

**RSPO PRINCIPLE AND CRITERIA
PUBLIC SUMMARY REPORT**

- Initial Assessment
- Annual Surveillance Assessment (2_4)
- Recertification Assessment (Choose an item.)
- Extension of Scope

Client Company Name / Parent Company: Johor Corporation
Client Company / Parent Company Address: Level 16, Menara Komtar, Johor Bahru City Centre, 80000 Johor Bahru, Johor Darul Takzim, Malaysia
Certification Unit: Mahamurni Plantations Sdn Bhd Sedenak Palm Oil Mill
Location of Certification Unit: Lot 136, Mukim Sedenak, 81000 Kulai, Johor, Malaysia
Date of Final Report: 15/12/2022

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Section 1: Scope of the Assessment

1. Company Details			
Parent Company	Johor Corporation		
RSPO Membership Number	1-0080-09-000-00	Membership Approval Date	15/06/2009
Address	Level 16, Menara Komtar, Johor Bahru City Centre, 80000 Johor Bahru, Johor Darul Takzim		
Palm Oil Mill / Group Manager / Estate (Certification Unit)	Mahamurni Plantations Sdn Bhd - Sedenak Palm Oil Mill		
Location / Address	Lot 136, Mukim Sedenak, 81000 Kulai, Johor, Malaysia		
Website	www.kulim.com.my		
Management Representative	Salasah Elias	E-mail	salasah@kulim.com.my
Telephone	07-8611611	Facsimile	07-8631084

2. Certification Information			
Certificate Number	RSPO 537873	Certificate Start Date	23/01/2019
Date of First Certification	23/01/2009	Certificate Expiry Date	22/01/2024
Scope of Certification	Production of Palm Oil and Palm Kernel		
Visit Objectives	<p>The objective of the assessment is to Annual surveillance Audit :</p> <ul style="list-style-type: none"> To confirm that the elements of the proposed scope of registration and the management system are conforming the requirements of the assessment standard. To confirm that the organization has effectively implemented and addressed the management system. To confirm the ability of the management system is able to meet applicable statutory and regulatory, contractual requirements, organization policies and wherever are applicable. To identify areas for potential improvement of the management system(s). 		
Assessment Cycle	<input type="checkbox"/> Pre Assessment (Choose an item.) <input type="checkbox"/> Initial Assessment <input checked="" type="checkbox"/> Annual Surveillance Assessment (ASA 2_4) <input type="checkbox"/> Recertification Assessment (Choose an item.) <input type="checkbox"/> Scope Extension		
Applicable Standards / Normative Reference	RSPO Certification System for P&C and RSPO ISH 2020 <input type="checkbox"/> Choose an item. <input checked="" type="checkbox"/> Malaysia National Interpretation 2019 for RSPO P&C 2018 for the Production of Sustainable Palm Oil		
Supply Chain Module	<input type="checkbox"/> Identity Preserved; <input checked="" type="checkbox"/> Mass Balance	Mill Capacity	90 ton/ hour

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ISH certification Phase	<input type="checkbox"/> Eligibility <input type="checkbox"/> Milestone A <input type="checkbox"/> Milestone B <input checked="" type="checkbox"/> Not Applicable		
Is this a remote audit or on-site audit	<input checked="" type="checkbox"/> On-site audit (Option AI)	<input type="checkbox"/> On-site audit (Option AII)	<input type="checkbox"/> Remote audit (Option B)

3. Other Certifications			
Certificate Number	Standard(s)	Certificate Issued by	Expiry Date
MSPO 697948	MS 2530-3:2013 Malaysian Sustainable Palm Oil (MSPO) Part 3: General Principles for Oil Palm Plantations and Organized Smallholders	BSI Services (Malaysia) Sdn. Bhd.	29/03/2024
MSPO 697947	MS 2530-4:2013 Malaysian Sustainable Palm Oil (MSPO) Part 4: General Principles for Palm Oil Mills	BSI Services (Malaysia) Sdn. Bhd.	29/03/2024
BVC-MSPO/SC-0027	MSPO Supply Chain Certification Standard (MSPO SCCS)	Bureau Veritas Certification	10/03/2025
A158820	MS 1500:2009	JAKIM	15/09/2023
EU-ISCC-Cert-DE119-60222022	ISCC EU	ASG Cert GmbH	24/04/2023
EU-PLUS-Cert-60222022	ISCC PLUS	ASG Cert GmbH	24/04/2023

4. Location(s) of Mill & Supply Bases			
Name (Mill / Supply Base / Group Manager / Smallholders)	Location	GPS Coordinates	
		Latitude	Longitude
Sedenak Palm Oil Mill	Lot 136, Mukim Sedenak, 81000 Kulai, Johor, Malaysia	1° 43' 47.41" N	103° 32' 21.97" E
Sedenak Estate	Lot 136, Mukim Sedenak, 81000 Kulai, Johor, Malaysia	1° 42' 48.79" N	103° 31' 36.24" E
Kuala Kabong Estate	PTD 35021, HSD 71140, Mukim Bukit Batu, Daerah Kulai, Johor, Malaysia	1° 41' 20.10" N	103° 26' 00.87" E

5. Description of Supply Base					
New Planting Development	<input checked="" type="checkbox"/> No (no change in total planted area) <input type="checkbox"/> Yes (please refer to Principle 7 for details)				
Estate / Smallholders	Total Planted (Mature + Immature) (ha)	HCV (ha)	Infrastructure & Other (ha)	Total Area (ha)	% of Planted
Sedenak Estate	2,617.47	26.39	164.14	2,808.00	93.22

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Kuala Kabong Estate	1,622.70	12.01	83.61	1,718.32	94.43
Total	4,240.17	38.4	247.75	4,526.32	93.68

6. Plantings & Cycle						
Estate / Smallholders	Age (Years) - ha				Mature	Immature
	0 - 3	4 - 14	15 - 25	>25		
Sedenak Estate	214.37	303.27	1,178.55	921.28	2,403.10	214.37
Kuala Kabong Estate	0.00	0.00	1,622.7	0.00	1,622.70	0.00
Total (ha)	214.37	303.27	2,801.25	921.28	4,025.80	214.37

Note: Only Mature area is considered as production area

7. Summary of Certified Tonnage of FFB (Own Certified Scope)				
Estate / Smallholders	Tonnage (MT) / year			
	Estimated last year (Jan 2022 – Dec 2022)	Actual (Nov 2021 – Aug 2022)		Forecast (Jan 2023 – Dec 2023)
		Previous license period (Nov 2021 – Mar 2022)	Current license period (Apr 2022 – Aug 2022)	
Sedenak Estate	57,827.00	17,708.58	14,741.75	54,203.00
Kuala Kabong Estate	26,458.00	7,666.89	6,616.80	25,160.00
Total	84,285.00	46,734.02		79,363.00

8. Summary of Certified Tonnage of FFB (from other certified unit(s))				
Estate / Smallholders	Tonnage (MT) / year			
	Estimated last year (Jan 2022 – Dec 2022)	Actual (Nov 2021 – Aug 2022)		Forecast (Jan 2023 – Dec 2023)
		Previous license period (Nov 2021 – Mar 2022)	Current license period (Apr 2022 – Aug 2022)	
Basir Ismail Estate		10,530.87	0.00	
Ulu Tiram Estate		1,544.05	0.00	
Siang Estate		2,894.11	64.34	
Bukit Layang Estate		1,461.62	1,978.48	
Sungai Papan Estate		108.00	934.17	
REM Estate		0.00	1,454.67	
Total		20,970.31		

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9. Summary of Non-Certified Tonnage of FFB (outside supplier – excluded from certificate)				
Out growers / smallholders	Tonnage (MT) / year			
	Estimated last year (Jan 2022 – Dec 2022)	Actual (Nov 2021 – Aug 2022)		Forecast (Jan 2023 – Dec 2023)
		Previous license period (Nov 2021 – Mar 2022)	Current license period (Apr 2022 – Aug 2022)	
3 rd Party FFB Supplier	308,422.00	98,064.64	112,935.56	357,256.00
Total	308,422.00	211,000.20		357,256.00

9A. Monthly Records of Certified and Uncertified FFB Received since the last audit				
No.	Month - Year	Volume of FFB from certified supply base (mt)	Volume of FFB from uncertified supply base (mt)	Total FFB/Month (mt)
1	Nov 2021	13,627.51	18,117.41	32,376.61
2	Dec 2021	13,228.72	16,550.69	30,242.21
3	Jan 2022	5,784.990	19,358.43	25,577.21
4	Feb 2022	4,809.790	22,551.43	27,906.01
5	Mar 2022	4,463.110	21,486.68	26,570.27
6	Apr 2022	4,482.530	19,388.74	24,754.59
7	May 2022	4,984.720	23,975.17	29,863.71
8	Jun 2022	7,343.100	29,069.21	37,431.46
9	Jul 2022	3,827.830	17,036.76	21,436.55
10	Aug 2022	5,152.030	23,465.68	30,305.67
TOTAL		67,704.33	211,000.20	286,464.29

10. Summary of Certified Tonnage (MT) (not applicable for ISS)				
Estimated last year (Jan 2022 – Dec 2022)	Actual (Nov 2021 – Aug 2022)		Forecast (Jan 2023 – Dec 2023)	
	Previous license period (Nov 2021 – Dec 2021)	Current license period (Jan 2022 – Aug 2022)		
FFB	FFB		FFB	
84,285.00 mt	26,856.23 mt	40,848.10 mt	79,363.00 mt	
	TOTAL	67,704.33 mt		
CPO (OER: 21.70 %)	CPO (OER: 18.83 %)		CPO (OER: 24.40 %)	
18,289.85 mt	5,504.96 mt	8,011.26 mt	19,353.00 mt	
	TOTAL	13,516.22 mt		

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PK (KER: 5.40 %)	PK (KER: 4.98 %)		PK (KER: 6.95 %)
4,551.39 mt	1,429.31 mt	2,142.92 mt	5,513.00 mt
	TOTAL	3,572.23 mt	

10A. Monthly Records of Certified CPO & PK since the last audit			
No.	Month - Year	Certified CPO (MT)	Certified PK (MT)
1	Nov 2021	2,782.41	724.44
2	Dec 2021	2,722.55	704.87
3	Jan 2022	1,167.66	302.57
4	Feb 2022	930.87	255.77
5	Mar 2022	856.80	240.85
6	Apr 2022	884.31	246.37
7	May 2022	983.52	259.16
8	Jun 2022	1,451.67	356.98
9	Jul 2022	744.85	203.22
10	Aug 2022	991.58	278.00
	TOTAL	13,516.22	3,572.23

11. Summary of Actual Volume sold					
Current License period (Apr 2022 – Aug 2022)					
	RSPO Certified	Other Schemes Certified		Conventional	Total
		ISCC	Others		
CPO (MT)	693.40	0	0	3,909.38	4,602.78
PK (MT)	962.86	0	0	348.69	1,311.55
Credits	0.00	0.00	0.00	0.00	0.00
Previous License period (Nov 2021 – Mar 2022)					
CPO (MT)	583.22	2,162.72	0.00	5,714.35	8,460.29
PK (MT)	2,171.53	0.00	0.00	56.97	2,228.50
Credits	7,234.00	0.00	0.00	0.00	7,234.00
Note:					
Conventional is RSPO certified material but sold as non-RSPO.					

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11A. Records of Certified CPO & PK Sold under PalmTrace since the last audit (if any)				
No.	Buyers Name	PalmTrace Trading License Number	Certified CPO Sold (MT)	Certified PK Sold (MT)
1	ABC	TR-b9682b54-d783	273.32	
2		TR-9cfe2dac-a7ff	205.35	
3		TR-99486170-faaa	104.55	
4		TR-9f3ef1f4-9a10	500.86	
5		TR-07bb7b89-57e4	192.54	
6	CDE	TR-c9a9bf21-e304		258.21
7		TR-9a682b98-744b		480.47
8		TR-8fed689f-968f		313.24
9		TR-ab2b8a1b-7391		120.64
10		TR-c61ddacb-ac12		115.32
11		TR-c61a2b04-d6e3		70.61
12		TR-e214b5f3-05b1		239.25
13		TR-6d91dc4f-839c		192.10
14		TR-fcd2814b-59a2		7.90
15		TR-42711daf-18aa		184.45
16		TR-e8d0506a-c1fd		15.55
17		TR-7831a3b5-cc67		173.79
18		TR-9d340bf8-037b		26.21
19		TR-a8da03fc-bdb7		200.00
20		TR-ebd304ca-13d5		200.00
21		TR-199b7dc5-d117		197.61
22		TR-93633b24-b082		2.39
23		TR-e98ac875-1da8		190.66
24		TR-14efd78c-7499		9.34
TOTAL			1,276.62	2,997.74

11B. Records of certified CPO & PK Sold under other schemes since the last audit (if any)				
No.	Buyers Name	Scheme Name	Certified CPO Sold (MT)	Certified PK Sold (MT)
1	ABC	ISCC	2,162.72	0.00
TOTAL			2,162.72	0.00

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11C. Records of CPO & PK Sold as conventional since the last audit (if any)			
No.	Buyers Name	CPO Sold (MT)	PK Sold (MT)
1.	ABC	9,623.73	405.66
TOTAL		9,623.73	405.66

11D. Records of Certified CPO Sold under RSPO Credits since the last audit (if any)			
No.	Buyers Name	PalmTrace Trading License Number	RSPO Credits of Certified CPO Sold
1	ABC	-	7,234.00
TOTAL			7,234.00

12. Independent Smallholders Certified Tonnage (MT) / Volume									
Phase	Estimated last year (key in period)			Actual (key in period)			Forecast (key in period)		
	Eligibility	MS A	MS B	Eligibility	MS A	MS B	Eligibility	MS A	MS B
	40%	70%	100%	40%	70%	100%	40%	70%	100%
FFB			N/A			N/A			N/A
IS-CSPO	N/A	N/A		N/A	N/A		N/A	N/A	
IS-CSPKO	N/A	N/A		N/A	N/A		N/A	N/A	
IS-CSPKE	N/A	N/A		N/A	N/A		N/A	N/A	
CSPK	N/A	N/A		N/A	N/A		N/A	N/A	

12A. Monthly Records of Certified CPO, PK & PKE (equivalent) produced since the last audit						
No.	Month - Year	FFB (MT)	Certified CPO (MT)	Certified PK (MT)	Certified PKO (MT)	Certified PKE (MT)
1	Nov 2021	13,627.51	2,782.41	724.44	0.00	0.00
2	Dec 2021	13,228.72	2,722.55	704.88	0.00	0.00
3	Jan 2022	5,784.990	1,167.66	302.57	0.00	0.00
4	Feb 2022	4,809.790	930.87	255.77	0.00	0.00
5	Mar 2022	4,463.110	856.80	240.85	0.00	0.00
6	Apr 2022	4,482.530	884.31	246.37	0.00	0.00
7	May 2022	4,984.720	983.52	259.16	0.00	0.00
8	Jun 2022	7,343.100	1,451.67	356.98	0.00	0.00
9	Jul 2022	3,827.830	744.85	203.22	0.00	0.00

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10	Aug 2022	5,152.030	991.58	278.00	0.00	0.00
TOTAL		67,704.33	13,516.22	3,572.24		0.00
Note: 1 mt = 1 credit						

13. Independent Smallholders Actual Sold Tonnage / Volume							
	FFB	FFB Conventional	FFB Other schemes	IS-CSPO	CSPK	IS-CSPKO	IS-CSPKE
Current License period (key in period)							
Credits				N/A	N/A	N/A	N/A
Physical	N/A	N/A	N/A				
Previous License period (key in period)							
Credits				N/A	N/A	N/A	N/A
Physical	N/A	N/A	N/A				

13A. Records of Certified FFB, CPO, PK & PKE (including credits) sold since the last audit							
No.	Buyers Name	PalmTrace Trading License Number	FFB Sold (MT)	Certified CPO Sold (MT/credit)	Certified PK Sold (MT/credit)	Certified PKO Sold (MT/credit)	Certified PKE Sold (MT/credit)
1	N/A	N/A	N/A	N/A	N/A	N/A	N/A
TOTAL			N/A	N/A	N/A	N/A	N/A

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.

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Representative: Dr. Chaiyaporn Seekao (Chaiyaporn.Seekao@bsigroup.com)

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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 **26 – 29/09/2022**. The audit programme is included as Section 2.3.

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

The Critical NC close out on-site assessment was conducted on **01/12/2022**. The audit programs are included in Section 2.3.

The methodology for collection of objective evidence included physical site inspections, observation of tasks and processes, interviews of staff, workers and their families and external stakeholders, review of documentation and monitoring data. 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.

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.

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.

