions as latest TBP 2021.	Complied
Any deviations from the maximum periods requires approval by the RSPO Secretariat.	No. There have no any deviations from the maximum periods requires approval by the RSPO Secretariat.	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?	There have been no changes to the time bound plan since all the estates and mill currently under Johor Corporation are already RSPO certified. This is consistent with the RSPO ACOP 2020 reporting. The link provided below: <a href="https://rspo.org/members/310/JohorCorporation">https://rspo.org/members/310/JohorCorporation</a>	Complied
Have there been any isolated lapses in implementation of the plan? If yes a <b>Minor</b> non-compliance shall be raised	There is no isolated lapse in Time Bound Plan except for smallholder proposed certification program that halted due to unstable supply to the mill	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 has been no fundamental failure to proceed with the implementation of the plan.	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.	No replacement after dates defined in RSPO P & C MYNI 2019.	Complied
Any new plantings since January 1 <sup>st</sup> 2010 shall comply with the RSPO New Plantings Procedure.	No new development since January 1 <sup>st</sup> 2010.	Complied

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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 land conflict under all certification units as verified in the RSPO RaCP Tracker, updated 01/02/2022.	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 as per verification.	Complied
Any Legal non- compliance is being addressed through measures consistent with the requirements of RSPO P&C criteria 2.1	No legal non-compliance reported and found during the onsite audit.	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. RSPO internal audit assessment for all uncertified units been conducted and the report had been submitted to all unit for improvement plan. The report indicated no systematic failures to proceed with implementation that should be raised as major Nonconformities.	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 per internal audit record verification.	Complied
Have there been any stakeholder (including NGO) consultation conducted?	Yes refer as per indicator 1.1.4 for details	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 because no scheme smallholder under Pasir Panjang operating unit	Complied

**Approved Time Bound Plan**

Project	Estate	Plan
INDONESIA	PT RAJ	TO BE INCLUDED IN TBP UPON COMPLETION OF ACQUISITION (EXPECTED COMPLETION IN 2023)
	PT TPR	
KULIM ESTATE	BUKIT LAYANG ESTATE	CERTIFIED RSPO IN 2020
TRADER	ENG LEE HENG	CERTIFIED RSPO IN 2020

LIST OF ESTATE MANAGE BY KULIM				
MILL BASE	KULIM/ JCORP ESTATE	ESTATE	STATUS	REMARKS
TEREH MILL	KULIM ESTATE	TEREH UTARA	CERTIFIED RSPO IN JAN 2009	* Merged Estates effective on 01 Jan 2021 as follows: 1. Selai & Enggang under under the name of Selai Estate. 2. Mutiara & Sg. Sembrong under the name of Mutiara Estate. 3. REM & Ulu Tiram under the name of Rem Estate. 4. Mungka & Sepai Loi under the name Mungka Estate. 5. Palong & Kemedak under the name of Palong Estate
		TEREH SELATAN		
		*SELAI		
		*ENGGANG		
		*MUTIARA		
		*SG. SEMBRONG		
		SG. TAWING		
SEDENAK MILL		SEDENAK		
		RENGAM		
		**BASIR ISMAIL		
	**ULU TIRAM			

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		KUALA KABONG		<p>6. Pasir Panjang &amp; Bukit Payong under the name of Pasir Panjang Estate.</p> <p>** Changes and additional of supply base for Sindora Certification Unit as follows.</p> <ol style="list-style-type: none"> <li>1. Basir Ismail Estate</li> <li>2. Ulu Tiram Estate</li> </ol>
SINDORA MILL		*REM		
PALONG MILL		SINDORA		
		SUNGAI PAPAN		
		*SEPANG LOI		
		UMAC		
		LABIS BAHRU		
		*MUNGKA		
		*KEMEDAK		
		*PALONG		
PASIR PANJANG MILL	KULIM ESTATE	*PASIR PANJANG	CERTIFIED RSPO IN MARCH 2017	
		*BUKIT PAYUNG		
		SIANG		
		BUKIT KELOMPOK		
		TUNJUK LAUT		
		PASIR LOGOK		

### 3.3 Details of Nonconformities

During this Assessment there were *No* nonconformities and no Opportunity For Improvement raised.

Non-conformity			
NCR Ref #	Nil	Date Issued	
Due Date		Date of nonconformity Closure	
Clause & Category (Critical / Minor)			
Statement of Nonconformity:			
Requirement Reference:			
Objective Evidence:			
Corrections:			
Root Cause Analysis:			
Corrective Actions:			
Assessment Conclusion:			

Opportunity for Improvements	
OFI #	Description
OFI 1	Nil

Positive Findings	
PF #	Description
PF 1	Good commitment and corporation from the management.
PF 2	Well maintained labour quarters at the mill and all estates.
PF 3	Positive feedbacks from internal and external stakeholders.

#### 3.3.1 Status of Nonconformities Previously Identified and Observations

Non-conformity			
NCR Ref #	1998993-202012-M1	Date Issued	9/12/2020
Due Date	8/3/2021	Date of nonconformity Closure	10/2/2021
Clause & Category (Critical / Minor)	6.2.4 (critical)		

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<b>Statement of Nonconformity:</b>	Housing conditions at Siang Estate are not in accordance with the requirements of the Employees’ Minimum Standard of Housing, Accommodation and Amenities Act 1990.
<b>Requirement Reference:</b>	The unit of certification provides adequate housing, sanitation facilities, water supplies, medical, educational and welfare amenities to national standards or above, where no such public facilities are available or accessible. National laws, or in their absence the ILO Guidance on Workers’ Housing Recommendation No. 115, are used. In the case of acquisitions of non-certified units, a plan is developed detailing the upgrade of infrastructure. A reasonable time (5years) is allowed to upgrade the infrastructure.
<b>Objective Evidence:</b>	<p>At Siang Division housing area, the following were observed:</p> <ol style="list-style-type: none"> <li>1. The area surrounding the workers’ housing was not maintained in a clean and sanitary condition. At the back of House No. 7 (Block F), construction waste and debris such broken doors, metal poles, exposed and rusty nails, discarded furniture, BRC wire, and scheduled waste (fluorescent tubes), etc, were kept in a disorderly and perilous manner.</li> <li>2. The perimeter drain between Blocks F and G was not in a good state of repair, not clear of debris to permit free flow.</li> </ol> <p>At Balau Division, the following were observed:</p> <ol style="list-style-type: none"> <li>3. An old and discarded motorbike with visible oil spill was left next to House No I3. The weekly housing inspection has not been conducted in an effective manner as it has failed to identify and record all the above.</li> </ol> <p>This is not in accordance with Section 23 (1) and (2) of the Employees’ Minimum Standard of Housing, Accommodation and Amenities Act 1990.</p>
<b>Corrections:</b>	<p>Siang Division</p> <p>Housekeeping of all construction waste been carried out as follows</p> <ol style="list-style-type: none"> <li>1) The construction waste surrounding area of the workers’ housing No. 7 (Block F) has been sort and removed on 09.12.2020.</li> <li>2) All Schedule waste such as fluorescent tubes been kept at respective SW storage of the estate – fluorescent tubes stored under code SW110.</li> <li>3) All perimeter drains is under progress for new construction, thus for the times being all drains will be assured free from debris as to permit free flow</li> </ol> <p>Balau Division</p> <ol style="list-style-type: none"> <li>a) The owner of an old and discarded motorbike (Azanian) has been taken out the motorbike on 09/12/2020 for repair.</li> <li>b) The Oil spillage effect has been cleaned using sand and has been put in schedule waste storage (SW408).</li> <li>c) All residents has been trained on how to handle cases of oil spillage from their vehicle (if any) which should using drip tray in order to trap the oil spillage.</li> <li>d) Retraining to EHA regarding line site inspection has been done on 10/12/2020</li> </ol>
<b>Root Cause Analysis:</b>	<ol style="list-style-type: none"> <li>1) Ineffective of line site inspection and reporting by EHA and no proper storage for construction and repair material.</li> <li>2) Lack of knowledge of schedule waste management by Carpenter</li> <li>3) Inadequate of awareness or briefing regarding rules and regulation at line site to all workers by management</li> </ol>



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<b>Corrective Actions:</b>	<p>Siang Division</p> <ul style="list-style-type: none"> <li>a) Re-training to EHA on effectiveness of the housing weekly inspection and report has been done on 10/12/2020.</li> <li>b) Carpenter store will be built as to accommodate relevant carpenter items. Work is in progress, expected completion in February 2021.</li> <li>c) To carry out Construction Site Safety Supervision and Waste Management training as to provide guide for internal construction work management at OU.</li> <li>d) To include monitoring mechanism for safe construction work and Schedule Waste Management in EHA inspection checklist.</li> <li>e) Assistant Manager who in-charge the line site will do physical check once the EHA submitting his weekly housing inspection report.</li> <li>f) Re-training to EHA on effectiveness of the housing weekly inspection and report has been done on 10/12/2020.</li> <li>g) Assistant Manager who in-charge the line site will do physical check once the EHA submitting his weekly housing inspection report.</li> </ul> <p>Balau Division</p> <ul style="list-style-type: none"> <li>a) Training to all workers regarding rules and regulation at line site shall be conducted to all workers.</li> <li>b) To include monitoring mechanism for Schedule Waste Management in EHA inspection checklist.</li> <li>c) Assistant Manager who in-charge the line site will do physical check once the EHA submitting his weekly housing inspection report</li> </ul>
<b>Assessment Conclusion:</b>	<p>Verified during site visit at Siang Estate, perimeter drain between block F &amp; G was repaired. Repair works for other line site blocks are still in progress and to be completed in Q3 of 2021. Backyard of house no.7 (block F) has been cleared and all construction materials moved to the new construction store which was completely built in December 2020.</p> <p>Records of implementation were verified as the following;</p> <ul style="list-style-type: none"> <li>i. Inventory @ 5th Schedule of scheduled waste for SW 410 and SW110 dated February 2021</li> <li>ii. Progress plan for house repair work for 2021 and related budget allocation.</li> <li>iii. Training records (line site inspection to EHA - 10/12/20, briefing to workers on line site/house rules - 13/12/20, scheduled waste training for PIC (EHA &amp; carpenter) - 10/12/20)</li> <li>iv. Site safety supervisor training by Kulim Safety - 7/2/21</li> <li>v. Line site inspection report for January 2021</li> </ul> <p>Based on site observation and records verification, it was found that corrective action plan have been effectively implemented. Thus, the previous major was closed on 10/2/21. Continuous implementation will be further verified in the next annual surveillance assessment.</p>
<b>Recert Verification:</b>	<p>Records showed that the VMO visits the estate clinics twice a month on 5/10/2021, 15/10/2021, 4/11/2021, 16/11/2021, and 7/12/2021.</p>

	<p>Houses have between 2 to 3 bedrooms with between 1 to 2 occupants per house. The areas surrounding the housing area are generally clean and well maintained, and houses were generally in good state of repair and grass kept reasonably short, domestic waste bins are emptied twice weekly and perimeter drains are clear of any blockages.</p> <p>There were some houses which had been extended by the occupants. A letter issued was by Kulim (Malaysia) Berhad General Manager, Property Management Department dated 16/01/2020 to management of all estates and mills gave a reminder of prohibition against extensions to workers houses. The memo also referred to earlier memo dated 17/09/2018 where the Company would not be responsible for any risks arising out of the extension and any fines imposed by authorities. To ensure this was understood by the affected occupants, a copy of the memo was given to house occupants together with a memo prohibiting against the same. Records were available which showed that the memo dated 25/01/ 2020 were issued to occupants of houses No 14 block C, House No 16 Block C, and House No 27 Blok C of Pasir Logok Estate.</p> <p>Housing inspections are conducted once a week where records of inspections were sighted. At Tunjuk Laut Estate, the weekly linesite inspections were carried out on 7/11/2021, 14/11/2021, 21/11/2021, 6/12/21, 13/12/21, 20/12/21, 27/12/21. Thus Major NC remained closed.</p>
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**3.3.2 Summary of the Nonconformities and Status**

CAR Ref.	Category (Critical / Minor)	P&C Indicator	Issued Date	Status & Date (Closure)
1998993-202012-M1	Critical	6.2.4	9/12/2020	Closed out on 10/2/21

**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 *Pasir Panjang 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)

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Communities	Kedai LPL at Pasir Logok Estate	Face to face interview
Contractor	Hamsa binti Ligiman (canteen)	Phone interview
Contractor	T.T. Tunjuk Laut Resources	Face to face interview
Contractor	V.M. Electrical Services	Face to face interview
Contractor	Perniagaan Logam & Automotive Kim Heng	Phone interview
Government	En Shafii from Jabatan Perhilitan Kota Tinggi	Phone interview
Government	En Danesh Nathan from Labour Office, Johor Baharu	Phone interview
External	En Mohd Nor Hasnizan bin Hasbullah of NUPW Kluang	Phone interview
Internal	Mat Yunus bin Peni (Contract worker)	Face to face interview
Internal	Gender Committee	Face to face interview

IS #	Description
1	<p><b>Feedbacks:</b>            Kedai LPL at Pasir Logok Estate informed that the estate does conduct price monitoring and that price lists have to be submitted regularly for purposes of monitoring. The proprietors are also invited by the estate to attend stakeholder meetings. So far, the proprietors have no negative issues to raise. Relationship with the estate is good and there has been no problem.</p>
	<p><b>Management Responses:</b>            Noted the comments from stakeholders.</p>
	<p><b>Audit Team Findings:</b>            No further issues to follow up on.</p>
2	<p><b>Feedbacks:</b>            V.M. Electrical Services provide electrical services to Pasir Logok and Tunjuk Laut Estates. There is no contract with the estates, as the services are extended based on requirements. V.M. Electrical Services are requested to send in price quotations before the being chosen to carry out the work. Once work is done, a delivery order and invoice is submitted. The payment term is 60 days and the estates have been able punctual in their payments. Invited to attend stakeholder meetings where Kulim Plantations provided briefings on company policies, code of ethical conduct, no child labour, etc.</p>
	<p><b>Management Responses:</b>            Noted the comments from stakeholders.</p>
	<p><b>Audit Team Findings:</b>            No further issues to follow up on.</p>
3	<p><b>Feedbacks:</b>            T.T. Tunjuk Laut Resources transports EFB from Pasir Panjang Mill to Pasir Logok estate. The company has two lorries and he employs his own sons to be the drivers. There is a 1-year contract which will expire in July 2022. However, the contract is in English. Although the contents were explained to him before signing,</p>

	<p>he would prefer it to be Bahasa Malaysia. T.T. Tunjuk Laut sends monthly invoices for work done, and payments are promptly received, and does not have any negative issues with Pasir Logok Estate. Is aware of Kulim Plantation’s company policies which were given during stakeholder meetings.</p> <p><b>Management Responses:</b> Noted comments by the stakeholder. Will arrange with Kulim Plantations HQ to prepare a Bahasa Malaysia version of contracts as requested by the stakeholder.</p> <p><b>Audit Team Findings:</b> Contracts which are signed with contractors are all in English. Preparing a Bahasa Malaysia version of contracts signed with third parties would further enhance the transparency and understanding of all terms and conditions in the contract. No futher issue.</p>
<p><b>4</b></p>	<p><b>Feedbacks:</b> Mat Yunus bin Peni has been contracted to inspect and maintain approximately 34km of elephant fence at Pasir Logok Estate. The contract he signed with Pasir Logok Estate will expire in May 2022. The contract was prepared in English. However, the contents were explained to him prior to signing. He prefers if the contract was in Bahasa Malaysia. So far there is no issues against Pasir Logok Estate. He receives his payment on time every month.</p> <p><b>Management Responses:</b> Noted comments by the stakeholder. Will arrange with Kulim Plantations HQ to prepare a Bahasa Malaysia version of contracts as requested by the stakeholder.</p> <p><b>Audit Team Findings:</b> Contracts which are signed with contractors are all in English. Preparing a Bahasa Malaysia version of contracts signed with third parties would further enhance the transparency and understanding of all terms and conditions in the contract. No futher issue.</p>
<p><b>5</b></p>	<p><b>Feedbacks:</b> Perniagaan Logam &amp; Automotive Kim Heng provides hardware to Pasir Panjang Mill. There is no contract because the services are provided only when required by the Mill, where a quotation would be given. The invoices states payments to be made in 3 months and so far payments have been punctual with no delay. Attended the last stakeholder meeting which was conducted online. Since the Covid-19 pandemic, no physical stakeholder meeting was held. Perniagaan Logam &amp; Automotive Kim Heng has also signed the Integrity Form.</p> <p><b>Management Responses:</b> Noted comments by the stakeholder.</p> <p><b>Audit Team Findings:</b> No further issue to follow up on.</p>
<p><b>6</b></p>	<p><b>Feedbacks:</b> En Shafii from Jabatan Perhilitan Kota Tinggi confirmed that Kulim Plantation Estates are very cooperative especially when there are wildlife sightings. Reports are provided to Jabatan Perhilitan Kota Tinggi, and during wildlife patrols at night, the estate also provided escort to accompany Perhilitan personnel. So far there has been no adverse issues regarding wildlife at any of the Kulim Plantation estates.</p> <p><b>Management Responses:</b> Noted comments by the stakeholder.</p> <p><b>Audit Team Findings:</b> No further issue to follow up on.</p>

<p><b>7</b></p>	<p><b>Feedbacks:</b>            En Mohd Nor Hasnizan bin Hasbullah of NUPW Kluang said that the MAPA/NUPW Collective Agreement has expired in December 2021. The process of renewal has commenced but he is not sure as to when it would be finalised. However, until the new Collective Agreement is signed, the terms in the previous Collective Agreement remains applicable. En Mohd Nor also confirmed that Kulim Plantation Estates have recognised their workers' rights to freedom of association and have not prohibited any of its workers from joining NUPW.</p> <p><b>Management Responses:</b>            Noted comments by the stakeholder.</p> <p><b>Audit Team Findings:</b>            No further issue to follow up on.</p>
<p><b>8</b></p>	<p><b>Feedbacks:</b>            En Danesh Nathan from Labour Office, Johor Baharu confirmed that there has been a lapse on the Department's part regarding applications for renewal of permit for supply of water under Section 6 (1) of the Employees' Minimum Standard of Housing, Accommodations and Amenities Act 1990. This has resulted in non-renewals of previously issued permits to Pasir Logok and Tunjuk Laut Estates, and Pasir Panjang Mill. The contractor and representatives from Pasir Logok Estate have met with En Danesh Nathan regarding this matter and the Labour Office would look into this in due course.</p> <p><b>Management Responses:</b>            Applications for permit renewals have been made to the Labour Office in Johor Baharu. Pasir Logok Estate is in the process of laying pipelines so that the estate. All conditions set by the Labour Office have been submitted and yet, there is no reply from the Labour Office.</p> <p><b>Audit Team Findings:</b>            Verified that respective applications have been made by Pasir Logok and Tunjuk Laut Estates, and Pasir Panjang Mill and the conditions imposed by the Labour Office have been submitted. However, no permit renewals have been issued by the Labour Office. In the meantime, the Estates continue to supply water from its own source as it had done previously, and also continue to carry out water quality sampling. Findings have shown that there is no trace of Total Coliform and <i>E.coli</i>. Management team will continue to follow up with the Labour Office, Johor Baharu on permit renewal.</p>
<p><b>9</b></p>	<p><b>Feedbacks:</b>            Hamsa binti Ligiman is the canteen proprietor at Pasir Panjang Mill. There is regular price and cleanliness checks conducted by the Mill.</p> <p><b>Management Responses:</b>            Noted comments by the stakeholder.</p> <p><b>Audit Team Findings:</b>            Price monitoring and canteen cleanliness inspections are being carried out monthly. Meetings are also regularly held to ensure prices are reasonable and that there are adequate supply of food supplies. No further issues.</p>

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<b>List of land owner / user contacted</b>					
Name	Years of ownership / used	Land area (ha)	Agreement (Yes / No)	Agreement base on FPIC (Yes/No)	Compliance on the agreement terms and conditions
Nil					
This operating unit already undergone 2 cycle of certification					



<b>Previous land owner / user comment</b>	
	<b>Feedbacks: Nil</b>
	<b>Audit Team verification and response:</b> This operating unit already undergone 2 cycle of RSPO audit

**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 Pasir Panjang POM certification unit 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 Pasir Panjang POM certification unit is certified.</p>	
Report prepared by	Acceptance of Assessment Conclusion
<b>Name:</b> Muhamad Naquiuddin Mazeli	<b>Name:</b> Salasah Elias
<b>Company Name:</b> BSI Services (M) Sdn Bhd	<b>Company Name:</b> Kulim (Malaysia) Berhad
<b>Title:</b> Lead Auditor	<b>Title:</b> Deputy General Manager
<b>Signature:</b> 	<b>Signature:</b> (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.) 
<b>Date:</b> 13/2/2022	<b>Date:</b> 14/ 2/ 2022

**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>Evidence was available that Pasir Panjang Palm Oil Mill and its supply base make available documents specified in the RSPO P&amp;C to the public. These documents are either available at the office and accessible at each operating unit which were audited. Alternatively, these documents were also available via the Company’s website <a href="http://www.kulim.com.my">http://www.kulim.com.my</a> or. These documents are:</p> <ul style="list-style-type: none"> <li>• Land titles/user rights</li> <li>• Occupational health and safety plans</li> <li>• Plans and impact assessments relating to environmental and social impacts</li> <li>• HCV documentation</li> <li>• Pollution prevention and reduction plans</li> <li>• Details of complaints and grievances</li> <li>• Continuous improvement plans</li> <li>• Public summary of certification assessment report</li> <li>• Human Rights Policy</li> <li>• Summary report of contributions to community development</li> </ul> <p>Stakeholders were also informed of the availability of these documents and briefed on them during stakeholder meetings. Records showed that the latest Pasir Panjang Complex stakeholder</p>	Complied



		meeting was held online on 10/10/2021 due to the Covid-19 pandemic. Records also showed that 64 stakeholders attended this online meeting.	
1.1.2	Information is provided in appropriate languages and accessible to relevant stakeholders. - Minor compliance -	Information requested by stakeholders were provided in the Bahasa Malaysia, which is the common language used by the stakeholders. This was evidenced by written responses given to the Labour Office, Johor Baharu dated 5/02/2021 from Pasir Panjang Mill, and by Pasir Logok Estate dated 16/06/2021.	Complied
1.1.3	<b>(C)</b> Records of requests for information and responses are maintained. - Critical (Major) compliance -	Pasir Panjang Mill and its supply base were able to demonstrate that records of requests for information by stakeholders and responses were maintained. At the Pasir Panjang Mill, a letter received from the Labour Office, Johor Baharu dated 5/01/2021 regarding permit renewal under Section 6(1) of the Employees' Minimum Standard of Accommodation, Housing and Amenities Act 1990 and the response given dated 5/02/2021 were maintained and sighted during the audit.  Similarly at Pasir Logok Estate, a letter dated 16/06/2020 from the Labour Office requesting the estate to take certain steps and provide more information was also available. The response from the estate dated 11/07/2021 was also documented and maintained.	Complied
1.1.4	<b>(C)</b> Consultation and communication procedures are documented, disclosed, implemented, made available, and explained to all relevant stakeholders by nominated representative. - Critical (Major) compliance -	Kulim (Malaysia) Sdn Bhd has developed an SOP known as Communication and Consultation Management System Issue No. 1 Doc. No. SQD/SMS/1.1 dated 1/08/2020. This SOP applies to all communications and consultations between the Company and its internal and external stakeholders. The objective of the procedure is to ensure the Company has an open and transparent communication methods with local communities and other stakeholders. This procedure was disclosed and explained during stakeholder meeting held online on 10/10/2021 which was attended by 64 stakeholders comprising contractors, suppliers, grocery	Complied

		shops, etc. The briefing was conducted by the nominated representative, Deputy Manager, Sustainability & Quality Department, Kulim Plantations Berhad.	
1.1.5	There is a current list of contact and details of stakeholders and their nominated representatives. - Minor compliance -	Stakeholder lists for Pasir Panjang Mill (updated 01/12/2021), Tunjuk Laut Estate (updated October 2021) and Pasir Logok Estate (updated 2021) were sighted and verified.  The lists contain relevant stakeholders and details of their nominated representatives. These stakeholders include suppliers, contractors, service providers, transporters, list of CPO and PKO buyers, government agencies such as Dept of Wildlife and National Parks, Labour Department, Immigration Dept, Dept of Safety and Health, Indonesian Consulate, Bangladeshi High Commission, schools, local communities such as surrounding villages such as Kg Sedili Besar, Kg Baru Tunjuk Laut, nearby schools, clinics, etc.	Complied
<b>Criterion 1.2:</b> The unit of certification commits to ethical conduct in all business operations and transactions.			
1.2.1	A policy for ethical conduct is in place and implemented in all business operations and transactions, including recruitment and contracts. - Minor compliance -	Kulim (Malaysia) Berhad has developed an Ethics Policy which was signed by the Executive Director and updated on 7/12/2021. Additionally, there is also the No Gift and Entertainment Policy also signed by its Executive Director and updated in August 2021. A review of the stakeholder meeting minutes confirmed that these Policies were communicated to all external stakeholders during the online stakeholder meeting held on 10/10/2021.  An addendum to contractors' letter of acceptance also included a provision which requires the contractor to comply with all of Kulim's relevant business policies, where failure to comply may result in termination of the contract. During stakeholder consultations held with auditors, the transporters, contractors and service providers also confirmed their awareness, compliance and implementation of the Policies.	Complied

		The Ethics Policy is also imposed on recruitment agents. Sighted was the contract dated 13 February 2020 for Indonesian manpower supply between Kulim (Malaysia) Berhad and PT Hamparan Karya Insani. This contract contains the contractor's undertaking that it complies with all applicable laws and codes relating to anti-bribery, fraud and corruption, and undertakes not to offer or accept bribe or any improper advantage from anyone in Kulim (Malaysia) Berhad.	
1.2.2	A system is in place to monitor compliance and the implementation of the policy and overall ethical business practice. - Minor compliance -	The system in place to monitor compliance and implementation of the No Gift and Entertainment Policy, Ethics Policy and overall business practice include: a. Internal audits; b. Contracts Administration Guidelines & Procedures for Kulim Malaysia Bhd (Head Office/Estates/Mill) updated August 2019. This guideline imposes a limit on the value of transaction for each management level; c. Integrity ethics declaration signed by all levels of employees (management, workers). d. Conflict of Interest Declaration forms signed by all levels of employees.	Complied
<b>Principle 2: Operate legally and respect rights</b>			
<b>Criterion 2.1:</b> There is compliance with all applicable local, national and ratified international laws and regulations.			
2.1.1	<b>(C)</b> The Unit of Certification complies with legal requirements - Critical (Major) compliance -	The CU continued to comply with all applicable laws and regulations. It is monitored by the operating units and head office sustainability team. Sampled and verified the up-to-date compliance of the following licenses and permits at the assessed OU: <u>Pasir Panjang POM</u> i) DOE license, ref: AS(B)J31/152/000/007 Jld.12 (5),	Complied

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		<p>compliance schedule no.: 004649 validity period (1/7/21 – 30/6/22), processing capacity 65 mt/hr, method of discharge: land application and composting, BOD3: 1000 mg/l.</p> <ul style="list-style-type: none"> <li>ii) MPOB license no. 592302004000 validity period 19/3/21 – 31/12/21) with processing capacity of 300,000 mt. Application for license renewal has been submitted by HQ in November 2021. Due to MCO, being told is being processed and delay is due to limited MPOB staff allowed to be in approver’s office.</li> <li>iii) Diesel Permit ref: KPDNKK.J.KTG/PERMIT 0028 (PD)(R), licensee: Kulim Pasir Panjang POM serial no. J000222, quantity: 20,000 liter valid until 02/02/22.</li> <li>iv) BAKAJ River water extraction license (08/A/KT/050 validity until 31/12/2021). Maximum extraction per day: 900 m3/day. Application for license renewal has been submitted by HQ in November 2021. Due to MCO, being told is being processed and delay is due to limited BAKAJ staff allowed to be in approver’s office.</li> <li>v) SPAN Water Services Industry (Licencing) Reg 2007 Class Licence No: SPAN/EKS/(PT)/800-4(1)/11/15 valid 15/1/2019 – 14/1/22</li> <li>vi) Energy commission license for private electrical installation, serial no. 46756, license no. 2021/01129 for 1600.55 kW installation capacity, validity period (6/07/21 – 5/07/2022).</li> <li>vii) Weighbridge, Equipment Serial No.: P15150075, Security Tag2.1K Q027007: valid 19/01/2022</li> <li>viii) Steam Boilers (JH PMD 1712 valid until 29/04/22, heating surface 907 m<sup>2</sup>) and (JH PMD 80248 valid until 20/02/2023)</li> <li>ix) Vertical Sterilizer (JH PMT 25364) valid until 29/04/22</li> </ul>	
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- x) Vertical Sterilizer (JH PMT 25365) valid until 29/04/22
- xi) Vertical Sterilizer (JH PMT 25366) valid until 29/04/22
- xii) Vertical Sterilizer (JH PMT 82981) valid until 22/03/2023
- xiii) Back Pressure Receiver (PMT 83952) valid until 29/04/22
- xiv) Air Compressor (JH PMT 25368) valid until 29/04/22
- xv) Competent Person

Sampled some of the following categories:

Competency	Validity/effective date	Remarks
Steam engineer, 2nd grade,	020/2014, issued on 24/2/14	FMA, Person in Charge Regulations 2014
Steam engineer, 2nd grade	144/2014, issued on 16/10/14	
Engine Driver, grade 1	Serial No: 034016 issued on 04/09/2013	
Engine Driver, grade 1	Serial No: 023940 issued on 30/01/2003	
Electrical Charge man (A4)	ref: PJ-T-4-B-0467- 2016, issued on 7/10/2020.	Electric Supply Act 1990
Electrical Charge man (A0)	ref: PJ-T-1-B-0378- 2008, issued on 25/09/2008.	
Scheduled Waste Competent Person, CePSWaM	Serial no. CePSWaM/03279 dated 09/12/19	EQA 1974, mill's compliance schedule
CePPOME Competent Person	Serial no. CePPOME/00133 dated 28/09/2019	

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		(PalmOil Mill Effluent)	Serial no. NW-SRO- AGT- 0539-S	ICOP Confined Space 2010	
		Authorized Gas Tester and Entry Supervisor for confined space (AGTES)			
<p><b><u>Pasir Logok Estate</u></b></p> <p>Pasir Logok Estate identified 47 legal requirements as applicable to it. Among them were:</p> <ul style="list-style-type: none"> <li>i) MPOB-licence no 620145002000 to sell and move FFB validity period 04/04/2020 – 31/03/2022</li> <li>ii) Diesel permit ref. no.: KPDNKK.J.KTG/PERMIT 0050 (PD), serial no.: J000215 capacity 15,000 litres valid until 11/01/2022</li> <li>iii) Air Compressor JH PMT 22734 valid till 29/03/2022</li> <li>iv) SPAN Water Services Industry Act 2006 Water Services Industry (Licensing) Regulations 2017 for Registration Notice for Class Licence No. SPAN/EKS/(PT)/800-4(1)/6/15 for Private Water Supply System and Class Licence-No. SPAN/EKS/(PT)/800-4(2)/6/15 Service Licence for Water Distribution And Water Treatment Validity period 26.08.2020 – 25.08.2023.</li> <li>v) BAKAJ Water Enactment (Johor) 1921, Licence for Diverting or Extraction 300 M<sup>3</sup> /day River Water No. 07/A/KT/009 File no. BAKAJ/334/430/2/8/1/8 expired on 31/12/2022.</li> <li>vi) Industrial Code of Practice for Confined Space 2010</li> </ul>					

		<p>vii) Children and Young Persons (Employment) Act 1966.</p> <p><b><u>Tunjuk Laut Estate</u></b></p> <p>Tunjuk Laut Estate too identified 47 legal requirements as applicable to it. Among them were:</p> <ul style="list-style-type: none"> <li>i) MPOB license no.: 619676002000 (validity period 13/10/2021 - 30/9/2022)</li> <li>ii) Permit to store diesel 20,000 liters ref. no.: BPKG JH(KTG) 0046PD; serial no.: J003158 (validity period 30/09/2021 – 29/09/2022)</li> <li>iii) River water extraction license letter ref. no.: SUKJ.BAKAJ:334/430/05/08/07/20 (validity period until 31/12/2021) for Division 1 by Director of Water Resources Johor currently being renewed via 9.12.2021. Due to MCO, being told license for renewal is being processed and delay is due to limited BAKAJ staff allowed to be in approver’s office.</li> <li>iv) River water extraction license letter ref. no.: SUKJ.BAKAJ:334/430/2/8/1/1 (validity period until 31/12/2021) for Division 2 by Director of Water Resources Johor currently being renewed via 9.12.2021.</li> <li>v) SPAN Water Services Industry Act 2006 Water Services Industry (Licensing) Regulations 2017 for Registration Notice for Class Licence No. SPAN/EKS/(PT)/800-4(1)/4/15 for Private Water Supply System and Class Licence-No. SPAN/EKS/(PT)/800-4(2)/4/15 Service Licence for Water Distribution And Water Treatment Validity period 2/07/2021 – 1/07/2024.</li> </ul>	
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>The Pasir Panjang CU continued to implement and maintain their established documented system for identifying, accessing, tracking updates and monitoring of compliance with the legal requirements that are applicable to their operation. Besides internal audit conducted annually by the Group Sustainability Team, each OU (mill</p>	Complied

and estate) from time to time individually evaluate their own legal requirements register (LRR) for compliance.

Among the applicable legal laws registered are EQA 1974, OSHA 1994, Factory & Machinery Act 1967, Employment Act, Workers' Minimum Standard of Housing and Amenities Act, Minimum Wages order 2020 to name a few. Other related legal for COVID19 pandemic under Prevention and Control of Infectious Diseases (Measure Within The Infected Local Areas) Regulation 2020 has also been identified.

A Tracking System is available to identify changes in the relevant regulations through head office, sustainability team, and internet website visits. The information gathered have centralised system for tracking any changes in the law and are being communicated from the Head Office. Kulim (Malaysia) to the respective OU.

The Person In Charge to ensure legal compliance at the assessed OU are as per table below:

Operating Unit	PIC	Job Position at OU	Date appointed
Pasir Panjang POM	Muhammad Aizuddin Bin Tukiman	Assistant Manager (Overall)	1/2/2021
Pasir Logok	Majid Mahasan B	Assistant Manager	1/2/2021
Tunjuk Laut	Mohd Shawal B Ab Rahim	Assistant Manager	1/2/2021



		<p>At the Regional Office level, an officer is appointed as Person Responsible for Compliance to ensure changes in laws and regulations are tracked, then notify and assist each OU within his/her care to comply. At this CU sighted the appointment letter of Pn. Norazimah Binti Abas, ref. No. (001) KMB/RMCO/PRC-2017 dated 31/06/2017 issued by Head of Audit, Risk Management and Compliance.</p>													
<p>2.1.3</p>	<p>Legal or authorised boundaries are clearly demarcated and visibly maintained, and there is no planting beyond these legal or authorised boundaries.</p> <p>- Minor compliance -</p>	<p>Whenever the land boundaries are adjacent with third party (smallholders, villages, other oil palm companies, etc.) the normal practice of Kulim (M) Berhad to indicate the legal boundaries are through construction of trenches. This was confirmed via the field visit at Pasir Logok and Tunjuk Laut estate. Apart from that, erection of concrete marker pole in bright red and white color stripe along the boundaries was also commonly practiced and clearly visible.</p> <p>At Pasir Logok Estate, 75.84 ha overplanting of oil palm trees have been detected following land resurvey conducted on 1 March 2010. The said plot had been surrendered to the Mersing Land Office in on 1 April 2010. New land title have been issued by the Land Office.</p> <p>Sighted the following concrete pole boundary markers clearly demarcated in red and white stripe and visibly maintained:</p> <table border="1" data-bbox="1137 1161 1942 1383"> <thead> <tr> <th rowspan="2">OU</th> <th rowspan="2">Neighbor</th> <th colspan="2">Boundary Marker</th> <th rowspan="2">Direction</th> </tr> <tr> <th>No.</th> <th>Total markers as per map</th> </tr> </thead> <tbody> <tr> <td>Pasir Logok</td> <td>Majlis Agama Islam Johor</td> <td>21</td> <td>142</td> <td>North wards</td> </tr> </tbody> </table>	OU	Neighbor	Boundary Marker		Direction	No.	Total markers as per map	Pasir Logok	Majlis Agama Islam Johor	21	142	North wards	<p>Complied</p>
OU	Neighbor	Boundary Marker			Direction										
		No.	Total markers as per map												
Pasir Logok	Majlis Agama Islam Johor	21	142	North wards											

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			Ladang Pesara Kerajaan	117		South West													
		Tunjuk Laut	Ladang 400	73 77	200	North East													
<b>Criterion 2.2:</b> All contractors providing operational services and supplying labour, and Fresh Fruit Bunch (FFB) suppliers, comply with legal requirements.																			
2.2.1	A list of contracted parties is maintained. - Minor compliance -	List of contracted parties is sighted being maintained under stakeholders' list at each OU. It mainly consists of suppliers and contractors.  The contract includes for activities such as CPO/FFB transportation, Biocomposting, road maintenance, harvesting and others.				Complied													
2.2.2	All contracts, including those for FFB supply, contain specific clauses on meeting applicable legal requirements, and this can be demonstrated by the third party. Evidence of legal due diligence of all contracted third parties, recruitment agencies (licensed/ accredited) for migrant workers, service providers and labour contractors, is available. - Minor compliance -	All contracts (short and long term), contain specific clauses meeting applicable legal requirements were spelled out in the contract. They are not allowed to commence any work at site until they have complied fully with the provisions of the Letter of Acceptance that include among other compliance to Safety, Health, Environment, Labor and Immigration laws and regulations.  Below is sample of contracts sighted:				Complied													
		<table border="1"> <thead> <tr> <th>OU</th> <th>Contractor</th> <th>Contract No</th> <th>Effective date</th> </tr> </thead> <tbody> <tr> <td>Pasir Logok</td> <td>RKP Enterprise</td> <td>MPSB/LPL 6/213/2020: (harvesting of FFB in P08 (228.65 ha))</td> <td>1/6/2020</td> </tr> <tr> <td>Tunjuk Laut</td> <td>RKP</td> <td>MPSB/LTL</td> <td>1/1/2021</td> </tr> </tbody> </table>						OU	Contractor	Contract No	Effective date	Pasir Logok	RKP Enterprise	MPSB/LPL 6/213/2020: (harvesting of FFB in P08 (228.65 ha))	1/6/2020	Tunjuk Laut	RKP	MPSB/LTL	1/1/2021
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Pasir Panjang POM	CPO Transporter Teo Tuan Kwee	MPSB/CPO1/ /2020 (Teo)	1/6/2020								
2.2.3	<p>All contracts, including those for FFB supply, contain clauses disallowing child, forced and trafficked labour. Where young workers are employed, the contracts include a clause for their protection.</p> <p>- Minor compliance -</p>	<p>All FFB supplies and processed at the CU Pasir Panjang POM are from Kulim (M) Berhad’s own estates. The CPO produced is Identity Preserved.</p> <p>The contractors engaged have exhibit, represent and warrant that they among others shall comply with applicable Employment Act 1955, Children and Young Person (Employment) Act 1966 (Revised 1988) and Immigration Act 1959/63 (revised 1975). Back in early October 2020 the management of the assessed OU had emailed to all its contractors addendum to the contract clauses disallowing child labour, forced and trafficked labour.”</p>	Complied								
<p><b>Criterion 2.3:</b> All FFB supplies from outside the unit of certification are from legal sources.</p>											
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> </ul>	<p>All directly sourced FFB at Kulim Pasir Panjang POM are from Kulim (M) Berhad’s own estates. Information required by this indicator for each FFB origin estates is shown in the table below.</p>	Complied								

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<ul style="list-style-type: none"> <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>	Estate Name	Estate Geo location	Land Title	MPOB Licence
	Pasir Panjang	103° 57" 15.9372" E 2° 0' 34.7616' N	PTD 558, PTD 4143 and PTD 4144 – tot3917.49 ha	5787360 02000
	Bukit Kelompok	103° 59" 54.3984" E 2° 0' 24.3108' N	Shared Land Title (HS 32182 – 2837.998 ha; 32183 – 1055.629 ha; 38184 -144.2 ha) total 4037.827 ha	5023036 02000
	Pasir Logk	104° 02" 20.3532" E 2° 1' 53.3856' N		5023087 02000
	Tunjuk Laut	103° 59' 9.5208 1° 57' 41.6916' N	PTD 36 and Lot 252, HS 13894 total 2648.79 ha-	6196760 02000
	Sg. Papan	104° 6" 21.8052" E 1° 31' 1.2576' N	Lot 8,70,115,219,249 335,356,571,592, 593, 679, 975, 979, 1349, 1350, 1353, 1354 (Total 2995.85 ha)	5702430 02000
	Siang	104° 12" 40.2372" E 1° 39' 10.1556' N	HSD 35429 Lot 1221 SSD 33258 PTD 532 (total 3443.1 ha)	5757830 02000

2.3.2	<p>For all indirectly sourced FFB, the unit of certification obtains from the collection centres, agents or other intermediaries, the evidence as listed in Indicator 2.3.1.</p> <p>- Minor compliance -</p>	<p>Sighted and verified delivery records showed there is no indirect sourced FFB at Pasir Panjang POM. All FFB supplied are from Kulim (M) Berhad's own estate.</p>	Complied
<p><b>Principle 3: Optimise productivity, efficiency, positive impacts and resilience</b></p>			
<p><b>Criterion 3.1:</b> There is an implemented management plan that aims to achieve long-term economic and financial viability.</p>			
3.1.1	<p><b>(C)</b> A business or management plan (minimum three years) is documented that includes, where applicable, a jointly developed business case for Scheme Smallholders.</p> <p>- Critical (Major) compliance -</p>	<p>The annual business plan is available. The document is in the form of annual budget and the projection for 5 years prepared as guidance for future planning. The annual business plan is available as per the Group Financial Procedure. &amp; Guidelines. Inclusive in the business plan is also Capital Expenditure (CAPEX) among others replacement / upgrading of building/machinery, workers amenities for the mill.</p> <p>Similarly, the estate possessed a business management plan among others to include the following components:</p> <ul style="list-style-type: none"> <li>a) Mature area / Immature area</li> <li>b) FFB production &amp; forecast</li> <li>c) Income – FFB selling price</li> <li>d) Revenue expenditure (general charges upkeep &amp; cultivation, harvesting)</li> <li>e) Mechanization operation</li> <li>f) Depreciation /amortization</li> <li>g) Capital expenditure</li> <li>h) Gross profit /Loss</li> </ul>	Complied

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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>All the estates have maintained record of replanting program from 2022 to 2026. For purpose of auditing record the horizon is limited to 5 years. Figures in ha otherwise stated.</p> <table border="1" data-bbox="1137 459 1912 724"> <thead> <tr> <th>Estate/ Year</th> <th>2022</th> <th>2023</th> <th>2024</th> <th>2025</th> <th>2026</th> </tr> </thead> <tbody> <tr> <td>Pasir Logok estate</td> <td colspan="5">The replanting will start on 2028 until 2045</td> </tr> <tr> <td>Tunjuk Laut estate</td> <td colspan="5">The replanting will start on 2031 until 2041</td> </tr> </tbody> </table>	Estate/ Year	2022	2023	2024	2025	2026	Pasir Logok estate	The replanting will start on 2028 until 2045					Tunjuk Laut estate	The replanting will start on 2031 until 2041					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 latest management review was carried out in each sample operating unit, sample on 6/9/2021 for Pasir Logok estate. The Management review meeting have discuss matter of the operating unit once a year after internal audit. The issue been discuss was include</p> <ol style="list-style-type: none"> <li>1. Results of internal audits</li> <li>2. Customer (internal/external) feedback</li> <li>3. Process performance and product conformity</li> <li>4. Status of preventive and corrective actions</li> <li>5. Follow-up actions from management reviews</li> <li>6. Changes that could affect the management system</li> <li>7. Recommendations for improvement</li> <li>8. Complaints and grievances</li> <li>9. Resource needed.</li> <li>10. The record was available at site for verification and kept at least 5 year.</li> </ol>	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>																					

<p>3.2.1</p>	<p><b>(C)</b> The action plan for continuous improvement is implemented, based on consideration of the main social and environmental impacts and opportunities of the unit of certification.</p> <p>- Critical (Major) compliance -</p>	<p>Pasir Panjang Mill, Pasir Logok and Tunjuk Laut Estates have their own continuous improvement plans. The following are some of the continuous improvements that have been earmarked:</p> <p>a. Pasir Logok Estate:</p> <ul style="list-style-type: none"> <li>• Repair 18 units estate workers’ quarters; targeted completion in June 2022;</li> <li>• Construct partition walls for 30 units workers quarters by July 2022.</li> </ul> <p>b. Pasir Panjang Mill:</p> <ul style="list-style-type: none"> <li>• Repair workers’ quarters; targeted completion April 2022;</li> <li>• Water tank flushing; targeted for March 2022;</li> <li>• CSR food basket for those affected by Covid-19 to continue.</li> </ul> <p>c. Tunjuk Laut Estate:</p> <ul style="list-style-type: none"> <li>• Repaint 20 units of workers’ quarters;</li> <li>• Repaint 1 unit of executive bungalow;</li> <li>• Repaint 2 units of staff houses.</li> </ul>	<p>Complied</p>
<p>3.2.2</p>	<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.</p>	<p>The record of RSPO template was available and verified as per verification on estate and Mill record such as fertiliser bin card, JKPP record, grievances record and etc.</p>	<p>Complied</p>

	<p>Until such metrics is agreed and developed, companies will carry on with existing reporting e.g. PalmGHG, Annual Communication of Progress (ACOP) reporting, and information provided to Certification Body and feedback via RSPO Secretariat is required.</p> <p>- Minor Compliance -</p>		
<p><b>Criterion 3.3: Operating procedures are Appropriately documented, consistently implemented and monitored.</b></p>			
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>The Mill operations are guided by the following documents</p> <ul style="list-style-type: none"> <li>• Quality Manual (PCPOM/QM) document no PCPOM/QM.4.0 recent reviewed dated 01/2/18</li> <li>• Standards Operating Procedure (PCPOM/SOP) dated 01/2/18 covering the following stations/operations among others</li> </ul> <p>The estate operation are guided with several SOP as per below:-</p> <ul style="list-style-type: none"> <li>• Agriculture Manual dated 3/10/2019</li> <li>• Guidelines on Safety during work (KULIM/PKS/OSH-1) dated 1/3/2021</li> <li>• Sustainable Management System (SQD/SMS/1.0) dated 1/8/2020</li> </ul>	Complied
3.3.2	<p>A mechanism to check consistent implementation of procedures is in place.</p> <p>- Minor Compliance -</p>	<p>In Pasir Logok Estate, there are several mechanisms that been used by management to ensure consistent implementation of procedures is in place. As per sampling in this estate as per below:-</p> <p>Internal Audit conducted on 11/7/2021 – 9/8/2021 by Sustainability &amp; Quality Department. From the result found one (1) opportunity for improvement been raised by internal auditor.</p> <p>Plantation inspectorate report dated 30/5/2021, the comment on the estate will further improve on trash with close monitoring and supervision in the field during daily inspection. Raking palm bas were in progress in P06, P07, and P08 and expected to be completed by end of July 2021.</p>	Complied



		Agronomist visited the estate on 21 & 22/2/2021. From the comment from agronomist the application was in line with to date programmed and no delayed of fertilizers consignment as well.	
3.3.3	Records of monitoring and any actions taken are maintained and available. - Minor Compliance -	There are several record of monitoring available at each operating unit. Sampling the monitoring record as per verify on Jadual Pematuhan, from the Jadual Pematuhan (AS(B)J31/152/00/007) from DOE for Pasir Panjang POM, the monitoring must be done by third party environment auditor twice a year. From the record monitoring latest conducted on 28/4/2021. From the comment BOD reading at POME final discharge point were within permissible limit Of 1000 mg/L.	Complied
<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	<b>(C)</b> In new plantings or operations including mills, an independent SEIA, undertaken through a participatory methodology involving the affected stakeholders and including the impacts of any smallholder/out-grower scheme, is documented. - Critical (Major) compliance -	There are no new plantings or new operations within Tunjuk Laut and Pasir Logok Estates. Nevertheless, each unit has its own Social Impact Assessments done which have been prepared internally. Details of the Social Impact Assessment are contained in Indicator 3.4.2 below.  From environmental aspect and impact, the operating unit as per sampling cover all activities including EFB/Composting, clinic, compound, harvesting, workshop, manuring, office, Scheduled waste, storage and others. This been review yearly basis dated 25/8/2021.	Complied
3.4.2	For the unit of certification, a SEIA is available and social and environmental management and monitoring plans have been developed with participation of affected stakeholders. - Minor Compliance -	Social Impact Assessment (SIA) as well as the Social Management and Monitoring Plans for Pasir Panjang Mill and its supply base were documented and available. These Plans were with participation of affected stakeholders via interviews and feedback received, including from NUPW and WOW meetings. Among the stakeholders who participated were harvesters, mandores, general	Complied

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		<p>workers, sprayers, charginer, boilerman, weighbridge operator, WOW and Union members. The respective Action Plans were updated as follows:</p> <ul style="list-style-type: none"> <li>a) Pasir Logok Estate updated on 30/12/2021 following social interviews were conducted on 13/10/2021;</li> <li>b) Pasir Panjang Mill updated on 30/12/2021 following social interviews conducted on 11/10/2021;</li> <li>c) Tunjuk Laut Estate updated on 30/12/2021 following social interviews conducted on 14/10/2021.</li> </ul> <p>Each the Social Management Plan has identified the positive and negative issues for the unit, and recommendations for social improvement, action, person in charge and monitoring.</p> <p>Positive impacts identified included health and safety at the linesite with regular mosquito fogging exercises, free medical treatment for workers and their dependants, job opportunities for local communities, alleviating school costs on workers by providing their children with school uniforms and shoes, providing face masks for workers during the current Covid-19 pandemic, distribution of basic food for workers.</p> <p>Negative social impacts included delay in renewing foreign workers' work passes, increase in the price of food and limited food stock during the Covid-19 pandemic.</p> <p>Among the actions identified to address the negative impacts included regular price and supply monitoring at all sundry shops at the estates and mill, and following up with MyEG on the status of work pass renewals for foreign workers.</p>	
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>Evidence was available that the Social Action and Monitoring Plan are being implemented, reviewed and updated annually. Implementations were evidenced by records of actions taken</p>	Complied

		<p>following inputs given during stakeholder consultations. For example, negative impacts identified included late renewal of foreign workers' work passes and increase in the price of food and limited food stock during the Covid-19 pandemic.</p> <p>Sighted and verified during the audit were records of correspondence with the Immigration Department and MyEG on permit renewals, and regular price monitorings of food items sold at the estate and mill grocery shops.</p>	
<p><b>Criterion 3.5:</b> A system for managing human resources is in place.</p>			
3.5.1	<p>Employment procedures for recruitment, selection, hiring, promotion, retirement and termination are documented and made available to the workers and their representatives where applicable.</p> <p>- Minor Compliance -</p>	<p>Reviewed and verified during the audit were the following documented SOPs:</p> <ul style="list-style-type: none"> <li>• Recruitment of New Foreign Workers Rev. No. 1 Issue No. 1 dated 1 Jan 2019; and</li> <li>• Recruitment of Local Workers for Operating Units Rev No. 00 Issue No. 01 dated 1 October 2020. This SOP contains procedures for recruitment, promotion, retirement, and termination.</li> </ul> <p>These SOPs are documented and kept at the office premises and available to all workers and their representatives, where applicable. Briefings were also given on 3/10/2021 (Pasir Panjang Mill), on 11/08/2021 (Pasir Logok Estate) and on 22/02/2021 (Tunjuk Laut Estate).</p>	Complied
3.5.2	<p>Employment procedures are implemented, and records are maintained.</p> <p>- Minor Compliance -</p>	<p>Evidence was available that Pasir Panjang Mill and its supply base were able to demonstrate the implementation of its own employment procedures and that records were maintained. For example, records for Malaysian workers include job application form, resume, copies of relevant certificates, NRIC and medical reports. For foreign workers, records include copies of passports,</p>	Complied

request for salary deductions for paying electricity bills, mosque funds, and consent for passports to be kept in the office.  
For each Estate and Mill, worker samples were taken from based on the formula of  $n = \sqrt{x} (0.8)$   
The sampled workers were as follows:

<b>Estate/Mill</b>	<b>Worker No</b>	<b>Nationality</b>
Tunjuk Laut Estate	626820	Bangladeshi
	627315	Bangladeshi
	626780	Bangladeshi
	627058	Indonesian
	627259	Indonesian
	627311	Indonesian
	632016	Malaysian
	632895	Malaysian
	633103	Malaysian
	632954	Malaysian
Pasir Panjang Mill	633082	Malaysian
	951911	Malaysian
	951939	Malaysian
	651122	Malaysian
	640023	Malaysian
	640024	Malaysian

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			640184	Malaysian	
			640189	Malaysian	
			640191	Malaysian	
			640197	Malaysian	
			640205	Malaysian	
			Passport B5780323	Indonesian	
			Passport C2750267	Indonesian	
			Passport B5782700	Indonesian	
			Passport C7254369	Indonesian	
			Passport C7327696	Indonesian	
		Pasir Logok Estate	633103	Malaysian	
			632895	Malaysian	
			632016	Malaysian	
			632954	Malaysian	
			633082	Malaysian	
			633074	Indonesian	
			632826	Indonesian	
			633045	Indonesian	
			633016	Indonesian	
			63262	Bangladeshi	
632760	Bangladeshi				
632892	Bangladeshi				

<b>Criterion 3.6:</b> An occupational health and safety (H&S) plan is documented, effectively communicated and implemented.						
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>This assessed CU continued to use the established HIRARC (Hazard Identification, Risk Assessment and Risk Control) procedure. It is developed by the OU assessed as means to identify hazards, analyze and assess its associated risk and subsequently apply the suitable control measures. In doing so, the resultant document is a HIRARC Register, mitigation plans and Standard Operating Procedures have been sighted established.</p> <p>HIRARC is subject for review when there is occurrence to any of the following event;</p> <ul style="list-style-type: none"> <li>a) Change in work process</li> <li>b) Revision/changes in legislative requirement</li> <li>c) Occurrence of accidents</li> <li>d) Annual interval</li> </ul> <p>For the mill it included all significant and routine activities at each work station from receipt of FFB at ramp through processing of FFB to despatch of CPO and PK, Hurricane - dust precipitant multi-cyclone installation, Biogas Plant and the Bio Polishing Installation and Composting Plant nearby.</p> <p>While at estate level it covered work from nursery, replanting (although no replanting program plan for the near future), field upkeep to harvesting to FFB despatch to mill. The HIRARC register was kept up-to-date at the following sampled Operating Units.</p> <table border="1" style="width: 100%; border-collapse: collapse;"> <thead> <tr style="background-color: #92d050;"> <th style="text-align: left;">Operating Unit</th> <th style="text-align: left;">Updated</th> </tr> </thead> <tbody> <tr> <td>Pasir Panjang POM</td> <td>October 2021 after occurrence of accident 24/9/2021</td> </tr> </tbody> </table>	Operating Unit	Updated	Pasir Panjang POM	October 2021 after occurrence of accident 24/9/2021
Operating Unit	Updated					
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Complied