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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 (Recertification 2)	Year 2 (ASA 2_1)	Year 3 (ASA 2_2)	Year 4 (ASA 2_3)	Year 5 (ASA 2_4)
Sedenak Palm Oil Mill	√	√	√	√	√
Sedenak Estate	√	√	√	√	√
Kuala Kabong Estate	√	√	√	√	√

Tentative Date of Next Visit: September 4, 2023 - September 7, 2023

Total Number of Mandays: 10 Mandays

2.2 BSI Assessment Team

Name	Role	Competency
Muhammad Fadzli Masran (MFM)	Team Leader	<p>Education: Holds a Bachelor Degree in Forestry Science, University Putra Malaysia</p> <p>Work Experience: He has more than 10 years working experience in palm oil estate as Assistant Manager managing operations and sustainability implementation experience including workers’ welfare, workers’ occupational, health & safety, environment conservation and protection at buffer areas and continuous improvement management plans. He involved in internal auditing on ISO9001 and ISO14001 standards at Kulim Plantations.</p> <p>Training attended: He has completed ISO IMS 9001, 14001, 45001 (OHS 18001) Lead Auditor Course in April 2018, endorsed RSPO Lead Auditor Course in July 2018, MSPO Lead Auditor Course in October 2018, endorsed RSPO Supply Chain Certification training course in January 2019, MSPO Supply Chain Certification System (SCCS) Auditor training Course (MPOCC Endorsed), CQI and IRCA Certified ISO 9001:2015 Lead Auditor Training Course in April 2019, HCV and GIS Training in November 2019 and SMETA Requirements Training in April 2021.</p> <p>Aspect covered in this audit: Economic management plan, mill best practices, estate best practices, Legal Requirements, land & Legal issue, Occupation Health Safety requirement, HIRARC, training, and RSPO supply chain requirements.</p> <p>Language proficiency: Fluent in in Bahasa Malaysia and English.</p>

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<p>Hafriazhar Mohd Mokhtar (HMM)</p>	<p>Team Member</p>	<p>Education: Holds a Bachelor of Engineering (Hons.) Chemical Engineering, University Technology Malaysia</p> <p>Work Experience: He has 20 years of working experience in multiple engineering disciplines emphasized on science, technology and sustainability. He acquired many skills from being involved in various industrial environments ranging from construction, plantation and mining before auditing. In summary, his started his career as Environmental Officer (2002-2003) in construction, Mill Engineer (2003-2008) in palm oil mill, Project Control Engineer (2008-2011) in mining and Auditor (2011-present) with accredited certification bodies.</p> <p>Training attended: He has completed Social Auditing & SMETA Training, HCV & HCS Introductory Training, ISO 45001 LA Training, MSPO LA Training, Endorsed RSPO SCCS LA Training, Endorsed RSPO P&C LA Training, ISO 9001 LA Training, ISO 50001 LA Training, and ISO 14001 LA Training</p> <p>Aspect covered in this audit: Policy and commitment, Social requirements, contract agreement, human rights, workers' welfare, smallholder welfare, Stakeholder Consultation RSPO supply chain requirements.</p> <p>Language proficiency: Fluent Bahasa Malaysia and English.</p>
<p>Nor Halis bin Abu Zar (NHAZ)</p>	<p>Team Member</p>	<p>Education: Bachelor of Science, Plantation Technology and Management, graduated from Universiti Teknologi Mara in 2012.</p> <p>Work Experience: He started his career as Assistant Manager at Kulim Plantations Sdn. Bhd. managing the day to day plantation operations. In his career at Kulim Plantation. He had accumulated more than 6 years of sustainability implementation experience. He is a qualified Lead Auditor for MS2530:2013 and has accumulated more than 400 audit days throughout his current career as the auditor for multiple disciplines covering Malaysia.</p> <p>Training attended: He has completed ISO IMS 9001 and 14001 Lead Auditor Course in January 2019, MSPO 2530:2013 Lead Auditor Course in February 2019, Endorsed RSPO Lead Auditor Course in October 2020, CQI and IRCA Certified ISO 45001 Lead Auditor Course in June 2021, ISO 9001:2015 Lead Auditor Course in April 2019, MSPO SCCS Auditor in February 2019 and also trained in SMETA Requirement Training on May 2021</p> <p>Language proficiency: Fluent Bahasa Malaysia and English.</p> <p>Aspect covered in this audit: Environment responsibility, natural and biodiversity conservation, Waste management, GHG, HCV, and environment impact assessment and management plan. Fluent in English.</p>
	<p>Peer Reviewer</p>	<p>Education:</p>

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		N/A Work Experience: N/A Training attended: N/A
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Accompanying Persons:

Name	Role
Valence Shem (VS)	Qualifying Reviewer

2.3 Assessment Plan

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

Assessment visit

Date	Time	Subjects	MFM	HMM	NHAZ
Sunday, 25/09/2022	PM	Auditors travel to Johor Bahru	√	√	√
Monday, 26/09/2022 Sedenak Estate	0900 - 0930	Opening meeting: <ul style="list-style-type: none"> Opening presentation by audit team leader Confirmation of assessment scope and finalize audit plan (including stakeholder's consultation) 	√	√	√
	0930 - 1300	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. Meeting with stakeholders (Government, village rep, smallholders, Union Leader, contractor etc.)	√	√	√
	1300 - 1400	Lunch break	√	√	√
	1400 - 1630	Document review P1 – P7: (General Documentation e.g. Legal, Manual and Procedure, production & monitoring records, IPM & HCV records, SEIA documents & records, OSH records, review pay documents, records of communication with stakeholder/workers representatives, new planting, CIP and implementation & etc.)	√	√	√
	1630 - 1700	Interim closing briefing	√	√	√

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Date	Time	Subjects	MFM	HMM	NHAZ
Tuesday, 27/09/2022 Kuala Kabong Estate	0900 - 1300	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. Meeting with stakeholders (Government, village rep, smallholders, Union Leader, contractor etc.)	√	√	√
	1300 - 1400	Lunch break	√	√	√
	1400 - 1630	Document review P1 – P7: (General Documentation e.g. Legal, Manual and Procedure, production & monitoring records, IPM & HCV records, SEIA documents & records, OSH records, review pay documents, records of communication with stakeholder/workers representatives, new planting, CIP and implementation & etc.)	√	√	√
	1630 - 1700	Interim closing briefing	√	√	√
Wednesday 28/09/2022 Sedenak POM	0900 - 1300	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. Meeting with stakeholders (Government, village rep, smallholders, Union Leader, contractor etc.)	√	√	√
	1300 - 1400	Lunch	√	√	√
	1400 - 1630	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.	√	√	√
	1630 - 1700	Audit team discussion & preparation for closing meeting	√	√	√
	1700 - 1730	Closing briefing	√	√	√
Thursday 29/09/2022 Sedenak POM	0900 - 1130	RSPO SCC general requirements, internal audit, management review, sales and purchasing documents, mass balance accounting and other relevant documents and records.	√	√	
	1130 - 1200	Audit team discussion & preparation for closing meeting	√	√	
	1200 - 1245	Closing briefing	√	√	

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Major NC Close Out Visit

Date	Time	Subjects	MFM
Wednesday 30/11/2022	PM	Auditor Travelling	√
Thursday 01/12/2022	09.00 – 09.15	Opening Meeting: Opening Presentation by Audit team leader. Confirmation of assessment scope and finalize Audit plan	√
	09.00 – 12.00	Verification on previous Major NC: 1. 2253186-202209-M1 a. Site observation ,workers interview (individual and group session) if necessary b. Document review – implemented evidence	√
	12.00 – 13.00	Closing Meeting	√
	13.00	Auditor travel back	√

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?	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? If no, has RSPO Secretariat approval obtained? Was the submission according to the template as announced by the RSPO Secretariat on 21/12/2021	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 2025.	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. If no, has RSPO Secretariat approval obtained? Was the submission according to the template as announced by the RSPO Secretariat on 21/12/2021.	There have not been any new acquisitions.	Complied
Any deviations from the maximum periods requires approval by the RSPO Secretariat.	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 has no any changes to the time-bound plan since the last audit. This is consistent with the RSPO ACOP reporting. https://document.rspo.org/2021/Johor_Cooperation_ACOP2021.pdf	Complied
Have there been any isolated lapses in implementation of the plan? If yes a Minor 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 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 Major non-compliance shall be raised	There has been no fundamental failure to proceed with the implementation of the plan.	Complied
Un-Certified Units or Holdings		
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.	There is no new plantings that replace primary forest.	Complied
Any new plantings since January 1 st 2010 shall comply with the RSPO New Plantings Procedure.	There are no new plantings since January 1st 2010.	Complied
Any Land conflicts are being resolved through a mutually agreed process, such as RSPO Complaints	No land conflict under all certification units as verified through RSPO RaCP tracker.	Complied

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System or Dispute Settlement Facility, in accordance with RSPO P&C criteria 4.4, 4.5, 4.6, 4.7 and 4.8.		
Any Labor disputes are being resolved through a mutually agreed process, in accordance with RSPO P&C criterion 4.2	There is No labour dispute.	Complied
Any Legal non- compliance is being addressed through measures consistent with the requirements of RSPO P&C criteria 2.1	There is No legal non-compliance.	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.	No internal audit have been conducted for uncertified estates in Indonesia following resolutions by Board of Director of Kulim to disposal of Palm Oil Plantations Asset at Indonesia (SUMSEL).	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?	Not applicable	Complied
Have there been any stakeholder (including NGO) consultation conducted?	Not applicable	Complied

3.2 Progress of scheme smallholders and/or outgrowers

Progress of scheme smallholders or outgrowers towards compliance with relevant standards		
Requirement	Remarks	Compliance
Has 100% of scheme smallholders and/or scheme outgrowers comply with the standard within three years of the mill's initial certification? OFI shall be raised if after one year where 100% of the scheme smallholders and scheme outgrowers are not in compliance, a minor NC after two years, and a major NC if this requirement is not met after three years.	Not applicable as there are no scheme smallholders or scheme outgrowers under the certification unit.	Complied

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Approved Time Bound Plan

Time Bound Plan for 100% Own Certified FFB

Project	Estate	Plan
Indonesia	PT RAJ	Kulim Malaysia Berhad had completed the acquisition in 2016. The rehabilitation was done for 3 years and completed in 2019. Kulim Malaysia Berhad has agreed to proceed with Sales and Purchase Agreement ("SPA") to dispose two oil palm plantation assets in South Sumatera, Indonesia during special BOD meeting held on 20 th October 2021. RSPO certification Time Bound Plan (TBP) was initially scheduled for completion in 2023 - application to revise the TBP from 2023 to 2025 has been approved by RSPO secretariat on 20 April 2022.
	PT TPR	
Kulim Estate	Bukit Layang Estate	Certified RSPO in 2020
Trader	Eng Lee Heng	Certified RSPO in 2020 under Wild Asia Sdn. Bhd (Wild Asia Group Scheme)

List of Estate Managed by KULIM				
Mill Base	Estate	Estate	Status	Remarks
Tereh Palm Oil Mill		Tereh selatan	Certified RSPO in March 2009	The total number of our Operating Units are now been reduced to 21 due to merger exercise between the following estates marked * that took effect from 01 January 2021. 1. Selai & Enggang 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 & Sepang Loi under the name of Mungka Estate 5. Palong & Kemedak under the name of Palong Estate
		Tereh utara		
		Sg. Tawing		
		Rengam		
		*Selai		
		*Enggang		
		*Mutiara		
		*Sg. Sembrong		

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		Wawasan		<p>6. Pasir Panjang & Bukit Payung under the name of Pasir Panjang Estate</p> <p>**The SINDORA POM supply bases been changed, to add in the following supply bases :</p> <ol style="list-style-type: none"> 1. Basir Ismail Estate 2. Ulu Tiram Estate
		Felda Paloh		
Sindora Mill	Kulim Estate	Sindora		
		Sungai Papan		
		**Basir Ismail		
		*Rem		
		* **Ulu Tiram		
		Sedenak		
Sedenak Mill		Kuala Kabong		
Palong Mill		Umac		
		Labis Bahru		
		*Mungka		
		*Sepang Loi		
		*Palong		
		*Kemedak		
Pasir Panjang Mill		*Pasir Panjang	Certified RSPO in March 2017	
		*Bukit Payung		
		Siang		
		Bukit Kelompok		
		Tunjuk Laut		

		Pasir Logok		
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3.3 Details of Nonconformities

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

During this Assessment there were one (1) Critical; one (1) Minor nonconformities and no Opportunity For Improvement raised. The Sedenak Palm Oil mill and Supply base Certification unit submitted Corrective Action Plans for the nonconformity. Corrective action plans with respect to the nonconformity was reviewed by the BSI audit team and accepted.

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

Non-conformity			
NCR Ref #	2253186-202209-M1	Issued Date	29/09/2022
Due Date	27/12/2022	Closure Date	01/12/2022
Indicator & Category (Critical / Minor)	6.7.3 - Major		
Statement of Nonconformity:	The workers awareness on the importance of PPE usage and management monitoring on the PPE usage was not effectively implemented.		
Requirement Reference:	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.		
Objective Evidence:	<p>Sedenak Estate</p> <p>The estate has provided all the workers with appropriate PPE as per Safety work procedure established.</p> <p>Sighted during travelling from mill to the estate office pass by field P06, it was noted that a harvester was carrying harvesting equipment on motorbike without sickle cover and safety helmets.</p> <p>Sighted during travelling from mill to the furrow (field P04/1), it was noted that 3 harvesters were not wearing safety helmets during harvesting at P98/1.</p> <p>This was against the Safety Operation Procedure for FFB Harvesting. Refer SOP no. KULIM/PKS/OSH-1, rev. 1 dated 01/03/2021.</p>		
Corrections:	Refresher training had been conducted for 3 harvesters were not wearing PPE on 3/10/2022. In this training, we brief the importance of personal protective equipment (PPE) during harvesting operations and how to carry harvesting equipment on a motorcycle.		
Root Cause Analysis:	Lack of monitoring by estate management and inadequate of training on the importance of PPE usage among the harvester.		
Corrective Actions:	<ol style="list-style-type: none"> 1. Refresher training will be conducted every 3 months for all workers as per training plan. 2. Random weekly inspection by field staff in estate during working hours, and the respective workers without appropriate PPE will not allowed to work as per 		

	<p>checklist. The respective reluctant workers will be recorded to monitor their PPE usage compliance.</p>
Assessment Conclusion:	<p>Major NC verification visit:</p> <ol style="list-style-type: none"> 1. The estate has conducted training on PPE awareness during harvesting operation and carrying harvesting equipment on motorcycle during changes of harvesting area. Reviewed the attendance list, training material, and training evaluation records for training conducted on 03/10/2022. 2. The estate has reviewed the training plan and included the PPE awareness training to be conducted every 3 months. 3. The estate has conducted PPE awareness training to all workers. Reviewed the latest training conducted on 15/10/2022. 4. The estate continuously conducted briefing on the PPE awareness. Reviewed the muster briefing records book FY 2022. reviewed latest briefing on PPE awareness dated 13/10/2022 The estate conducted PPE inspection at the workplace on weekly basis at random day. Reviewed the PPE inspection records as follows: <ol style="list-style-type: none"> a. H05 dated 25/11/2022, 18/11/2022, 21/10/2022 b. H40 dated 15/11/2022, 04/10/2022, 08/11/2022 c. G28 dated 29/11/2022, 15/11/2022, 08/11/2022 5. Noted during interview with workers, noted the satisfactory understanding on the PPE awareness. <p>Based on the site verification documented evidences provided, the CAP verified to be sufficient to address the Major NC. Hence, Major NC closed on 01/12/2022.</p>

Non-conformity			
NCR Ref #	2253186-202209-N1	Issued Date	29/09/2022
Due Date	Next Assessment	Closure Date	Next Assessment
Indicator & Category (Critical / Minor)	7.3.2 – Minor		
Statement of Nonconformity:	The procedures of labelling Schedule Waste generated was not effectively demonstrated		
Requirement Reference:	Proper disposal of waste material, according to procedures that are fully understood by workers and managers, is demonstrated.		
Objective Evidence:	<p>Sedenak Estate</p> <p>Training on schedule waste has been conducted on 10/07/2022 at Sedenak Estate. Latest disposal has been conducted on 14/04/2022 and 28/06/2022.</p> <p>However, during site visit at Schedule Waste Store and document verification at Sedenak Estate, it was found that Labelling for SW409 (Plastic Pesticide Container) that generated on 10/05/2022 was labelled with Inflammable Liquid Waste (Label 1) instead of Toxic Substance (Waste) (Label 8). It was not in line with Environmental Quality (Scheduled Wastes) Regulations 2005 Section 10 Labelling Of Schedule Waste (2) Containers of scheduled wastes shall be clearly labelled in accordance with the types applicable to them as specified in the Third Schedule and marked with the scheduled waste code as specified in the First Schedule for</p>		

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	identification and warning purposes. Other reference was Guidelines for Packaging, Labelling and Storage of Scheduled Wastes in Malaysia, Third Schedule, Labelling Requirement For Schedule Waste.
Corrections:	<ol style="list-style-type: none"> 1. Flammable labels were immediately changed to toxic labels during the audit. 2. Refresher training had been conducted for store operator on 3/10/2022. In this training, the test was given to make sure the operator understands the training given. 3. SID will provide the scheduled waste code and description of each generated SW label are displayed at the scheduled waste store for easy reference by the SW operator.
Root Cause Analysis:	Inadequate monitoring over SW management plan by estate management
Corrective Actions:	<ol style="list-style-type: none"> 1. Monthly Monitoring by estate management to ensure all label was appropriately in place. 2. A CEP SWAM course was arranged by HCMD on 20th – 24th November 2022 for Assistant Manager En Bussra as SW Personnel.
Assessment Conclusion:	The effectiveness on the CAP implementation will be assessed during next assessment.

Opportunity for Improvements	
OFI #	Description
OFI 1	N/A

Positive Findings	
PF #	Description
PF 1	Good commitment from the management teams on the documentation and preparation of the audit
PF 2	Good data upkeep and record at Kuala Kabong clinic
PF 3	Good housekeeping at the housing area
PF 4	Positive feedbacks from external stakeholders

3.3.1 Status of Nonconformities Previously Identified and Observations

Non-conformity			
NCR Ref #	2139646-2021111-M1	Date Issued	02/12/2021
Due Date	01/03/2022	Date of nonconformity Closure	13/02/2022
Clause & Category (Critical / Minor)	3.3.2 - Critical – Reoccurrence of Minor		
Statement of Nonconformity:	The implementation of procedures was not comprehensively checked in the operating units.		