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		<table border="1"> <tr> <td data-bbox="1137 359 1487 448">Pasir Logok Estate</td> <td data-bbox="1487 359 1937 448">October 2021 after occurrence of accident 7/10/2021</td> </tr> <tr> <td data-bbox="1137 448 1487 496">Tunjuk Laut Estate</td> <td data-bbox="1487 448 1937 496">September 2021</td> </tr> </table>	Pasir Logok Estate	October 2021 after occurrence of accident 7/10/2021	Tunjuk Laut Estate	September 2021	
Pasir Logok Estate	October 2021 after occurrence of accident 7/10/2021						
Tunjuk Laut Estate	September 2021						
		<p>Appropriate risk control measures were determined and implemented for the respective activities and operation. Most of the moving part and rotating machinery were installed with machine guarding and properly covered. Appropriate administrative controls such as safety signage were seen displayed at all work stations in the mill and estate office and workshop. In general, the control measures were appropriate to the identified risks.</p> <p>With respect to hazardous chemicals, all precautions attached to the products were properly observed by conducting a generic CHRA at all work station/area involving workers at mill and estates. The CHRA was carried out by Competent assessor, DOSH Registration no. JKKP HQ/03/ASS/00/309 from QMSPRO for estates and DOSH Registration no. JKKP HQ/14/ASS/00/350 from Amcen Lab Sdn Bhd for mill as follows:</p> <p><u>Generic CHRA</u></p> <p>For all Kulim Estates, period of assessment was from 25/4/2018 – 13.8.2018 involving 211 chemicals (81 pesticides, 49 fertilizers, 4 water treatment plant, 74 workshop chemicals, 2 linesite (fogging) and 1 diesel fuel.</p> <p>At all Kulim POM period of generic assessment was undertaken in September 2021 at 7 work stations involving 56 chemicals (Lab - 23, WTP -4 Boiler – 5, workshop 8, electrical 2, Schedule Waste Store 7, chemical Store 7) and report submitted to Kulim by Assessor on 29 October 2021.</p>					

		<p><u>Supplementary CHRA</u></p> <p>Subsequently, a Supplementary Assessment was organized only for all Kulim estates from 22/12/2020 – 31/01/2021 covering 35 new pesticides and 9 new fertilizers. All recommended mitigation plans from both generic and supplementary assessments have been taken and completed as of 31/12/2021 CHRA at all work station/area involving workers at mill and estates. The CHRA was carried out by Competent assessor, DOSH Registration no. JKPP HQ/03/ASS/00/309 from QMSPRO for estates and DOSH Registration no. JKPP HQ/14/ASS/00/350 from Amcen Lab Sdn Bhd for mill as follows:</p> <p><u>Generic CHRA</u></p> <p>For all Kulim Estates, period of assessment was from 25/4/2018 – 13/8/2018 involving 211 chemicals (81 pesticides, 49 fertilizers, 4 water treatment plant, 74 workshop chemicals, 2 linesite (fogging) and 1 diesel fuel.</p> <p>At all POMs belonging to Kulim period of generic assessment was undertaken in September 2021 at 7 work stations involving 56 chemicals (Lab -23, WTP -4 Boiler – 5, workshop 8, electrical 2, Schedule Waste Store 7, chemical Store 7) and report submitted to Kulim by Assessor on 29 October 2021.</p> <p><u>Supplementary CHRA</u></p> <p>Subsequently, a Supplementary Assessment was organized only for all Kulim estates from 22/12/2020 – 31/01/2021 covering 35 new pesticides and 9 new fertilizers. All recommended mitigation plans from both generic and supplementary assessments have been taken and completed as of 31/12/2021</p>	
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<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>The plan effectiveness was monitored at various intervals, for example:</p> <table border="1"> <thead> <tr> <th>No.</th> <th>Item</th> <th>Activity</th> <th>Monitoring interval / monitored by</th> </tr> </thead> <tbody> <tr> <td>1</td> <td>Shovel and tractor Checklist</td> <td>Inspection</td> <td>Daily / shovel and Tractor driver</td> </tr> <tr> <td>2</td> <td>Wearing of PPE</td> <td>Reminders and Observation</td> <td>During roll-call/ Assembly Mandore/Supervisor / Assistant Manager</td> </tr> <tr> <td>3</td> <td>First Aid Box</td> <td>Inventory and record checks</td> <td>Monthly / Estate Hospital Assistant or Medical Assistant</td> </tr> <tr> <td>4</td> <td>DOSH Equipment and Machineries Certificate of Fitness</td> <td>Inspection / Test</td> <td>Monthly for 15-monthly renewal / Assistant Manager</td> </tr> <tr> <td rowspan="2">5</td> <td>a. OSH objectives, targets and programmes.</td> <td>Track and report</td> <td>Monthly / Safety and Health PIC</td> </tr> <tr> <td>b. OSH Committee meeting and Workplace Inspection.</td> <td>Attend meeting and conduct inspection</td> <td>3-monthly / Mill or Estate Manager and Appointed Committee members</td> </tr> <tr> <td>6</td> <td>Employees Audiometric Test</td> <td rowspan="2">Arrange to conduct examination</td> <td rowspan="2">Annually / Estate Hospital Assistant or Medical Assistant</td> </tr> <tr> <td>7</td> <td>Medical surveillance</td> </tr> </tbody> </table>	No.	Item	Activity	Monitoring interval / monitored by	1	Shovel and tractor Checklist	Inspection	Daily / shovel and Tractor driver	2	Wearing of PPE	Reminders and Observation	During roll-call/ Assembly Mandore/Supervisor / Assistant Manager	3	First Aid Box	Inventory and record checks	Monthly / Estate Hospital Assistant or Medical Assistant	4	DOSH Equipment and Machineries Certificate of Fitness	Inspection / Test	Monthly for 15-monthly renewal / Assistant Manager	5	a. OSH objectives, targets and programmes.	Track and report	Monthly / Safety and Health PIC	b. OSH Committee meeting and Workplace Inspection.	Attend meeting and conduct inspection	3-monthly / Mill or Estate Manager and Appointed Committee members	6	Employees Audiometric Test	Arrange to conduct examination	Annually / Estate Hospital Assistant or Medical Assistant	7	Medical surveillance	<p>Complied</p>
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		8	Up to date OSH Legal Compliance	Track changes in law, update, train and review for compliance	Annually or when there is changes in law/ Assistant Manager (Mill and Estate) and Compliance Executive from Regional Office
		9	5-yearly Chemical Health Risk Assessment	Arrange timely assessment by DOSH Registered Competent Person. Act on recommended actions.	3-months before expiry date / Assistant Manager (Mill and Estate)  As soon as Possible / Assistant Manager
		10	OSH Management System	Review documentation	Annually or after accident / Assistant Manager and HQ PIC
				HIRARC review	
		11	Risk Management	Identify High Risk Area	Annually / Assistant Manager and HQ PIC
				Preventive Maintenance	Annually / Assistant Manager and Workshop foreman
		12	Accident Investigation/ Reporting	Conduct Investigation	As soon as accident occur / Safety Committee
				Report Accident to DOSH	Immediate for death. Others follow NADOPOD

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			JKKP submission 8/6	Regulation 2004 / Assistant Manager After completion of accident investigation / Assistant Manager	
	13	Safety and Health Job related training (see Annual Safety & Health Plan) e.g. Chemical handling, Emergency Response and Fire Drill, Pest & Disease, Harvesting, Spraying, Boiler Operation, Working at Height, Lock Out Tag Out, Use of PPE	Respective Operating Unit PIC to arrange.  Conduct workers post training assessment to evaluate their understanding and effectiveness of training given	As and when notified by HQ Coordinator for centralised training. Monthly for courses conducted by own Assistant Manager.  1-2 months after attend training / Immediate Supervisor.	
<p><b>Criterion 3.7:</b> All staff, workers, Scheme Smallholders, out-growers, and contract workers are appropriately trained.</p>					
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>Document No. SQD/SMS/3/14-F1 Annual Training Program for 2021 issued by Sustainability and Quality Department, HQ is made available at each Operating Unit visited, one set specific for Mill and another for Estate use. Noted, there is no smallholders at this CU. Hence, the Pasir Panjang CU maintained a list of staff, workers, contractors and stakeholders only whom training must be provided and the frequency per year each training subject is delivered. Date of training for each in-house program is determined by the Operating Unit Trainer referring to the SQD Annual Training Program, while other external training date is arranged by HQ PIC.</p>			Complied

		<p>The established formal training programme covers all aspects of the RSPO P &amp; C and RSPO Supply Chain. The program address:</p> <ul style="list-style-type: none"> <li>• Documentation of all the training assessment needs,</li> <li>• The target group (new employees, seasoned workers, gender specific, language barrier) and formal training conducted,</li> <li>• Methods of training delivery such as classroom theory, hands-on demonstration, team work;</li> <li>• List of participants attending and trainer’s experience and qualification;</li> <li>• continual improvement plan to comply with the needs of RSPO.</li> </ul> <p>Interviewed staff and workers confirmed evidence of adequate and appropriate training on environment and safe working practices as well as Requirements provided to:</p> <ul style="list-style-type: none"> <li>• workers exposed to machinery and high noise levels;</li> <li>• workers working in confined space;</li> <li>• workers working at height;</li> <li>• Emergency Response Team;</li> <li>• mill production and maintenance workers related to their trade or job position;</li> <li>• chemical handlers;</li> <li>• harvesters;</li> <li>• pesticides operators;</li> <li>• fertilizer applicators;</li> <li>• shovel and tractor drivers;</li> <li>• general workers.</li> </ul> <p>The following training program were held in 2021:</p>	
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	Training Courses common to POM and estates
1	Spill containment
2	Waste cleaning and landfill
3	Schedule waste handling and management
4	Water treatment
5	Water sampling
6	Effluent sampling
7	Chemical handling and SDS
8	Emergency Response Plan and CPR
9	Fire drill and use of fire extinguisher
10	First Aid
11	PCD cleaning
12	Safety workshop at Works and Management
13	Safety Work at Chemical Store
14	Safety Work at Engine Room
15	Safety Work at Diesel Tank
16	PPE Usage
17	Working at height
18	Briefing on RSPO, ISCC, MSPO, OSH & ISO to staff / workers
19	Briefing on RSPO, ISCC, MSPO, OSH & ISO to stakeholder / contractor
20	Tractor / Lorry / Shovel & MB Safe Driving
21	FFB Grading
22	Policy Training
23	Covid-19 reminders - MCO
24	Legal & other requirement
25	Zero burning
26	ESH role & function
27	Wages Guidelines
28	Equality /Freedom of Unionized
29	Housing Amenities (Hygiene)
30	Sexual Harassment

			<b>Training Courses specific to POM only</b>
		31	ISCC Stamping on Weighbridge Ticket
		32	Induction course for new workers
		33	Supply Chain (RSPO & MSPO)
		34	Briefing on HALAL to Staff / Workers
		35	LOTO (Lock Out and Tag Out)
		36	Method to dispose trapped rats
		37	Method to cleanse and rinse FFB contaminated with rat faeces
		38	Work in Confined Space
		39	Work station On-the-job training
			<b>Training Courses specific to Estate only</b>
		40	Manuring – manual application and manure at buffer zone
		41	Manuring – mechanical spreader and manure at buffer zone
		42	Harvesting
		43	Spraying
		44	Spraying calibration
		45	Fertilizer sampling
		46	Fertilizer handling
		47	Rat baiting
		48	Fogging
		49	Triple rinsing
		50	Safety Work at Fertilizer Store
		51	Bagworm treatment
		52	Integrated Pest Management
		53	Contractor harvester (MRS, PPE, FFB Grading)
		54	Elephant Incursion Patrolling Briefing
		55	Taklimat Keselamatan Kawalan Gajah
		56	Latihan Keselamatan Jalan
		57	Grass cutting using Niken

		Records of evaluation to check the understanding of participants was also sighted maintained.	
3.7.2	Records of training are maintained. - Minor Compliance -	The daily briefing records were sighted maintained. It is undertaken by estates and mill where they organized the briefing prior to work commencement. Subject discussed were normally reminders focussed on estate and mill operations, environmental and safety compliance.  Records of formal training were kept in the training file. Data captured include date training held, course name, trainers name, venue, list of attendees and sometimes training evaluation form.	Complied
3.7.3	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. - Minor Compliance -	The mill has identified all relevant personnel involve in supply chain system such as Mill Manager, Asst. Mill Manager, QA Supervisor, and Weighbridge Operator.  The mill conducted the training need analysis for the personnel identified in SCCS. Latest training was conducted as follows:  Training on supply chain dated 29/8/2021 under training scope SOP/RSPO/MSPO/ISCC/HALAL/RSPO SCCS/ ABMS. Attended with total 9 people included weighbridge operator and Security guard.	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	Identity Preserved Module  A mill is deemed to be Identity Preserved (IP) if the FFB processed by the mill are sourced from plantations/estates that are certified against the RSPO Principles and Criteria (RSPO P&C), or against the Group Certification scheme.  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	Pasir Panjang Palm Oil Mill only receives certified FFB from own certified supply base. Therefore, qualifies for the Identity Preserved supply chain system and module. During the P&C assessment, the audit team verified the volumes and sources of certified FFB entering the mill, the implementation of processing controls and volume sales of RSPO certified products.	Complied

	RSPO certified products. If a mill process certified and uncertified FFB without physically separating them, then only Mass Balance Module is 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>	Pasir Panjang POM is under Identity Preserved module. Thus, this indicator is not applicable.	Not Applicable
3.8.3	The estimated tonnage of CPO and PK products that could potentially be produced by the certified mill shall be recorded by the certification body (CB) in the public summary of the P&C certification report. This figure represents the total volume of certified oil palm product (CPO and PK) that the certified mill is allowed to deliver in a year. The actual tonnage produced shall then be recorded in each subsequent annual surveillance report.	The estimated tonnage of CPO and PK products that could potentially be produced by the certified mill is recorded in this public summary report. Summary of CPO and PK deliver in a year (December 2020 to December 2021) reported under B of the report.	Complied
3.8.4	The mill shall also meet all registration and reporting requirements for the appropriate supply chain through the RSPO IT platform.	<p>The mill has met all registration and reporting requirements for the appropriate supply chain through the RSPO supply chain managing organization, Palm Trace.</p> <p>The registration of Palm Trace will be carried out by the Marketing Department in HQ. Company has registered in Palm Trace system as follows:</p> <p>Members ID: RSPO_PO1000005256</p> <p>License valid until 8/03/2022</p> <p>Member category : Oil Mill</p>	Complied
3.8.5	Documented procedures	Kulim (Malaysia) Berhad has developed Traceability Procedure (Doc. No.: SQD/SMS/2.1, Issue No. 1, Rev. No.: 05 dated 1/8/20)	Complied



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	<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>On the marketing side, Procedure title: CSPO &amp; CSPK Supply Chain; Rev: 02 Procedure #MKTG 04; Date: January 2021 is referred to.</p> <p>b) Seen the records that included in the procedure are as below:</p> <ul style="list-style-type: none"> <li>i. Weighbridge tickets</li> <li>ii. Training records</li> <li>iii. Internal audit report</li> <li>iv. Invoice and contracts</li> <li>v. Delivery and storage records</li> <li>vi. Daily Production Report</li> </ul> <p>The training already conducted on 29/8/2021 for the critical control point responsible person such as Weighbridge Operators and Security Guards. Seen the attendance list and interviewed with the attendees confirmed that they are understand the procedure.</p> <p>c) Head of each operating unit has automatically appointed as person responsible for all certification inclusive of RSPO SCCS. Responsibility of the person-in-charge has clearly stated in the appointment letter dated 15/9/2021 (SQD/ADMIN/019/21).</p> <p>d) Kulim (Malaysia) Berhad has developed Traceability Procedure (Doc. No.: SQD/SMS/2.1, Issue No. 1, Rev. No.: 05 dated 1/8/20) and CSPO &amp; CSPK Supply Chain; Rev: 02 Procedure #MKTG 04; Date: January 2021 which has covered the process of incoming of FFB and ensuring no contamination in the IP mill.</p>	
3.8.6	<p>Internal Audit</p> <ul style="list-style-type: none"> <li>i) The mill shall have a written procedure to conduct annual internal audit to determine whether the mill:</li> </ul>	<p>Kulim (Malaysia) Berhad has developed Internal Audit Procedure (Doc. No.: SQD/SMS/5/0, Issue No.: 1, Rev. No.: 0 dated 1/7/2018) where the objective is to ensure that the implementation of company's RSPO, ISCC and MSPO management system is in line with the policies, procedures and other</p>	Complied

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	<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>requirements. The frequency of the internal audit to be carried out is at least once within 12 months (before expiry of the certificate). The latest internal audit was carried out on 11/7/2021-9/8/2021 by SQD team. There no non-conformance was raised based on Internal Audit Report. All the clauses in RSPO SCCS and RSPO Market Communications and Claims were covered during the audit.</p>	
<p>3.8.7</p>	<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>i. When FFB delivered to the mill from the estate, the transporters presented FFB dispatch report to the mill weighbridge clerk in order the FFB to be received by the mill.</p> <p>E.g. of information available in the FFB dispatch report is as follows:</p> <ul style="list-style-type: none"> <li>• FFB dispatch no. (DB A No. 122942)</li> <li>• Estate’s names (Pasir Logok Estate)</li> <li>• Date of delivery (30/11/21)</li> <li>• Field No. (field P10)</li> <li>• Lorry no. JUL 8020</li> <li>• Weight (11.05 mt)</li> <li>• WB ticket: 122322</li> <li>• Traceability Identification: RSPO certified FFB (RSPO 657192)</li> </ul> <ul style="list-style-type: none"> <li>• FFB dispatch no. (DB A no. 31341)</li> <li>• Estate’s names (Tunjuk Laut Estate)</li> <li>• Date of delivery (29/11/21)</li> </ul>	<p>Complied</p>

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		<ul style="list-style-type: none"> <li>• Field No. (field P07,08,11,14,16B)</li> <li>• Lorry no. JKK 3088</li> <li>• Weight (32,290 mt)</li> <li>• WB ticket: 122264</li> <li>• Traceability Identification: RSPO certified FFB (RSPO 657192)</li> </ul> <p>Diversion crop from other certified management unit ;-</p> <ul style="list-style-type: none"> <li>• FFB despatch no. (DB A no. 6324)</li> <li>• Estate’s names (Rem Estate)</li> <li>• Date of delivery (3/8/2021)</li> <li>• Field No. (field P14,12,10,88,04A,18)</li> <li>• Lorry no. JSP 3312</li> <li>• Weight (40.58 mt)</li> <li>• WB ticket: 115454</li> <li>• Traceability Identification: RSPO certified FFB (RSPO 612392)</li> </ul> <ul style="list-style-type: none"> <li>• FFB despatch no. (DB A no. 101001)</li> <li>• Estate’s names (Sungai Papan Estate)</li> <li>• Date of delivery (29/11/21)</li> <li>• Field No. (field P13,15,06)</li> <li>• Lorry no. BGW 5375</li> <li>• Weight (38.12 mt)</li> <li>• WB ticket: 122306</li> <li>• Traceability Identification: RSPO certified FFB (RSPO 612392)</li> </ul>	
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		<p>ii. No overproduction as per verification with Mass balance sheet and record production. From the record the total production of CPO was 47,556.7 mt (66827mt from certificate) and for PK was 12049.59 mt (15672mt from certificate)</p> <p>iii. Regarding to handle the non- conforming product the Kulim (Malaysia) Berhad has developed Traceability Procedure (Doc. No.: SQD/SMS/2.1, Issue No. 1, Rev. No.: 05 dated 1/8/20) under 6.8 Product (Crop) Diversion. Verification on diversion FFB from other Own mill, the Head of plantation Division already approve the diversion as per email dated 2/6/2021 diversion from Sedenak Mill to Pasir Panjang Mill, this was followed as per SOP Traceability (SQD/SMS/2.1) under 6.8.2</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>Pasir Panjang POM ensured the required information is available in document form. Sampled of CPO contract: CPOIP-M21051 dated 21/10/2021, quantity 500 mt (delivery month – December 2021)</p> <ul style="list-style-type: none"> <li>• The name and address of the buyer; XXX</li> <li>• The name and address of the seller: Pasir Panjang POM</li> <li>• The loading or shipment/ delivery date; 2/12/2021</li> <li>• The date on which the documents were issued; 2/12/2021</li> <li>• A description of the product, including the applicable supply chain model (Identity Preserved, Segregated or Mass Balance or the approved abbreviations); Crude Palm Oil (CPO) RSPO IP</li> <li>• The quantity of the products delivered; e.g. 42.85 mt</li> <li>• Any related transport documentation; e.g. Despatch note e.g.#C09319</li> <li>• Supply chain certificate number of the seller; e.g. On weighbridge ticket e.g. RSPO 657192</li> </ul>	<p>Complied</p>

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	<p>h) Any related transport documentation;  i) A unique identification number.</p>	<ul style="list-style-type: none"> <li>• A unique identification number: palm trace no. TR-2ca6eaf3-6af6</li> <li>• Available in a few forms e.g. DN no., seal no., etc.</li> </ul> <p>Pasir Panjang POM ensured the required information is available in document form. Sampled of PK contract: MPOK 2081 IP dated 18/11/20, quantity 2,500 mt (delivery month – Nov 2021)</p> <ul style="list-style-type: none"> <li>• The name and address of the buyer; XXX</li> <li>• The name and address of the seller: Pasir Panjang POM</li> <li>• The loading or shipment/ delivery date; e.g. 15/11/20</li> <li>• The date on which the documents were issued;</li> <li>• A description of the product, including the applicable supply chain model (Identity Preserved, Segregated or Mass Balance or the approved abbreviations); Palm Kernel (PK) RSPO IP</li> <li>• The quantity of the products delivered; e.g. 42.76 mt</li> <li>• Any related transport documentation; e.g. Despatch note e.g. #K02174</li> <li>• Supply chain certificate number of the seller; e.g. On weighbridge ticket e.g. RSPO 657192</li> <li>• A unique identification number: palm trace no. TR-5c93fa14-0fd7</li> <li>• Available in a few forms e.g. DN no., seal no., etc.</li> </ul>	
3.8.9	<p><b>Outsourcing Activities</b></p> <p>i) The mill shall not outsource its milling activities. In cases where he mill outsources activities to independent third parties (e.g. subcontractors for storage, transport or other outsourced activities), the mill holding</p>	<p>No CPO and PK process, bulking facilities outsourced by the mill. Transporter for PK was assigned by buyer. For CPO, contract agreement with a few contractors as per below:</p>	Complied

	<p>the certificate shall ensure that the independent third party complies with relevant requirements of this RSPO Supply Chain Certification</p> <p>ii) The mill shall ensure the following:</p> <p>a) The mill has legal ownership of all input material to be included in outsourced processes</p> <p>b) The mill has an agreement or contract covering the outsourced process with each contractor through a signed and enforceable agreement with the contractor. The onus is on the mill to ensure that certification body (CB) has access to the outsourcing contractor or operation if an audit is deemed necessary.</p> <p>c) The mill has a documented control system with explicit procedures for the outsourced process which is communicated to the relevant contractor.</p> <p>d) The mill shall furthermore ensure (e.g. through contractual arrangements) that independent third parties engaged provide relevant access for duly accredited CBs to their respective operations, systems, and all information, when this is announced in advance.</p>	<p>i) Semai Setia Transport refer to LOA, MPSB/G1/6/2(2020) dated 15th June 2020. Date commencement: 1st June 2020, completion date: 31st May 2023.</p> <p>ii) Teo Tuan Kwee Sdn Bhd, refer to LOA, MPSB/G1/6/2(2020) dated 15th June 2020. Date commencement: 1st June 2020, completion date: 31st May 2023.</p> <p>Under clause 6 on the contract;</p> <p>For contract operation in RSPO, ISCC and MSPO certified mills or estates, the contractor is required to comply with all RSPO, ISCC and MSPO requirements related to the execution of the contract.</p>	
3.8.10	<p>The mill shall record the names and contact details of all contractors used for the physical handling of RSPO certified oil palm products.</p>	<p>Stated in the contract agreement between Kulim and with CPO transporter Teo Tuan Kwee Sdn. Bhd. as per Letter of award ref. no. MPSB/G1/6/2(2020) dated 15/6/2020 under section 6. The Transporter's undertakings, obligations and covenants under subsection.</p>	Complied
3.8.11	<p>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.</p>	<p>No change of names and contract details of transporter for the physical handling of RSPO certified oil palm products</p>	Complied
3.8.12	<p>Record keeping</p>	<p>i)The mill has maintained the accurate, complete, up-to-date and accessible records and reports covering all aspects of these Sustainability Management System as below:</p>	Complied

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	<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>	<ul style="list-style-type: none"> <li>- Dispatch of CPO/PK delivery order</li> <li>- Daily Production Report</li> <li>- FFB Despatch Report from supplying estate</li> <li>- Training records</li> <li>- FFB Transaction records</li> <li>ii) Traceability Procedure (Doc. No.: SQD/SMS/2.1, Issue No. 1, Rev. No.: 05 dated 1/8/20), the records retention for all RSPO Supply Chain related records to be retained for a minimum of 5 years' period.</li> <li>iii) Records and balance of all receipts of RSPO certified FFB and deliveries of RSPO certified CPO and PK monitored on a real-time basis on daily/monthly production figure.</li> </ul>	
3.8.13	<p><b>Extraction Rate</b></p> <p>The oil extraction rate (OER) and the kernel extraction rate (KER) shall be applied to provide a reliable estimate of the amount of certified CPO and PK from the associated inputs. Mill shall determine and set their own extraction rates based upon past experience, documented and applied it consistently.</p>	<p>Conversion factor of CPO and PK production is depending on the actual OER and KER. Last year's average from Dec 2020 to December 2021 were 21.74 % (OER) &amp; 5.53 % (KER).</p>	Complied
3.8.14	<p>Extraction rates shall be updated periodically to ensure accuracy against actual performance or industry average if appropriate.</p>	<p>The facility is using the actual extraction rate and therefore updating of rates is not necessary.</p>	Complied

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3.8.15	<p>Processing</p> <p>For Identity Preserved Module, the mill shall assure and verify through documented procedures and record keeping that the RSPO certified oil palm product is kept separated from non-certified oil palm products, including during transport and storage to strive for 100% separation.</p>	<p>It has been confirmed through documented procedures and record keeping that the RSPO certified oil palm product is kept separated from non-certified oil palm products, including during transport and storage to strive for 100% separation. No incoming of uncertified FFB and mill only process RSPO certified FFB from Kulim (M) Berhad group estates.</p>	Complied
3.8.16	<p>Registration of Transactions</p> <p>i) Shipping Announcement in the RSPO IT platform shall be carried out by the mills when RSPO certified products are sold as certified to refineries, crushers, and traders not more than three months after dispatch with the dispatch date being the Bill of Lading or the dispatch documentation date.</p> <p>ii) Remove: RSPO certified volumes sold under different scheme or as conventional, or in case of underproduction, loss or damage shall be removed in the RSPO IT platform.</p>	<p>Shipping announcement in the RSPO IT platform carried out by by the mills when RSPO certified products are sold as certified to refineries. Details of transaction summarized under as per below:-</p> <p>contract no: MPOK 2075 IP  Product name: CSPK  Shipping date: 9/7/2021  Transaction Id; TR-2efea0ed-cebb  Confirmation Announcement date: 19/7/2021</p>	Complied
3.8.17	<p>Claims</p> <p>The mill shall only make claims regarding the production of RSPO certified oil that are in compliance with the RSPO Rules on Market Communications and Claims.</p>	<p>Kulim (Malaysia) Berhad has obtained Trademark License from RSPO and seen the trademark license# 1-0080-09-100-00 which valid from 13/8/2021 – 12/8/2023 for Pasir Panjang POM. The facility is aware with the requirements of the RSPO Rules on Market Communications and Claims.</p>	Complied
<b>General corporate communications</b>			
4.1	<p>A corporate communication is one made by any RSPO member that highlights its membership of the RSPO and/or its commitment to the principles of the RSPO. Corporate communication is an 'off-product' claim.</p>	<p>No off-product claim made by Pasir Panjang POM and verified through document and site review (notice board, business card, shipping documentation, procurement/ purchasing document and promotional material etc).</p>	Complied
4.2	<p>In corporate communications a member is allowed to:</p> <p>a. Display its RSPO membership status</p>	<p>Not applicable as no off-product claim made by Pasir Panjang POM as to date.</p>	Not Applicable



	<p>b. Display the RSPO web address (www.rspo.org)</p> <p>c. State that the member supports the work of the RSPO</p> <p>d. State the member’s history with regard to the RSPO.</p> <p>e. Use the RSPO trademark to promote its membership of the RSPO.</p> <p>Additionally, where an RSPO member displays the RSPO trademark in digital format this must be accompanied by the text ‘Check our progress at www.rspo.org’ where the link must lead to the member’s profile page.</p>		
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.	Not applicable as no off-product claim made by Pasir Panjang POM as to date.	Not Applicable
4.4	Members must ensure that all communication is consistent, clear and cannot mislead consumers or other stakeholders as to the certified content of oil palm products in the member’s own products.	Not applicable as no off-product claim made by Pasir Panjang POM as to date.	Not Applicable
4.5	Members are not allowed to use the RSPO corporate logo as shown in the RSPO Rules on Market Communications & Claims document. This is for the sole use of the RSPO secretariat.	There was no RSPO corporate logo has been used verified through website, notice board, business card, shipping documentation and procurement/ purchasing document.	Not Applicable
<b>Business to business communications</b>			
5.1	Business to Business communication relates to RSPO members in the supply chain selling to and/or communicating with other organizations in the supply chain about the use of certified sustainable oil palm products.	Business to business communication is demonstrated via shipping documentation and invoices to the next supply chain actor or buyer. Verified the weighbridge tickets to buyer where claim of CSPO (Identity Preserved) was stamped on the tickets.	Complied
5.2	When confirming the sale of certified oil palm products, members must adhere to the requirements of the RSPO SCCS. This includes stating the supply chain model and certificate number under which the claim is being made.	Shipping documentation verified and conformance with the requirements of RSPO SCCS. In the weighbridge ticket, it stated that the product is CSPO (Identity Preserved) with RSPO certificate number: RSPO 657192.	Complied

5.3	<p>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:</p> <p>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.</p> <p>b. If the distributor or wholesaler is supply chain-certified they should follow the requirements outlined in section 5.2.</p>	Pasir Panjang Palm Oil Mill 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 Pasir Panjang POM and only produce crude and unfinished product. This is not applicable for POM.	Not Applicable
6.2	Only RSPO members who have supply chain certification are authorised to use the RSPO trademark and/or RSPO label, with the exception of RSPO Credits and of retailers in accordance with 6.8 below.	No business to consumer communication on product specific claim made by Pasir Panjang POM and only produce crude and unfinished product. This is not applicable for POM.	Not Applicable
6.3	When on-pack claims on RSPO-certified sustainable oil palm products are used, the RSPO trademark and associated identification number must be present.	No business to consumer communication on product specific claim made by Pasir Panjang POM and only produce crude and unfinished product. This is not applicable for POM.	Not Applicable
6.4	Business to consumer communication shall not include information about the claimant’s RSPO membership status.	No business to consumer communication on product specific claim made by Pasir Panjang POM and only produce crude and unfinished product. This is not applicable for POM.	Not Applicable

6.5	Members shall not communicate to consumers' information about their suppliers' RSPO membership status.	No business to consumer communication on product specific claim made by Pasir Panjang POM and only produce crude and unfinished product. This is not applicable for POM.	Not Applicable
6.6	Use of the RSPO trademark is restricted to claims about RSPO-certified sustainable palm oil products and it is not authorised for use in relation to any other ingredient.	No business to consumer communication on product specific claim made by Pasir Panjang POM and only produce crude and unfinished product. This is not applicable for POM.	Not Applicable
6.7	Use of any other trademark or logo to highlight the presence of RSPO-certified sustainable oil palm products is an unauthorised product-specific claim.	No business to consumer communication on product specific claim made by Pasir Panjang POM and only produce crude and unfinished product. This is not applicable for POM.	Not Applicable
6.8	RSPO members who are retailers or food service companies can apply for an RSPO trademark license for use in business to consumer communications, provided they can demonstrate the validity of these claims to an RSPO-accredited certification body (CB). This will be undertaken via a remote audit, prior to the trademark use, during which the retailer or food service company will need to demonstrate that the use of the trademark is in compliance with the rules contained within this document and that the claim itself can be supported through a certified supply chain. Any other palm oil claims, including those highlighting the absence of palm oil, must be highlighted to the CB during the audit to ensure that all claims comply with the requirements of these rules. The CB will confirm the outcome of these audits, to be conducted annually, to RSPO who may continue to grant a trademark license or withdraw permission based upon the audit findings. This is in keeping with the rules applying to RSPO supply chain certified members. The guidance document for audits is available on <a href="http://www.rspo.org">www.rspo.org</a> .	No business to consumer communication on product specific claim made by Pasir Panjang POM and only produce crude and unfinished product. This is not applicable for POM.	Not Applicable
<b>MODULE A – IDENTITY PRESERVED &amp; SEGREGATED SPECIFIC RULES</b>			
<b>Certified oil palm content (IP)</b>			
	For IP, 95% or above of the oil palm content must be RSPO IP-certified.	Oil palm content is 100% CPO and claim as RSPO IP-certified.	Complied

	For SG, 95% or above of the oil palm content must be SG, or a combination of SG and IP.	No SG claim made.	Complied
	Where there is any percentage of non-certified oil palm within the product, the reason for this must be fully justified and an action plan for moving to fully certified oil palm must be in place, in accordance with the requirements of the RSPO SCCS. In addition, the volume of non-certified oil palm products must be covered by the purchase of RSPO Credits of equivalent volume.	Oil palm content is 100% CPO and claim as RSPO IP-certified. All infeed material (FFB) is RSPO certified.	Complied
<b>Labelling and trademark (IP)</b>			
	Members are allowed to use the RSPO label in one of the following ways: <ul style="list-style-type: none"> <li>• RSPO trademark which includes the tag 'CERTIFIED' or</li> <li>• RSPO trademark which includes the tag 'This product contains certified sustainable palm oil'. Wherever a RSPO trademark is displayed, the applicable trademark license number must be shown immediately under or next to the trademark or the 'statement'. Font must be Calibri, font size must be at least 4pt (1.4 mm or 0.06 inch). In on-pack communications, the RSPO trademark can be printed anywhere on the pack.</li> </ul>	Pasir Panjang POM is not use RSPO label in its product (CPO & PK). This is confirmed due site visit observation and interview with the mill management.	Complied
<b>Messaging (IP)</b>			
	Messaging ALLOWED in storytelling in product-related communications may include some or all of the following elements: <ul style="list-style-type: none"> <li>• The oil palm products contained in this product have been certified to come from RSPO sources. <a href="http://www.rspo.org">www.rspo.org</a></li> <li>• By choosing this product, you are sure it contains RSPO-certified palm oil. For more information: <a href="http://www.rspo.org">www.rspo.org</a></li> </ul>	As to date, no RSPO trademark used on the RSPO products. Kulim (Malaysia) Berhad has stated the member's history with regard to RSPO in the company's website and annual report 2019 without the trademark logo used. Pasir Panjang POM is not use RSPO label in its product (CPO & PK). This is confirmed due site visit observation and interview with the mill management.	Complied

	<ul style="list-style-type: none"> <li>• RSPO-certified sustainable oil palm products were kept apart from other oil palm products throughout the supply chain. <a href="http://www.rspo.org">www.rspo.org</a></li> <li>• Certified sustainable oil palm products can be traced back to RSPO-certified mills and plantations. <a href="http://www.rspo.org">www.rspo.org</a></li> <li>• The entire supply chain is monitored by independent, RSPO-accredited auditors. <a href="http://www.rspo.org">www.rspo.org</a></li> <li>• RSPO-certified sustainable palm oil has been produced to stringent environmental and social criteria. <a href="http://www.rspo.org">www.rspo.org</a></li> <li>• References to (or images of) particular RSPO-certified production units, if the relationship to those units can be shown by company records.</li> </ul>		
<p><b>Principle 4: Respect community and human rights and deliver benefits</b></p>			
<p><b>Criterion 4.1:</b> The unit of Certification respects human rights, which includes respecting the rights of Human Rights Defenders.</p>			
<p>4.1.1</p>	<p><b>(C)</b> A policy to respect human rights, including prohibiting retaliation against Human Rights Defenders (HRD), is documented and communicated to all levels of the workforce, operations, FFB suppliers and local communities and prohibits intimidation and harassment by the unit of certification and contracted services, including contracted security forces.</p> <p>- Critical (Major) compliance -</p>	<p>The Policy to respect human rights is documented in Kulim (Malaysia) Berhad’s Sustainability Policy dated 1/10/2021 signed by its Managing Director. Among others, this Policy states the commitment to respect, support and protect international human rights against violence, threats, all forms of retaliation, and effective elimination of all forms of violation of human rights which include against HRD, whistleblowers, complainants and community spokespersons.</p> <p>This Policy was communicated to stakeholders during the online stakeholder meeting on 10/10/2021, and to all levels of workforce during the following briefings:</p> <p>Tunjuk Laut Estate: 11/08/2021  Pasir Panjang Mill: 2/05/2021  Tunjuk Laut Estate: 3/10/2021</p>	<p>Complied</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>There is no evidence of any use of violence or the instigation of violence within Pasir Panjang Mill and its supply base. This was further verified during interviews held with the workers and external stakeholders such as contractors and suppliers.</p>	Complied
<b>Criterion 4.2:</b> There is a mutually agreed and documented system for dealing with complaints and grievances, which is implemented and accepted by all affected parties			
4.2.1	<p><b>(C)</b> The mutually agreed system, open to all affected parties, resolves disputes in an effective, timely and appropriate manner, ensuring anonymity of complainants, HRD, community spokespersons and whistleblowers, where requested, without risk of reprisal or intimidation and follows the RSPO policy on respect for HRD.</p> <p>- Critical (Major) compliance -</p>	<p>An agreed and documented system which deals with complaints and grievances is available and documented as Grievance Procedure Doc No. SQD/SMS/4.1 dated 1 August 2020. This SOP is to ensure that the Company has a documented system for dealing with complaints and grievances that is agreeable to all sides and accepted by all stakeholders. This SOP is applicable to all parties who deal with the Company who may have complaints and grievances. Clause 5.8 states that complainants' anonymity would be respected and protected if requested.</p> <p>In addition, the Company's Sustainability Policy also states that it respects, supports and protects international human rights against violence, threats, all forms of retaliation, and effective elimination of all forms of violation of human rights which include against HRD, whistleblowers, complainants and community spokespersons.</p>	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>To ensure understanding by illiterate parties, the briefings were given verbally, and when necessary, translators from among the workers (usually a worker representatives) are sought to translate documents including procedures for dealing with complaints and grievances.</p> <p>Workers interviewed also confirmed their understanding of the complaints and grievance procedures.</p> <p>Briefings on grievance procedure were given as follows:  Pasir Logok Estate: 23/06/2021</p>	Complied

		Pasir Panjang Mill: 1/10/2021 Tunjuk Laut Estate: 22/02/2021 and 7/10/2021	
4.2.3	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. - Minor compliance -	Based on complaints book sighted, no grievances have been filed against Pasir Panjang Mill and its supply base. Records of complaints can only be seen from housing defects at the linesite. Reports of repairs that needed to be carried out also contained status of repair works done and acknowledged by the complainants. The repair works were carried out within a reasonable timeframe of less than one week.	Complied
4.2.4	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. - Minor compliance -	Conflict resolution mechanism is contained in Clause 5.5 of Grievance Mechanism Doc. No. SQD/SMS/4.1 Issue No. 1 dated 1 August 2020. This mechanism provides an option for parties to engage independent legal, technical advice and third-party mediator.	Complied
<b>Criterion 4.3:</b> The unit of Certification contributes to local sustainable development as agreed by local communities.			
4.3.1	Contributions to community development that are based on the results of consultation with local communities are demonstrated. - Minor compliance -	Evidence was available that contributions to local development was made based on results of requests received from and consultation with the respective communities. Among the contributions made was payment on 11/05/2021 for a school programme known as Ihya' Ramadhan which was based on request received from from SK LKTP Tenggara Selatan dated 25/04/2021.  In addition, Pasir Panjang Mill and supply base only offer an ongoing job opportunity to those living nearby. At Pasir Panjang Mill for example, more than 80% of the workforce are generally locally sourced.	Complied
<b>Criterion 4.4:</b> Use of the land for oil palm does not diminish the legal, customary or user rights of other users without their free, prior and informed consent.			

<p>4.4.1</p>	<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>Copies of land titles were sighted and verified for Pasir Logok Estate and Tunjuk Laut Estate. It was also verified that there are no overlapping claims by the local community or indigenous peoples.</p> <p>The sampled land titles were as follows:</p> <p><b>Pasir Logok Estate:</b></p> <p>a. HSD 32183 No Lot PTD 402 (1055.629 ha)  Land use: Agriculture  60-year lease from 1/04/ 2010 to 31/03/2070.  Ownership: Johor Corporation</p> <p>b. HSD 32184 No PT PTD 403 (144.2 ha)  Land use: Agriculture  60-year lease from 1/04/2010 to 31/03/2070.  Ownership: Johor Corporation</p> <p>c. HSD 32182 No PTD 401 (2837.998 ha)  Land use: Agriculture  60-year lease from 1/04/2010 to 31/03/2070.  Ownership: Johor Corporation</p> <p><b>Tunjuk Laut Estate:</b></p> <p>a. HSD 7747 No Lot PTD 36 (2839.7879 ha)  Land use: Oil palm plantation  99-year lease from 10/01/1988 to 9/01/2087  Ownership: Perbadanan Johor</p> <p>b. HSD 13894 No Lot PTD 252 (28.02 ha)  Land use: Oil palm plantation</p>	<p>Complied</p>
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		<p>99-year lease from 10/01/1988 to 10/06/1993  Ownership: Perbadanan Johor</p> <p><b>Pasir Panjang Mill</b>  The Mill shares its 13ha mill area with Pasir Panjang Estate with the following land title: HSD 35107 PTD 558 (1609.869 ha); a 99-year lease valid from 17/09/2013 to 16/09/2112 issued to Johor Corporation.</p>	
4.4.2	Copies of documents evidencing agreement-making processes and negotiated agreements detailing the FPIC process are available and include:	No issues related to loss of legal customary rights with indigenous peoples, local communities and other stakeholders reported during the time of audit through interviewed with the local communities. Boundary stone and trenches were available to demarcate the boundary of land.	Complied
4.4.2a	Evidence that a plan has been developed through consultation and discussion in good faith with all affected groups in the communities, with particular assurance that vulnerable, minorities' and gender groups are consulted, and that information has been provided to all affected groups, including information on the steps that are taken to involve them in decision making. - Minor compliance -	Based on documents sighted and interviews conducted with stakeholders, there was no evidence of any dispute or overlapping land claim with any previous owner, occupants or affected communities. Therefore, this indicator is not applicable.	Not Applicable
4.4.2b	Evidence that the unit of certification has respected communities' decisions to give or withhold their consent to the operation at the time that these decisions were taken. - Minor compliance -	Based on documents sighted and interviews conducted with stakeholders, there was no evidence of any dispute or overlapping land claim with any previous owner, occupants or affected communities. Therefore, this indicator is not applicable.	Not Applicable
4.4.2c	Evidence that the legal, economic, environmental and social implications of permitting operations on their land have been understood and accepted by affected communities, including the implications for the legal	Based on documents sighted and interviews conducted with stakeholders, there was no evidence of any dispute or overlapping land claim with any previous owner, occupants or affected communities. Therefore, this indicator is not applicable.	Not Applicable

	status of their land at the expiry of the unit of certification's title, concession or lease on the land. - Minor compliance -		
4.4.3	<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). - Critical (Major) compliance -	Based on documents sighted and interviews conducted with stakeholders, there was no evidence of any dispute or overlapping land claim with any previous owner, occupants or affected communities. Therefore, this indicator is not applicable.	Not Applicable
4.4.4	All relevant information is available in appropriate forms and languages, including assessments of impacts, proposed benefit sharing, and legal arrangements. - Minor compliance -	Based on documents sighted and interviews conducted with stakeholders, there was no evidence of any dispute or overlapping land claim with any previous owner, occupants or affected communities. Therefore, this indicator is not applicable.	Not Applicable
4.4.5	<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. - Critical (Major) compliance -	Based on documents sighted and interviews conducted with stakeholders, there was no evidence of any dispute or overlapping land claim with any previous owner, occupants or affected communities. Therefore, this indicator is not applicable.	Not Applicable
4.4.6	There is evidence that implementation of agreements negotiated through FPIC is annually reviewed in consultation with affected parties. - Minor compliance -	Based on documents sighted and interviews conducted with stakeholders, there was no evidence of any dispute or overlapping land claim with any previous owner, occupants or affected communities. Therefore, this indicator is not applicable.	Not Applicable
<b>Criterion 4.5:</b> No new plantings are established on local peoples' land where it can be demonstrated that there are legal, customary or user rights, without their FPIC. This is dealt with through a documented system that enables these and other stakeholders to express their views through their own representative institutions.			
4.5.1	<b>(C)</b> Documents showing identification and assessment of demonstrable legal, customary and user rights are available. - Critical (Major) compliance -	There is no new planting within Pasir Logok Estate and Tunjuk Laut Estate. Evidence of rightful and legal land ownership are as per Indicator 4.4.1 above. There is no evidence of other legal, customary or user rights.	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 access to independent advice through a documented, long-term and two-way process of consultation and negotiation.</p> <p>- Critical (Major) compliance -</p>	<p>There is no new planting within Pasir Logok Estate and Tunjuk Laut Estate. Evidence of rightful and legal land ownership are as per Indicator 4.4.1 above. There is no evidence of other legal, customary or user rights. Therefore, this Indicator is not applicable.</p>	Not Applicable
4.5.3	<p>Evidence is available that affected local peoples understand they have the right to say 'no' to operations planned on their lands before and during initial discussions, during the stage of information gathering and associated consultations, during negotiations, and up until an agreement with the unit of certification is signed and ratified by these local peoples. Negotiated agreements are non-coercive and entered into voluntarily and carried out prior to new operations.</p> <p>- Minor compliance -</p>	<p>There is no new planting within Pasir Logok Estate and Tunjuk Laut Estate. Evidence of rightful and legal land ownership are as per Indicator 4.4.1 above. There is no evidence of other legal, customary or user rights.</p>	Not Applicable
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>There is no new planting within Pasir Logok Estate and Tunjuk Laut Estate. Evidence of rightful and legal land ownership are as per Indicator 4.4.1 above. There is no evidence of other legal, customary or user rights.</p>	Not Applicable
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>There is no new planting within Pasir Logok Estate and Tunjuk Laut Estate. Evidence of rightful and legal land ownership are as per Indicator 4.4.1 above. There is no evidence of other legal, customary or user rights.</p>	Not Applicable

4.5.6	Evidence is available that the communities (or their representatives) gave consent to the initial planning phases of the operations prior to the issuance of a new concession or land title to the operator. - Minor compliance -	There is no new planting within Pasir Logok Estate and Tunjuk Laut Estate. Evidence of rightful and legal land ownership are as per Indicator 4.4.1 above. There is no evidence of other legal, customary or user rights.	Not Applicable
4.5.7	New lands are not acquired for plantations and mills after 15 November 2018 as a result of recent (2005 or later) expropriations without consent under the right of eminent domain of the federal and state land acquisition legislations. - Minor compliance -	There is no evidence that new lands were acquired for Pasir Logok Estate, Tunjuk Laut Estate and Pasir Panjang Mill after 15 November 2018 as a result of expropriations without consent.	Not Applicable
4.5.8	<b>(C)</b> New lands are not acquired in areas inhabited by communities in voluntary isolation. - Critical (Major) compliance -	Based on documents sighted and interviews conducted with stakeholders, there was no evidence of new lands acquired in areas inhabited by communities who live in voluntary isolation.	Not Applicable
<b>Criterion 4.6:</b> Any negotiations Concerning compensation for loss of legal, customary or user rights are dealt with through a documented system that enables indigenous peoples, local communities and other stakeholders to express their views through their own representative institutions.			
4.6.1	<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 -	Procedure for identifying legal, customary or user rights, and a procedure for identifying people entitled to compensation is in place and is contained in the SPO Negotiations Concerning Compensation Program dated 4 September 2007. This procedure is to ensure any negotiation with regards to compensation for loss of local rights are dealt with fairly.	Complied
4.6.2	<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. - Critical (Major) compliance -	An SOP known as Negotiations Concerning Compensation Program dated 4 September 2007 was established by Kulim (Malaysia) Berhad to identify legal and customary rights as well as people entitled to compensation as per procedure in place and is contained in the SPO Negotiations Concerning Compensation Program dated 4 September 2007. The procedure is to ensure any negotiation with regards to compensation for loss of local rights are dealt with fairly.	Complied

4.6.3	Evidence is available that equal opportunities are provided to both men and women to hold land titles for scheme small holdings. - Minor compliance -	Pasir Panjang POM does not have any arrangements for scheme smallholdings. Therefore, this indicator is not applicable.	Complied
4.6.4	The process and outcomes of any negotiated agreements, compensation and payments are documented, with evidence of the participation of affected parties, and made publicly available to them. - Minor compliance -	Based on documents sighted and interviews conducted with stakeholders, there was no evidence of any dispute with any previous owner or occupants. Therefore, this indicator is not applicable.	Complied
<b>Criterion 4.7:</b> Where it can be demonstrated that local peoples have legal, customary or user rights, they are compensated for any agreed land acquisitions and relinquishment of rights, subject to their FPIC and negotiated agreements.			
4.7.1	<b>(C)</b> A mutually agreed procedure for identifying people entitled to compensation is in place. - Critical (Major) compliance -	Procedure for identifying legal, customary or user rights, and a procedure for identifying people entitled to compensation is in place and is contained in the SPO Negotiations Concerning Compensation Program dated 4 September 2007. This procedure is to ensure any negotiation with regards to compensation for loss of local rights are dealt with fairly.	Complied
4.7.2	<b>(C)</b> A mutually agreed procedure for calculating and distributing fair and gender-equal compensation (monetary or otherwise) is established and implemented, monitored and evaluated in a participatory way, and corrective actions taken as a result of this evaluation. - Critical (Major) compliance -	An SOP known as Negotiations Concerning Compensation Program dated 4 September 2007 was established by Kulim (Malaysia) Berhad to identify legal and customary rights as well as people entitled to compensation as per procedure in place and is contained in the SPO Negotiations Concerning Compensation Program dated 4 September 2007. The procedure is to ensure any negotiation with regards to compensation for loss of local rights are dealt with fairly, and briefed to stakeholder on 7 October 2020.	Complied
4.7.3	Communities that have lost access and rights to land for plantation expansion are given opportunities including employment and supply contracts to benefit from plantation development. - Minor compliance -	Based on documents sighted and interviews conducted with stakeholders, there was no evidence of any dispute with any previous owner or occupants. However, Pasir Panjang Mill and its supply base offer job opportunities to local communities living within its vicinity.	Complied

<b>Criterion 4.8:</b> The right to use the land is demonstrated and is not legitimately contested by local people who can demonstrate that they have legal, customary, or user rights.			
4.8.1	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. - Minor compliance -	Based on documents sighted and interviews conducted with stakeholders, there was no evidence of any dispute with any previous owner or occupants. Therefore, this indicator is not applicable.	Not Applicable
4.8.2	<b>(C)</b> Land conflict is not present in the area of the unit of certification. Where land conflict exists, acceptable conflict resolution processes (see Criteria 4.2 and 4.6) are implemented and accepted by the parties involved. In the case of newly acquired plantations, the unit of certification addresses any unresolved conflict through appropriate conflict resolution mechanisms. - Critical (Major) compliance -	Based on documents sighted and interviews conducted with stakeholders, there was no evidence of any dispute with any previous owner or occupants. Pasir Panjang POM and its supply base were not newly acquired units. Therefore, this indicator is not applicable.	Not Applicable
4.8.3	Where there is evidence of acquisition through dispossession or forced abandonment of customary and user rights prior to the current operations and there remain parties with demonstrable customary and land use rights, these claims will be settled using the relevant requirements (Indicators 4.4.2, 4.4.3 and 4.4.4) - Minor compliance -	Based on documents sighted and interviews conducted with stakeholders, there was no evidence of any acquisition through dispossession or forced abandonment of customary and user rights prior to the current operations. Therefore, this indicator is not applicable.	Not Applicable
4.8.4	For any conflict or dispute over the land, the extent of the disputed area is mapped out in a participatory way with involvement of affected parties (including neighbouring communities where applicable). - Minor compliance -	Based on documents sighted and interviews conducted with stakeholders, there was no evidence of any dispute with any previous owner or occupants. Therefore, this indicator is not applicable.	Not Applicable
<b>Principle 5: Support smallholder inclusion</b>			
<b>Criterion 5.1:</b> The unit of certification deals fairly and transparently with all smallholders (Independent and Scheme) and other local businesses.			