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Requirement Reference:	A mechanism to check consistent implementation of procedures is in place.
Objective Evidence:	<ul style="list-style-type: none"> a. Ladang Basir Ismail; Standard Operating Procedure; Lubricant & Petrol Store; No.4. Semua bahan kimia hendaklah disimpan didalam bekas yang betul. During the site visit it was noticed that unlabelled plastic bottles were used to store lubricants on the tractor. b. Work Instruction: General Store; Document Number: UTE-EMS-OP-W31; No.4. No chemicals are allowed to be stored here. <ul style="list-style-type: none"> - Ulu Tiram Estate; Visit to the General Store, it was noticed that Chemical: Calcium Hypochlorite was stored without proper containment tray and hazard signages. There were no SDS (Safety Data Sheet) available for the mentioned chemical as well. - Ulu Tiram Estate; Visit to the General Store, it was noticed that there was a 20 Litres white unopened chemical container with no label or SDS placed on the floor of the store.
Corrections:	<p>Ladang Basir Ismail</p> <ul style="list-style-type: none"> a. Briefing conducted on company SOP done immediately to the Contractors' drivers involved. <p>Ulu Tiram Estate</p> <ul style="list-style-type: none"> a. Transfer the Calcium Hypochlorite to the chemical store with proper containment tray and hazard signage and SDS, was carried out immediately b. b. Upon further checking, the unopened 20 litre container is not a chemical but it is a soap, container has been labelled accordingly.
Root Cause Analysis:	<ul style="list-style-type: none"> a. New contractor driver was not adequately briefed on company SOP. b. Inadequate monitoring at general store by Estate management.
Corrective Actions:	<p>Ladang Basir Ismail</p> <ul style="list-style-type: none"> a. Continual briefing and awareness to be conducted during muster roll-call to also involve Contractors' workers. b. Assistant manager and staff in charge to carry out periodical inspection during work activities of the workers. <p>Ulu Tiram Estate</p> <ul style="list-style-type: none"> a. Continual briefing and awareness during muster/roll-call. b. Assistant manager and staff in charge to do inspection during the work activities in general store, to ensure no chemical allowed to be stored in general store.
Assessment Conclusion:	<p>Critical Nonconformity Close Out verification was conducted for the certification unit on 13/02/2022. During the visit, the following were verified:</p> <p>Basir Ismail Estate</p> <ol style="list-style-type: none"> 1. Briefing was done for all workers including contractors workers on the company's SOP on chemical management on 01/12/2021. Records were available for verification. 2. The estate have established a "Senarai Pemeriksaana Harian Traktor" where all tractors and tractor drivers are inspected every morning to ensure compliance towards the SOPs. Sighted the checklist dated 25/11/2021 available for verification.

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	<p>Ulu Tiram Estate</p> <p>1. Briefing was conducted for the storekeepers and related personals on Store Management on 04/12/2021.</p> <p>2. A weekly checklist have been established entitled "Checklist – General Store" where the management monitor the stores on a weekly basis to ensure compliance to the SOP. Sighted the Checklist available for the month of December 2021.</p> <p>Based on the evidence provided the Critical Nonconformity is successfully closed on 13/02/2022.</p>
Effectiveness Closure (for previous audit closed Critical NC):	<p>Verified the record of awareness training that has been conducted by the Sedenak Certification Units on SOP of Handling of Chemicals and workplace inspection in order to ensure the effectiveness of SOP implementation. Training conducted as below:</p> <p>Training: SOP - Chemical Safety Handling, CHRA Awareness To Workers and Contractors record on:</p> <p>Sedenak POM: 15/08/2022 Sedenak Estate: 26/08/2022 Kuala Kabong Estate: 08/02/2022</p> <p>Workplace inspection (Borang Audit Keselamatan) latest record on:</p> <p>Sedenak POM: 02/09/2022 Sedenak Estate: 12/09/2022 Kuala Kabong Estate: 22/09/2022</p> <p>There was no recurrence of non-conformity and therefore the non-conformity report remains closed.</p>

Non-conformity			
NCR Ref #	2139646-202111-M2	Date Issued	02/12/2021
Due Date	01/03/2022	Date of nonconformity Closure	13/02/2022
Clause & Category (Critical / Minor)	3.6.1 Critical		
Statement of Nonconformity:	Hazards were inadequately identified, assessed and controlled in the operating units		
Requirement Reference:	All operations are risk assessed to identify H&S issues. Mitigation plans and procedures are documented and implemented.		
Objective Evidence:	<p>It was found that the hazards were inadequately identified, assessed and controlled. Evidences are detailed out as below:</p> <p>Kuala Kabong Estate</p> <p>a. The Estate Workshop uses Acetylene and Oxygen Tanks for Welding Works. The hazard and risks associated with oxygen and acetylene tanks such as the decomposition which can generate heat and cause fire and explosions</p>		

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	<p>through flashbacks from welding & hot work operations and movement & separation of the gas and the porous mass inside the cylinder and its control measures has not been assessed in the HIRARC titled Workshop; Revised on 01/08/2021.</p> <p>Furthermore, during the visit to the mill, it was sighted that the there was no usage of "flashback arrestors" to stop flames in its tracks.</p> <p>b. Ramp in the estate was used to collect FFB from the platforms and transferred to the External FFB Lorry's for transport to the Mill. The HIRARC titled Ramp dated 01/08/2021 only captured work activity climbing lorry and fixing canvas.</p> <p>All other work activities such as works on the ramp platform, working at height, FFB tractors unloading FFB, back bucket works, etc were not identified and assessed its hazards and risks.</p> <p>c. Ramp HIRARC stated the Existing Control – PPE such as Safety Shoes, Safety Harness and Safety Helmet. During the visit to the ramp it was noticed that the ramp attendant was wearing wellington boots.</p> <p>d. The estate uses a blower at the ramp and office compound. There was no evidence that the operation has been assessed in the HIRARC.</p> <p>Ulu Tiram Estate</p> <p>a. Site verification indicated the HIRARC for the operations at the Ramp was not adequate to assess the risks associated to the operations.</p> <ul style="list-style-type: none"> - The existing controls for various risks at the ramp was "work as a team". - The ramp attendant acknowledged that he was the only attendant working at the ramp. - The ramp attendant was seen climbing over the railing to go into the ramp hopper without any harness to remove off spec FFBs. The HIRARC did not capture the risks associated to this activity. - Interview with the ramp worker indicated he was unaware on the methods to use the safety harness provided while climbing down. - The HIRAC for RAMP stated, Work Activity: Grading FFB; Hazard: Injury; Existing Control: Safety Boot has been provided. Visit to the ramp indicated the ramp attendant was not provided with safety boot. <p>Basir Ismail Estate</p> <p>a. Verified the HIRARC for Transport – Transporting FFB – Platform to Ramp; Existing Control Measures – PPE: Safety Shoes. It was sighted during the field visit at Basir Ismail Estate the Contract Tractor Drivers were wearing Rubber Shoes and Rubber boots instead of Safety Shoes.</p>
<p>Corrections:</p>	<p>Kuala Kabong Estate</p> <p>a. HIRARC for workshop regarding "flashback arrestors" had been updated on 30/11/2021.</p> <p>b. "Flashback arrestors" had been fixed to oxygen and acetylene tank on 30/11/2021.</p> <p>c. HIRARC for works on the ramp platform, working at height, FFB tractors unloading FFB, back bucket works had been updated on 30/11/2021.</p> <p>d. Ramp attendant had immediately been provided with safety shoes on 30.11.2021. Workers were also briefed on the right PPE for respective work station and PPE used compliance.</p>

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	<p>e. HIRARC for blower had been updated on 30/11/2021.</p> <p>Ulu Tiram Estate</p> <p>a. Awareness training on safety harness conducted for ramp attendant on 02/12/2021.</p> <p>Basir Ismail Estate</p> <p>a. Briefing provided to the contractor and driver on company</p>
<p>Root Cause Analysis:</p>	<p>Kuala Kabong Estate</p> <p>a. Inadequate understanding on hazard identification at workshop by estate PIC</p> <p>b. Inadequate understanding on hazard identification at ramp platform, working at height, FFB tractors unloading FFB, back bucket works by estate PIC</p> <p>c. Ramp attendant was not provided with safety shoes as stated in HIRARC</p> <p>d. HIRARC was not properly update to include the usage of blower.</p> <p>Ulu Tiram Estate</p> <p>a. Insufficient awareness and training for the operation at the ramp activities to the ramp attendant.</p> <p>Basir Ismail Estate</p> <p>a. New contractor driver was not adequately brief on company Safety Policy</p>
<p>Corrective Actions:</p>	<p>Kuala Kabong Estate</p> <p>a. Annual refresher training on HIRARC to be provided to all operating unit tentatively on 07/02/2022.</p> <p>b. HIRARC of "flashback arrestors" for workshop will be updated as per legal requirement and whenever necessary.</p> <p>c. HIRARC updated as per requirement and whenever necessary.</p> <p>d. Weekly PPE inspection by the estate management in order to ensure correct PPE being provided and used by the workers at concerned work stations.</p> <p>Ulu Tiram Estate</p> <p>a. Annual refresher training on HIRARC to be provided to all operating unit tentatively on 07/02/2022.</p> <p>b. Review on the HIRARC and identify all the related activities at respective station.</p> <p>c. Update all the activities in HIRARC report.</p> <p>Basir Ismail Estate</p> <p>a. Mandore Inspection of PPE before workers start their work.</p>

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Assessment Conclusion:	<p>Critical Nonconformity Close Out verification was conducted for the certification unit on 13/02/2022. During the visit, the following were verified:</p> <p>Kuala Kabong Estate</p> <ol style="list-style-type: none"> 1. The HIRARC for Workshop have been updated on 30/11/2021 to include the risks of cutting works and ensuring the usage of flashback arrestors as its risk control. 2. The HIRARC for Ramp was updated on 30/11/2021 to include the risks such as working at height, unloading FFB and pushing of FFB at ramp. 3. The ramp attendance has been issued with Safety Shoe. Sighted the PPE Issuance Form dated 30/11/2021, issuance of the safety shoe and acknowledged by the workers. Workers PPE Inspection Record were updated weekly to monitor the usage of PPE by the workers. Verified the records for December 2021 and December 2022. 4. The HIRARC for Blower operation have been made available dated 30/11/2021 and available for verification. 5. Refresher Trainings on HIRARC for each operating units were conducted on 07/02/2022. Records were available for verification. <p>Ulu Tiram Estate</p> <ol style="list-style-type: none"> 1. Training on methods to use the Safety Harness were provided to the Ramp attendant on 02/12/2022. Records of training were available for verification. 2. Visit to the Ramp at Ulu Tiram Estate indicated that all safety requirements were adhered to. Interview with the ramp attendant indicated that he was aware of all the safety procedures. It was noticed that all required PPEs were worn by the attendant as well. <p>Basir Ismail Estate</p> <ol style="list-style-type: none"> 1. A briefing entitled "Cara Kerja Selamat Untuk Pemandu Tractor" was conducted on 01/12/2021 for the contractor's drivers in the estate. The training records were available for verification. 2. The contractor drivers were provide with Safety Boots as well as other required PPEs as stated in the Checklist for PPE Distribution December 2021. Sighted the acknowledgement from the drivers dated 01/12/2021. 3. The estate have established a PPE Inspection Checklist where the estate mandore conduct daily monitoring on the usage of PPE by the contractor drivers. Sighted the PPE Inspection Checklist for the Month of December 2021 and January 2022. <p>Based on the evidence provided the Critical Nonconformity is successfully closed on 13/02/2022.</p>
Effectiveness Closure (for previous audit closed Critical NC):	<p>Noted during site visit at workshop in Kuala kabong Estate and Sedenak Estate, sighted the flashback arrestor was installed at the Oxygen and acetylene tank.</p> <p>Reviewed the latest HIRARC review conducted by operating units visited. The HIRARC includes working at height, unloading FFB and pushing of FFB at ramp and mistblower operation.</p>

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	<p>Sighted during site visit and interview with ramp attendance, they were provided with appropriate PPE as per SOP established such as safety harness and safety boots.</p> <p>There was no recurrence of non-conformity and therefore the non-conformity report remains closed.</p>
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Non-conformity			
NCR Ref #	2139646-202111-M3	Date Issued	02/12/2021
Due Date	01/03/2022	Date of nonconformity Closure	13/02/2022
Clause & Category (Critical / Minor)	2.1.1 Critical		
Statement of Nonconformity:	Compliance with legal requirement was not demonstrated effectively.		
Requirement Reference:	The Unit of Certification complies with legal requirements		
Objective Evidence:	<p>Basir Ismail Estate</p> <p>Verified the Overtime record book for weighbridge operator (Employee No.: 602030) in Basir Ismail Estate found that he has worked more than 104 hours of overtime in May 2021 (120 hours), June 2021 (135 hours), July 2021 (136 hours), August 2021 (144 hours) and October 2021 (139 hours) without approval from authority. Besides, reviewed the payslips for the respective months found that he was only paid for 104 hours of overtime.</p> <p>Kuala Kabong Estate</p> <p>Sampled the Overtime Form for May 2021 and Checkroll G23, G26 and G21 for the weighbridge operator (Employee No.: 604899) in Kuala Kabong Estate found that she has worked 53 hours of overtime on May 2021. However, verified the payslips found that she only paid for 44.50 hours of overtime.</p>		
Corrections:	<p>a. Conduct briefing to staff and workers on overtime limit at 104 hours monthly.</p> <p>b. Payment of underpaid Overtime had been done on 01.12.2021.</p>		
Root Cause Analysis:	Inadequate monitoring over compliance to legal requirement.		
Corrective Actions:	<p>a. Strictly monitoring on accumulate overtime hours for respective staff and workers overtime time record on weekly basis. Assistant manager to notify respective staff should the accumulate overtime hours expected to be over 104 at month end.</p> <p>b. Clerk to print overtime summary record after completion of key in process for respective staff verification. Upon verification obtain by respective staff, proceed with payment.</p>		
Assessment Conclusion:	<p>Critical Nonconformity Close Out verification was conducted for the certification unit on 13/02/2022. During the visit, the following were verified:</p> <p>Basir Ismail Estate</p> <ol style="list-style-type: none"> 1. Briefing on Overtime Payment were conducted by the management for the office staffs on 01/12/2021. Records of briefing were available for 		

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	<p>verification.</p> <p>2. Sample Payslip for worker ID# 11110858 for the month of Dec 2021 and Jan 2022 indicated that the workers overtime did not exceed 104 hours.</p> <p>Kuala Kabong Estate</p> <p>1. The estate has established a Monitoring Overtime Records where the over time of workers is monitored on a monthly basis to avoid any underpayments in the future.</p> <p>2. The underpayment for the worker have been reimbursed in December 2021. Sighted the Petty Cash Reimbursement for the month December 2021 which was acknowledged by the worker</p> <p>Based on the evidence provided the Critical Nonconformity is successfully closed on 13/02/2022.</p>
Effectiveness Closure (for previous audit closed Critical NC):	<p>Records of pay documents including payslips, checkroll and Socso 8A form verified for month of Dec 2021, March 2022 & June 2022 for sample workers as in indicator 6.1.6 give the 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>There was no recurrence of non-conformity and therefore the non-conformity report remains closed.</p>

Non-conformity			
NCR Ref #	2139646-202111-M4	Date Issued	02/12/2021
Due Date	01/03/2022	Date of nonconformity Closure	13/02/2022
Clause & Category (Critical / Minor)	2.2.2 Critical – Reoccurrence of Minor		
Statement of Nonconformity:	Due diligence of contractors was not available.		
Requirement Reference:	<p>All contracts, including those for FFB supply, contain specific clauses on meeting applicable legal requirements, and this can be demonstrated by the third party.</p> <p>Evidence of legal due diligence of all contracted third parties, recruitment agencies (licensed/ accredited) for migrant workers, service providers and labour contractors, is available.</p>		
Objective Evidence:	<p>Basir Ismail Estate</p> <p>Reviewed the employment contract, payslips and SOCSO contribution Form 8A of contractors found the following issues:</p> <ol style="list-style-type: none"> 1. Employment contract signed by the workers of Gunalash Enterprise was incomplete. Terms and conditions such as annual leave and medical leave entitlement, reason of dismissal and notice period was not available. 2. SOCSO contribution made was not in accordance to Employees’ Social Security Act 1969 (Act 4) for the workers of Gunalash Enterprise and Sri Thilakkumar 		

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	<p>Enterprise.</p> <ol style="list-style-type: none"> There is no mention of the wages' rate in the employment contract signed by the workers of Sri Thilakkumar Enterprise. There was no payment of wage for public holiday on February 2021 to the workers of Soko SK Enterprise as verified in the payslips. During interview in the field found there were 4 foreign workers employed by Soko SK Enterprise as harvesters. However, there was no employment contract, permit and payslips sighted during the time of audit. <p>Kuala Kabong Estate</p> <p>Reviewed the records of contractors' workers found the following issues:</p> <ol style="list-style-type: none"> Reviewed the payslips and FFB Ticket Report for May 2021 and August 2021 found that the FFB Lorry Drivers (Eco Lane Enterprise) have worked on rest day. However, no payment of wages as per Employment Act 1955, Section 60 (3) (d). <table border="1"> <thead> <tr> <th>I/C No.</th> <th>Dates of Work on Rest Day</th> </tr> </thead> <tbody> <tr> <td>700913-71-50XX</td> <td>22/05/2021, 07/08/2021, 14/08/2021, 21/08/2021, 28/08/2021</td> </tr> <tr> <td>730507-01-61XX</td> <td>14/08/2021</td> </tr> </tbody> </table> <ol style="list-style-type: none"> EPF contribution made by Eco Lane Enterprise for the workers were not in accordance to Employees Provident Fund Act 1991, Third Schedule. <p>Ulu Tiram Estate</p> <p>Reviewed the records of contractors' workers found the following issues:</p> <ol style="list-style-type: none"> Reviewed the payslips and productivity reports for May 2021, August 2021 and October found that the FFB Loader & Driver and harvesters (TBK Plantation Works and Perusahaan Mewah Hijau) have worked on rest day. However, no payment of wages as per Employment Act 1955, Section 60 (3) (d). <table border="1"> <thead> <tr> <th>Passport No.</th> <th>Dates of Work on Rest Day</th> </tr> </thead> <tbody> <tr> <td>C2748457 (Harvester)</td> <td>22/05/2021, 29/05/2021, 21/08/2021, 23/10/2021</td> </tr> <tr> <td>C6902851 (Harvester)</td> <td>22/05/2021, 29/05/2021, 21/08/2021, 23/10/2021</td> </tr> <tr> <td>C3811881 (FFB Loader & Driver)</td> <td>08/05/2021, 22/05/2021, 29/05/2021, 07/08/2021, 14/08/2021, 21/08/2021, 28/08/2021, 02/10/2021, 09/10/2021, 23/10/2021, 30/10/2021</td> </tr> </tbody> </table> <ol style="list-style-type: none"> Employment contract signed by the worker of TBK Plantations Works (Passport No.: C3811881) was incomplete. Terms and conditions such as annual leave and medical leave entitlement, reason of dismissal and notice period was not available. 	I/C No.	Dates of Work on Rest Day	700913-71-50XX	22/05/2021, 07/08/2021, 14/08/2021, 21/08/2021, 28/08/2021	730507-01-61XX	14/08/2021	Passport No.	Dates of Work on Rest Day	C2748457 (Harvester)	22/05/2021, 29/05/2021, 21/08/2021, 23/10/2021	C6902851 (Harvester)	22/05/2021, 29/05/2021, 21/08/2021, 23/10/2021	C3811881 (FFB Loader & Driver)	08/05/2021, 22/05/2021, 29/05/2021, 07/08/2021, 14/08/2021, 21/08/2021, 28/08/2021, 02/10/2021, 09/10/2021, 23/10/2021, 30/10/2021
I/C No.	Dates of Work on Rest Day														
700913-71-50XX	22/05/2021, 07/08/2021, 14/08/2021, 21/08/2021, 28/08/2021														
730507-01-61XX	14/08/2021														
Passport No.	Dates of Work on Rest Day														
C2748457 (Harvester)	22/05/2021, 29/05/2021, 21/08/2021, 23/10/2021														
C6902851 (Harvester)	22/05/2021, 29/05/2021, 21/08/2021, 23/10/2021														
C3811881 (FFB Loader & Driver)	08/05/2021, 22/05/2021, 29/05/2021, 07/08/2021, 14/08/2021, 21/08/2021, 28/08/2021, 02/10/2021, 09/10/2021, 23/10/2021, 30/10/2021														

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	<p>Sedenak Estate</p> <p>Reviewed the payslips of contractor’s workers (Yap Aun Kok) (Passport No.: C5719809 and C7521687) found that the contractor only paid 1 day of public holiday wage instead 3 days on May 2021. This has confirmed through interviewed with the contractor.</p>
Corrections:	<p>Basir Ismail Estate</p> <ul style="list-style-type: none"> a. Estate to provide sample of said document for Contractors to amend the employment letter. b. The list of the employee has been updated in the list of estate contract employees. <p>Kuala Kabung Estate</p> <ul style="list-style-type: none"> a. Payment of wages regarding working on rest day to be done. <p>Ulu Tiram Estate</p> <ul style="list-style-type: none"> a. Estate immediately to provide and brief relevant Contractors on legal requirement on 12 December 2021. b. Arrears will be paid for the underpaid work on rest day for the month of May, August and October 2021. <p>Sedenak Estate</p> <ul style="list-style-type: none"> c. The contractor immediately paid to their harvesters on the miss payment of two public holidays in May 2021. It was paid on 3rd December 2021.
Root Cause Analysis:	Estate’s lack of understanding on the requirements of Due Diligence on contractors.
Corrective Actions:	<ul style="list-style-type: none"> a. Estate Management to conduct periodical due diligence and briefing with regards of all legal requirement that need to be complied with contractors as per term and condition on contract agreement. b. Monthly checking on all contractor’s workers documents i.e., payslip should be carried out for monitoring purposes to ensure fully compliance by the contractor
Assessment Conclusion:	<p>Critical Nonconformity Close Out verification was conducted for the certification unit on 13/02/2022. During the visit, the following were verified:</p> <p>Basir Ismail Estate</p> <ol style="list-style-type: none"> 1. Briefing was conducted for the contractor on the requirements of the contract agreement on 01/12/2021. The contractor was provided with a sample of Kulim Plantation’s Worker’s Contract Agreement. 2. The Contractor has amended the contract agreement to include all legal requirements. Sighted the Contract agreement for the workers of the 3 contractors available for verification to include the requirements such as terms and conditions for annual leave and medical leave entitlement, reason of dismissal and notice period, etc. 3. The estate has established a Checklist Document of Contract Workers to monitor the legal compliance and payslips of the contractors workers. Sighted the checklist for the month of January 2022 available for verification.

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	<p>Kuala Kabong Estate</p> <ol style="list-style-type: none"> 1. Briefing Contractor's Due Diligence was conducted on 07/12/2021 for all contractors in the estate. The records of briefing were available for verification. 2. The reimbursement of the underpayment for Work on Rest Days has been done December 2021. Verified the reimbursement for Eco Lane Enterprise's workers for the month of May 2021 and Aug 2021 paid in December 2021 and acknowledged receive by the worker. 3. The estate have established a Checklist Document of Contract Workers to monitor the legal compliance and payslips of the contractors workers. Sighted the checklist for the month of December 2021 available for verification. <p>Ulu Tiram Estate</p> <ol style="list-style-type: none"> 1. The reimbursement of the underpayment for Work on Rest Day was done on December 2021. Sighted the Resit Bayaran dated 08/12/2021 for the sampled workers available for verification. 2. Briefing on relevant legal requirements for the contractor was done on 12/12/2021 at the estate. 3. The contractor has emended the contract agreement to include all legal requirements. Sighted the contract agreement for Perusahaan Mewah Hijau available for verification. 4. The estate has established a Checklist Document of Contract Workers to monitor the legal compliance and payslips of the contractors workers. Sighted the checklist for the month of December 2021 available for verification. <p>Sedenak Estate</p> <ol style="list-style-type: none"> 1. The underpayment of Public Holiday has been reimbursed to the respective workers on 03/12/2021. Sighted the Payment Voucher for the reimbursement dated 03/12/2021, acknowledged by the workers. 2. The contractors have been briefed on matters pertaining to the workers such as public holidays, minimum wages, leave, rest day work payments, etc during the Contractors Meeting dated 23/12/2021. The contractors have also been provided a list of yearly public holidays to ensure their workers are paid according to the established public holidays. Records of training and attendance were available for verification. 3. The estate have established a Checklist Document of Contract Workers to monitor the legal compliance and payslips of the contractors workers. Sighted the checklist for the month of January 2022 available for verification. <p>Based on the evidence provided the Critical Nonconformity is successfully closed on 13/02/2022.</p>
<p>Effectiveness Closure (for previous audit closed Critical NC):</p>	<p>Contractors were required to submit evidence of compliance as per Checklist Document of Contract Workers such as workers' payslip, form 8A for SOCSO contribution and etc.</p> <p>As per sample: Contract # MPSB/SEDENAK 3/115/2020; Harvesting of Fresh Fruit Bunches (FFB) in Field P00 & P01 and Loading of FFB into bin at Ladang Sedenak, Kulai Johor;</p>

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	<p>Contractor: LCT Tan & Son Enterprise with Mahamurni Plantations Sdn. Bhd.; Commencement date: 1/8/2021; Completion date: 31/7/2024</p> <p>Reviewed the contracts workers document and Checklist Document of Contract Workers for the month of March 2022 & June 2022 found complied with legal requirement.</p> <p>There was no recurrence of non-conformity and therefore the non-conformity report remains closed.</p>
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Non-conformity			
NCR Ref #	2139646-202111-M5	Date Issued	02/12/2021
Due Date	01/03/2022	Date of nonconformity Closure	13/02/2022
Clause & Category (Critical / Minor)	5.1.6 Critical		
Statement of Nonconformity:	The payments for FFB suppliers were not made in a timely manner.		
Requirement Reference:	Agreed payments are made in a timely manner and receipts specifying price, weight, deductions and amount paid are given.		
Objective Evidence:	<p>As refer to the agreement, under Clause 3, "Monthly payments shall be made in three (3) instalments. The first instalment payment being made on or before 15th of the month in payment of FFB delivered in the first 10 days of the same month at a price per tonne based on 80% of the previous month's price calculated in accordance with the agreement..." Verified the payment records of FFB suppliers found the payment was not made within the agreed period as per the agreement of Purchase of FFB. Records of payment vouchers, payment memo and transaction record as below:</p> <ul style="list-style-type: none"> i. Payment Memo dated 15/11/2021; Payment Voucher# PV2102130 dated 18/11/2021 for first payment; Transaction No.: 202111170110230613 dated 18/11/2021. ii. Payment Memo dated 15/11/2021; Payment Voucher# PV2102142 dated 18/11/2021 for first payment; Transaction No.: 202111170110230613 dated 18/11/2021. <p>FFB suppliers have informed during stakeholder consultation that the payment was late in the past four months and they have brought this matter to the Head Office. However, the issue has yet to be resolved.</p>		
Corrections:	<ul style="list-style-type: none"> a. Mill management will notify to CFD and Outside Crop Purchase (OCP) Department on each due date of the payment shall be made to FFB supplier b. Mill Management will ensure all data of "FFB Received" is send to CFD within 2 days on each instalment period. 		
Root Cause Analysis:	As per discussion with CFD, there is no issue about the payment since the payment transaction is clearly made but due to new additional policy implementation since July 2021, there are some issue in payment approval that need to be improved.		
Corrective Actions:	CFD improvement on SOP regards to payment approval and remittance is being revised as follows:		

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	<ol style="list-style-type: none"> 1. The FFB data must be submitted to HO on working days after FFB delivered to Mill (i.e. 1st advance on 11th. And 2nd. Advance on 21st. of the month) 2. The payment should be done within 5 working days after the FFB data received from mill : <ol style="list-style-type: none"> a. 1st Advance: <ol style="list-style-type: none"> i. FFB calculation and Payment Preparation on 12th of the month and memo for approval submitted. ii. FFB payment approval on 13th of the month. iii. FFB payment remittance should be on 14/15th of the month. b. 2nd Advance <ol style="list-style-type: none"> i. FFB calculation and Payment Preparation on 23th of the month. ii. FFB payment approval on 24th of the month. iii. FFB payment remittance should be on 25th of the month. 3. The payment process will be made earlier but after 10th and 25th if the date falls on weekend or public holiday. 4. FFB Payment process approval will be in separate memo from the other payment based on the values and level of approval limit
<p>Assessment Conclusion:</p>	<p>Critical Nonconformity Close Out verification was conducted for the certification unit on 13/02/2022. During the visit, the following were verified:</p> <p>Sedenak POM</p> <ol style="list-style-type: none"> 1. The mill henceforth sends a memo to the Corporate Finance Department (CFD), stating the total FFB received from outside sources. The memo will be sent thrice a month, for the period 01st to 10th, 11th to 20th and 21st to 31st. Verified the memo dated 21st January 2021 and 11th January 2021 sent to Corporate Finance Department. 2. The CFD then releases a Memo for FFB Advance Payment for the particular Month which is done within 5 days of receiving the above mentioned memo from the mill. Sighted the 1st FFB Advance Payment for December 2021 dated 13/12/2021 and 2nd FFB Advance Payment for December 2021 dated 21/12/2021. 3. Sighted the payment records for Pertubuhan Peladang Negeri, Asam Bubok and Che Yu Trading payments done on 15th December 2021, which is within the date stated in the agreement. 2nd payment was done on 23/12/2021 as sighted the payments for the suppliers as well. <p>Based on the evidence provided the Critical Nonconformity is successfully closed on 13/02/2022.</p>
<p>Effectiveness Closure (for previous audit closed Critical NC):</p>	<p>Verified the evidence of payment based on the invoice claimed by the supplier from estate and dealer/collection center. Detail of contract and payment as below:</p> <p>Supplier from Estate</p> <ol style="list-style-type: none"> 1. Estate: Peladang Kulai, Contract No: 14/SDKM/OCP2022: Agreement validity from 01/01/2022 to 31/12/2022 <p>Invoice 1st payment dated 12/05/2022; Invoice No: SISEPOM0522/01/33, Payment Voucher# PV2200901 dated 14/05/2022. Invoice 2nd payment dated 23/05/2022; Invoice No: SISEPOM0522/02/33, Payment Voucher# PV2200947 dated 25/05/2022. Invoice 3rd payment dated 31/05/2022; Invoice No: SISEPOM0522/03/33, Payment Voucher# PV2201098 dated 05/06/2022.</p>

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	<p>2. Estate: Peladang Johor, Contract No: 03/SDKM/OCP2022: Agreement validity from 01/01/2022 to 31/12/2022</p> <p>Invoice 1st payment = Nil. Invoice 2nd payment dated 23/05/2022; Invoice No: SISEPOM0522/02/34, Payment Voucher# PV2200948 dated 25/05/2022. Invoice 3rd payment dated 31/05/2022; Invoice No: SISEPOM0522/03/34, Payment Voucher# PV2201099 dated 05/06/2022.</p> <p>Supplier from Dealer</p> <p>1. Dealer: Hwa Lee Oil Palm Trading, Contract No: 18/SDKM/OCP2022: Agreement validity from 01/01/2022 to 31/12/2022</p> <p>Invoice 1st payment dated 12/05/2022; Invoice No: SISEPOM0522/01/42, Payment Voucher# PV2200904 dated 14/05/2022. Invoice 2nd payment dated 23/05/2022; Invoice No: SISEPOM0522/02/42, Payment Voucher# PV2200950 dated 25/05/2022. Invoice 3rd payment dated 31/05/2022; Invoice No: SISEPOM0522/03/42, Payment Voucher# PV2201088 dated 05/06/2022.</p> <p>2. Dealer: Perniagaan Sri Mahtai, Contract No: 07/SDKM/OCP2022: Agreement validity from 01/01/2022 to 31/12/2022</p> <p>Invoice 1st payment = Nil. Invoice 2nd payment = Nil. Invoice 3rd payment dated 31/05/2022; Invoice No: SISEPOM0522/03/27, Payment Voucher# PV2201095 dated 05/06/2022.</p> <p>3. Dealer: Hj Mansor & Keluarga Enterprise, Contract No: 24/SDKM/OCP2022: Agreement validity from 01/01/2022 to 31/12/2022</p> <p>Invoice 1st payment dated 12/05/2022; Invoice No: SISEPOM0522/01/44, Payment Voucher# PV2200908 dated 14/05/2022. Invoice 2nd payment dated 23/05/2022; Invoice No: SISEPOM0522/02/44, Payment Voucher# PV2200953 dated 25/05/2022. Invoice 3rd payment dated 31/05/2022; Invoice No: SISEPOM0522/03/44, Payment Voucher# PV2201105 dated 05/06/2022.</p> <p>There was no recurrence of non-conformity and therefore the non-conformity report remains closed.</p>
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Non-conformity			
NCR Ref #	2139646-202111-N1	Date Issued	02/12/2021
Due Date	Open	Date of nonconformity Closure	Open
Clause & Category (Critical / Minor)	6.5.4 Minor		
Statement of Nonconformity:	Grievance mechanism was not implemented effectively.		
Requirement Reference:	A grievance mechanism, which respects anonymity and protects complainants where requested, is established, implemented and communicated to all levels of the workforce.		
Objective Evidence:	Kulim (M) Berhad has established Panel Complaint for WOW in all the operating units as a grievance mechanism to make complaint related to sexual harassment and violence. However, during interview with the workers, found that they do not		

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	understand the process to make complaints when there were sexual harassment case that has happened.
Corrections:	Briefing to the WOW members regarding grievance reporting and process to make complaints when there were sexual harassment occurred, had been carried out by estate management on 30/11/2021.
Root Cause Analysis:	Inadequate briefing on Grievance mechanism and sexual harassment.
Corrective Actions:	<ul style="list-style-type: none"> a. WOW members will be updated and re-fresh regarding the process each time during the WOW meeting. b. Conduct compliance engagement visit to operating unit in 2022
Assessment Conclusion:	The corrective action plan is accepted. Effectiveness of corrective action taken will be further verified in the next assessment.
ASA 2_4 verification	<p>HMM</p> <p>Evidence of CAP implementation verified as following:</p> <ul style="list-style-type: none"> - Briefing to the WOW members dated 30/11/2021, 2/3/2022 and 29/3/2022 on grievance reporting and process to make complaints when there is sexual harassment occurred - Human Capital Division Roadshow by Engagement Relation-Kaunseling /Imam/Bilal/Wakil WOW HQ/Unit Operation for Kulim Northern Region from 24/8/2022 to 2/9/2022 – Sedenak POM & Estate 28/8/2022, Kuala 26/8/2022 & Bukit Layang 29/8/2022 – Socialization of Video in Bangladeshi and Lombok Language - Compliance engagement visit (Internal Audit) conducted on 15/8/2022 – 18/8/2022 Northern Region <p>No reoccurrence of non-conformity. The CAP is effectively implemented. Thus, the minor NC is effectively closed on 29/09/2022.</p>