5.1.1	Current and previous period prices paid for FFB are publicly available and accessible by smallholders. - Minor compliance -	Not applicable as there is no FFB sourced from smallholders.	Not Applicable
5.1.2	<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). - Critical (Major) compliance -	Not applicable as there is no FFB sourced from smallholders.	Not Applicable
5.1.3	<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. - Critical (Major) compliance -	Not applicable as there is no FFB sourced from smallholders.	Not Applicable
5.1.4	<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. - Critical (Major) compliance -	Not applicable as there is no FFB sourced from smallholders.	Not Applicable
5.1.5	Contracts are fair, legal and transparent and have an agreed timeframe. - Minor compliance -	Not applicable as there is no FFB sourced from smallholders.	Not Applicable
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 -	Not applicable as there is no FFB sourced from smallholders.	Not Applicable
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 -	Not applicable as there is no FFB sourced from smallholders.	Not Applicable

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 -	Not applicable as there is no FFB sourced from smallholders.	Not Applicable
5.1.9	<b>(C)</b> The unit of certification has a grievance mechanism for smallholders and all grievances raised are dealt with in a timely manner. - Critical (Major) compliance -	Not applicable as there is no FFB sourced from smallholders.	Not Applicable
<b>Criterion 5.2:</b> The unit of certification supports improved livelihoods of smallholders and their inclusion in sustainable palm oil value chains.			
5.2.1	The Company consults with interested smallholders (irrespective of type) within the Unit of Certification, including women or other partners in their supply base, to assess their needs for support to improve their livelihoods and their interest in RSPO certification. - Minor compliance -	There are no smallholders under the Pasir Panjang POM certification as the estates that supply FFB to Pasir Panjang POM are more than 50 Ha as defined RSPO MYNI 2019.	Complied
5.2.2	The unit of certification develops and implements smallholder support programme to improve smallholder livelihood and build their capacity to enhance productivity, quality, organisational and managerial competencies, and specific elements of RSPO certification (including the RSPO Independent Smallholder Standard or RISS). - Minor compliance -	There are no smallholders under the Pasir Panjang POM certification as the estates that supply FFB to Pasir Panjang POM are more than 50 Ha as defined RSPO MYNI 2019.	Complied
5.2.3	Where applicable, the unit of certification provides support to smallholders to promote legality of FFB production. - Minor compliance -	There are no smallholders under the Pasir Panjang POM certification as the estates that supply FFB to Pasir Panjang POM are more than 50 Ha as defined RSPO MYNI 2019.	Complied
5.2.4	<b>(C)</b> Evidence exists that the unit of certification trains Scheme Smallholders on pesticide handling. - Critical (Major) compliance -	There are no smallholders under the Pasir Panjang POM certification as the estates that supply FFB to Pasir Panjang POM are more than 50 Ha as defined RSPO MYNI 2019.	Complied



5.2.5	The unit of certification regularly reviews and publicly reports on the progress of the Smallholder support programme. - Minor compliance -	There are no smallholders under the Pasir Panjang POM certification as the estates that supply FFB to Pasir Panjang POM are more than 50 Ha as defined RSPO MYNI 2019.	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 -	The publicly available policies developed by the Company on non-discrimination and equal opportunities are available as follows: a. Business Policy b. Core Labour Standard c. People Policy  These Policies emphasise on fairness and equal opportunities for relevant group such as all employees, including foreign and local are embedded. These Policies prevent discrimination based on ethnic origin, caste, national origin, religion, disability, gender, sexual orientation, gender identity, union membership, political affiliation or age.  Implementation of these Policies were evidenced from reviews of employment contracts of foreign and local workers, as well as interviews conducted with sampled workers. These workers confirmed the absence of any form of discrimination and that they were accorded equal opportunities.	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 -	Reviewed and sampled during the audit were employment contracts, monthly payslips, and manpower supply contract between Kulim (Malaysia) Berhad and PT Hamparan Karya Insani dated 13/01/2020. The agreement states among others that cost of workers' transportation to the respective estates/mill will be borne by Kulim. The Demand Letter issued by Indonesian consulate dated	Complied

		<p>17/02/2020 also specifies that levy and PLKS fees are to be borne by employer.</p> <p>Payslips of migrant workers that were sampled also showed no evidence of recruitment fees being paid. Interviews were also carried out with local and migrant workers from Indonesia and Bangladesh. Based on the above, there was no evidence of any form of discrimination or charging of recruitment fees for migrant workers.</p>	
6.1.3	<p>The unit of certification demonstrates that recruitment selection, hiring, access to training and promotion are based on skills, capabilities, qualities and medical fitness necessary for the jobs available.</p> <p>- Minor compliance -</p>	<p>Evidence was available that the process of recruitment, selection and hiring are based on skills, capabilities, qualities and medical fitness. This was evidenced by the recruitment records of the following workers:</p> <p>Pasir Logok Estate: Workers No. 633103, 632895, 632016, 633082  Tunjuk Laut Estate: Workers No. 632016, 632895, 633082, 632954  Pasir Panjang Mill: Workers No. 951911, 640023, 951939, 651122.</p>	Complied
6.1.4	<p>Pregnancy testing is not conducted as a discriminatory measure and is only permissible when it is legally mandated. Alternative equivalent employment is offered for pregnant women.</p> <p>- Minor compliance -</p>	<p>Based on interviews conducted with Medical Assistants and representatives of Women OnWards (WOW), there are no female workers working in the laboratory, or in the field as manurers and sprayers. No pregnancy tests are conducted on other female employees within Pasir Panjang Mill, Pasir Logok Estate and Tunjuk Laut Estate unless they requested for the tests themselves.</p>	Complied
6.1.5	<p><b>(C)</b> A gender committee is in place specifically to raise awareness, identify and address issues of concern, as well as opportunities and improvements for women.</p> <p>- Critical (Major) compliance -</p>	<p>The gender committees at Pasir Panjang Mill, Pasir Logok and Tunjuk Laut Estates are known as Women On Wards (WOW). Membership is open to all female employees including employees' wives. WOW was set up to promote gender equality and empower women's knowledge and skills. Based on minutes sighted and interviews conducted with WOW members, meetings and gatherings held discussed and provided awareness on sexual harassment, domestic violence, how to make complaints if there</p>	Complied

		<p>was a case, reproductive rights, the new census for new mothers, and briefings on Company policies. The meetings were held as follows:</p> <p>Pasir Logok Estate: 24/03/2021          Pasir Panjang Mill: 30/03/2021          Tunjuk Laut Estate: 11/02/2021</p>	
6.1.6	<p>There is evidence of equal pay for the same work scope.          - Minor compliance -</p>	<p>Based on the review of employment contracts, payslips and interviews conducted, Pasir Panjang Mill, Tunjuk Laut Estate and Pasir Logok Estate were able to demonstrate that workers receive equal pay for the same work scope. Sampled were the following workers:</p> <ul style="list-style-type: none"> <li>a. Pasir Panjang Mill:             <ul style="list-style-type: none"> <li>- Worker No. 951913 and 951911 (Boilerman)</li> <li>- Worker No. 951911 (Boilerman)</li> <li>- Worker No. 640135 (Gardener)</li> <li>- Worker No. 640024 (Gardener)</li> </ul> </li> <li>b. Pasir Logok Estate:             <ul style="list-style-type: none"> <li>- Worker No. 632005 (General worker)</li> <li>- Worker No. 633103 (General worker)</li> <li>- Worker No. 632001 (Field mandore)</li> <li>- Worker No. 633006 (Field mandore)</li> </ul> </li> <li>c. Tunjuk Laut Estate:             <ul style="list-style-type: none"> <li>- Worker No. 627117 (General worker)</li> <li>- Worker No. 627256 (General worker)</li> <li>- Worker No. 627311 (Tractor driver)</li> <li>- Worker No. 627282 (Tractor driver)</li> </ul> </li> </ul>	Complied

<b>Criterion 6.2:</b> Pay and conditions for staff and workers and for contract workers always meet at least legal or industry minimum standards and are sufficient to provide decent living wages (DLW).		
6.2.1	<p><b>(C)</b> Applicable labour laws, union and/or other collective agreements and documentation of pay and conditions are available to the workers in national languages (English or Bahasa Malaysia) and explained to them in language they understand.</p> <p>- Critical (Major) compliance -</p>	<p>Kulim (Malaysia) Berhad is a member of the Malaysian Agricultural Producers Association (MAPA) and is therefore subjected to the agreement between MAPA and the National Union of Plantation Workers (NUPW). The MAPA/NUPW agreement dated 2/04/2019 had expired on 31/12/2021. Based on the interview conducted with the NUPW officer, the terms and conditions of the previous MAPA/NUPW agreement remains binding pending the signing of a new agreement.</p> <p>The employment contracts signed with all workers contain applicable labour laws related to duration, hours of work, overtime, annual/medical leave, public holiday, mutual termination, salary deductions, maternity entitlement, etc are stipulated in the employment contracts. Clause 9 of all the employment contract states that unless otherwise stated, all terms and conditions of contract are subjected to the Employment Act 1955 and SOCSO Act 1969, and the current MAPA/NUPW agreement. These contracts were prepared in Bahasa Malaysia for Malaysian and Indonesian workers. For Bangladeshi workers, the contracts were also prepared in Bengali.</p> <p>In addition, the Company had also printed and distributed to all workers a booklet entitled Buku Panduan Anggota Pekerja Perladangan which contain applicable labour laws and contents of NUPW/MAPA agreement.</p> <p>Workers interviewed confirmed that the contents of their contracts were explained to them prior to signing and that they had understood the contents.</p> <p>The following workers' employment contracts were sampled and reviewed:</p>

Complied

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		Estate/Mill	Worker No	Nationality	
		Tunjuk Laut Estate	626820	Bangladeshi	
			627315	Bangladeshi	
			626780	Bangladeshi	
			627058	Indonesian	
			627259	Indonesian	
			627311	Indonesian	
			632016	Malaysian	
			632895	Malaysian	
			633103	Malaysian	
			632954	Malaysian	
			633082	Malaysian	
		Pasir Panjang Mill	951911	Malaysian	
			951939	Malaysian	
			651122	Malaysian	
			640023	Malaysian	
			640024	Malaysian	
			640184	Malaysian	
			640189	Malaysian	
			640191	Malaysian	
			640197	Malaysian	
		640205	Malaysian		

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			Passport B5780323	Indonesian	
			Passport C2750267	Indonesian	
			Passport B5782700	Indonesian	
			Passport C7254369	Indonesian	
			Passport C7327696	Indonesian	
		Pasir Logok Estate	633103	Malaysian	
			632895	Malaysian	
			632016	Malaysian	
			632954	Malaysian	
			633082	Malaysian	
			633074	Indonesian	
			632826	Indonesian	
			633045	Indonesian	
			633016	Indonesian	
			63262	Bangladeshi	
			632760	Bangladeshi	
			632892	Bangladeshi	
6.2.2	<p><b>(C)</b> Employment contracts and related documents detailing payments and conditions of employment (e.g. regular working hours, deductions, overtime, sick leave, holiday entitlement, maternity leave, reasons for dismissal, period of notice, etc. in compliance with national legal requirements) and payroll documents give accurate information on compensation for all work performed. This includes a form of record for work done by family members.</p>	<p>Details of payments and conditions of employment are stated and documented in the employment contracts given to all workers. The contract contains terms related to duration, hours of work, overtime, annual/medical leave, public holiday, mutual termination, salary deductions, maternity entitlement, etc. The terms are in compliance with the Employment Act 1955, and the MAPA/NUPW agreement. For the workers' easy reference, the Company had</p>	Complied		

	<p>- Critical (Major) compliance -</p>	<p>also printed and distributed to all workers a booklet <i>entitled Buku Panduan Anggota Pekerja Perladangan</i> which contain applicable labour laws and contents of NUPW/MAPA agreement.</p> <p>Workers' payslips were also reviewed which showed accurate information for all work performed, such as daily rated work, piece rated work, overtime, and work on rest days. None of the workers' family members assisted in any of the work done by the workers.</p> <p>Workers who were sampled and their payslips reviewed were as per indicator 6.2.1 above. The payslips sighted were:</p> <p>Pasir Logok Estate: February, June, August 2021  Pasir Panjang Mill: January, May, August 2021  Tunjuk Laut Estate: January, May, August 2021</p> <p>Statutory deductions by Malaysian workers were for contributions for EPF, EIS, SOCSO. Foreign workers had no statutory deductions made. Non-statutory deductions for both local and foreign workers were for monthly surau deductions, sports and recreational club membership, NUPW membership fee and payment for advances. Records of workers' applications to deduct their salaries for these non-statutory deductions were sighted and verified. Written permit from the Labour Department were also sighted as follows:</p> <ol style="list-style-type: none"> <li>a. <i>Tabung Khairat</i>: Permit refrence No. TK (NJ) U – 21 dated 31 March 2019 for RM5 per month and according to package, notmore than RM37.50 per month.</li> <li>b. NUPW Trade Union fee: Permit reference No. (20) dlm. BSM 7/2/35/68 Jld 26 JTK dated 16 May 2002.</li> <li>c. Medical fees exceeding company subsidy: Ref No. TK(NJ)U-21 dated 2/05/2019.</li> <li>d. Monthly <i>surau</i> contributions: Serial No: PP3/29/168/2005 dated 1/11/2005</li> </ol>	
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		Also sighted was the Labour Office permit granted under Section S60A(4) EA 1955 dated 3/12/2020 Ref: BHG. PU/9/134 Jld 34(8) which allowed monthly overtime to exceed 104 hours, but not more than 130 hours per month. Workers' written consent to work more than 104 hours of overtime per month was also sighted at Pasir Panjang Mill: Worker No. 640184, 640197, 951939, 640023)	
6.2.3	<p><b>(C)</b> There is evidence of legal compliance for regular working hours, deductions, overtime, sickness, holiday entitlement, maternity leave, reasons for dismissal, period of notice and other legal labour requirements.</p> <p>- Critical (Major) compliance -</p>	<p>Based on review of workers' sampled punch cards, employment contracts and payslips, evidence was available that Pasir Panjang Mill and its supply base were able to demonstrate compliance with Employment Act 1955 related to regular working hours, overtime, sickness and holiday entitlement, maternity leave, etc. This includes statutory deductions (SOCSO, EPF, EIS) and non-statutory deductions (e.g. sports and recreation club, <i>surau</i> funds, electricity bills, union membership, etc) in accordance with the relevant laws and Labour Office permits. These permits are as detailed out under Indicator 6.2.2 above.</p> <p>The workers sampled during the audit were the same as per those sampled in Indicator 6.2.1 above.</p>	Complied
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>Pasir Panjang Mill, Tunjuk Laut and Pasir Logok Estates were able to demonstrate that they provided free adequate housing with sanitation facilities, free water and electric supplies, houses of worship, recreational amenities such as football fields, badminton/takraw courts, canteen, sundry shop, multi-purpose hall and medical facilities which could be enjoyed by all works and their dependents.</p> <p>Records showed that the VMO visits the estate clinics twice a month on 5/10/2021, 15/10/2021, 4/11/2021, 16/11/2021, and 7/12/2021.</p> <p>Houses have between 2 to 3 bedrooms with between 1 to 2 occupants per house. The areas surrounding the housing area are</p>	Complied



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		<p>generally clean and well maintained, and houses were generally in good state of repair and grass kept reasonably short, domestic waste bins are emptied twice weekly and perimeter drains are clear of any blockages.</p> <p>There were some houses which had been extended by the occupants. A letter issued was by Kulim (Malaysia) Berhad General Manager, Property Management Department dated 16/01/2020 to management of all estates and mills gave a reminder of prohibition against extensions to workers houses. The memo also referred to earlier memo dated 17/09/2018 where the Company would not be responsible for any risks arising out of the extension and any fines imposed by authorities. To ensure this was understood by the affected occupants, a copy of the memo was given to house occupants together with a memo prohibiting against the same. Records were available which showed that the memo dated 25/01/2020 were issued to occupants of houses No 14 block C, House No 16 Block C, and House No 27 Blok C of Pasir Logok Estate.</p> <p>Housing inspections are conducted once a week where records of inspections were sighted. At Tunjuk Laut Estate, the weekly linesite inspections were carried out on 7/11/2021, 14/11/2021, 21/11/2021, 6/12/21, 13/12/21, 20/12/21, 27/12/21.</p> <p>Water quality sampling was also carried out by Decagon Lab &amp; Analytical Testing Sdn Bhd as follows:</p> <p><u>Pasir Panjang Mill:</u></p> <ol style="list-style-type: none"> <li>1. Report Ref LW/553/21 dated 16/06/2021 for sample taken on 26/05/2021. Total coliform count: Nil. E Coli: Nil.</li> <li>2. Report Ref LW/1130(1-2)/21 dated 22/11/2021 for sample taken 7/11/2021. Total coliform count: Nil. E Coli: Nil.</li> </ol> <p><u>Tunjuk Laut Estate:</u></p>	
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		<p>1. Report Ref LW/1143 (1-2)21 dated 22/11/2021 for sample taken on 7/11/2021. Total coliform count: Nil. E Coli: Nil.</p> <p>2. Report Ref No. LW/1144(1-2)/21 dated 22/11/2021 for sample taken on 7/11/2021. Total coliform count: Nil. E Coli: Nil.</p>	
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>Pasir Panjang Mill, Tunjuk Laut and Pasir Logok Estates were able to demonstrate that efforts have been made to improve workers' access to adequate, sufficient and affordable food. Based on visits made to the canteen/grocery shops and interviews conducted with the canteen and grocery shop operators showed that price lists were submitted regularly for price and supply monitoring. Sighted was grocery shop price monitoring and cleanliness inspection at Tunjuk Laut Estate on 5/11/2021, and a price list of items sold dated 1/11/2021.</p>	Complied
6.2.6	<p>A DLW is paid to all workers, including piece rate/quotas, for whom the calculation is based on achievable quotas during regular work hours.</p> <p><b>PROCEDURAL NOTE:</b></p> <p>STATEMENT FROM THE RSPO STANDARDS STANDING COMMITTEE REGARDING INDICATOR 6.2.6 ON DECENT LIVING WAGE</p> <p>With reference to procedural note of indicator 6.2.6, the RSPO has published a guidance on the DLW calculation in June 2019. The RSPO Secretariat will endeavour to carry out DLW country benchmarks for palm oil producing countries in which RSPO members operate and for which no Global Living Wage Coalition (GLWC) benchmarks exist (As of September 2019, GLWC has developed national benchmarks in Bangladesh, Belize, Brazil, China, Colombia, Costa Rica, Dominican Republic, Ecuador, Ethiopia, Ghana, Guatemala, India, Kenya, Malawi, Mexico, Nicaragua, Pakistan, South Africa, Sri Lanka, Uganda and Vietnam These benchmarks are developed based on banana, coffee, floriculture, textile, manufacturing, seafood processing and tea industry. The RSPO is in the process of commissioning benchmarks for Malaysia and Indonesia for the palm oil sector and will develop methods to 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>Based on pay slips sighted, all sampled workers who complete the number of days offered in a month receive at least minimum wages applicable, which is RM1,100 per month, or more.</p> <p>Pasir Panjang Mill, Tunjuk Laut and Pasir Logok Estates have calculated their own prevailing wages and in-kind benefits. The calculation took into account housing, electricity and water, education, creche facilities, healthcare, sports and recreation activities, transport, clothing and food. The prevailing wage calculation is therefore as follows:</p> <p>Pasir Logok Estate:</p> <ul style="list-style-type: none"> <li>- Average monthly take home salary per worker: RM1784.52</li> <li>- Average monthly take home pay per contract worker: RM2646.23</li> </ul> <p>Pasir Panjang Mill:</p> <ul style="list-style-type: none"> <li>- Average monthly take home salary per worker: RM1,693.08.</li> </ul>	Complied

	<p>In the absence of such benchmarks, the RSPO will collaborate with the GLWC and/or local experts on developing oil palm industry benchmarks (Benchmark in this context may include other approaches and/or methods to calculate the applicability of DLW in the country or region in accordance to the RSPO endorsed method for determining a DLW. Local applicability for benchmarks is important and it may differ based on the needs of each locality or country). These benchmarks will be developed in collaboration and consultation with relevant stakeholders such as palm oil industry members, workers' union, authorities and/or relevant organisations.</p> <p><i>For countries where no living wage standard is established, until such time that an RSPO endorsed benchmark for the country is in place, national minimum wages shall be paid to all workers. In addition to the payment of minimum wages, the Unit of Certification (UoC) shall conduct an assessment of the prevailing wages and in-kind benefits provided to workers in the Unit of Certification aligned with the RSPO Guidance for Implementing a Decent Living Wage (RSPO Guidance for Implementing a Decent Living Wage. The RSPO will also develop further guidance and tools to calculate DLW in line with the RSPO endorsed methodology which may include independent studies by local experts in their respective region or country).</i></p> <p>Once these benchmarks are available, this procedural note is no longer applicable. UoC shall have an implementation plan towards the payment of a DLW with specific targets, and a phased implementation process including:</p> <ul style="list-style-type: none"> <li>• Updated assessment on prevailing wages and in-kind benefits</li> <li>• There is annual progress on the implementation of living wages</li> <li>• Where a minimum wage, based on equivalent of baskets of goods, is stipulated in Collective Bargaining Agreements (CBAs), this should be used as the foundation for the gradual implementation of the living wage payment</li> <li>• The UoC may choose to implement the living wage payment in a specific section as a pilot project; the pilot will then be evaluated and adapted before eventual scale up of the living wage implementation.</li> </ul> <p>- Minor compliance -</p>	<p>Tunjuk Laut Estate:</p> <ul style="list-style-type: none"> <li>- Average monthly take home salary per worker: RM2287.17</li> </ul> <p>The above calculations show that average monthly take home pay for each worker is above the national minimum wage of RM1,100 per month.</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 casual, temporary or day labour employed within Pasir Panjang Mill, Tunjuk Laut Estate and Pasir Logok Estate.</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>			
<p>6.3.1</p>	<p><b>(C)</b> A published statement recognising freedom of association and right to collective bargaining in national languages (English and/or Bahasa Malaysia) is available and is explained to all workers, in language that they understand, and is demonstrably implemented.</p> <p>- Critical (Major) compliance -</p>	<p>A published statement on freedom of association is available and displayed at the main notice boards within Pasir Panjang Mill, Tunjuk Laut and Pasir Logok Estates. These were further explained to workers via:</p> <ul style="list-style-type: none"> <li>- Paragraph 2 of the Employees’ Guide Book which confirms and respects workers’ rights to join a union recognized by the Kulim (Malaysia) Berhad.</li> <li>- Kulim (Malaysia) Berhad’s Core Labour Standards on Rights of Employees which states that Kulim recognises and respects the rights of employees to form and/or join trade unions of their choice which are given due recognition by KULIM.</li> </ul> <p>Review of meeting minutes and interview held with the NUPW office confirmed that freedom of association and right to collective are being implemented.</p> <p>Briefings were also held as follows:</p> <p>Pasir Logok Estate (25/06/2021, 11/08/2021)  Pasir Panjang Mill (31/01/2021, 3/10/2021)  Tunjuk Laut Estate (22/02/2021, 24/02/2021, 11/10/2021).</p>	<p>Complied</p>
<p>6.3.2</p>	<p>Minutes of meetings between the unit of certification with trade unions or workers representatives, who are freely elected, are documented in national languages (English and/or Bahasa Malaysia) and made available upon request.</p> <p>- Minor compliance -</p>	<p>Sighted and reviewed during the audit were minutes of meetings between the Mill and Estates with trade unions or workers representatives. These representatives were freely elected by the workers themselves. The minutes of meetings were documented in Bahasa Malaysia.</p> <p>The meeting minutes reviewed were at Pasir Logok Estate (08/09/2021), Pasir Panjang Mill (19/20/2021) and Tunjuk Laut</p>	<p>Complied</p>

		<p>Estate (23/09/2021). These meetings were attended by worker and management representatives.</p> <p>Among the issues discussed included minimum wage, procedures when leaving estate premises during Covid-19 pandemic, change of cash card to CIMB Card, invitation by union leader for workers to join trade union, last date for payment of wages being 7<sup>th</sup> of every month, cleanliness, hygiene and family day.</p>	
6.3.3	<p>Management does not interfere with the formation or operation of registered unions/ labour organisations or associations, or other freely elected representatives for all workers including migrant and contract workers.</p> <p>- Minor compliance -</p>	<p>Based on audit interview held with NUPW representatives, review of minutes of meetings between NUPW representatives and management at Pasir Logok Estate (08/09/2021), Pasir Panjang Mill (19/20/2021) and Tunjuk Laut Estate (23/09/2021), evidence was available that management does not interfere with the formation or operation of the NUPW. Workers’ representatives were chosen from among the workers as confirmed by the NUPW representatives.</p> <p>The meetings were attended by Malaysian workers as well as foreign workers from Indonesia and Bangladesh.</p>	Complied
<b>Criterion 6.4: Children are not employed or exploited.</b>			
6.4.1	<p>A formal policy for the protection of children, including prohibition of child labour and remediation is in place, and included into service contracts and supplier agreements.</p> <p>- Minor compliance -</p>	<p>Kulim (Malaysia) Berhad has established Core Labour Standard Policy dated 1/10/2021 where they are not engaged in or support the use of Child Labour and will provide adequate support to enable children of its employees to attend and remain in school until no longer a child. This was verified during field observations and review of check roll list. The minimum age of workers to recruit is 18 years old. This requirement is also included in all agreements with its contractors via Addendum to the Agreement.</p> <p>Sampled were the addendums signed by Sg Rezki Sdn Bhd (FFB transporter), TT Tunjuk Laut Resources (EFB transporter) and RKP Enterprise (harvesting contractor).</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>Documentary evidence is available that minimum age requirements are met. This is based on workers' check roll list and copies of their passport/NRIC details. Based on workers' NRIC and passports, all workers were at least 18 years old when employed.</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 the workers list of all Pasir Logok Estate, Tunjuk Laut Estate and Pasir Panjang Mill, interviews conducted and observations made, there is no evidence that young persons are being employed at any of the operating units.</p>	Complied
6.4.4	<p>The unit of certification demonstrates communication about its 'no child labour' policy and the negative effects of child labour, and promotes child protection to supervisors and other key staff, smallholders, FFB suppliers and communities where workers live.</p> <p>- Minor compliance -</p>	<p>Kulim (Malaysia) Berhad has established Core Labour Standard Policy dated 1/10/2021 where they are not engaged in or support the use of Child Labour and will provide adequate support to enable children of its employees to attend and remain in school until no longer a child. This Policy was also communicated during stakeholder meeting held on 10/10/2021.</p> <p>Contractors are also required to sign contract addendums which contain a provision stating that the contractor shall comply with applicable labour and employment laws regarding and prohibit any form of child labour, forced or trafficked labour. Sampled and reviewed during the audit were the contract Addendum signed by Sg Rezki Sdn Bhd (FFB transporter), TT Tunjuk Laut Resources (EFB transporter) and RKP Enterprise (harvesting contractor).</p> <p>Interviews held with contractors and suppliers also confirmed their understanding of no child labour policy that exists within the Company.</p>	Complied
<p><b>Criterion 6.5:</b> There is no harassment or abuse in the workplace, and reproductive rights are protected.</p>			
6.5.1	<p><b>(C)</b> A policy to prevent sexual and all other forms of harassment and violence is implemented and communicated to all levels of the workforce.</p>	<p>A Policy to prevent sexual and other forms of harassment are available in Sexual Harassment Policy dated 7/12/2021 signed by</p>	Complied

	- Critical (Major) compliance -	<p>Executive Director. This Policy has been communicated to all levels of workforce during Wow meetings held as follows:</p> <p>Pasir Logok Estate: 24/03/2021</p> <p>Pasir Panjang Mill: 30/03/2021</p> <p>Tunjuk Laut Estate: 11/02/2021</p> <p>Further briefing was also given during Policy training and during muster briefings at Pasir Logok Estate (on 31/05/2021 &amp; 23/12/2021), Panjang Mill (on 2/05/2021), Tunjuk Laut Estate (on 3/02/2021 &amp; 5/10/2021).</p> <p>Cumulatively, these briefings were given to all levels of the workforce.</p>	
6.5.2	<p><b>(C)</b> A policy to protect the reproductive rights of all, especially of women, is implemented and communicated to all levels of the workforce.</p> <p>- Critical (Major) compliance -</p>	<p>Kulim (Malaysia) Berhad has established Core Labour Standard Policy dated 1/10/2021 signed by its Executive Director. The Policy provides protection of reproductive rights of all workers. The Labour Standard specifies that the Company recognizes the rights of employees to reproduction and reproductive health, including the right to make decision on reproduction.</p> <p>Interviews with female employees also show that this Standard is being implemented where female workers are entitled to 60 days paid maternity leave, and pregnant women are given light work to do. This Standard was communicated to all levels of workforce during briefings on Company policies as follows:</p> <ul style="list-style-type: none"> <li>- Pasir Logok Estate (on 31/05/2021 &amp; 23/12/2021)</li> <li>- Panjang Mill (on 2/05/2021)</li> <li>- Tunjuk Laut Estate (on 3/02/2021 &amp; 5/10/2021).</li> </ul>	Complied
6.5.3	Management has assessed the needs of new mothers, in consultation with the new mothers, and actions are taken to address the needs that have been identified.	A census form to assess the needs of new mothers is available. This form enables the assessment to be done of new mothers' needs for creche/childcare, antenatal, vaccination, maternity and paternity,	Complied

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	- Minor compliance -	postpartum care, prenatal check-up, breastfeeding facilities, awareness and counselling. However, there has been no new mother during the past one year. Nevertheless, female employees interviewed confirmed their awareness of this assessment form.	
6.5.4	A grievance mechanism, which respects anonymity and protects complainants where requested, is established, implemented and communicated to all levels of the workforce. - Minor compliance -	The Company's grievance mechanism is available and documented in Grievance Mechanism Doc. No. SQD/SMS/4.1 Issue No. 1 dated 1 Aug 2020. The scope covers all those who deal with Kulim (Malaysia) Berhad and may have complaints or grievances. The aim of this mechanism is to have a documented system for dealing with complaints and grievances that is agreeable and accepted by all stakeholders. Clause 5.8 states that anonymity of complainants will be respected and protected if requested. This mechanism was briefed during muster briefings as follows: <ul style="list-style-type: none"> <li>- Tunjuk Laut Estate: 22/02/2021 &amp; 15/07/2021.</li> <li>- Pasir Panjang Mill: 1/10/2021</li> <li>- Pasir Logok Estate: 23/06/2021 &amp; 27/12/2021.</li> </ul> The Company has established a complaint flowchart for WOW (Carta Alir Aduan WOW). This flowchart shows the different stages involved when WOW receives and handles grievances. The efficiency of handling the grievances can be further improved by incorporating specific timeframes for each stage.	Complied
<b>Criterion 6.6:</b> No forms of forced or trafficked labour are used.			
6.6.1	<b>(C)</b> All workers have entered into employment voluntarily and the following are prohibited: <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> </ul>	Pasir Panjang Mill, Pasir Logok and Tunjuk Laut Estates were able to demonstrate that all workers have entered into employment voluntarily. This was further confirmed from interviews conducted with the workers themselves. <b>Passports:</b> Workers are given the option of either keeping their own passports, or to keep their passports at the management office for safety	Complied



<ul style="list-style-type: none"> <li>• Involuntary overtime</li> <li>• Lack of freedom of workers to resign</li> <li>• Penalty for termination of employment</li> <li>• Debt bondage</li> <li>• Withholding of wages</li> </ul> <p>- Critical (Major) compliance -</p>	<p>reasons. Sighted during the audit, letters from workers confirming their preference to keep their passports at the office for safety reasons.</p> <p><b>Recruitment fees:</b>  Reviewed was contract dated 13 February 2020 between Kulim (Malaysia) Berhad and PT Hamparan Karya Insani for manpower supply from Indonesia. The agreement states among others, that cost of transportation to the respective estates/mill will be borne by Kulim. No recruitment fees are imposed on any of the foreign workers. This was further confirmed in interviews held with the workers from Indonesia and Bangladesh.</p> <p><b>Contract substitution:</b>  Employment contracts with workers, recruitment agent contracts with PT Hamparan Karya Insani, and interviews held with the workers from Indonesia and Bangladesh confirmed that no contract substitution has occurred.</p> <p><b>Involuntary overtime:</b>  Based on documents signed by workers on overtime, and based on interviews conducted, there is no evidence of involuntary overtime within the Pasir Panjang Mill, Pasir Logok and Tunjuk Laut Estates.</p> <p><b>Lack of freedom of workers to resign &amp; penalty for termination of employment:</b>  Clause 5 of employment contracts allow for early termination of contract by giving of 2 months’ notice (upon confirmation) and 2 weeks’ notice (on probation). There is no mention of any penalty payable.</p> <p><b>Debt bondage &amp; withholding of wages:</b>  Based on payslips sighted and interview with workers, there was no evidence of any debt bondage and withholding of wages.</p>	
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6.6.2	<p><b>(C)</b> Where temporary or migrant workers are employed, a specific labour policy and/or procedures are established and implemented.</p> <p>- Critical (Major) compliance -</p>	<p>A special labour policy and procedures have been established under the Kulim (Malaysia) Berhad Core Labour Standard signed by Executive Director dated 1/10/2021. This Policy:</p> <ul style="list-style-type: none"> <li>- prohibits the employment of children and young persons, forced and bonded labour</li> <li>- provides for signing of written employment contracts in a language they understand with clear remuneration and description of duties</li> <li>- workers' entitlement to housing and basic amenities which are at par with statutory requirements</li> <li>- free of discrimination, coercion or violence</li> <li>- rights of employees to join trade unions</li> <li>- accessibility to grievance procedure</li> <li>- entitled to one day off per week.</li> </ul> <p>Based on pay slips, employment contracts, punch cards reviewed, and interviews conducted with workers, Tunjuk Laut and Pasir Logok Estates, as well as Pasir Panjang Mill were able to demonstrate the implementation of this Policy.</p>	Complied
<b>Criterion 6.7:</b> The unit of certification ensures that the working environment under its control is safe and without undue risk to health.			
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>Sighted records of</p> <ul style="list-style-type: none"> <li>• Appointment Letter for person responsible for H&amp;S with given designation OU ESH Chairman signed by Chairman ESH, Head Office dated 1 February 2021. They are the respective Manager for Pasir Panjang POM; and Manager of Pasir Logok Estate and Tunjuk Laut Estate.</li> <li>• Quarterly OSH Committee Minutes of Meeting. The meeting discussed concerns of all parties about health, safety and welfare. The below standard Meeting Agenda was used by all</li> </ul>	Complied

		<p>assessed Operating Units:</p> <ul style="list-style-type: none"> <li>a) Confirmation of minutes previous meeting;</li> <li>b) Workplace inspection report;</li> <li>c) Accident report;</li> <li>d) General Safety;</li> <li>e) HIRARC/training;</li> <li>f) Complaint from Employee/External Party;</li> <li>g) Other matters.</li> </ul> <p>Enumerated in the table below is the quarterly OSH Committee meeting dates.:</p> <table border="1" data-bbox="1137 798 1899 1141"> <thead> <tr> <th rowspan="2">Operating Unit</th> <th colspan="4">Date of OSH Committee Meeting in 2021</th> </tr> <tr> <th>1</th> <th>2</th> <th>3</th> <th>4</th> </tr> </thead> <tbody> <tr> <td>Pasir Panjang POM</td> <td>25 Mar</td> <td>29 Jul</td> <td>29 Sep</td> <td>25 Nov</td> </tr> <tr> <td>Pasir Logok Estate</td> <td>3 Mar</td> <td>6 Jun</td> <td>10 Sep</td> <td>10 Dec</td> </tr> <tr> <td>Tunjuk Laut Estate</td> <td>25 Mar</td> <td>23 Jun</td> <td>23 Sep</td> <td>21 Dec</td> </tr> </tbody> </table>	Operating Unit	Date of OSH Committee Meeting in 2021				1	2	3	4	Pasir Panjang POM	25 Mar	29 Jul	29 Sep	25 Nov	Pasir Logok Estate	3 Mar	6 Jun	10 Sep	10 Dec	Tunjuk Laut Estate	25 Mar	23 Jun	23 Sep	21 Dec	
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6.7.2	<p>Accident and emergency procedures are in place and instructions are clearly understood by all workers. Accident procedures are available in national languages (English and/or Bahasa Malaysia) and explained in the language understandable to the workforce. Assigned operatives trained in first aid are present in both field and other operations, and first aid equipment is available at worksites. Records of all accidents are kept and periodically reviewed.</p>	<p>Pasir Panjang CU continued to use the established procedures for accident and emergencies written in Bahasa Malaysia. The procedures have been summarized in a flowchart form showing identified credible incidences that could happen at site and are displayed at office and muster ground noticeboard for information to all employees in the estates/mill. They include emergencies relating to fire, chemical spillage, flood and accident at work place.</p>	Complied																								

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	<p>- Minor compliance -</p>	<p>a) <i>Ahli J/Kuasa Pasukan Bertindak Kecemasan 2020</i> headed by the Estate/Mill Manager</p> <p>b) <i>Carta Aliran Pelan Tindakan Kecemasan Semasa Kebakaran</i></p> <p>c) <i>Carta Aliran Pelan Tindakan Kecemasan Semasa Berlaku Banjir</i></p> <p>d) <i>Carta Aliran Pelan Tindakan Kecemasan Semasa Berlaku Tumpahan Kimia</i></p> <p>Important telephone contact numbers were also displayed.</p> <p>ERT members received training and drill practice in emergency procedures appropriate to their workplace and degree of risk.</p> <p>Trained First Aiders are present in the field and mill operations. They are among the employees working as field staff/mandores at estate and supervisors and operators at the mill. First aid boxes are available at various locations in the estate/mill workstation (workshop, store, FFB receiving ramp, sterilizer, press, boiler). Estate distributed their first aid box to the mandores who brought it along to the field during operations.</p> <p>Records of all accidents are kept and filed for a minimum 10 years in the office. The methodology of occupational injuries is recorded using LTA. (Lost Man day MC.) This is summarized officially in the JKPP 8 submitted to DOSH before 31 January of the following year for accident cases occurring in the past year.</p>	
<p>6.7.3</p>	<p><b>(C)</b> Workers use appropriate personal protective equipment (PPE), which is provided free of charge to all workers at the place of work to cover all potentially hazardous operations, such as pesticide application, machine operations, land preparation, and harvesting. Sanitation facilities for those applying pesticides are available, so that workers can change out of PPE, wash and put on their personal clothing.</p>	<p>The assessed estates and mill continued to provide their employees with PPE free of charge. Appropriate type of PPE is given to protect workers from risk of exposure to potentially hazardous substance(s) or harm arising from work activity at the workplace. The relevant PPE given is based on control measures recommended by the CHRA Assessor and/or those documented in the HIRARC Register.</p>	<p>Complied</p>

	<p>- Critical (Major) compliance -</p>	<p>Following are examples of PPE given to workers by occupation.</p> <p><u>Estate workers.</u></p> <ul style="list-style-type: none"> <li>➤ Harvester - Safety helmet, hand glove. wellington boots, sickle cover;</li> <li>➤ Loose Fruit Collector - Safety helmet, hand glove. wellington boots,</li> <li>➤ Sprayer – Single cartridge Organic Vapor Respirator, nitrile rubber glove (chemical resistant), goggles, wellington boots, apron;</li> <li>➤ Manurer - Apron, wellington boots, dust mask, nitrile glove, safety glass;</li> <li>➤ Tractor / Badang driver – Safety helmet, safety shoes, safety glass, cotton gloves;</li> <li>➤ Water treatment Plant Operator - Safety boots, ear muff, safety vest, helmet, cotton glove, dust mask;</li> <li>➤ Workshop – leather glove, respirator, welding helmet or face shield fitted with proper filter shade (for welding/oxycutting), ear plug, cotton glove for non-hot work, safety shoes, helmet, safety glass</li> </ul> <p><u>Mill workers</u></p> <ul style="list-style-type: none"> <li>➤ FFB Graders –</li> <li>➤ Mill operator – Safety boots, safety glass, ear plug, safety vest, helmet, cotton glove</li> <li>➤ Water treatment Plant Operator - Safety boots, ear muff, safety vest, helmet, cotton glove, dust mask</li> <li>➤ Shovel driver - Safety helmet, safety shoes, safety glass, cotton gloves;</li> <li>➤ Workshop – leather glove, respirator, welding helmet or face</li> </ul>	
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		<p>shield fitted with proper filter shade (for welding/oxycutting), ear plug, cotton glove for non-hot work, safety shoes, helmet, safety glass</p> <p>For non-routine activity such as Work at Height and in Confined Space special PPE are provided. In addition to standard PPE set (Safety helmet, safety shoes, safety glass, cotton gloves) (a) for Working at Height body harness is given, and (b) for Confined Space Entry safety line, Gas detector, Breathing Apparatus are included. Records of PPE issuance are maintained in worker's individual file. During field and mill visit workers were observed to don the PPE correctly as well as reasonably maintained them.</p> <p><u>Changing room and Shower room</u></p> <p>Sanitation facilities for estate workers applying pesticides are available, so that workers can change out of PPE, wash and put on their personal street clothing.</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>All Kulim (M) Berhad mills and estates use SOCSO for local and foreign workers medical care and workplace accident coverage. The insurance coverage has ceased effective 2018 following the Government directive. Sampled the SOCSO contribution as follows:</p> <table border="1" data-bbox="1137 1042 1919 1289"> <thead> <tr> <th colspan="2" rowspan="2">Operating Unit</th> <th colspan="3">SOCSO Ref no.</th> </tr> <tr> <th>Sept 2021</th> <th>October 2021</th> <th>November 2021</th> </tr> </thead> <tbody> <tr> <td>Pasir Estate</td> <td>Logok</td> <td>202109070103 421785</td> <td>202100701062 40890</td> <td>202111080109 306389</td> </tr> <tr> <td>Tunjuk Estate</td> <td>Laut</td> <td>202110070106 245000</td> <td>202111080109 312172</td> <td>202112070112 271927</td> </tr> </tbody> </table>	Operating Unit		SOCSO Ref no.			Sept 2021	October 2021	November 2021	Pasir Estate	Logok	202109070103 421785	202100701062 40890	202111080109 306389	Tunjuk Estate	Laut	202110070106 245000	202111080109 312172	202112070112 271927	Complied
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Pasir Estate	Logok	202109070103 421785	202100701062 40890	202111080109 306389																	
Tunjuk Estate	Laut	202110070106 245000	202111080109 312172	202112070112 271927																	

6.7.5	Occupational injuries are recorded using Lost Time Accident (LTA) metrics. - Minor compliance -	Records on Lost Time Accident (LTA) metrics at mill/estates had been verified to be in satisfactory trending. JKPP 8 been submitted to DOSH annually before 31 January 2021 for all recorded case occurring in 2020. <table border="1" data-bbox="1137 507 1921 753"> <thead> <tr> <th>Year 2020</th> <th>Pasir Logok Estate</th> <th>Tunjuk Laut Estate</th> <th>Pasir Panjang POM</th> </tr> </thead> <tbody> <tr> <td>Date submitted to DOSH</td> <td>18.1.2021</td> <td>27.1.2021</td> <td>14.1.2021</td> </tr> <tr> <td>LTA days</td> <td>31</td> <td>2</td> <td>2</td> </tr> <tr> <td>Non-LTA days</td> <td>42</td> <td>20</td> <td>105</td> </tr> </tbody> </table>	Year 2020	Pasir Logok Estate	Tunjuk Laut Estate	Pasir Panjang POM	Date submitted to DOSH	18.1.2021	27.1.2021	14.1.2021	LTA days	31	2	2	Non-LTA days	42	20	105	Complied
Year 2020	Pasir Logok Estate	Tunjuk Laut Estate	Pasir Panjang POM																
Date submitted to DOSH	18.1.2021	27.1.2021	14.1.2021																
LTA days	31	2	2																
Non-LTA days	42	20	105																

**Principle 7: Protect, conserve and enhance ecosystems and the environment**

**Criterion 7.1:** Pests, diseases, weeds and invasive introduced species are effectively managed using appropriate Integrated Pest Management (IPM) techniques.

7.1.1	<b>(C)</b> IPM plans are implemented and monitored to ensure effective pest control. - Critical (Major) compliance -	Both the Estates continued to monitor the Implementation of Integrated Pest Management (IPM) plans. - The estates had in place documented the IPM plan which covered monitoring of pest, control of pest population levels at below threshold levels by using cultural, biological, physical/mechanical and use of pesticides - In order to minimize use of insecticides on leaf-eating pest, the estates planted beneficial plants such as Turnera subulata, Cassia cobanensis, Antigonon leptopus, Euphorbia heterophylla, along the roadsides and designated points in the fields and also within the nursery perimeter. - The plan also advocated single layer compost mulching in order to prevent the breeding of rhinoceros beetles. Monthly detection and observation of leaf eating pests, mammalian pests and	Complied
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		<p>diseases had been continued. These monthly detection and observations were carried by staff.</p> <ul style="list-style-type: none"> <li>- Census records for Ganoderma affected palms were sighted. All the estates carried census on rat damage and diseases like Ganoderma.</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> <ul style="list-style-type: none"> <li>- Minor compliance -</li> </ul>	<p>This is not practiced in the two estates visited. None of species were referenced in the Global Invasive Species Database and CABI.org are used in the management of IPM. The estates have declared this compliance in the status of IPM species invasiveness.</p>	Complied
7.1.3	<p>There is no use of fire for pest control unless in exceptional circumstances such as plantation sanitation, i.e. where no other effective methods exist, and with prior approval of government authorities.</p> <ul style="list-style-type: none"> <li>- Minor compliance -</li> </ul>	<p>There was no land preparation in CU Mill and Estates by burning ever since KMB practiced zero burning as per the policy in:</p> <ul style="list-style-type: none"> <li>a) ARM-SOP-Section A04 - Under felling/clearing &amp; land preparation</li> <li>b) Kulim Sustainability Handbook - Pollution Management pg 29</li> </ul> <p>KMB has a policy of no open burning. As advocated, the estates practiced zero burning. There was no evidence that fire had been used to prepare land for replanting in the estate No fire was used for waste disposal.</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> <ul style="list-style-type: none"> <li>- Critical (Major) compliance -</li> </ul>	<p>The justification for chemical usage at the assessed estates continued to be guided by Kulim Agricultural Reference Manual (ARM) Section H01, SOP and in the Pictorial Safety Standard Book. In here too there are other written justifications provided for various fields operations.</p> <p>The Manual has included chemical register list which indicates the use of selective products that are specific to the targeted pest, weed or disease. The list includes chemical such as Glyphosate, 2-4D</p>	Complied



		<p>methyl amine, Metsulfuron methyl, Triclopyr butoxy ethyl, Glufosinate, etc.</p> <p>Verified during visit to chemical store that Kulim (M) Berhad estates observed and complied not to use Pesticides that are categorised by World Health Organisation as Class 1A or 1B, or that listed by the Stockholm or Rotterdam Conventions, including paraquat. No illegal agrochemicals (stated by local and international laws) was seen used in the two estates. In essence, the pesticides used were those officially registered and approved under the Pesticide Act 1974 and are confined to only class II, class III &amp; class IV only.</p> <p>It is noted that purchase of pesticides is controlled and note made by each individual estate. Rather the purchases are arranged centrally through Head Office.</p>							
7.2.2	<p><b>(C)</b> Records of pesticides use (including active ingredients used and their LD50, area treated, amount of active ingredients applied per ha and number of applications) are provided.</p> <p>- Critical (Major) compliance -</p>	<p>Records of pesticides used (including active ingredients used and area treated, amount of active ingredients applied per ha and number of applications) were established, monitored and recorded in bin cards, program sheets, chemical register, field- cost books and in progress reports by the two estates. Instructions and precautionary measures stated in the Safety Data Sheet produced by the manufacturer were strictly followed.</p> <p>The table below shows records of weedicide /pesticide use in year 2021.</p> <p><b>Pasir Logok Estate</b></p> <table border="1" data-bbox="1137 1193 1928 1343"> <thead> <tr> <th data-bbox="1137 1193 1655 1273">Active ingredients</th> <th data-bbox="1655 1193 1807 1273">Area sprayed, ha</th> <th data-bbox="1807 1193 1928 1273">a.i/ha (lt/ha)</th> </tr> </thead> <tbody> <tr> <td data-bbox="1137 1273 1655 1343">Glyphosate Isoprpylamine 41% (LD<sub>50</sub> rat 5000 mg/kg)</td> <td data-bbox="1655 1273 1807 1343">1,992.68</td> <td data-bbox="1807 1273 1928 1343">0.6213</td> </tr> </tbody> </table>	Active ingredients	Area sprayed, ha	a.i/ha (lt/ha)	Glyphosate Isoprpylamine 41% (LD <sub>50</sub> rat 5000 mg/kg)	1,992.68	0.6213	Complied
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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 management encourage establishing biological control as per IPM plan. The implementation in the field is consistent with the Kulim (M) Berhad Group SOP. The two estates visited were committed to minimize the usage of agrochemicals through the implementation growing of beneficial plants i.e. <i>Tunera subulata</i>, <i>Cassia cobanensis</i> and <i>Antigonon leptopus</i> as per the guidelines as stated in ARM section J10.</p>	Complied																											
7.2.4	<p>There is no prophylactic use of pesticides, unless in exceptional circumstances, as identified in national best practice guidelines.</p> <p>- Minor compliance -</p>	<p>Blanket spraying was not practiced by this CU and soft grasses were seen maintained in the field. It had also been the practice that insecticides are used only after a threshold level has been exceeded as per the Agricultural Reference Manual (ARM) Section J51-</p>	Complied																											

		<p>Intergrated Pest Management.</p> <p>There was no prophylactic use of pesticides found at estates visited. The quantity of agrochemicals required for various field conditions are documented and justified in KMB Agriculture Reference Manual Section H01.</p>	
7.2.5	<p>Pesticides that are categorised as World Health Organisation Class 1A or 1B, or that are listed by the Stockholm or Rotterdam Conventions, and paraquat, are not used, unless in exceptional circumstances, as validated by a due diligence process, or when authorised by government authorities for pest outbreaks.</p> <p>The due diligence refers to:</p> <ul style="list-style-type: none"> <li>a) Judgment of the threat and verify why this is a major threat</li> <li>b) Why there is no other alternative which can be used</li> <li>c) Which process was applied to verify why there is no other less hazardous alternative</li> <li>d) What is the process to limit the negative impacts of the application</li> <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>The two visited estates confined their usage of pesticides that were purchased and controlled centrally by HQ office. KMB only purchased chemicals that are registered under the Malaysian Pesticides Act 1974 (Act 149) and Regulations.</p> <p>Sighting of the Chemical Store and the Chemical Register showed that only class, III &amp; IV chemicals were used. There were no Class 1A and Class1B agrochemicals used.</p> <p>Paraquat was eliminated. In its place, alternatives such as Glyphosate were used instead.</p>	Complied

<p>7.2.6</p>	<p><b>(C)</b> Pesticides are only handled, used or applied by persons who have completed the necessary training and are always applied in accordance with the product label. All precautions attached to the products are properly observed, applied, and understood by workers (see Criteria 3.6). Personnel applying pesticides must show evidence of regular updates on the knowledge about the activity they carry out.</p> <p>- Critical (Major) compliance -</p>	<p>Records showed that pesticides were handled, used and applied by trained persons and as per the SDS of the product.</p> <ul style="list-style-type: none"> <li>a) The staff and workers such as the storekeepers, sprayers, fertilizer and rat bait workers were trained and they had understood the hazards involved and how the chemicals should be handled in a safe manner.</li> <li>b) The trade and generic names of the chemicals were made known to the workers through the SDS training. SDS was also displayed at all storage areas as observed during the audit.</li> <li>c) The training included the safety aspects and usage of PPE when handling with pesticides. Records of training are shown in 3.7.2 and verified.</li> <li>d) All workers involved in pesticide application were provided with appropriate PPE per the recommendation by the CHRA Assessor and replaced when worn-out. PPE issuance &amp; replacement records were verified by the auditors.</li> <li>e) From interviews conducted with workers and staff in the field and store clerks it was established that they had been trained and were aware of safe handling procedure.</li> <li>f) Job Knowledge in respect of activity for each pesticides handler are periodically refreshed and updated.</li> </ul> <p>Sampled training in relation to pesticides &amp; chemical handling as shown below.</p> <table border="1" data-bbox="1137 1331 1921 1374"> <thead> <tr> <th>No</th> <th>Training subject</th> <th>Training date in year 2021</th> </tr> </thead> <tbody> <tr> <td> </td> <td> </td> <td> </td> </tr> </tbody> </table>	No	Training subject	Training date in year 2021				<p>Complied</p>
No	Training subject	Training date in year 2021							

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			Pasir Logok Estate	Tunjuk Laut Estate	
		1	Pesticides Handling	10 Jan	15 Feb
		2	Spraying including Spraying at HCV/Buffer Zone	11 Jan	15 March and 19 Apr
		3	Rat baiting	6 Jan	11 March
		4	Safe work at Chemical Store	4 Apr	19 Apr
		5	Safe work at Fertilizer Store	23 Mar	15 Mar
		6	PPE usage	10 Jan	19 Apr
		7	Bagworm treatment	5 Sep	9 Apr
		8	Manuring – Manure application and manure at buffer zone	10 March	15 Feb
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>At Pasir Logok and Tunjuk Laut Estates the storage of pesticides were in accordance with the Occupational Safety and Health Act 1994 (Act 514) and its Regulations and Orders and Pesticides Act 1974 (Act 149) and its Regulations. All information regarding the chemicals affixed as product label and the accompanying Safety Data Sheet (see OSH CLASS 2013 Regulations) with details of its usage, hazards, trade and generic names were found available in Bahasa Malaysia language. Workers understood and were carefully explained to them by Assistant Manager and Field Conductor.</p> <p>At these estates, their chemical stores were inspected and it was noted that they all comply with the relevant act as well as best</p>			Complied

		<p>practice.</p> <ul style="list-style-type: none"> <li>a) All stores were secured under lock and key with restricted access.</li> <li>b) Only authorized personnel are assigned to handle the chemicals.</li> <li>c) Provision of ventilation fan.</li> <li>d) Display of Safety Pictorial poster, namely the required PPE and chemical Safety hazards pictogram.</li> <li>e) Pesticides were separated by class.</li> <li>f) Store keeper was trained in the handling of all pesticides.</li> <li>g) SDS leaflets were available at all pesticide stores.</li> <li>h) Records of purchase, storage and use were maintained.</li> <li>i) Daily balance of remaining solution after completing pre-mixing were recorded and kept in the store under lock and key.</li> <li>j) Concrete cemented floor, bund wall and provision of sump pond.</li> </ul>	
7.2.8	<p>All pesticide containers are triple rinsed and punctured before being disposed of and/or handled responsibly if used for other purposes.</p> <p>- Minor compliance -</p>	<p>The estates visited showed adherence to the established procedure SPO/W1/06–Scheduled Wastes (Hazardous Waste) Management dated 01/10/2020.</p> <p>Sighted empty pesticides containers of various sizes (100 gm to 20 liter) had been triple rinsed, 3 holes punched at its bottom to render it useless and stored separately in the scheduled wastes store. Thereafter disposal arrangement will be made with DOE registered Contractor, for example, at Tunjuk Laut Estate 0.294mt was disposed on 3.1.2022 to Kualiti Alam.</p>	Complied

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7.2.9	<p><b>(C)</b> Aerial spraying of pesticides is prohibited, unless in exceptional circumstances where no other viable alternatives are available. This requires prior government authority approval. All relevant information is provided to affected local communities at least 48 hours prior to application of aerial spraying.</p> <p>- Critical (Major) compliance -</p>	<p>Aerial application of agrochemicals is not practiced in both Estates. This is confirmed through observation during the field visit, estate complex and interview with the employees. Such method is no longer in existence in the KMB estates practices.</p>	Complied												
7.2.10	<p><b>(C)</b> Specific annual medical surveillance for pesticide operators, and documented action to treat related health conditions, is demonstrated.</p> <p>- Critical (Major) compliance -</p>	<p>Annual medical surveillance conducted as follows:</p> <table border="1" data-bbox="1137 632 1917 874"> <thead> <tr> <th>Estate</th> <th>Date tested</th> <th>No. Pesticides Operators</th> <th>of Test results</th> </tr> </thead> <tbody> <tr> <td>Pasir Logok</td> <td>9.9.2021</td> <td>30</td> <td>All Fit To Work</td> </tr> <tr> <td>Tunjuk Laut</td> <td>15.10.2021</td> <td>25</td> <td>*All Fit To Work</td> </tr> </tbody> </table> <p>All medical surveillance was conducted by OHD Doctor (HQ/11/DOC/00/235) from <i>Klinik Falck Bestari</i>.</p> <p>*The results for the entire workers were positive and declared FIT to handle chemical except for 1 unfit sprayer at Tunjuk Laut Estate. He suffered from <i>dematitis (skin)</i> and have been removed from the spraying work assigned to general upkeep work.</p>	Estate	Date tested	No. Pesticides Operators	of Test results	Pasir Logok	9.9.2021	30	All Fit To Work	Tunjuk Laut	15.10.2021	25	*All Fit To Work	Complied
Estate	Date tested	No. Pesticides Operators	of Test results												
Pasir Logok	9.9.2021	30	All Fit To Work												
Tunjuk Laut	15.10.2021	25	*All Fit To Work												
7.2.11	<p><b>(C)</b> No work with pesticides is undertaken by persons under the age of 18, pregnant or breastfeeding women or other people that have medical restrictions and they are offered alternative equivalent work.</p> <p>- Critical (Major) compliance -</p>	<p>All estates and mill in the CU continued to comply with the established procedure and guidelines stated in the Standard Operating Procedure, KMB Agrochemical Management ref SQD/SMS/6.1dated 01/8/2020. Verified through interview and record sighting.</p> <p>Found that the estates maintained the list of sprayers. No female Pesticides sprayers nor lady under age of 18 as verified in Employee Register were employed at Pasir Logok Estate and Tunjuk Laut Estate.</p>	Complied												

Criterion 7.3: Waste is reduced, recycled, reused and disposed of in an environmentally and socially responsible manner.								
7.3.1	<p>A waste management plan which includes reduction, recycling, reusing, and disposal based on toxicity and hazardous characteristics, is documented and implemented.</p> <p>- Minor compliance -</p>	<p>Pasir Panjang Mill and all the 2 estates had identified all wastes and sources of pollution. The Waste Management Action Plan 2022 were established to mitigate and control the identified wastes and source of pollution. The common significant environmental issue for the estates and mill operations among others as summarized below;</p> <table border="1" style="width: 100%; border-collapse: collapse;"> <thead> <tr> <th style="width: 30%;">Estate/Mill</th> <th>Waste identified</th> </tr> </thead> <tbody> <tr> <td>Pasir Panjang Pom</td> <td>SW, Office waste, Domestic waste, Garden waste, Scrap iron, POME, EFB, Sludge, liquid waste, emission and Shredded fibre</td> </tr> <tr> <td>Tunjuk Laut estate &amp; Pasir Logok</td> <td>Spent IPA, hexane, filter, lubricants, hydraulic oil, grease, used batteries, Domestic waste, and sewage.</td> </tr> </tbody> </table> <p>Wastes management plan is developed through the environmental aspects and impacts assessment. The mitigation measures were then derived from this exercise. Generally, the scheduled wastes were disposed through licensed vendors, organic wastes were disposed through landfill. Nonetheless, the wastes management plan can be further enhanced by including the management of recyclable wastes from the household and office such as plastic bottles/containers, glass, papers and metal.</p> <p>Tunjuk Laut estate Spent IPA, hexane, filter, lubricants, hydraulic oil, grease, used batteries, Domestic waste, and sewage.</p> <p>The implementation such as disposal of scheduled waste and others (training) implementation was available under 7.3.2 and 7.3.3.</p>	Estate/Mill	Waste identified	Pasir Panjang Pom	SW, Office waste, Domestic waste, Garden waste, Scrap iron, POME, EFB, Sludge, liquid waste, emission and Shredded fibre	Tunjuk Laut estate & Pasir Logok	Spent IPA, hexane, filter, lubricants, hydraulic oil, grease, used batteries, Domestic waste, and sewage.
Estate/Mill	Waste identified							
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Tunjuk Laut estate & Pasir Logok	Spent IPA, hexane, filter, lubricants, hydraulic oil, grease, used batteries, Domestic waste, and sewage.							