Opportunity for Improvement	
OFI#	Description
OFI 1	<p>OFI Statement:</p> <p>OFI Ref #: 2139646-202111-I1</p> <p>Clause: 7.8.2</p> <p>Monitoring of HCV can be further improved by ensuring no activities such as fishing is conducted in the water course located within the certification unit</p> <p>Verification / Follow-up actions:</p> <p>Based on site visit, the evidence of prohibiting of illegal hunting and fishing activities signage was available at Sedenak Estate and Kuala Kabong Estate. There is no evidence that fishing activities conducted. Verified through interview of workers found they have good awareness on HCV and Biodiversity. Awareness Training on HCV and Biodiversity has been conducted on 23/03/2022 at Sedenak Estate and 17/03/2022 at Kuala Kabong Estate.</p>

3.3.2 Summary of the Nonconformities and Status

CAR Ref.	Category (Critical / Minor)	P&C Indicator	Issued Date	Status & Date (Closure)
1692792-201809-M1	Major	SCCS E4.2	11/10/2018	Closed out on 10/01/2019
1692792-201809-M2	Major	4.6.6	11/10/2018	Closed out on 10/01/2019
1692792-201809-N1	Minor	2.1.3	11/10/2018	Closed out on 03/10/2019
1830966-201906-M1	Major	2.1.1	03/10/2019	Closed out on 24/12/2019
1971716-202010-M1	Major	6.2.3	15/10/2020	Closed out on 10/01/2021
1971716-202010-N1	Minor	2.2.2	15/10/2020	Escalated to Critical Non-Conformity due to Reoccurrence of Non-Compliance.
1971716-202010-N2	Minor	7.3.2	15/10/2020	Closed out on 02/12/2021
1971716-202010-N3	Minor	7.3.3	15/10/2020	Closed out on 02/12/2021
1971716-202010-N4	Minor	3.3.2	15/10/2020	Escalated to Critical Non-Conformity due to Reoccurrence of Non-Compliance.
2139646-202111-M1	Critical	3.3.2	02/12/2021	Closed out on 13/02/2022
2139646-202111-M2	Critical	3.6.1	02/12/2021	Closed out on 13/02/2022
2139646-202111-M3	Critical	2.1.1	02/12/2021	Closed out on 13/02/2022
2139646-202111-M4	Critical	2.2.2	02/12/2021	Closed out on 13/02/2022
2139646-202111-M5	Critical	5.1.6	02/12/2021	Closed out on 13/02/2022
2139646-202111-N1	Minor	6.5.4	02/12/2021	Closed out on 29/09/2022
2253186-202209-M1	Critical	6.7.3	29/09/2022	Closed out on 01/12/2022
2253186-202209-N1	Minor	7.3.2	29/09/2022	Open

3.4 Stakeholders and previous land owner / user consultation

Stakeholder consultation involved internal and external stakeholders. External stakeholders were contacted by telephone to arrange meetings at a location convenient to them to discuss Kulim Sedenak Palm Oil mill and Supply base 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

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of the local communities to meet with the village head and residents. Company officials were not present at any of the internal or external stakeholder interviews. A list of Stakeholders contacted is included as 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)
Local village representatives	1. Kampung Melayu Sedenak 2. Felda Bukit Batu	Face to face interview
Schools' representatives	Sekolah Kebangsaan Sedenak	Face to face interview
Estate suppliers & contractors	1. Sri Misan 2. Hong Hui Trading	Face to face interview
Mill contractors	Kulim Green Energy Ventures Sdn. Bhd.	Face to face interview
Gender committee representatives	Woman Onwards (WOW) Chairperson	Face to face interview
Workers Representative	1. Mandore 2. Harvester 3. General workers 4. Gender Committee Representative NUPW Representative	Face to face interview

Stakeholders comment	
1	<p>Feedbacks: Local village representatives Having good relationship with company management. No disturbance or negative impact caused by the mill and estate operation. In fact, positive impact mainly job opportunity within Kulim's mill and estate benefits villagers so much. No issue of land dispute between villagers and estate.</p> <p>Audit Team verification and response: No further issue.</p>
2	<p>Feedbacks: Schools' representatives School teachers and admin staff have good relationship with company management and staff. Most of school students among mill and estates employees' children. No issue of mill and estate operational impact towards school. Consistent contributions by company and management in school programs and activities.</p> <p>Audit Team verification and response: No further issue.</p>
3	<p>Feedbacks: Estate suppliers & contractors Have long business relationship for more than 20 years with Kulim. Transparent agreements been signed by both party on contract works with clear pricing, payment and other terms and conditions. Payment always made promptly by company.</p> <p>Audit Team verification and response:</p>

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	No further issue.
4	<p>Feedbacks: Mill contractors</p> <p>Kulim Green Energy Ventures Sdn. Bhd. (KGEV) is Build, Own, Operate and Transfer (BOOT) contractor to Sedenak POM for biogas facilities. Transparent agreements been signed by Sedenak POM and KGEV with clear pricing, payment and other terms and conditions. No issue in payment</p>
	<p>Audit Team verification and response:</p> <p>No further issue.</p>
5	<p>Feedbacks: Gender committee representatives</p> <p>They informed that the management treated the female workers equally with male workers. No discrimination occurred. The female workers were given opportunity on promotion of work based on work performance and capability. They also informed that no case of sexual harassment and domestic violence reported. They are aware on the reporting channel if any case of sexual harassment and domestic violence occur in the estate or mill</p>
	<p>Audit Team verification and response:</p> <p>No further issue.</p>

List of land owner / user contacted					
Name	Years of ownership / used	Land area (ha)	Agreement (Yes / No)	Agreement base on FPIC (Yes/No)	Compliance on the agreement terms and conditions
Sedenak Certification Unit have already undergone 2nd Cycle of Replanting therefore this is not applicable.					



Previous land owner / user comment	
	Feedbacks: N/A
	Audit Team verification and response: N/A

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.

Formal Signing-off of Assessment Conclusion and Recommendation

The audit objectives have been achieved and the certificate scope is appropriate. Based on the results of this audit, it is concluded that Kulim Sedenak Palm Oil Mill and Supply base has complied with the Malaysia National Interpretation 2019 of the RSPO P&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 Kulim Sedenak Palm Oil Mill and Supply base is remain certified.

Report prepared by	Acceptance of Assessment Conclusion
Name: Muhammad Fadzli b. Masran	Name: Salasah Elias
Company Name: BSI Services (M) Sdn. Bhd.	Company Name: Kulim Malaysia Berhad
Title: Client Manager	Title: Deputy General Manager
Signature: 	Signature: <i>(I the undersigned, being the most senior relevant management representative of the operation seeking or holding certification, agree with the contents of this report and accept the liability in execution of the procedure in the report.)</i> 
Date: 09/12/2022	Date: 11/12/2022

Appendix A: Summary of Findings

Criterion / Indicator	Assessment Findings	Compliance	
Principle 1: Behave ethically and transparently			
Criterion 1.1: The unit of certification provides adequate information to relevant stakeholders on environmental, social and legal issues relevant to RSPO Criteria, in appropriate languages and forms to allow for effective participation in decision making.			
1.1.1	<p>(C) Documents that are specified in the RSPO P&C are made available to the public.</p> <p>- Critical (Major) compliance -</p>	<p>Sedenak Palm Oil Mill and supply base made available documents specified in the RSPO P&C to the public. These documents are either available via the Company's website link as following:</p> <ul style="list-style-type: none"> - https://kulim.com.my/ms/sustainability/ - https://kulim.com.my/ms/corporate-governance/ <p>Specific public documents also accessible upon request at each operating unit such as but not limited to following:</p> <ul style="list-style-type: none"> - Land titles/user rights - Occupational health and safety plans - Plans and impact assessments relating to environmental and social impacts - HCV documentation - Pollution prevention and reduction plans - Details of complaints and grievances - Continuous improvement plans - Public summary of certification assessment report - Human Rights Policy <p>Summary report of contributions to community development</p>	Complied
1.1.2	Information is provided in appropriate languages and accessible to relevant stakeholders.	The information is provided in either English or Bahasa Malaysia, or both to relevant external stakeholders. Translated information	Complied

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	- Minor compliance -	provided to internal stakeholders among foreign workers by each country's workers' representatives. Briefing to all workers was conducted from time to time during daily morning muster assembly. Latest information provided to external stakeholders with explanation made during latest Sedenak Complex (Northern Region) External Stakeholder Meeting; Date: 22/9/2022; Venue: The Legend Golf and Country Resort, Sedenak. The meeting involved the management of all estates and mill within Sedenak Complex and attended by external stakeholders among local community representatives, local school headmasters and teachers, vendors among contractors and suppliers and relevant government and authorities' personnel.	
1.1.3	(C) Records of requests for information and responses are maintained. - Critical (Major) compliance -	The mill and estates within Sedenak complex maintained all records of requests made for a minimum 5-years period. No external requests received since last audit. Internal request mainly involved housing repair request by workers as per sample sighted of latest request received by Kuala Kabong Estate date: 7/9/2022; house # LQ31; Complete date: 7/9/2022.	Complied
1.1.4	(C) Consultation and communication procedures are documented, disclosed, implemented, made available, and explained to all relevant stakeholders by nominated representative. - Critical (Major) compliance -	The consultation and communication procedures are documented as the Communication and Consultation Procedure; SOP # SQD/SMS/1.1; Issue # 1; Rev # 0; Date: 1/8/2020. Latest explanation on the procedure also made during Sedenak Complex (Northern Region) External Stakeholder Meeting; Date: 22/9/2022; Venue: The Legend Golf and Country Resort, Sedenak. The meeting involved the management of all estates and mill within Sedenak Complex.	Complied
1.1.5	There is a current list of contact and details of stakeholders and their nominated representatives. - Minor compliance -	Current stakeholder lists for Sedenak POM complex were sighted. This list contains all relevant stakeholders and details of their nominated representatives. These stakeholders include suppliers, contractors, service providers, transporters, list of CPO and PK	Complied

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		buyers, government agencies such as Dept of Safety and Health, Indonesian Consulate, Labour Department, surrounding villages such nearby schools, clinics, etc.	
Criterion 1.2: The unit of certification commits to ethical conduct in all business operations and transactions.			
1.2.1	<p>A policy for ethical conduct is in place and implemented in all business operations and transactions, including recruitment and contracts.</p> <p>- Minor compliance -</p>	<p>The company established an Ethics Policy signed by the Executive Director on 1/5/2018. Additionally, there is a No Gift and Entertainment Policy also signed by Executive Director on 1/5/2018. Policy briefings were included in Refresher & Awareness Program 2022; Doc. # SQD/SMS/3.7-F1; Issue # 1; Rev. # 2; Date: 1/7/2022. Latest REM Estate briefing on Sustainable Policies on 25/8/2022 for workers. As per sample Vendor’s Letter of Declaration Anti-Bribery and Corruption as following:</p> <ul style="list-style-type: none"> - Pengangkutan Sempurna Sdn. Bhd. - Soko SK Enterprise <p>For Sungai Papan Estate latest briefing on Sustainable Policies was conducted by management to workers on 3/4/2022. Sample Vendor’s Letter of Declaration Anti-Bribery and Corruption as following:</p> <ul style="list-style-type: none"> - Union Harvest Sdn. Bhd. - Perniagaan Insan Permai <p>The Ethics Policy is also imposed on recruitment agents as addendum to contract agreement dated 13/2/2020 for Indonesian workers recruitment agency between Kulim (Malaysia) Berhad and PT Hamparan Karya Insani. This contract contains the contractor’s undertaking that it complies with all applicable laws and codes relating to anti-bribery, fraud and corruption, and undertakes not to offer or accept bribe or any improper advantage from anyone in Kulim (Malaysia) Berhad.</p>	Complied

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1.2.2	<p>A system is in place to monitor compliance and the implementation of the policy and overall ethical business practice.</p> <p>- Minor compliance -</p>	<p>System to monitor compliance includes the internal audit for RSPO requirements that conducted annually to ensure the implementation of the policy and overall ethical business practices are implemented. Latest internal audit was conducted as he compliance engagement visit on 15/8/2022 – 18/8/2022 for Northern Region that included the mill and all estates within Sedenak POM.</p>	Complied
Principle 2: Operate legally and respect rights			
Criterion 2.1: There is compliance with all applicable local, national and ratified international laws and regulations.			
2.1.1	<p>(C) The Unit of Certification complies with legal requirements</p> <p>- Critical (Major) compliance -</p>	<p>Sedenak POM and Estates has documented all Licence, permit and applicable Law and Regulations to ensure compliance towards all applicable local, national and ratified international laws and regulations. The compliances is guided by the document Sustainable Management System; Compliance To Legal Requirement; Document Number: SQD/SMS/2.0; Document Date: 01/08/2020; Issue: 01.</p> <p>Among permit and license sampled were:</p> <p>Sedenak Estate</p> <ol style="list-style-type: none"> 1. MPOB License (FFB) #501224702000, Validity Period: 01/04/2022 – 31/03/2023 2. MPOB License (Nursery) #620248011000, Validity Period: 17/05/2022 – 30/04/2023 3. Permit Barang Kawalan Berjadual, #P(J001971) #KPDNHEP.J-JB/26/5A/11/248(P/D)(P14), Description: Diesel (22,730 Litres) and Petrol (5,460 Litres), Validity Period: 31/03/2021 – 30/03/2024 4. License for Diversion and Extraction of River Water #BAKAJ/334/300/05/02/07/09, #07/A/KJ/118; Validity Perion 	Complied

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		<p>until 31/12/2022.</p> <ol style="list-style-type: none"> 5. SPAN License, #SPAN/EKS/(PT)/800-4(2)/2/14, Validity Period: 13/04/2020 – 12/04/2023. 6. Air Compressor #JH PMT 22735, Validity Period: 14/06/2022 – 25/08/2023 7. Sedenak Estate has obtained approval from Jabatan Tenaga Kerja Negeri Johor for deduction of wages for the following: <ul style="list-style-type: none"> • Ref. No.: TK (NJ) U-21 dated 31/03/2019 for Skim Khairat Keluarga Perbadanan Johor for RM 5 per month and premium not more than RM 37.50. • Ref. No.: TK (NJ) U-21 dated 02/05/2019 for medical fee more than subsidized amount. • Ref. No.: TK (NJ) U-21 dated 31/03/2019 for sport and recreational fee for not more than RM 10. • Ref. No.: TK (NJ) U-21 dated 26/11/2019 for school fare for RM 10. <p>Kuala Kabong Estate</p> <ol style="list-style-type: none"> 1. MPOB License, #503896302000; Validity Period: 01/04/2022 – 31/03/2023. 2. Permit Barang Kawalan Berjadual, #KPDNHEP.J-JB/26/5A/11/851 (P/D0 (13) #P(J000100); Description: Diesel (8,000 Litres), Petrol (400 Litres), Validity Period: 10/05/2021 – 09/05/2024. 3. Air Compressor #JH PMT 22737, Validity until 25/08/2023. 4. Weighbridge Serial # 05153, #PBJ004267 valid until 	
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		<p>21/03/2025</p> <p>5. Kuala Kabong Estate has obtained approval from Jabatan Tenaga Kerja Negeri Johor for deduction of wages for the following:</p> <ul style="list-style-type: none"> • Ref. No.: TK (NJ) U-21 dated 31/03/2019 for Skim Khairat Keluarga Perbadanan Johor for RM 5 per month and premium not more than RM 37.50. • Ref. No.: TK (NJ) U-21 dated 31/03/2019 for sport club and recreation fee not more than RM 10.00. • Ref. No.: TK (NJ) U-21 dated 02/05/2019 for medical fee more than subsidized amount. • S/N: PP3/29/001/2008 dated 14/02/2008 for water and electricity bill not more than RM 50.00/ person. • S/N: PP3/29/002/2008 dated 14/02/2008 for mosque fund not more than RM 1/ person. <p>Sedenak POM</p> <ol style="list-style-type: none"> 1. MPOB License, #500058304000, Validity Period: 01/01/2022 – 31/12/2022. 2. River Water Diversion and Extraction License, #08/A/KJ/051, #BAKAJ/334/300/05/02/08/1, Validity until: 31/12/2022. 3. River Water Diversion and Extraction License, #07/A/KJ/118, #BAKAJ/334/300/05/02/07/09, Validity until: 31/12/2022. 4. Permit Barang Kawalan Berjadual, #KPDNKK.J-JB/26/5A/11/1057 (P/D) (P14); Description: Diesel; Storage Quantity: 19,100 Litres, Validity Period: 16/01/2021 – 15/01/2024. 	
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		<ol style="list-style-type: none"> 5. Energy Commission – Private Installation License, #LP 12/1/9/1822; License Date of Issuance: 07/06/2016; License valid for 10 years. 6. DOE License – Compliance Schedule; License Number: 004532; License validity period: 01/07/2022 – 30/06/2023. 7. Sedenak POM has obtained approval from Jabatan Tenaga Kerja Semenanjung Malaysia for overtime limit and Jabatan Tenaga Kerja Negeri Johor for deduction of wages as below: <ul style="list-style-type: none"> • Ref. No.: BHG. PU/9/134 Jld 34 (14) dated 09/12/2020 for overtime limit to 130 hours per month. • Ref. No.: TK (NJ) U-21 dated 31/03/2019 for Skim Khairat Keluarga Perbadanan Johor for RM 5 per month and premium not more than RM 37.50. • Ref. No.: TK (NJ) U-21 dated 02/05/2019 for medical fee more than subsidized amount. 8. Competent Person: Certified Environmental Professional In Schedule Waste (CePSWaM), #CePSWaM/02828 dated 28/08/2019 to Assistant Engineer NRIC 890120-XX-XXXX 9. Competent Person : Certified Environmental Professional In The Treatment Of Palm Oil Mill Effluent (CePPOME) #CePPOME/00152 dated 26/02/2020 to Assistant Engineer NRIC 820421-XX-XXXX 	
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>Sedenak POM certification unit continued to implement and maintain their established documented system for identifying, accessing, tracking updates and monitoring of compliance with the legal requirements that are applicable to the CU’s operation.</p>	Complied