Complied



<p>7.3.2</p>	<p>Proper disposal of waste material, according to procedures that are fully understood by workers and managers, is demonstrated.</p> <p>- Minor compliance -</p>	<p>Generally, the workers have demonstrated good understanding in proper disposal of wastes. The visited labour quarters were observed to be in clean condition. Wastes were properly disposed as mentioned in Indicator 7.3.1.</p> <p>In Pasir Panjang POM and the estates in the CU, procedure SPO/W1/06-10 Scheduled Wastes (Hazardous Waste) Management has been established. Training conducted on 23/9/021, trained by Muhammad Aizuddin bin Tukiman (CePSWaM/04078). Attended by 34 person including, lab operator, SW storekeeper and Operation operator.</p> <ul style="list-style-type: none"> <li>a. Management and disposal of waste 2021 has been established compiled by Assistant Engineer/Assistants/Staff.</li> <li>b. Waste Management Plan 2020 has been established prepared by SQD and verified by the Assistant Engineer/Assistants/Manager.</li> <li>c. Interview with staffs and workers i.e. storekeepers and chemical mixer were trained and they had understood the hazards involved and how the chemicals should be used and disposed in a safe manner.</li> <li>d. Among the identified wastes include empty chemical containers including pesticides containers. Empty pesticides containers were washed at washing station prior to disposal.</li> <li>e. Inventory and consignment documents verified for confirmation of proper management and disposal. The CU scheduled waste is disposed to Kualiti Alam Sdn Bhd registered with DOE.</li> </ul> <p>In Pasir Panjang Mill, latest disposal was 30/12/2021 as per detail below:-</p> <table border="1" data-bbox="1137 1305 1825 1383"> <tr> <td>SW 408</td> <td>SW 306</td> <td>SW 305</td> <td>SW 110</td> <td>SW 409</td> <td>SW 410</td> <td>SW 429</td> </tr> </table>	SW 408	SW 306	SW 305	SW 110	SW 409	SW 410	SW 429	<p>Complied</p>
SW 408	SW 306	SW 305	SW 110	SW 409	SW 410	SW 429				

		<table border="1"> <tr> <td>-</td> <td>-</td> <td>1.3</td> <td>0.019</td> <td>0.151</td> <td>0.095</td> <td>0.23</td> </tr> </table> <p>Previously disposal was on 29/6/2021 for SW 408,306,305,410,110, 409,410 and 429.</p> <p>For Tunjuk Laut Estate they generate of SW 404, 102, 305, 410, 408 and others and last disposal was on 21/12/2021. In Pasir Logok estate, the inventory verification was verified as per consignment note dated 20/12/2021 as per detail below:-</p> <table border="1"> <tr> <td>SW 307</td> <td>SW 306</td> <td>SW 305</td> <td>SW 109</td> <td>SW 409</td> </tr> <tr> <td>0.135</td> <td>0.235</td> <td>0.333</td> <td>0.038</td> <td>0.758</td> </tr> </table>	-	-	1.3	0.019	0.151	0.095	0.23	SW 307	SW 306	SW 305	SW 109	SW 409	0.135	0.235	0.333	0.038	0.758	
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0.135	0.235	0.333	0.038	0.758																
7.3.3	The unit of certification does not use open fire for waste disposal. - Minor compliance -	There was no wastes disposal by using open fire observed during the site visits.	Complied																	
<b>Criterion 7.4:</b> Practices maintain soil fertility at, or where possible improve soil fertility to, a level that ensures optimal and sustained yield.																				
7.4.1	Good agriculture practices, as contained in SOPs, are followed to manage soil fertility to optimise yield and minimise environmental impacts. - Minor compliance -	<p>Good agriculture practices to manage soil fertility to ensure optimal and sustained yield and to minimize environmental impacts are followed in accordance with Kulim (M) Berhad Agriculture Manual, dated 31/10/2017. Noted, there were some activities being interrupted due to MCO caused by Covid-19 Pandemic and this Industry-wide problem was a result of shortage of oil palm plantation workers.</p> <p>For Kulim, there are 19 SOPs and 18 Work Instruction (WI) covering all aspects of oil palm management. Sampled the following documents:</p> <ul style="list-style-type: none"> <li>• Planting - Soil Conservation and Terracing</li> <li>• Road drains, bridges, culverts and fences</li> <li>• Establishment and Maintenance of Legume Covers</li> </ul>	Complied																	

		<ul style="list-style-type: none"> <li>• Spraying, Manuring, Harvesting, Pruning and Ablation</li> <li>• Leaf and soil sampling, and</li> <li>• Weed management.</li> </ul> <p>Inorganic as well as organic fertilizer (POME and EFBs) is applied as per recommendation in the Agriculture Manual. Recycling of biomass waste into useful nutrients, such as EFB application at 50t/ha, frond stacking, water management in low lying areas, maintenance of soft weeds, and keeping <i>Nephrolepis biserrata</i> in the interline and terrace areas were evident during field visits at the assessed estates.</p> <p>The practices of SOPs and WIs are consistently monitored by estate operation management and estate inspectorate. The recommendations for improvements are given to maintain the sustainable practices.</p>							
7.4.2	<p>Periodic tissue and soil sampling is carried out by Companies to monitor and manage changes in soil fertility and plant health.</p> <p>- Minor compliance -</p>	<p>The assessed estates continued the practice of foliar and soil sampling carried out by Internal Agronomist from Agronomy Advisory and Services Department. Leaf and soil nutrient analysis are used in the diagnosis of fertilizer requirements in oil palms prior to the fertilizer application program for the next financial year. The frequency for sampling and analysis for leaf is annually while for soil it is conducted at 5 year intervals (Leaf and Soil Sampling Notes Procedure - Kulim (M) Bhd. Analysis reports were summarized as per below:</p> <table border="1" data-bbox="1137 1161 1930 1375"> <thead> <tr> <th data-bbox="1137 1161 1317 1246">Estate</th> <th data-bbox="1317 1161 1630 1246">Foliar analysis (yearly)</th> <th data-bbox="1630 1161 1930 1246">Soil Sampling (5 yearly)</th> </tr> </thead> <tbody> <tr> <td data-bbox="1137 1246 1317 1375">Pasir Logok</td> <td data-bbox="1317 1246 1630 1375">Report ref: L1/2006/PL/0385-0412, dated 17/06/2020</td> <td data-bbox="1630 1246 1930 1375">Report Ref: SI/2021/05/48 dated 07/05/2021</td> </tr> </tbody> </table>	Estate	Foliar analysis (yearly)	Soil Sampling (5 yearly)	Pasir Logok	Report ref: L1/2006/PL/0385-0412, dated 17/06/2020	Report Ref: SI/2021/05/48 dated 07/05/2021	Complied
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		Tunjuk Laut	Report ref: L1/2008/TL/0838-0905 dated 24/08/2020	Report ref: SI/2021/08/68 dated 04/08/2021																			
7.4.3	<p>A nutrient recycling strategy is in place, which includes the recycling of Empty Fruit Bunches (EFB), Palm Oil Mill Effluent (POME), palm residues and optimal use of inorganic fertilisers.</p> <p>- Minor compliance -</p>	<p>EFB and composting were applied as per agricultural manual:</p> <ol style="list-style-type: none"> <li>D05: EFB Utilization at rate 50mt/ha.</li> <li>D08: Bio-compost application at the rate of 7mt/ha or 50kg/palm on selected area.</li> </ol> <table border="1" data-bbox="1137 655 1921 1230"> <thead> <tr> <th>Estate</th> <th>Amount</th> <th>Type</th> <th>Remark</th> </tr> </thead> <tbody> <tr> <td rowspan="2">Pasir Logok Estate</td> <td>7,243.38 mt</td> <td>Manual application (EFB)</td> <td>Field P03, P05, P06, P07, P10 (241.33 ha)</td> </tr> <tr> <td>1,650 mt</td> <td>Manual application (Biocompost)</td> <td>Field P04, P05, P08, P09, P10 (235.71 ha)</td> </tr> <tr> <td rowspan="2">Tunjuk Laut Estate</td> <td>13,506.90 mt</td> <td>Manual application (EFB)</td> <td>Field P06, P08, P09, P11 and P12 (450.23 ha)</td> </tr> <tr> <td>3353.49 mt</td> <td>Manual application (Biocompost)</td> <td>Field P07, P08, P09, P13, and P14 (479.07 ha)</td> </tr> </tbody> </table>			Estate	Amount	Type	Remark	Pasir Logok Estate	7,243.38 mt	Manual application (EFB)	Field P03, P05, P06, P07, P10 (241.33 ha)	1,650 mt	Manual application (Biocompost)	Field P04, P05, P08, P09, P10 (235.71 ha)	Tunjuk Laut Estate	13,506.90 mt	Manual application (EFB)	Field P06, P08, P09, P11 and P12 (450.23 ha)	3353.49 mt	Manual application (Biocompost)	Field P07, P08, P09, P13, and P14 (479.07 ha)	Complied
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7.4.4	<p>Records of fertiliser inputs are maintained.</p> <p>- Minor compliance -</p>	<p>Fertilizer application program were made available to the audit team as recommended by the Agronomist. Record showed application date, field number, dosage applied per palm, type of fertilizer and</p>			Complied																		

		<p>number of application. It was noted there was delay in application due to MCO imposed during Covid-19 pandemic attack, thus causing</p> <ul style="list-style-type: none"> <li>a) interruption of fertilizer delivery</li> <li>b) all manuring workers were diverted to assist in harvesting operation.</li> </ul> <p>Overall, the year program at the two visited estates was not achieved. There was manuring interruption between 1 – 2 months. The manuring program was carried forward as per Agronomist concerns due to shortage of workers, and, therefore general workers were diverted to assist harvesting.</p>	
<b>Criterion 7.5:</b> Practices minimise and control erosion and degradation of soils.			
7.5.1	<p><b>(C)</b> Maps identifying marginal and fragile soils, including steep terrain, are available.</p> <p>- Critical (Major) compliance -</p>	<p>Like all KMB Estates, the estates visited in CU continued to have a management strategy for planting on slopes in order to minimize and control erosion and degradation of soils. The plantings on slopes between 9 and 25 degrees was guided by:</p> <ul style="list-style-type: none"> <li>a) Slope &amp; River Protection Policy in Section A17 KMB Manual</li> <li>b) Buffer Zone &amp; 25-degree slope in Section A07 KMB Manual</li> <li>c) Land Preparation for Terracing in Section A08 KMB Manual.</li> </ul> <p>Slope area constructed with terrace and stop bund. Planting terraces had been constructed where slope &gt;7°. Fields are established with cover crops such as mucunna and others. For area workshop or washing tractor area, have a silt trap and oil trap for prevent contamination of surface and groundwater through runoff of either soil, nutrients or chemicals. It was observed that practices to minimize and control erosion and degradation of soils were in place through proper stacking of fronds, EFB application, avoidance of blanket spraying, construction terraces, road maintenance and maintenance of soft vegetation in the interlines. Cover crops were planted in the replants and in certain mature areas. The cover crop</p>	Complied

		mucuna bracteata had been planted along crucial slopes by management. Large areas with neprolepis biserrata in the inter rows were sighted during the visit.																			
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 -	There was no replanting on steep slopes at the sampled estates. Generally, the areas with slopes above 25 degrees were left unplanted and regeneration of plants growth was observed.	Complied																		
7.5.3	There is no new planting of oil palm on steep terrain. - Minor compliance -	No new planting at all the sampled estates.	Complied																		
<b>Criterion 7.6:</b> Soil surveys and topographic information are used for site planning in the establishment of new plantings, and the results are incorporated into plans and operations.																					
7.6.1	<b>(C)</b> To demonstrate the long-term suitability of land for palm oil cultivation, soil maps or soil surveys identifying marginal and fragile soils, including steep terrain, are taken into account in plans and operations. - Critical (Major) compliance -	Soil surveys are made available in a soil map for all estates. The below table showed soil series as depicted in the soil map at Pasir Logok Estate. A similar map was also sighted at Tunjuk Laut Estate. <table border="1" data-bbox="1137 938 1655 1385"> <thead> <tr> <th colspan="2"><b>Pasir Logok</b></th> </tr> <tr> <th><b>Soil Series</b></th> <th><b>%</b></th> </tr> </thead> <tbody> <tr> <td>Kompleks Aluvium Setempat</td> <td>4.18</td> </tr> <tr> <td>Siri Apek</td> <td>6.39</td> </tr> <tr> <td>Siri Baling</td> <td>6.2</td> </tr> <tr> <td>Siri Batu Lapan</td> <td>5.83</td> </tr> <tr> <td>Siri Bungor</td> <td>27.29</td> </tr> <tr> <td>Siri Holyroad</td> <td>1.42</td> </tr> <tr> <td>Siri Jabil</td> <td>0.5</td> </tr> </tbody> </table>	<b>Pasir Logok</b>		<b>Soil Series</b>	<b>%</b>	Kompleks Aluvium Setempat	4.18	Siri Apek	6.39	Siri Baling	6.2	Siri Batu Lapan	5.83	Siri Bungor	27.29	Siri Holyroad	1.42	Siri Jabil	0.5	Complied
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7.6.2	<p>Extensive planting on marginal and fragile soils, is avoided, or, if necessary, done in accordance with the soil management plan for best practices.</p> <p>- Minor compliance -</p>	<p>There is no marginal and fragile soils as verified in the soil map at this CU.</p>	Complied																						

7.6.3	<p>Soil surveys and topographic information guide the planning of drainage and irrigation systems, roads and other infrastructure.</p> <p>- Minor compliance -</p>	<p>Topographic map is available and continued to be used to manage the drainage and road works at Pasir Logok and Tunjuk Laut Estates.</p> <p>Sampled topography information as follows:</p> <table border="1" data-bbox="1137 515 1904 866"> <thead> <tr> <th>Slope</th> <th>Pasir Logok Estate</th> <th>Tunjuk Laut Estate</th> </tr> </thead> <tbody> <tr> <td>0<sup>0</sup>-2<sup>0</sup></td> <td>7.1%</td> <td>12.35%</td> </tr> <tr> <td>2<sup>0</sup>-6<sup>0</sup></td> <td>22.99%</td> <td>11.43%</td> </tr> <tr> <td>6<sup>0</sup>-12<sup>0</sup></td> <td>46.8%</td> <td>56.61%</td> </tr> <tr> <td>12<sup>0</sup>-20<sup>0</sup></td> <td>23.11</td> <td>18.93%</td> </tr> <tr> <td>20<sup>0</sup>-25<sup>0</sup></td> <td>Nil</td> <td>0.44%</td> </tr> <tr> <td>&gt;25<sup>0</sup></td> <td>Nil</td> <td>0.24%</td> </tr> </tbody> </table>	Slope	Pasir Logok Estate	Tunjuk Laut Estate	0 <sup>0</sup> -2 <sup>0</sup>	7.1%	12.35%	2 <sup>0</sup> -6 <sup>0</sup>	22.99%	11.43%	6 <sup>0</sup> -12 <sup>0</sup>	46.8%	56.61%	12 <sup>0</sup> -20 <sup>0</sup>	23.11	18.93%	20 <sup>0</sup> -25 <sup>0</sup>	Nil	0.44%	>25 <sup>0</sup>	Nil	0.24%	Complied
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<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	<p><b>(C)</b> There is no new planting on peat regardless of depth after 15 November 2018 in existing and new development areas.</p> <p>- Critical (Major) compliance -</p>	<p>No peat soil in sampling estate, in Pasir Logok estate verified as per soil analysis and soil map as per data below;-</p> <p>As per Semi Detailed Soil Map (DOA) 2012 dated 18/9/2019 with total organic matter 1.15%.</p>	Complied																					
7.7.2	<p>Areas of peat within the managed areas are inventoried, documented and reported (effective from 15 November 2018) to RSPO Secretariat.</p> <p><b>PROCEDURAL NOTE:</b></p> <p>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).</p> <p>- Minor compliance -</p>	<p>The Kulim Management team already send the inventory of Peat area that applicable under Kulim Berhad to RSPO secretariat dated 12/9/2019. No peat soil in sampling estate (Pasir Logok estate and Tunjuk Laut estate).</p>	Complied																					



7.7.3	<p><b>(C)</b> Subsidence of peat is monitored, documented and minimised.          - Critical (Major) compliance -</p>	There is no peat soil or soil categorized as marginal or fragile soil in all estates visited. There was also no new planting in the estates	Complied
7.7.4	<p><b>(C)</b> A documented water and ground cover management programme is in place.          - Critical (Major) compliance -</p>	There is no peat soil in Pasir Logok estate and Tunjuk Laut estate however management already establish the SOP on water and ground cover management programme is documented in the KMB Agricultural Manual (Water Management in Inland, Costal and Peat lands) issued on 01.07.2011. Details are described in 7.8.1.	Complied
7.7.5	<p><b>(C)</b> For plantations planted on peat, drainability assessments are conducted following the RSPO Drainability Assessment Procedure, or other RSPO recognised methods, at least five years prior to replanting. The assessment result is used to set the timeframe for future replanting, as well as for phasing out of oil palm cultivation at least 40 years, or two cycles, whichever is greater, before reaching the natural gravity drainability limit for peat. When oil palm is phased out, it is replaced with crops suitable for a higher water table (paludiculture) or rehabilitated with natural vegetation.           This is subject to transitional (5 years: 2019 to 2024) arrangement stated in the Drainability Assessment Procedure.           Within 12 months initial implementation period, company could submit other alternate methodologies to be considered by RSPO for recognition.          - Critical (Major) compliance -</p>	There is no peat soil or soil categorized as marginal or fragile soil in all estates visited. There was also no new planting in the estates.	Complied
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.          - Critical (Major) compliance -</p>	There is no peat soil or soil categorized as marginal or fragile soil in all estates visited. There was also no new planting in the estates	Complied
7.7.7	<p><b>(C)</b> All areas of unplanted and set-aside peatlands in the managed area (regardless of depth) are protected as "peatland conservation areas"; new drainage, road building and power lines by the unit of certification</p>	There is no peat soil or soil categorized as marginal or fragile soil in all estates visited. There was also no new planting in the estates	Complied

	<p>on peat soils is prohibited; peatlands are managed in accordance with the 'RSPO BMPs for Management and Rehabilitation of Natural Vegetation Associated with Oil Palm Cultivation on Peat', version 2 (2019) and associated audit guidance.</p> <p>- Critical (Major) compliance -</p>																				
<p><b>Criterion 7.8:</b> Practices maintain the quality and availability of surface and groundwater.</p>																					
<p>7.8.1</p>	<p>A water management plan is in place and implemented to promote more efficient use and continued availability of water sources and to avoid negative impacts on other users in the catchment. The plan addresses the following:</p> <p>a) The unit of certification does not restrict access to clean water or contribute to pollution of water used by communities.</p> <p>b) Workers have adequate access to clean water.</p> <p>- Minor compliance -</p>	<p>Water management plan sampling in Tunjuk Laut estate have establish on 1/8/2021. From the mater management plan already identified the source of water in estate such as pond, river (Sg Temubur and Sg Gemereh) and rain water harvesting. In this water management plan, there also stated plan for emergency and monitoring must be conducted in estate. Sampling as per below;-</p> <p>Water analysis on 22/11/2021 (LW/1144(1-2)/21) for domestic water from water treatment plant.</p> <table border="1" data-bbox="1137 874 1935 1203"> <thead> <tr> <th>Parameter</th> <th>Result (treated)</th> <th>Regulation limit for drinking water</th> </tr> </thead> <tbody> <tr> <td>pH</td> <td>7.0</td> <td>6.5 – 9.0</td> </tr> <tr> <td>Aluminium</td> <td>ND</td> <td>5</td> </tr> <tr> <td>Chlorine</td> <td>1.2</td> <td>0.2-5</td> </tr> <tr> <td>Total coliform</td> <td>ND</td> <td>Nil</td> </tr> <tr> <td>E.Coli</td> <td>ND</td> <td>Nil</td> </tr> </tbody> </table> <p>For water analysis for river (Sg Temubur and Sg Gemereh) latest record was on 22/11/2021 (WI/2021/11/558). The river water analysis based on nitrate nitrogen and Phosphate, this to ensure the river was not polluted after fertiliser programme as per water management plan and HCV plan. The result as per below;-</p>	Parameter	Result (treated)	Regulation limit for drinking water	pH	7.0	6.5 – 9.0	Aluminium	ND	5	Chlorine	1.2	0.2-5	Total coliform	ND	Nil	E.Coli	ND	Nil	<p>Complied</p>
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Parameter	Sg. Temubur Kiri		Sg. Gemereh		Limit
	Inlet	Out let	Inlet	Out let	
Nitrate	0.31	0.68	1.73	1.04	7
Phosphate	<0.20	<0.20	<0.20	<0.20	0.2

Water analysis (LW/1145(1-2)/21 dated 22/11/2021 in Pasir Logok estate. The result for water usage (water treatment) result was followed as standard APHA 3111D. the result as per below:-

Parameter	Result	Regulation limit for drinking water
pH	7.3	6.5 – 9.0
Aluminium	0.54	5
Chlorine	1.7	0.2-5
Total coliform	ND	Nil
E.Coli	ND	Nil

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<p>7.8.2</p>	<p><b>(C)</b> Water courses and wetlands are protected, including maintaining and restoring appropriate riparian and other buffer zones in line with 'RSPO Manual on BMPs for the management and rehabilitation of riparian reserves' (April 2017) or applicable National legislation or specific environmental permit. Smallholders may replant existing planted areas provided there is no evidence of environmental deterioration having occurred during the previous cycle.</p> <p>- Critical (Major) compliance -</p>	<p>As per compliance schedule from DOE license no; 004649, the management need to monitor the river water quality for Sungai Pasir Panjang in Mac, June September and December 2021. Sampling on Dec 2021 (report No. WI/2021/11/549) monitoring as per below:-</p> <table border="1" data-bbox="1137 539 1926 837"> <thead> <tr> <th>Parameter</th> <th>Unit</th> <th>Up stream</th> <th>Downstream</th> </tr> </thead> <tbody> <tr> <td>pH at 25c</td> <td></td> <td>6.3</td> <td>6.3</td> </tr> <tr> <td>COD</td> <td>mg O<sub>2</sub>/L</td> <td>5</td> <td>18</td> </tr> <tr> <td>AN</td> <td>mgNH<sub>3</sub>/L</td> <td>&lt;0.20</td> <td>&lt;0.20</td> </tr> <tr> <td>DO</td> <td>mgDO/L</td> <td>7.08</td> <td>7.31</td> </tr> <tr> <td>Sulphate</td> <td>Mg/L</td> <td>5</td> <td>5</td> </tr> </tbody> </table> <p>In Tunjuk Laut Estate, there 2 rivers across the estate. Sungai Temubur and Sungai Gemereh. From the water management plan, the water analysis for river (Sg Temubur and Sg Gemereh) latest record was on 22/11/2021 (WI/2021/11/558). The river water analysis based on nitrate nitrogen and Phosphate, this to ensure the river was not polluted after fertiliser programme as per water management plan and HCV plan. The result as per below;-</p> <table border="1" data-bbox="1137 1082 1926 1279"> <thead> <tr> <th rowspan="2">Parameter</th> <th colspan="2">Sg. Temubur Kiri</th> <th colspan="2">Sg. Gemereh</th> <th rowspan="2">Limit</th> </tr> <tr> <th>Inlet</th> <th>Out let</th> <th>Inlet</th> <th>Out let</th> </tr> </thead> <tbody> <tr> <td>Nitrate</td> <td>0.31</td> <td>0.68</td> <td>1.73</td> <td>1.04</td> <td>7</td> </tr> <tr> <td>Phosphate</td> <td>&lt;0.20</td> <td>&lt;0.20</td> <td>&lt;0.20</td> <td>&lt;0.20</td> <td>0.2</td> </tr> </tbody> </table>	Parameter	Unit	Up stream	Downstream	pH at 25c		6.3	6.3	COD	mg O <sub>2</sub> /L	5	18	AN	mgNH <sub>3</sub> /L	<0.20	<0.20	DO	mgDO/L	7.08	7.31	Sulphate	Mg/L	5	5	Parameter	Sg. Temubur Kiri		Sg. Gemereh		Limit	Inlet	Out let	Inlet	Out let	Nitrate	0.31	0.68	1.73	1.04	7	Phosphate	<0.20	<0.20	<0.20	<0.20	0.2	<p>Complied</p>
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Phosphate	<0.20	<0.20	<0.20	<0.20	0.2																																												

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<p>7.8.3</p>	<p>Mill effluent is treated to be in compliance with national regulations. Discharge quality of mill effluent, especially Biochemical Oxygen Demand (BOD), is regularly monitored.          - Minor compliance -</p>	<p>The effluent treatment plant was made in accordance and interview with operator in charge revealed that the operation was in accordance with standard operation procedure and legal requirements.</p> <p>a. No overflow was observed, and flow meter reading was recorded daily. The mill monitoring the effluent and submits to DOE through Online Environmental Report (OER)'.          b. Pasir Panjang Mill DOE license no 004649 was for land application requirement of which is BOD less than 1000 mg/l in Ldg Pasir Panjang field no P14.          c. The results from final discharge were compliance within parameter limit. Record was sighted and verified.</p> <table border="1" data-bbox="1137 790 1928 1283"> <thead> <tr> <th>Parameter/ Date</th> <th>6/7/2021</th> <th>3/8/2021</th> <th>6/9/2021</th> </tr> </thead> <tbody> <tr> <td>pH</td> <td>8.1</td> <td>8.1</td> <td>7.9</td> </tr> <tr> <td>BOD at 30c</td> <td>88</td> <td>94</td> <td>140</td> </tr> <tr> <td>COD</td> <td>1817</td> <td>949</td> <td>1391</td> </tr> <tr> <td>Total Solid</td> <td>7036</td> <td>3992</td> <td>5008</td> </tr> <tr> <td>Suspended Solid</td> <td>832</td> <td>460</td> <td>680</td> </tr> <tr> <td>Oil and Grease</td> <td>10</td> <td>9</td> <td>10</td> </tr> <tr> <td>AN</td> <td>213</td> <td>143</td> <td>210</td> </tr> </tbody> </table>	Parameter/ Date	6/7/2021	3/8/2021	6/9/2021	pH	8.1	8.1	7.9	BOD at 30c	88	94	140	COD	1817	949	1391	Total Solid	7036	3992	5008	Suspended Solid	832	460	680	Oil and Grease	10	9	10	AN	213	143	210	<p>Complied</p>
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AN	213	143	210																																

7.8.4	<p>Mill water use per tonne of FFB is monitored and recorded.</p> <p>- Minor compliance -</p>	<p>The mill processing water are obtained from the water catchment adjacent to the mill complex. The water usage monitoring is made on a monthly basis with the latest recording (water usage per mt in 2021 of fresh fruit bunches (FFB) below;</p> <table border="1" data-bbox="1137 507 1930 705"> <thead> <tr> <th>Year</th> <th>Water usage</th> <th>FFB produce</th> <th>Water use per tonne of FFB</th> </tr> </thead> <tbody> <tr> <td>2020</td> <td>308,315</td> <td>283,106.00</td> <td>1.09</td> </tr> <tr> <td>2021</td> <td>351,526</td> <td>298,275.19</td> <td>1.18</td> </tr> </tbody> </table>	Year	Water usage	FFB produce	Water use per tonne of FFB	2020	308,315	283,106.00	1.09	2021	351,526	298,275.19	1.18	Complied
Year	Water usage	FFB produce	Water use per tonne of FFB												
2020	308,315	283,106.00	1.09												
2021	351,526	298,275.19	1.18												

**Criterion 7.9:** Efficiency of fossil fuel use and the use of renewable energy is optimised

7.9.1	<p>A plan for efficiency of the use of fossil fuels and to optimise renewable energy is implemented, monitored and documented.</p> <p>- Minor compliance -</p>	<p>At the estates, the plan to optimize the usage of diesel is by regular maintenance of diesel-powered machinery and educational programme for the operators on fuel saving. At the mill, the utilization of fiber and shell as biofuel for boiler operation is consistently implemented to generate electricity through turbines. This helps to reduce the dependency to fossil fuel. The estates and mill record and monitor the diesel utilization over. Performance variation in view of several factors i.e. The record sampling as per below:-</p> <table border="1" data-bbox="1137 1078 1930 1283"> <thead> <tr> <th>Diesel usage/Operating unit</th> <th>Year 2020</th> </tr> </thead> <tbody> <tr> <td>Pasir Panjang POM</td> <td>106,000</td> </tr> <tr> <td>Pasir Logok Estate</td> <td>301,086</td> </tr> <tr> <td>Tunjuk Laut Estate</td> <td>290,043</td> </tr> </tbody> </table>	Diesel usage/Operating unit	Year 2020	Pasir Panjang POM	106,000	Pasir Logok Estate	301,086	Tunjuk Laut Estate	290,043	Complied
Diesel usage/Operating unit	Year 2020										
Pasir Panjang POM	106,000										
Pasir Logok Estate	301,086										
Tunjuk Laut Estate	290,043										

**Criterion 7.10:** Plans to reduce pollution and emissions, including greenhouse gases (GHG), are developed, implemented and monitored and new developments are designed to minimise GHG emissions.