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		<p>Each office of the operating unit (mill and estate) has its own legal requirements register (LRR) and were being evaluated individually from time to time for compliance mainly through internal audit. Among the applicable legal laws registered are EQA, OSHA, Factory & Machinery Act, Employment Act, and Workers' Minimum Standard of Housing and Amenities Act.</p> <p>Latest updated has been done on 31/08/2022 with updating Of Minimum wages Order 2022, Employees Provident Fund (Amendment No. 2) Rules 2022, Employees Provident Fund (Amendment Of Eight Schedule) Order 2022 and Prevention And Control Of Infectious Disease (Measures Within Infected Local Areas) (National Recovery Plan) (Transition Phase To Endemic) 2022.</p> <p>Tracking system available to identify changes in the relevant regulations through head office, sustainability team, website information and the information are communicated from the Head Office. Kulim (Malaysia) Berhad have centralised system for tracking any changes in the law. The tracking law person in-charge is Pn Siti Hajarah Baharom ((25) RMI/COM/GM/2022/25) dated 21/07/2022 who will maintain the changes in laws and updated the Legal and other requirement in Sedenak Complex.</p>	
2.1.3	<p>Legal or authorised boundaries are clearly demarcated and visibly maintained, and there is no planting beyond these legal or authorised boundaries.</p> <p>- Minor compliance -</p>	<p>Legal or authorised boundaries are clearly demarcated and visibly maintained as per verification during site visit. Whenever the land boundaries are adjacent with third party (smallholders, villages, other oil palm companies, etc.) the normal practice of sample estate to indicate the legal boundaries are through construction of trenches and parameter road. This was confirmed through the field visit at Sedenak Estate and Kuala Kabong Estate. Apart from that, erection of concrete slab with GPS coordinate along the boundaries</p>	Complied

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		<p>was also commonly practiced and clearly visible. Boundary and monthly patrolling record was verified.</p> <p><u>Sedenak Estate</u></p> <p>Sighted boundary peg at P10/01 (No.109) and P01/06 (No. 51), Neighbouring to KTM Reserve. Verified that there is no planting beyond these legal or authorised boundaries.</p> <p><u>Kuala Kabong Estate</u></p> <p>Sighted boundary peg at P00/5 (No.87) and P00/04 (No. 100), Neighbouring to Risda and Smallholders. Verified that there is no planting beyond these legal or authorised boundaries.</p>	
Criterion 2.2: All contractors providing operational services and supplying labour, and Fresh Fruit Bunch (FFB) suppliers, comply with legal requirements.			
2.2.1	<p>A list of contracted parties is maintained.</p> <p>- Minor compliance -</p>	<p>A list of contracted parties is maintained accordingly. Seen the List Of Contract Register 2022 at Sedenak Estate, Kuala Kabong estate and Sedenak POM where all the contractors engaged by the operating units were included.</p>	Complied
2.2.2	<p>All contracts, including those for FFB supply, contain specific clauses on meeting applicable legal requirements, and this can be demonstrated by the third party.</p> <p>Evidence of legal due diligence of all contracted third parties, recruitment agencies (licensed/ accredited) for migrant workers, service providers and labour contractors, is available.</p> <p>- Minor compliance -</p>	<p>All the contractors have signed an agreement prior to provide any services. There is an addendum to the contract agreement where specifically mentioned the contractor shall comply with applicable labour and employment laws. Sampled of the contract agreement as below:</p> <p><u>Sedenak Estate</u></p> <ol style="list-style-type: none"> 1. Contract #MPSB/C1/6/13/2021: Harvesting Of FFB In Field P0), P01 And Loading Into Bin At Ladang Sedenak which valid from 01/08/2021 until 31/07/2024. 2. Contract #MPSB/C1/6/16/2021: Loading & Transport And Application Of Fibre From Shredding Station Into Fields At Ladang Sedenak which valid from 01/01/2021 until 30/09/2022 3. Contract #MPSB/C1/6/49/2022: Road Maintenance Work (Grading, Lateriting, Patching Potholes) which valid from 15/04/2022 until 14/03/2023 	Complied

		<p>Kuala Kabong Estate</p> <ol style="list-style-type: none"> 1. Contract #KMB/LKK1/2017: Loading & Transporting Of FFB From Fields To Ramp & From Ramp To Sedenak Palm Oil Mill which valid from 01/10/2017 until 30/09/2022. 2. Contract #KMB/C1/51/1/2022: Road Grading, Latheriting, Patching Potholes and Hiring Of JCB which valid from 15/04/2022 until 14/03/2023. 3. Contract #KMB/C1/56/46/2022: Desilting Of Drain which valid 15/04/2022 until 14/03/2023. <p>Sedenak POM</p> <ol style="list-style-type: none"> 1. Contract No.: SDPOM 01/2022 – To Supply Labours, Tools and Consumable Tools for Excavation Works which valid 01/04/2022 – 31/12/2022 2. Contract No.: SDPOM 05/2022 – Cleaning Boiler and Wire Grate which valid 01/05/2022 – 31/12/2022 <p>Verified the agreements between the mill and FFB suppliers also found that specific clause of compliance of legal requirements was outlined in the agreement. Interviewed with the contractors confirmed that they are aware of the terms and conditions outlined in the agreement and comply accordingly. Payment to contractors were made according with the term in the agreement. Sample of payment below:</p> <p>Sedenak POM</p> <ol style="list-style-type: none"> 1. Contract No.: SDPOM 01/2022 – To Supply Labours, Tools and Consumable Tools for Excavation Works which valid 01/04/2022 – 31/12/2022 <p>Sample Invoice Checked has been submitted on 31/07/2022 with reference number: 0185 from contractors and payment</p>	
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		<p>was made by the mill on 10/08/2022 comply as per payment term in the contract section 5.3 and 5.4.</p> <p>2. Contract No.: SDPOM 05/2022 – Cleaning Boiler and Wire Grate which valid 01/05/2022 – 31/12/2022 Sample Invoice checked has been submitted on 25/05/2022 with reference number: SDPOM05/2022 from contractors and payment was made by the mill on 10/06/2022 comply as per payment term in the contract section 5.3 and 5.4.</p> <p>Sedenak Estate</p> <ol style="list-style-type: none"> 1. Sighted the payments record for Lai Cheong & Son, Invoice dated 31/07/2022 and payment was done on 09/08/2022. 2. Sighted the payment record for LCT Tan & Son Enterprise, Invoice dated 31/07/2022 and payment was done on 09/08/2022 <p>Kuala Kabong Estate</p> <ol style="list-style-type: none"> 1. Sighted the payment record for WW Brothers Earthwork & Enterprise, Invoice dated 01/09/2022 and payment was done on 07/09/2022 2. Sighted the payment record for Jendela Insan Sdn Bhd, Invoice dated 31/08/2022 and payments made on 07/09/2022 	
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>Refer Addendum To The Contact Agreement Clause: Contractor Employees (2) The Contractor represent and warrant that the contractor shall comply with applicable labour and employment laws, regarding and prohibits any form of child labour, forced and trafficked labour. Any eligible young labour will be employed only in accordance with Children and Young Person (Employment) Act 1966. Other than that, for Letter Of Award (LOA) refer section 15.7 stipulated on the same commitment.</p>	Complied
Criterion 2.3: All FFB supplies from outside the unit of certification are from legal sources.			
2.3.1	(C) For all directly sourced FFB, the mill requires:	Refer Sedenak Mill – FFB Supplier List 2022 that contains details of Information on geo-location of FFB origins, Evidence of the	Complied

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	<ul style="list-style-type: none"> • Information on geo-location of FFB origins • Evidence of the ownership status or the right/claim to the land, or valid use of land by the grower/smallholder • One or more supporting documents for claims • Valid MPOB license <p>- Critical (Major) compliance -</p>	<p>ownership status to the land or valid use of land by the grower/smallholder, Supporting documents (Agreement) for claims and Valid MPOB license.</p> <p>The mill has 3 estates supplying Certified FFB within the certification scope. The mill also receives non-certified FFB from 24 outside FFB Suppliers (18 FFB Traders and 5 Estates).</p> <p>The mill has compiled the evidence for all its suppliers on the information on geo-location of FFB origins, evidence of the ownership status or the right/claim to the land, or valid use of land by the grower/smallholder, one or more supporting documents for claims and valid MPOB license.</p> <p>Sampled the documents as below:</p> <ol style="list-style-type: none"> 1. Peladang JB (Estate) Area: ha, MPOB Licence Number: 504973615000, Licence valid from 01/09/2022 to 31/08/2023 2. Puncak Rata (M) Sdn Bhd (Estate) Area: ha, MPOB Licence Number: 520542002000, Licence valid from 01/05/2022 to 30/04/2023 3. Peladang Kulai (Estate) Area: ha, MPOB Licence Number: 505165015000, Licence valid from 01/11/2021 to 31/10/2022 4. Perniagaan Sri Mahtai (Dealer/Collection Centre), MPOB Licence Number: 504609502000, Licence valid from 01/12/2021 to 30/11/2022 5. Hwa Lee Trading (Dealer/Collection Centre), MPOB Licence Number: 561877015000, Licence valid from 01/07/2022 to 30/06/2023 6. Hj Mansor & Keluarga Enterprise (Dealer/Collection Centre), MPOB Licence Number: 617693115000, Licence valid from 01/10/2022 to 30/09/2023 	
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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>There are 18 Collection Centres/FFB Traders registered in the mill's list of FFB suppliers. The mill is in the process of obtaining the information mentioned in Indicator 2.3.1 of the indirectly sourced FFB.</p>	Complied
<p>Principle 3: Optimise productivity, efficiency, positive impacts and resilience</p>			
<p>Criterion 3.1: There is an implemented management plan that aims to achieve long-term economic and financial viability.</p>			
3.1.1	<p>(C) A business or management plan (minimum three years) is documented that includes, where applicable, a jointly developed business case for Scheme Smallholders.</p> <p>- Critical (Major) compliance -</p>	<p>Sedenak certification unit has established and implemented its commitment to long term sustainability and improvements through a capital expenditure programme. Annual business plan in the form of annual budget and the projection for 5 years (2023-2027) were prepared as guidance for future planning. In estate the business plan was include harvesting, vehicles, operation including medical expenses, upkeep and cultivation. Verified that the business plan contains FFB throughput, mill utilization rate, CPO, OER and KER, costs of production, and CAPEX.</p> <p>Similarly, the mill has a business plan prepared annually in the form of year budget and the projection for 5 years prepared as guidance for future planning. The business plan among others contains.</p> <ul style="list-style-type: none"> a) FFB Processing & CPO/CPK production forecast b) Extraction Ratios – OER / KER, c) Cost of production d) administration / labour overhead e) processing cost labour, maintenance, consumables f) depreciation and head office charges- g) EVIT running accounts 	Complied

		h) CAPEX - capital expenditure.																					
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>A long-range replanting programme projected for the minimum of 5 years was made available for review. Refer to replanting programme subject to annual review.</p> <table border="1" data-bbox="1137 523 1928 869"> <thead> <tr> <th rowspan="2">Year of Replanting</th> <th colspan="2">Estate / Replanting Ha</th> </tr> <tr> <th>Sedenak Estate</th> <th>Kuala Kabong Estate</th> </tr> </thead> <tbody> <tr> <td>2023</td> <td>233.33</td> <td>0.00</td> </tr> <tr> <td>2024</td> <td>257.60</td> <td>0.00</td> </tr> <tr> <td>2025</td> <td>336.10</td> <td>0.00</td> </tr> <tr> <td>2026</td> <td>94.25</td> <td>0.00</td> </tr> <tr> <td>2027</td> <td>-</td> <td>0.00</td> </tr> </tbody> </table>	Year of Replanting	Estate / Replanting Ha		Sedenak Estate	Kuala Kabong Estate	2023	233.33	0.00	2024	257.60	0.00	2025	336.10	0.00	2026	94.25	0.00	2027	-	0.00	Choose an item.
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2026	94.25	0.00																					
2027	-	0.00																					
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>Sedenak Certification Unit has conducted Management Review Meeting upon receipt of Internal Audit Report conducted by Sustainability Department. The latest management review meeting as per sample below: -</p> <p>Sedenak Estate: 08/09/2022 Kuala Kabong Estate: 12/09/2022</p> <p>The issue discussed were:</p> <ol style="list-style-type: none"> 1. Chairman remarks 2. Follow up actions from last management review 3. Process performance and product conformity 4. Customer feedback 5. Changes that could affect Management System 6. Results of Internal Audit 	Complied																				

		<ul style="list-style-type: none"> 7. Results of External Audit 8. Complaints and grievances 9. Other matters <p>For Sedenak POM, Management Review Meeting has been conducted on 30/08/2022. The issue been discussed was include: -</p> <ul style="list-style-type: none"> 1. Chairman speech 2. Conformation of previous meeting 3. Follow up action from previous meeting 4. Result of Internal and External audits 5. Review process performance and product conformity 6. Changes that could affect the management system 7. Continues improvement 8. Training 9. Other matters 	
<p>Criterion 3.2: The unit of Certification regularly monitors and reviews their economic, social and environmental performance and develops and implements action plans that allow demonstrable Continuous improvement in key operations.</p>			
<p>3.2.1</p>	<p>(C) The action plan for continuous improvement is implemented, based on consideration of the main social and environmental impacts and opportunities of the unit of certification.</p> <p>- Critical (Major) compliance -</p>	<p>The operating units has established Continuous Improvement Plan dated 01/09/2022. Among the improvement plan established as follows:</p> <p>Sedenak Estate</p> <ul style="list-style-type: none"> 1. Install safety signage at workstation 2. Repaint labour quarters 3. Install dustbin bracket and cloth hanger for labour quarters 4. Repair parameter drain 5. Rewiring labour quarters 	<p>Complied</p>

		<ul style="list-style-type: none"> 6. Gender committee engagement session 7. Desilting drain at field for drain maintenance <p>Kuala Kabong Estate</p> <ul style="list-style-type: none"> 1. Install fire resistant door for chemical store 2. Repainting workers quarters 3. Rewiring Surau 4. Drainability assessment for 2027 replanting program <p>Sedenak Palm Oil Mill</p> <ul style="list-style-type: none"> 1. Donations to mosque, school and temple 2. School buses and uniform to employee children 3. Installation roofing at EFB area 4. Replacement of fibre scrapper conveyer 5. Firefighting system 6. Resurface hard standing area at EFB yard 	
3.2.2	<p>As part of the monitoring and continuous improvement process, annual reports are submitted to the RSPO Secretariat using the [RSPO metrics template].</p> <p>PROCEDURAL NOTE:</p> <p>The RSPO metrics template is awaiting decision/agreement by RSPO and the issue is still being discussed.</p> <p>Until such metrics is agreed and developed, companies will carry on with existing reporting e.g. PalmGHG, Annual Communication of Progress (ACOP) reporting, and information provided to Certification Body and feedback via RSPO Secretariat is required.</p> <p>- Minor Compliance -</p>	<p>RSPO metric template version 2.1 is used for the reporting of Sedenak Palm Oil Mill certification unit's metrics (economic, social and environment). Data reporting period is January to December 2021 for (social and environment metrics) and economic metrics from August 2021 – July 2022 (counting back 2 months from audit month). Based on verification with input data, no discrepancies of data reported for the said period for all metrics.</p>	Complied

Criterion 3.3: Operating procedures are Appropriately documented, consistently implemented and monitored.		
3.3.1	<p>(C) Standard Operating Procedures (SOPs) for the unit of certification are in place.</p> <p>- Critical (Major) compliance -</p>	<p>Standard Operating Procedure has been developed for the Mill and Estate for guidance in all operation conducted in the site. For Sedenak POM, Standard Operating Procedure (SDPOM/QM), dated 1/2/2018 is referred to. Among activities discussed as below:</p> <ol style="list-style-type: none"> 1. Reception Station 2. Fruit Handling 3. Sterilisation 4. Threshing 5. Empty Bunch Press 6. Digestion and pressing 7. Clarification 8. Kernel Extraction 9. Effluent Treatment & Waste Management 10. Boiler House <p>Estates have a separate SOP that covered mainly on nursery operations, replanting, upkeep mature and immature oil palm and harvesting. Refer Agricultural Manual dated 19/11/2018 with Latest updated on 02/10/2019 for Harvesting Terrace Area, manuring and Mature and Immature Oil Palm: Circle and Selective – Terrace Area. Among activities discussed as below:</p> <ol style="list-style-type: none"> 1. Replanting 2. Roads, Drains, Bridges, Culverts & Fences 3. Construction of Estate Buildings

Complied

		<ol style="list-style-type: none"> 4. Manuring 5. Harvesting 6. Pruning and Ablation 7. Soil Conservation 8. Justification of Chemical Uses 9. Weeds Management 10. Integrated Pest Management 	
3.3.2	<p>A mechanism to check consistent implementation of procedures is in place. - Minor Compliance -</p>	<p>Mechanism to check consistent implementation of procedures are in place. Internal audit by SQD department conducted on annual basis to check and report compliance against company policy and procedure with regards to operation, safety, health and welfare requirements. For other to ensure consistency of SOP implementation was verification from Agronomist Report, Regional Controller Report and Plantation Inspectorate Report.</p> <p>Awareness on SOP has been given to the workers and contractors in order to ensure the SOP in the Mill and Estate were implemented. Refer training record as below:</p> <p>Sedenak POM: 15/08/2022 Sedenak Estate: 26/08/2022 Kuala Kabong Estate: 08/02/2022</p> <p>Workplace inspection (Borang Audit Keselamatan) has been conducted by the person in charge i.e Assistant Manager and Field Staff and discussed in the quarterly OSH Meeting. Latest workplace inspection record as below:</p>	Complied