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>Main sources of GHG emission identified were methane (CH) emission through POME treatment and boiler stack from the mill. Other less significant GHG emissions identified including CO, SOx and NOx from various sources including fossil fuel, chemical and fertilizer consumptions mainly from estates activities.</p> <p>The emission value is recorded and calculated through the utilisation of RSPO's Palm GHG Calculator ver. 4.</p>	Complied															
7.10.2	<p><b>(C)</b> Starting 2014, the carbon stock of the proposed development area and major potential sources of emissions that may result directly from the development are estimated and a plan to minimise them prepared and implemented (following the RSPO GHG Assessment Procedure for New Development).</p> <p>- Critical (Major) compliance -</p>	Not applicable since no new development by the certification unit.	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>In Pasir Panjang POM, they conducted stack emission monitoring and Ambient air quality to ensure the significant pollutant been control and monitored. This report also been monitored by DOE. The latest record on stack emission was on 1/12/2021, this conducted by Mareff Management Sdn Bhd. The result as per below:-</p> <table border="1" data-bbox="1137 1043 1930 1343"> <thead> <tr> <th>Parameter</th> <th>Result</th> <th>Standard</th> </tr> </thead> <tbody> <tr> <td>Stack gas velocity</td> <td>49.33 to 49.84</td> <td>-</td> </tr> <tr> <td>Particle mass flow rate</td> <td>3.18</td> <td>-</td> </tr> <tr> <td>Percent isokinetic</td> <td>94 to 106</td> <td>110</td> </tr> <tr> <td>Concentration corrected 12% CO2</td> <td>136</td> <td>150</td> </tr> </tbody> </table>	Parameter	Result	Standard	Stack gas velocity	49.33 to 49.84	-	Particle mass flow rate	3.18	-	Percent isokinetic	94 to 106	110	Concentration corrected 12% CO2	136	150	Complied
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		<p>For ambient air also been monitored dated December 2021 (report ref: PPJAmbient-12/12/21), this conducted also by Mareff Management Sdn Bhd. The result as per below:-</p> <table border="1"> <thead> <tr> <th>Parameter</th> <th>Concentration</th> <th>Standard</th> </tr> </thead> <tbody> <tr> <td>PM</td> <td>38</td> <td>100</td> </tr> <tr> <td>SO2</td> <td>0</td> <td>250</td> </tr> <tr> <td>NOx</td> <td>0</td> <td>280</td> </tr> <tr> <td>CO</td> <td>0</td> <td>30mg/m3</td> </tr> </tbody> </table> <p>From the conclusion, the Mareff Management Sdn Bhd, the record was complied with the limits of the New Malaysian Ambient Air Quality Standard (2020).</p>	Parameter	Concentration	Standard	PM	38	100	SO2	0	250	NOx	0	280	CO	0	30mg/m3	
Parameter	Concentration	Standard																
PM	38	100																
SO2	0	250																
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<b>Criterion 7.11:</b> Fire is not used for preparing land and is prevented in the managed area																		
7.11.1	<p><b>(C)</b> Land for new planting or replanting is not prepared by burning. - Critical (Major) compliance -</p>	<p>There was no new planting and replanting which prepared by burning and in lined with Sustainability handbook has described therein on Environmental Policy (signed by the Executive Director) to include the adoption of Zero Open Burning Policy dated January 2008</p>	Complied															
7.11.2	<p>The unit of certification establishes fire prevention and control measures for the areas directly managed by the unit of certification. - Minor compliance -</p>	<p>Kulim (M) Berhad has subscribed to ASEANFireAlert for the whole group estate's for aerial monitoring. FWI @ Fire Weather Index will be identified at each estate (i.e high risk area – peat soil) to monitor changes in FWI. ASEANFireAlert will trigger any changes in FWI and a notification will be sent to HQ personnel via mobile phone. Operating unit's personnel will be informed and reported to fire department for further action.</p>	Complied															
7.11.3	<p>The unit of certification engages with adjacent stakeholders on fire prevention and control measures.</p>	<p>Engagement with adjacent stakeholders was done 10/10/2021 stakeholder meeting within Complex Tunjuk Laut using Microsoft</p>	Complied															



	- Minor compliance -	Team. This meeting attended by 64 stakeholder including Semai Alam Sdn Bhd, Ladang Kumpulan Melayu Johor and etc.	
<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	<p><b>(C)</b> Land clearing since November 2005 has not damaged primary forest or any area required to protect or enhance HCVs. Land clearing since 15 November 2018 has not damaged HCVs or HCS forests.</p> <p>A historic Land Use Change Analysis (LUCA) is conducted prior to any new land clearing, in accordance with the RSPO LUCA guidance document.</p> <p>- Critical (Major) compliance -</p>	Certification Unit and supply base did not carry out any new plantings since November 2005. Therefore, this indicator is not applicable during this assessment. The immature areas are of replanted area.	Complied
7.12.2	<p><b>(C)</b> HCVs, HCS forests and other conservation areas are identified as follows:</p> <p>a) For existing plantations with an HCV assessment conducted by an RSPO-approved assessor and no new land clearing after 15 November 2018, the current HCV assessment of those plantations remains valid.</p> <p>b) Any new land clearing (in existing plantations or new plantings) after 15 November 2018 is preceded by an HCV-HCS assessment, using the HCSA Toolkit and the HCV-HCSA Assessment Manual. This will include stakeholder consultation and take into account wider landscape-level considerations.</p> <p><b>PROCEDURAL NOTE:</b> Requirement is further clarified under the Interpretation of Indicator 7.12.2 and Annex 5 (approved by BOG on 12 June 2019).</p> <p>- Critical (Major) compliance -</p>	<p>The last assessment conducted was in July 2009 for Pasir Logok and Tunjuk Laut Estates respectively. The assessment was conducted by A.J.F.M Dekker. The assessment was a Rapid Biodiversity Assessment. The report has identified the list of natural habitats that is possible present in the operating units. The report details the findings of a rapid appraisal of the biodiversity in the estates and addresses the RSPO P&amp;C relevant to biodiversity conservation and HCV. Therein being provided details relating to the following;</p> <ul style="list-style-type: none"> <li>a) General biodiversity issues</li> <li>b) Watercourses and drainage</li> <li>c) Habitats natural and man-made</li> <li>d) Wildlife</li> <li>e) Ponds and reservoirs</li> <li>f) Wetlands /watercourses</li> <li>g) Legal aspects</li> <li>h) Immediate and long-term effect.</li> </ul>	Complied

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		<p>Summary of HCV report by A.J.F.M Dekker as per the following:</p> <table border="1" data-bbox="1137 403 1915 962"> <thead> <tr> <th>Estate</th> <th>Assessment date</th> <th>HCV Identified area</th> </tr> </thead> <tbody> <tr> <td>Siang Estate</td> <td>9th July 2009</td> <td>71.11 ha with total of 10 hot spot identified with estate</td> </tr> <tr> <td>Bkt Payung estate</td> <td>4th July 2008</td> <td>293.65 ha with total of 10 hot spot identified with estate.</td> </tr> <tr> <td>Pasir Logok estate</td> <td>8<sup>th</sup>July 2008</td> <td>There are 4 HCV area in Pasir Logok Estate with total 17.4 ha</td> </tr> <tr> <td>Tunjuk Laut estate</td> <td>3<sup>rd</sup> July 2008</td> <td>There are 29.23 ha hcv in Tunjuk laut estate. this cover pond area, steep area, Buffer zone, swampy and others.</td> </tr> </tbody> </table>	Estate	Assessment date	HCV Identified area	Siang Estate	9th July 2009	71.11 ha with total of 10 hot spot identified with estate	Bkt Payung estate	4th July 2008	293.65 ha with total of 10 hot spot identified with estate.	Pasir Logok estate	8 <sup>th</sup> July 2008	There are 4 HCV area in Pasir Logok Estate with total 17.4 ha	Tunjuk Laut estate	3 <sup>rd</sup> July 2008	There are 29.23 ha hcv in Tunjuk laut estate. this cover pond area, steep area, Buffer zone, swampy and others.	
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Tunjuk Laut estate	3 <sup>rd</sup> July 2008	There are 29.23 ha hcv in Tunjuk laut estate. this cover pond area, steep area, Buffer zone, swampy and others.																
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>- Critical (Major) compliance -</p>	<p>The management plan was available in Pasir Logok estate, there are 2 term in the HCV plan. The immediate action plan and Long Term action. This included erosion control, restore natural vegetation, buffer zone management, bird survey and wildlife &amp; Habitat protection. The management plan dated 6/6/2021 was developed based on recommendation of HCV assessment report.</p> <p>Regular security patrol and sighting within the estate was carried out and finding/issue recorded by the respective estate personal/security to monitor the conservation / buffer zone areas. Monitoring and control of any illegal hunting, fishing or collecting activities was also implemented. Signage that prohibit hunting,</p>	Complied															

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		fishing and water polluting activities were verified on-site found to be satisfactorily maintained. The monitoring conducted weekly basis and last monitoring was conducted on 27/12/2021 and previously was on 20/12/2021. From the monitoring record no issue been raise or RTE been sighted.	
7.12.5	Where rights of local communities have been identified in HCV areas, HCS forest after 15 November 2018, peat land and other conservation areas, there is no reduction of these rights without evidence of a negotiated agreement, obtained through FPIC, encouraging their involvement in the maintenance and management of these conservation areas. - Minor compliance -	Not applicable since there is no land clearing after November 2005.	Not Applicable
7.12.6	All rare, threatened or endangered (RTE) species are protected, whether or not they are identified in an HCV assessment. A programme to regularly educate the workforce about the status of RTE species is in place. Appropriate disciplinary measures are taken and documented in accordance with company rules and national law if any individual working for the company is found to capture, harm, collect, trade, possess or kill these species. - Minor compliance -	Although there are RTE species identified at Pasir Logok estate and Tunjuk Laut estate, there is evidence to continuously prevent and discourage illegal or hunting, fishing or collecting activities. Signage as well as routine patrolling activities were carried out as part of the efforts to create awareness among employees about biodiversity. The latest awareness training on environmental and biodiversity was carried out on 10/10/2021 for internal stakeholders (workers) at sampling Pasir Logok estate and 15/8/2021 for Tunjuk Laut estate.	Complied

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<p>7.12.7</p>	<p>The status of HCVs, HCS forests after 15 November 2018, other natural ecosystems, peatland conservation areas and RTE species is monitored. Outcomes of this monitoring are fed back into the management plan.</p> <p>- Minor compliance -</p>	<p>Management plan is incorporated with ongoing monitoring of the status of HCV and RTE species that are affected by plantation or mill operations and reported by the Kulim SQD Team from Head Office. Outcomes of monitoring are communicated with plantation management and with management plan. HCV monitoring/patrolling records available.</p> <p>Pasir Logok Estate</p> <table border="1" data-bbox="1137 612 1921 794"> <thead> <tr> <th>Date of Monitoring</th> <th>Visited area</th> </tr> </thead> <tbody> <tr> <td>27/12/2021</td> <td>Reservoir &amp; Buffer zone Ex sand mining Swampy area</td> </tr> </tbody> </table> <p>Tunjuk Laut Estate</p> <table border="1" data-bbox="1137 842 1921 1066"> <thead> <tr> <th>Date of Monitoring</th> <th>Visited area</th> </tr> </thead> <tbody> <tr> <td>29/12/2021</td> <td>Steep area Buffer zone Pond Swampy area</td> </tr> </tbody> </table>	Date of Monitoring	Visited area	27/12/2021	Reservoir & Buffer zone Ex sand mining Swampy area	Date of Monitoring	Visited area	29/12/2021	Steep area Buffer zone Pond Swampy area	<p>Complied</p>
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<p>7.12.8</p>	<p><b>(C)</b> Where there has been land clearing without prior HCV assessment since November 2005, or without prior HCV-HCSA assessment since 15 November 2018, the Remediation and Compensation Procedure (RaCP) applies.</p> <p>- Critical (Major) compliance -</p>	<p>Not applicable since there is no land clearing after November 2005.</p>	<p>Not Applicable</p>								

**Appendix B: GHG Reporting Executive Summary**

The GHG emissions that were produced in **2021** for **Pasir Panjang POM** and supply base was calculated using the PalmGHG Calculator version 4. The assessment team had verified the data input in the PalmGHG Calculator against operations records. PalmGHG Calculation Options selected 'Full version' and 'Exclude LUC Emission' calculation option is not applied. The records verified includes:

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

The summary of the Net GHG emitted **2021** for **Pasir Panjang POM** and supply base are as following:

Emission per product	tCO <sub>2</sub> e/tProduct
CPO	0.35
PKO	0

Extraction	%
OER	22.34
KER	5.43

Production	t/yr
FFB Process	283,106.00
CPO Produced	63249.67
PKO Produced	0

Land Use	Ha
OP Planted Area	17040.84
OP Planted on peat	0
Conservation (forested)	0
Conservation (non-forested)	0
<b>Total</b>	<b>17,040.84</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	133702.67	0.48	901.63	0.40	0	0	134604.30	0.88
CO <sub>2</sub> Emission from fertilizer	12096.60	0.04	75.94	0.03	0	0	12172.54	0.07
NO <sub>2</sub> Emission	10143.55	0.04	61.98	0.03	0	0	10205.53	0.07
Fuel Consumption	5521.54	0.02	21.49	0.01	0	0	5543.03	0.03
Peat Oxidation	0	0	0	0	0	0	0	0
<b>Sink</b>								
Crop Sequestration	-126732.37	-0.45	-854.63	-0.38	0	0	-127586.99	-0.83
Conservation Sequestration	-3490.19	-0.01	0	0	0	0	-3490.19	-0.01
<b>Total</b>	<b>31241.79</b>	<b>0.11</b>	<b>206.42</b>	<b>0.09</b>	<b>0</b>	<b>0</b>	<b>31448.21</b>	<b>0.21</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	7911.23	0.03
Fuel Consumption	330.72	0
Grid Electricity Utilization	0	0
<b>Credit</b>		
Export of Grid Electricity	0	0
Sales of PKS	-11880.09	-0.04
Sales of EFB	0	0
<b>Total</b>	<b>-3638.14</b>	<b>-0.01</b>

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

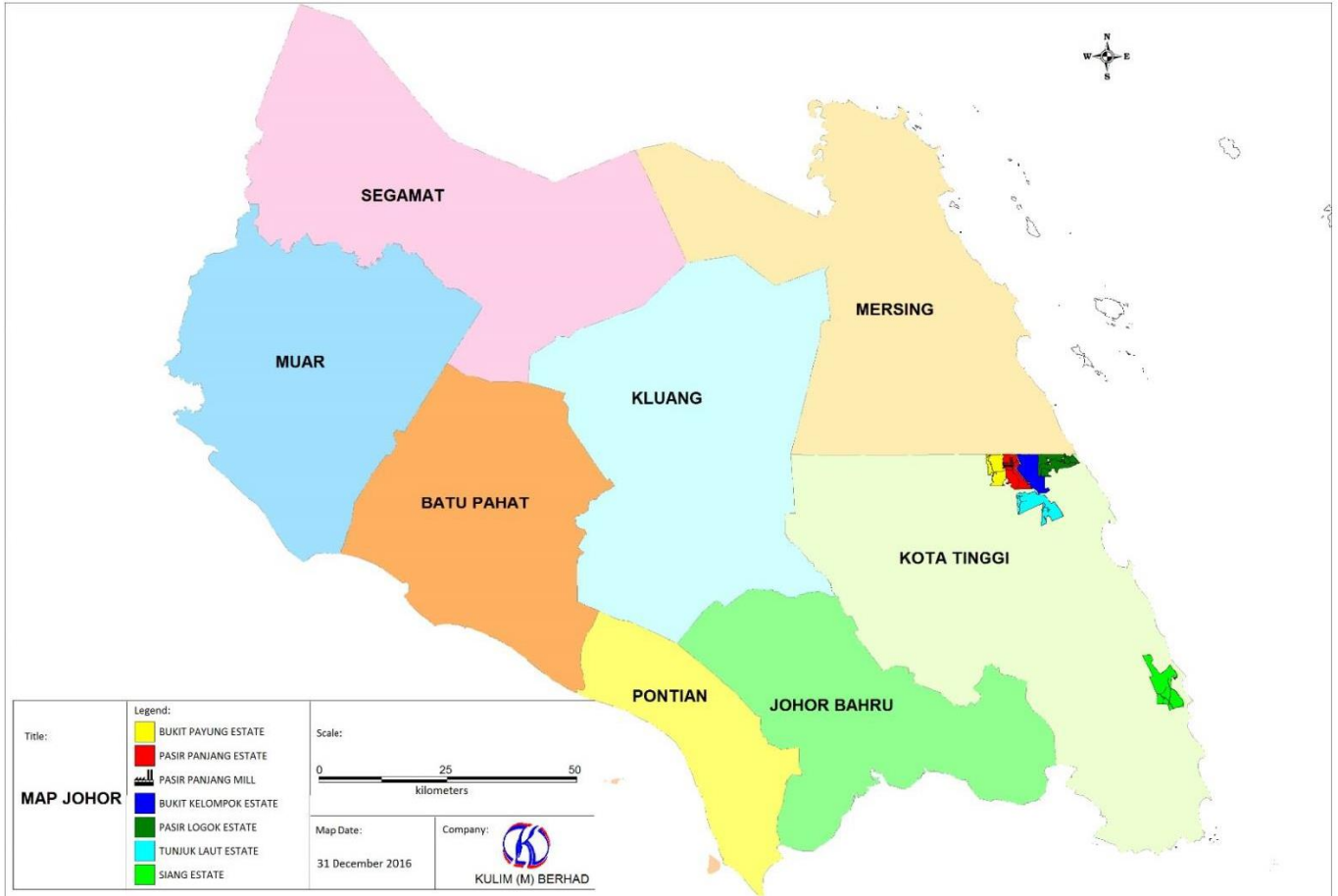
Emissions	tCO <sub>2</sub> e
PK from own mill	0
PK from other source	0
Fuel Consumptions	0
<b>Total Crusher emissions</b>	<b>0</b>

\*This mill has no kernel crusher operation.

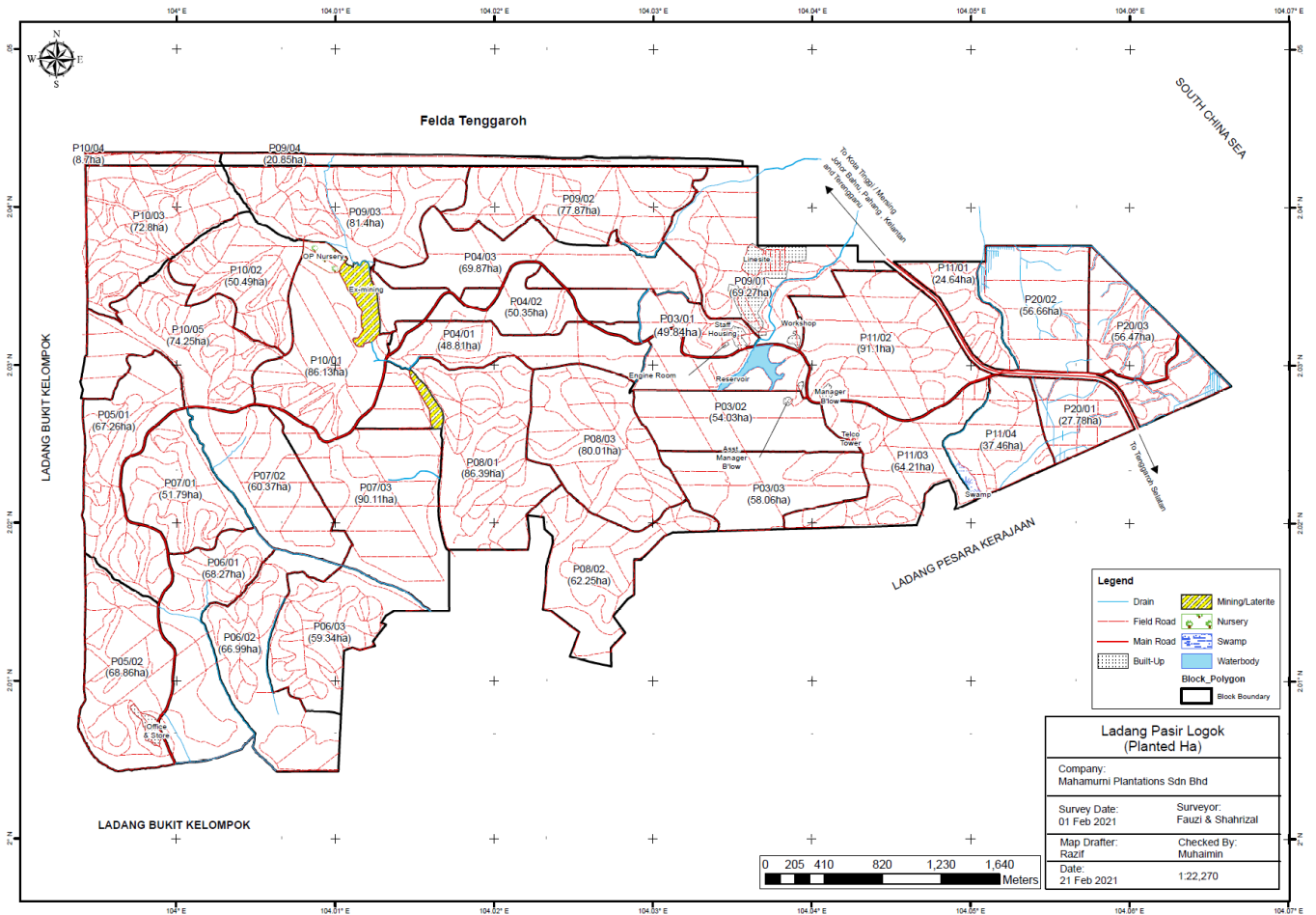
<b>Palm Oil Mill Effluent (POME) Treatment:</b>	
Divert to Compost (%)	0
Divert to anaerobic diversion (%)	100

<b>POME Diverted to Anaerobic Digestion:</b>	
Divert to anaerobic pond (%)	0
Divert to methane captured (flaring) (%)	50.04
Divert to methane captured (energy generation) (%)	49.96

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

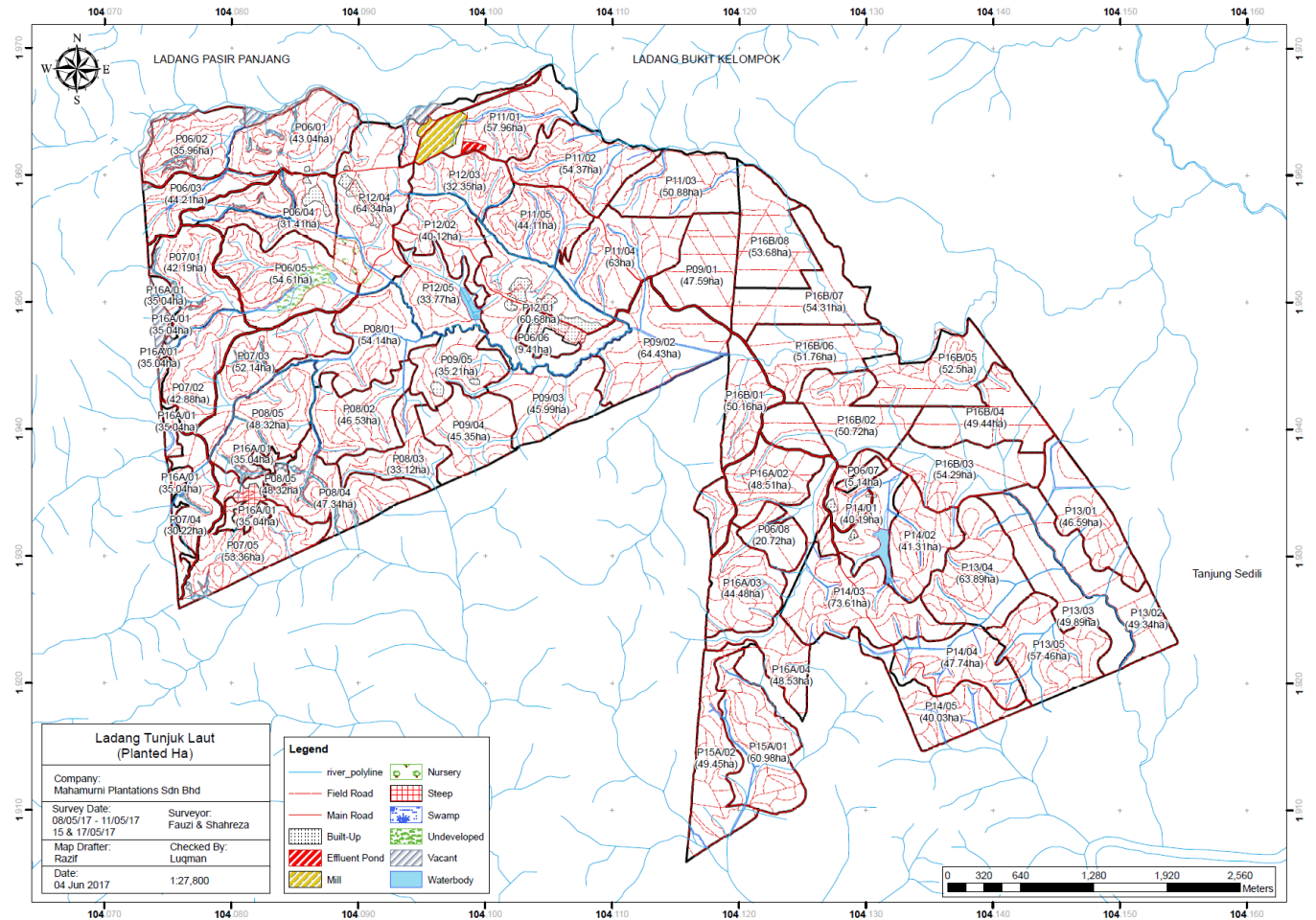


**Appendix D: Pasir Logok Estate Field Map**





**Tunjuk Laut Estate Field Map**





## Appendix F: List of Abbreviations

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