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		Sedenak POM: 02/09/2022 Sedenak Estate: 12/09/2022 Kuala Kabong Estate: 22/09/2022	
3.3.3	Records of monitoring and any actions taken are maintained and available. - Minor Compliance -	Records of monitoring with regards to Best practice SOP and RSPO implementation are maintained and available for verification. Among monitoring records checked: Sedenak Estate 1. Plantation Inspectorate report visit 03/2022 dated 27/06/2022. 2. Internal audit report dated 15/08/2021 by SQD team (Result 1 NC) 3. Agronomist Report 01/2021 dated 06/05/2021. Kuala Kabong Estate 1. Plantation Inspectorate report visit 03/2022 dated 05/09/2022. 2. Agronomist Report 01/2022 dated 16/08/2022. 3. Internal audit report dated 05/09/2022 by SQD team (Result 1 NC) Sedenak POM 1. Mill Inspectorate report visit 02/2022 dated 20-21/03/2022. 2. Internal audit report dated 24/08/2022 by SQD team (Result 1 NC)	Complied
Criterion 3.4: A comprehensive Social and Environmental Impact Assessment (SEIA) is undertaken prior to new plantings or operations, and a social and environmental management and monitoring plan is implemented and regularly updated in ongoing operations.			
3.4.1	(C) In new plantings or operations including mills, an independent SEIA, undertaken through a participatory methodology involving the affected	<u>Environmental</u>	Complied

	<p>stakeholders and including the impacts of any smallholder/out-grower scheme, is documented.</p> <p>- Critical (Major) compliance -</p>	<p>The mill had established Environmental Impact Assessment (EIA) procedure and has been documented as per Environmental Aspect and Impact Assessment Form (EIA-SEDPOM-2022) dated 15/09/2022. All significant impacts have been determined and mitigation plan was developed thereafter as per document. Among of activities discussed in the EIA were:</p> <ol style="list-style-type: none"> 1. Chemical mixing and storage 2. CPO storage 3. Lab operation 4. Composting Plant 5. POME Treatment 6. Waste handling 7. Storage of hydrocarbon 8. Diesel Engine <p>Similarly, for the estates the EIA was available for each activity reviewed for the year of 2022. The EIA has been prepared by assistant Manager, Reviewed by Environmental Officer and ERA approval by Manager. This aspect and impact include activities among sample estates:</p> <p><u>Sedenak Estate reviewed on 04/02/2022</u></p> <ol style="list-style-type: none"> 1. Application of EFB Compost 2. Clinic 3. Compound 	
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		<ol style="list-style-type: none"> 4. Harvesting 5. Workshop 6. Manuring 7. Office 8. Nursery 9. Schedule Waste 10. Storage 11. Chemical Application 12. Use of Machine And Tractor 13. Construction 14. Bio compost <p><u>Kuala Kabong Estate reviewed on 30/08/2022</u></p> <ol style="list-style-type: none"> 1. Clinic 2. Compound 3. Harvesting 4. Workshop 5. Manuring 6. Office 7. Scheduled waste 	
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		<p>8. Storage</p> <p>9. Chemical Application</p> <p>10. Use of Machine and contractor</p> <p>Peat management</p> <p><u>Social</u></p> <p>Assessment conducted through Evaluation of Impact Significant based on matrix as following:</p> <ul style="list-style-type: none"> - Likelihood – A measure of probability - Consequence – Outcome of the event - Frequency – Rate of occurrences of event <p>As per Kulim (Malaysia) Berhad Social Impact Register 2022; Date: 23/9/2022</p>	
3.4.2	<p>For the unit of certification, a SEIA is available and social and environmental management and monitoring plans have been developed with participation of affected stakeholders.</p> <p>- Minor Compliance -</p>	<p><u>Environmental</u></p> <p>Sedenak Certification Unit has established Environmental Management Plan and was made available in the estates/mill for review. Internal stakeholders (estate and mill team) were consulted for during review process especially for those interact directly with the activities at estates and mill’s workstation. The issue on environmental plan also being discussed in the Stakeholders Meeting. Refer Stakeholder Meeting dated 22/09/2022 for Sedenak Complex that conducted at The Legend Golf And Country Resort, Sedenak. Result of participation will be considered as part of SEIA review process. If there is any environmental incidents or changes of process (new installation/modification, SEIA will be reviewed to evaluate the environmental impact.</p>	Complied

		<p><u>Social</u></p> <p>Based on stakeholder consultation as per minutes meeting sighted "Mesyuarat dan sesi taklimat bersama pihak-pihak berkepentingan Komplek Sedenak (northern Region) done at The Legends Golf and Country Resort dated 22/09/2022, the Social Management Plan developed as Appendix 2 of Kulim (Malaysia) Berhad Social Impact Register 2022; Date: 23/9/2022. Sample identified issue and mitigation plans as following:</p> <p>Serial # LKK01; Issue: Suhakam recommendation on foreign workers passport handling; Action plan: Implementation as per Passport Act 1955; Own passport keeping by workers effective from 3/8/2022</p>	
3.4.3	<p>(C) The social and environmental management and monitoring plan is implemented, reviewed and updated regularly in a participatory way.</p> <p>- Critical (Major) compliance -</p>	<p><u>Environmental</u></p> <p>The management plan established based on operation with significant impact to the environment. The management plan was reviewed annually. The management plan stated the environmental issue, mitigation actions, monitoring plan and person responsible for monitoring implementation. Various management plan related environment as below:</p> <ul style="list-style-type: none"> • Reduction of Pollution & Emission Management Plan 2022 • Biodiversity Improvement Plan 2022 • Waste & Pollution Management Plan 2022 • Water Management Plan 2022 <p><u>Social</u></p>	Complied

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		<p>Social Management and Monitoring Plan was reviewed annually and documented as Appendix 2 of Kulim (Malaysia) Berhad Social Impact Register 2022; Date: 23/9/2022. Sample identified issue and mitigation plans as following:</p> <p>Serial # LKK01; Issue: Suhakam recommendation on foreign workers passport handling; Action plan: Implementation as per Passport Act 1955; Own passport keeping by workers effective from 3/8/2022</p>	
Criterion 3.5: A system for managing human resources is in place.			
3.5.1	<p>Employment procedures for recruitment, selection, hiring, promotion, retirement and termination are documented and made available to the workers and their representatives where applicable.</p> <p>- Minor Compliance -</p>	<p>Employment procedures for recruitment, selection, hiring, promotion, retirement and termination are documented and made available to the workers and their representatives as per following:</p> <ul style="list-style-type: none"> - Manual Procedure Rev. # 01; Recruitment of Local Workers for Operating Units; Issue # 01; Date: 1/6/2021 - Manual Procedure Rev. # 1; Recruitment of New Foreign Workers; Issue # 1; dated 1/1/2019 	Complied
3.5.2	<p>Employment procedures are implemented, and records are maintained.</p> <p>- Minor Compliance -</p>	<p>The employment of local workers was through advertisement and word of mouth. The Manager informed that they would publish the vacancy via banner displayed outside the guard house and informed head of local communities if there is any vacancy available. Besides, some of the local communities will walk-in to apply for job. Reviewed the records of employment such as employment letter, medical check-up, check registration of EPF where identification number was available.</p> <p>Employment of foreign workers are managed through Human Resource Department in HQ. There was no recruitment of foreign workers since last audit.</p>	Complied
Criterion 3.6: An occupational health and safety (H&S) plan is documented, effectively communicated and implemented.			

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3.6.1	<p>(C) All operations are risk assessed to identify H&S issues. Mitigation plans and procedures are documented and implemented.</p> <p>- Critical (Major) compliance -</p>	<p>All operating units has conducted assessment for risk covers all main operations and support operations. Reviewed the risk assessment conducted as follows:</p> <p>Sedenak Estate</p> <p>Latest Noise Risk Assessment was conducted on 28/12/2021 by assessor with DOSH Registration no. HQ/18/PEB/00/00014. Refer report no. HQ/18/PEB/00/00014-2021/023. Base on the report, the Daily Noise Exposure Limit was within permissible limits.</p> <p>Latest Chemical Hazard Risk Assessment was conducted on 22/12/2020 – 31/01/2021 by assessor with DOSH registration no. HQ/03/ASS/00/154. Refer Supplementary for report no. JKKP HQ/03/ASS/00/154-2021/016 dated February 2021. The report was supplementary report no. JKKP HQ/03/ASS/00/154-2018/042 conducted on 17/04/2018 – 13/08/2018.</p> <p>The estate has established HIRARC register for all operation in the estates. The HIRARC was reviewed once a year of during accident occur. Latest review was conducted on 07/04/2022.</p> <p>Kuala Kabong Estate</p> <p>Latest Chemical Hazard Risk Assessment was conducted on 22/12/2020 – 31/01/2021 by assessor with DOSH registration no. HQ/03/ASS/00/154. Refer Supplementary for report no. JKKP HQ/03/ASS/00/154-2021/007 dated February 2021. The report was supplementary report no. JKKP HQ/03/ASS/00/154-2018/041 conducted on 17/04/2018 – 13/08/2018.</p> <p>The estate has established HIRARC for the operations. The latest annual review was conducted on 01/08/2022 for all operations.</p>	Complied
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		<p>Latest review was conducted on 15/09/2022 due to accident occur on 13/09/2022 at harvesting operation.</p> <p>Latest Noise Risk Assessment was conducted on 28/12/2021 by assessor with DOSH Registration no. HQ/18/PEB/00/00014. Refer report no. HQ/18/PEB/00/00014-2021/024. Base on the report, the Daily Noise Exposure Limit was within permissible limits.</p> <p>Sedenak Palm Oil Mill</p> <p>The mill has established HIRARC register for all operation at the mill at reviewed on annually basis or during accident occurred. Latest review was conducted on 14/03/2022 due to accident occur on 12/03/2022.</p> <p>Noise risk Assessment was conducted on 30/08/2020 by assessor with DOSH reg. no. HQ/18/PEB/00/00018. Refer report no. HQ/18/PEB/00/00018-2020/40. As per report, baseline audiometric test shall be established for every employee within 3 months from the days employee commence work. Latest baseline audiometric was conducted on 27/09/2022 for new joined employee. Latest annual audiometric test was conducted on 10/05/2022 by OHD with DOSH reg. no. HQ/15/DOC/00/395. 60 workers were attended the retest.</p> <p>Chemical Hazard Risk Assessment was conducted on 17/04/2018 – 13/08/2018 by assessor with DOSH registration no. HQ/03/ASS/00/154. Refer report no. JKPP HQ/03/ASS/00/154-2018/059.</p>	
3.6.2	<p>(C) The effectiveness of the H&S plan to address health and safety risks to people is monitored.</p> <p>- Critical (Major) compliance -</p>	<p>Kulim has established safety and health plan and documented in the OSH Calendar. Reviewed the implementation of the management plan FY 2022 as follows:</p> <p>Sedenak Estate</p>	Complied

		<ol style="list-style-type: none"> 1. The estate has attended Electrical Safety Training conducted by the Kulim Safety and Training Services on 29/06/2022 at Kulim Training Centre. The estate was represented by the Asst. Manager and Foreman. 2. The estate has attended the Fire Safety Team Basic Course conducted by Johor Fire department on 08 – 10/08/2022. Reviewed certificate of attendance no. JBPM/ JH(1)/ 05620/ 005620/ 2022 and JBPM/ JH(1)/ 05628/ 005628/ 2022. <p>Kuala Kabong estate</p> <ol style="list-style-type: none"> 1. The estate continuously conducted training on the accident and emergency procedure to ensure the workers understanding. The estate has sent the field supervisor to attend the Fire Safety Team Basic Course conducted by Johor Fire department on 08 – 10/08/2022. Reviewed certificate of attendance no. JBPM/ JH(1)/ 05635/ 005635/ 2022 2. The estate representative, Asst. manager has attended the Hazard Identification, Risk Assessment and Risk Control (HIRARC) 2.0 training program conducted by Kulim Safety and Training Services on 06/02/2022 at Kulim Training Centre. Reviewed the training material and attendance report. 3. The estate representative, field supervisor has attended the Accident Investigation training program conducted by Kulim Safety and Training Services on 22/05/2022 at Kulim Training Centre. Reviewed the training material and attendance report. 	
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		<p>Sedenak Palm Oil Mill</p> <ol style="list-style-type: none"> 1. As per Noise Risk Assessment report, baseline audiometric test shall be established for every employee within 3 months from the days employee commence work. Latest baseline audiometric was conducted on 27/09/2022 for new joined employee. Latest annual audiometric test was conducted on 10/05/2022 by OHD with DOSH reg. no. HQ/15/DOC/00/395. 60 workers were attended the retest. Hearing conservation program was conducted on 19/09/2022. Reviewed the training attendance and training material. 2. As per CHRA recommendation, LEV Examination conducted on annually basis and monitoring conducted on monthly basis. Latest LEV Examination was conducted on 06/10/2021 by Hygiene Tech. with DOSH reg. no. HQ/16/JHII/00/210. The LEV system were found effective during the examination. The mill also conducted the LEV monitoring and maintenance on monthly basis. Reviewed the monitoring records dated 02/07/2022, 06/08/2022 and 03/09/2022. 4. The mill representative has attended Lock Out & Tag Out training conducted by Kulim Safety and Training Services on 22/09/2022 at Kulim Training Centre. Reviewed the training material and attendance report. 5. The mill representative has attended Awareness of Scaffolding Dismantle and Erection training conducted by Kulim Safety and Training Services on 18/09/2022. Reviewed the training material and attendance report. 	
<p>Criterion 3.7: All staff, workers, Scheme Smallholders, out-growers, and contract workers are appropriately trained.</p>			

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3.7.1	<p>(C) A documented programme that provides training is in place, which is accessible to all staff, workers, Scheme Smallholders and out-growers, taking into account gender-specific needs, and which covers applicable aspects of the RSPOP&C, in a form they understand, and which includes assessments of training.</p> <p>- Critical (Major) compliance -</p>	<p>The operating units conducted training need analysis to identify training required for the employee and documented in Training Plan. The analysis covers the current job function, skill/knowledge required, present ability, job need and required training.</p> <p>The operating units has established training program base on the training need analysis conducted. Reviewed the training program FY 2022.</p>	Complied
3.7.2	<p>Records of training are maintained.</p> <p>- Minor Compliance -</p>	<p>The operating units maintain the training records for all employees and contractors. Sighted the training records as follows:</p> <p>Sedenak Estate</p> <ol style="list-style-type: none"> 1. Pesticide handling, chemical mixing and calibration training dated 04/01/2022 2. PPE awareness for harvester training dated 18/01/2022 3. Safety work procedure for harvester training dated 10/02/2022 4. Safety work procedure for rat baiting training dated 17/02/2022 5. Safety work procedure for fogging training dated 24/02/2022 6. Chemical handling, CDA spraying and PPE usage training dated 25/02/2022 7. First Aid Kit training dated 08/03/2022 8. Safety work procedure for herbicide, pest and disease and bufferzone training dated 15/03/2022 9. Manual manuring and fertiliser application training dated 16/03/2022 10. Scheduled waste training dated 10/04/2022 	Complied

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		<ol style="list-style-type: none"> 11. Triple rinse training dated 19/05/2022 12. Safety work procedure for tractor driver, lorry and MB training dated 05/07/2022 13. Landfill management training dated 06/07/2022 14. Firefighting and use of fire extinguisher training dated 23/05/2022 <p>Kuala Kabong Estate</p> <ol style="list-style-type: none"> 1. PPE awareness and spraying calibration training dated 14/09/2022 2. Safety work procedure training dated 17/07/2022 3. Chemical handling and triple rinsing training dated 14/07/2022 4. Rat baiting training dated 05/07/2022 5. Ammonium salt usage training dated 13/09/2022 and 18/08/2022 6. Emergency eyewash and shower usage and PPE and clothes cleaning training dated 04/09/2022 7. Fertiliser handling training dated 28/08/2022 8. FFB grading training 14/08/2022 9. Safety work procedure for harvesting training dated 14/08/2022 10. Safety work procedure for oil spillage training 10/08/2022 11. Safety work procedure for workshop, fertiliser store, chemical store and diesel tank training dated 09/08/2022 12. Firefighting and use of fire extinguisher training dated 07/08/2022 	
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		<p>13. Firefighting at peat area training dated 07/08/2022</p> <p>Sedenak Palm Oil Mill</p> <ol style="list-style-type: none"> 1. First Aid training dated 08/09/2022 2. Pay slip and wage rate briefing dated 23/08/2022 3. ERT – Bund rupture and oil spillage training dated 19/08/2022 4. FFB Grading Quality Training dated 19/08/2022 5. Lorry and tanker inspection training dated 16/08/2022 6. Chemical safety handling, CHRA Awareness and water test sampling 15/08/2022 7. OSH, ISCC, RSPO, MSPO, Halal and Workers Union refresher training dated 12/08/2022 8. Firefighting system training dated 27/07/2022 9. Scheduled waste management training dated 26/07/2022 10. 3R (Reuse, Reduce & Recycle) awareness training dated 26/07/2022 11. Furrow maintenance training dated 12/06/2022 12. Fire drill training dated 06/07/2022 13. Biodiversity awareness training dated 25/05/2022 14. PPE awareness, Permit to Work, LOTO and Safety Work Procedure training dated 14/03/2022 15. ISCC, GHG Calculation, Stamping and Supply Chain awareness training dated 25/01/2022 	
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.	SCCS training was conducted for personnel carrying out tasks critical to the effective implementation of the SCCS. Review the training attendance and material as follows:	Complied

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	- Minor Compliance -	1. ISCC, GHG Calculation, Stamping and Supply Chain awareness training dated 25/01/2022	
Criterion 3.8: Supply chain requirement for mills (note: All supply chain requirements are considered as Critical (C) . However it will not contribute to suspension if there is more than 5 non-compliance within a principle)			
3.8.1	<p>Identity Preserved Module</p> <p>A mill is deemed to be Identity Preserved (IP) if the FFB processed by the mill are sourced from plantations/estates that are certified against the RSPO Principles and Criteria (RSPO P&C), or against the Group Certification scheme.</p> <p>Certification for CPO mills is necessary to verify the volumes and sources of certified FFB entering the mill, the implementation of any processing controls (for example, if physical separation is used), and volume sales of RSPO certified products. If a mill process certified and uncertified FFB without physically separating them, then only Mass Balance Module is applicable.</p>	<p>Kulim (Malaysia) Berhad has developed Standard Operating Procedure for Supply Chain Certification System. Reviewed SOP as follows:</p> <ol style="list-style-type: none"> 1. Traceability Procedure. Refer Doc. No.: SQD/SMS/2.1, Issue No. 1, Rev. No.: 06 dated 17/02/2022 and 2. CSPO & CSPK Supply Chain Procedure. Refer Doc. No.: MKTG 04, Rev. 02 dated January 2021 <p>As per SOP established, under section 4. Definition, Identity Preserved (IP) defined as FFB used by the mill sourced from plantations/ estates that are certified against the RSPO Principle and Criteria (RSPO P&C), and /or against the Group Certification scheme.</p> <p>Sedenak Palm Oil Mill received FFB from both certified and uncertified source using Mass Balance Module. Thus, the criteria is not applicable.</p>	Not Applicable
3.8.2	<p>Mass Balance Module</p> <p>A mill is deemed to be Mass Balance (MB) if the mill process FFB from both RSPO certified and uncertified plantations/estates. A mill may be taking delivery of FFB from uncertified growers, in addition to those from its own and 3rd party certified supply base. In that scenario, the mill can claim only the volume of oil palm products produced from processing of the certified FFB as MB.</p>	<p>As per SOP established, under section 4. Definition, Mass Balance (MB) – FFB used by the mill may be from uncertified growers, in addition to those from its own and third party certified supply base. Only the volume of oil palm products produced from processing of the certified FFB claimed as MB.</p> <p>Sedenak Palm Oil Mill received FFB from both certified and uncertified source using Mass Balance Module. During the P&C assessment, the audit team verified the volumes and sources of</p>	Complied

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		certified FFB entering the mill, the implementation of processing controls and volume sales of RSPO certified products.															
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 since last audit (10 months from November 2021 – August 2022) reported in the table 10 in 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, PalmTrace.</p> <p>The registration of PalmTrace will be carried out by the Marketing Department in HQ. Company has registered in PalmTrace system as follows:</p> <table border="1" style="width: 100%;"> <tr> <td>License ID</td> <td>CB131085 (Active)</td> </tr> <tr> <td>Member Name</td> <td>KULIM (MALAYSIA) BERHAD - Sedenak Palm Oil Mill</td> </tr> <tr> <td>Member ID</td> <td>RSPO_PO1000000019</td> </tr> <tr> <td>RSPO Membership Number</td> <td>1-0080-09-000-00 (Johor Corporation)</td> </tr> <tr> <td>Type of Business</td> <td>Oil mill</td> </tr> <tr> <td>Issued On</td> <td>18-03-2022</td> </tr> <tr> <td>Issued By</td> <td>BSI Services Malaysia Sdn Bhd.</td> </tr> </table>	License ID	CB131085 (Active)	Member Name	KULIM (MALAYSIA) BERHAD - Sedenak Palm Oil Mill	Member ID	RSPO_PO1000000019	RSPO Membership Number	1-0080-09-000-00 (Johor Corporation)	Type of Business	Oil mill	Issued On	18-03-2022	Issued By	BSI Services Malaysia Sdn Bhd.	Complied
License ID	CB131085 (Active)																
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		<table border="1"> <tr> <td>Start Date</td> <td>23-03-2022</td> </tr> <tr> <td>End Date</td> <td>22-01-2023</td> </tr> </table>	Start Date	23-03-2022	End Date	22-01-2023	
Start Date	23-03-2022						
End Date	22-01-2023						
3.8.5	<p>Documented procedures</p> <p>The mill shall have written procedures and/or work instructions or equivalent to ensure the implementation of all elements of the applicable supply chain model specified. This shall include at minimum the following:</p> <ol style="list-style-type: none"> a) Complete and up to date procedures covering the implementation of all the elements of the supply chain model requirements. b) Complete and up to date records and reports that demonstrate compliance with the supply chain model requirements (including training records). c) Identification of the role of the person having overall responsibility for and authority over the implementation of these requirements and compliance with all applicable requirements. This person shall be able to demonstrate awareness of the mill’s procedures for the implementation of this standard. d) The mill shall have documented procedures for receiving and processing certified and non-certified FFBS including ensuring no contamination in the IP mill. 	<p>Kulim (Malaysia) Berhad has developed Standard Operating Procedure for Supply Chain Certification System. Reviewed SOP as follows:</p> <ol style="list-style-type: none"> 1. Traceability Procedure. Refer Doc. no. SQD/SMS/2.1, Issue No. 1, Rev. No.: 06 dated 17/02/2022 and 2. CSPO & CSPK Supply Chain Procedure. Refer Doc. no. MKTG 04, Rev. 02 dated January 2021 <p>The mill maintain the records and reports on the implementation of supply chain model requirements as per SOP for Control of Record. Refer Doc. no. SQD/SMS/3.4, issue no. 1, rev.0 dated 20/09/2019 stated that records shall be kept for five (5) years. Reviewed the records that included in the procedure are as below:</p> <ol style="list-style-type: none"> 1. Weighbridge tickets 2. Training records 3. Internal audit report 4. Invoice and contracts 5. Delivery and storage records 6. Daily Production Report <p>SCCS training was conducted for personnel carrying out tasks critical to the effective implementation of the SCCS. Review the training attendance and material as follows:</p> <ol style="list-style-type: none"> 1. ISCC, GHG Calculation, Stamping and Supply Chain awareness training dated 25/01/2022 <p>Head of each operating unit appointed as person responsible for all certification inclusive of RSPO SCCS. Responsibility of the</p>	Complied				

		<p>person-in-charge has clearly stated in the appointment letter, SQD/ADMIN/019/21 dated 15/09/2021.</p> <p>Kulim (Malaysia) Berhad has developed Traceability Procedure which has covered the process of incoming of FFB and ensuring no contamination in the IP mill.</p>	
3.8.6	<p>Internal Audit</p> <p>i) The mill shall have a written procedure to conduct annual internal audit to determine whether the mill:</p> <p>a. Conforms to the requirements in the RSPO Supply Chain Certification Standard and the RSPO Market Communications and Claims Documents.</p> <p>b. Effectively implements and maintains the standard requirements within its organisation.</p> <p>ii) Any non-conformities found as part of the internal audit shall be issued corrective action. The outcomes of the internal audits and all actions taken to correct non-conformities shall be subject to management review at least annually. The mill shall maintain the internal audit records and reports.</p>	<p>Kulim (Malaysia) Berhad has developed Internal Audit Procedure. Refer doc. no. SQD/SMS/3.2, Issue No. 1, Rev. No. 0 dated 01/08/2020 where the objective is to ensure that the implementation of company's RSPO, ISCC and MSPO management system is in line with the policies, procedures and other requirements. The frequency of the internal audit to be carried out is at least once within 12 months (before expiry of the certificate).</p> <p>The latest internal audit was carried out on 24/08/2022 by Sustainability Innovation Department team. There no non-conformance was raised based on Internal Audit Report. All the clauses in RSPO SCCS and RSPO Market Communications and Claims were covered during the audit.</p>	Complied
3.8.7	<p>Purchasing and Goods In</p> <p>i) The mill shall verify and document the tonnage and sources of certified and the tonnage of non-certified FFBs received.</p> <p>ii) The mill shall inform the CB immediately if there is a projected overproduction of certified tonnage.</p> <p>iii) The mill shall have a mechanism in place for handling non-conforming FFB and/or documents.</p>	<p>Purchasing and Goods In documents maintained as per sample Certified FFB received verified as following:</p> <p>i) FFB Receive Ticket # 436263; Date: 13/6/2022; Supplier: Sedenak Estate; DO # 11485; Nett weight: 12,180 kg; Cert. # RSPO 537873</p> <p>ii) FFB Receive Ticket # 441582; Date: 28/9/2022; Supplier: Kuala Kabong Estate; DO # 19071; Nett weight: 30,2480 kg; Cert. # RSPO 537873</p> <p>Based on the production records, no overproduction of certified tonnage as to date.</p>	Complied

		<p>The mill has a mechanism in place for handling non-conforming FFB and/or documents as specified in the procedure Traceability; Doc. # SQD/SMS/2.1; Rev. # 06; Date: 17/2/2022.</p>	
<p>3.8.8</p>	<p>Sales and Goods Out The supplying mill shall ensure that the following minimum information for RSPO certified products is made available in document form. The information shall be complete and can be presented either on a single document or across a range of documents issued for RSPO certified oil palm products (for example, delivery notes, shipping documents and specification documentation):</p> <ol style="list-style-type: none"> a) The name and address of the buyer; b) The name and address of the seller; c) The loading or shipment / delivery date; d) The date on which the documents were issued; e) RSPO certificate number; f) A description of the product, including the applicable supply chain model (Identity Preserved or Mass Balance or the approved abbreviations); g) The quantity of the products delivered; h) Any related transport documentation; i) A unique identification number. 	<p>Sales and Goods Out documents maintained as per sample verified as following:</p> <p>Certified CPO:</p> <ul style="list-style-type: none"> - Buyer: Carotino Sdn. Bhd.; PLO 519, Jalan Besi 1, Kawasan Perindustrian Pasir Gudang, 81700 Pasir Gudang, Johor - Seller: Mahamurni Plantations Sdn. Bhd., Sedenak Palm Oil Mill, KB 721, 80990 Johor Bahru, Johor - Despatch Ticket # C31723; Date: 30/7/2022 - RSPO Cert. # RSPO 537873 - Product: CSPO MB - Nett weight: 29,720 kg - Vehicle # NAU 3025 <p>Certified PK:</p> <ul style="list-style-type: none"> - Buyer: Jin Lee (Oil Mills) Sdn. Bhd.; PLO 239, Jalan Timah Dua Kawasan Perindustrian, 81700, Pasir Gudang, Johor - Seller: Mahamurni Plantations Sdn. Bhd., Sedenak Palm Oil Mill, KB 721, 80990 Johor Bahru, Johor - Despatch Ticket # K09452; Date: 31/5/2022 - RSPO Cert. # RSPO 537873 - Product: CSPK MB - Nett weight: 40,650 kg - Vehicle # JQQ 9636 	<p>Complied</p>

<p>3.8.9</p>	<p>Outsourcing Activities</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 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>No processing outsource activity by Sedenak POM except for transportation as per Memorandum of Agreement (MOU) as following:</p> <ul style="list-style-type: none"> - Transportation Agreement; Contract # MPSB/CPO 1/2020 (MIRZAFIZ); MOU date: 5/10/2020; Transporter: Mirzafiz Sdn. Bhd. for CPO transportation - Transportation Agreement; Contract # MPSB/CPO 1/2020 (TEO); MOU date: 5/10/2020; Transporter: Teo Tuan Kwee Sdn. Bhd. for CPO transportation <p>The agreement specified the following:</p> <ul style="list-style-type: none"> - The mill has legal ownership of all CPO transported until it reaches customer - The explicit procedure specified is Traceability; Doc. # SQD/SMS/2.1; Rev. # 06; Date: 17/2/2022 - Transporters agreed to provide relevant access for duly accredited CBs to their respective operations, systems, and all information with signing on the contract by both parties 	<p>Complied</p>
<p>3.8.10</p>	<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>The list of outsourced contractors was sighted, "list of stakeholders" to include the transport contractor for CPO. The independent third parties involve in Mill operation is only transportation services for CPO and PK.</p>	<p>Complied</p>
<p>3.8.11</p>	<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 new contractor used for the processing or physical handling of RSPO certified oil palm products transportation.</p>	<p>Complied</p>

<p>3.8.12</p>	<p>Record keeping</p> <p>i) The mill shall maintain accurate, complete, up-to-date and accessible records and reports covering all aspects of this RSPO Supply Chain Certification Standard requirements.</p> <p>ii) Retention times for all records and reports shall be a minimum of two (2) years and shall comply with relevant legal and regulatory requirements and be able to confirm the certified status of raw materials or products held in stock.</p> <p>iii) For Identity Preserved Module, the mill shall record and balance all receipts of RSPO certified FFB and deliveries of RSPO certified CPO and PK on a real-time basis.</p> <p>iv) For Mass Balance Module, the mill:</p> <p>a) Shall record and balance all receipts of RSPO certified FFB and deliveries of RSPO certified CPO and PK on a real-time basis and / or three-monthly basis.</p> <p>b) All volumes of certified CPO and PK that are delivered are deducted from the material accounting system according to conversion ratios stated by RSPO.</p> <p>c) The mill can only deliver Mass Balance sales from a positive stock. Positive stock can include product ordered for delivery within three (3) months. However, a mill is allowed to sell short (i.e. product can be sold before it is in stock).</p>	<p>Accurate, complete, up-to-date and accessible records and reports covering all aspects of this RSPO Supply Chain Certification Standard requirements available for verification. As spelt out in its supply chain procedure, records are to be maintained minimum of two years for sample records as per following:</p> <ul style="list-style-type: none"> - Mass Balancing Records for Sedenak Palm Oil Mill - Daily Production Summary Report - Monthly Production Summary Report <p>Based on mass balance sheet latest dated end of September 2022, no negative stock recorded.</p>	<p>Complied</p>
<p>3.8.13</p>	<p>Extraction Rate</p> <p>The oil extraction rate (OER) and the kernel extraction rate (KER) shall be applied to provide a reliable estimate of the amount of certified CPO and PK from the associated inputs. Mill shall determine and set their own extraction rates based upon past experience, documented and applied it consistently.</p>	<p>The oil extraction rate (OER) and the kernel extraction rate (KER) for Sedenak POM is determined and set their own extraction rates based upon past experience, documented and applied consistently.</p>	<p>Complied</p>

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3.8.14	Extraction rates shall be updated periodically to ensure accuracy against actual performance or industry average if appropriate.	For the last review period from Nov 2021 to Aug 2022 the OER: 18.83 % and KER: 4.98 % were reported.	Complied
3.8.15	Processing For Identity Preserved Module, the mill shall assure and verify through documented procedures and record keeping that the RSPO certified oil palm product is kept separated from non-certified oil palm products, including during transport and storage to strive for 100% separation.	Not applicable for mass balance module.	Not Applicable
3.8.16	Registration of Transactions i) Shipping Announcement in the RSPO IT platform shall be carried out by the mills when RSPO certified products are sold as certified to refineries, crushers, and traders not more than three months after dispatch with the dispatch date being the Bill of Lading or the dispatch documentation date. ii) Remove: RSPO certified volumes sold under different scheme or as conventional, or in case of underproduction, loss or damage shall be removed in the RSPO IT platform.	Shipping Announcement in the RSPO IT platform carried out by the mills when RSPO certified products are sold as certified to refineries, crushers, and traders not within three months after dispatch with the dispatch date being the Bill of Lading or the dispatch documentation date.	Complied
3.8.17	Claims The mill shall only make claims regarding the production of RSPO certified oil that are in compliance with the RSPO Rules on Market Communications and Claims.	There is no claim on RSPO SCCS by Sedenak POM.	Complied
General corporate communications			
4.1	A corporate communication is one made by any RSPO member that highlights its membership of the RSPO and/or its commitment to the principles of the RSPO. Corporate communication is an 'off-product' claim.	Kulim (Malaysia) Berhad has stated the member's history with regard to RSPO in the company's website and annual report 2021 without the use of trademark logo.	Complied
4.2	In corporate communications a member is allowed to: a. Display its RSPO membership status b. Display the RSPO web address (www.rspo.org)	Kulim (Malaysia) Berhad has stated the member's history with regard to RSPO in the company's website and annual report 2021 without the use of trademark logo.	Complied

	<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.	The company does not make any statement that may misleading to the consumers to believe that RSPO membership by itself implies that selling of RSPO-certified oil palm products by verified through the website.	Complied
4.4	Members must ensure that all communication is consistent, clear and cannot mislead consumers or other stakeholders as to the certified content of oil palm products in the member’s own products.	The communication that made via website is consistent, clear and does not mislead the consumer and stakeholders as to the certified content of oil palm products in their own products.	Complied
4.5	Members are not allowed to use the RSPO corporate logo as shown in the RSPO Rules on Market Communications & Claims document. This is for the sole use of the RSPO secretariat.	There was no RSPO corporate logo has been used verified through website, notice board, business card, shipping documentation and procurement/ purchasing document.	Complied
Business to business communications			
5.1	Business to Business communication relates to RSPO members in the supply chain selling to and/or communicating with other organizations in the supply chain about the use of certified sustainable oil palm products.	Business to business communication is demonstrated via shipping documentation and invoices to the next supply chain actor or buyer. Verified the weighbridge tickets to buyer where claim of CSPO (Mass Balance) 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 (Mass Balanced) with RSPO certificate number: RSPO 537873.	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>	<p>Sedenak Oil Mill is not under distributor or wholesaler category. Thus, this requirement is not applicable.</p>	Not Applicable
Business to consumer communication			
6.1	<p>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.</p>	<p>No business to consumer communication on product specific claim made by Sedenak Palm Oil Mill and only produce crude and unfinished product. This is not applicable for POM.</p>	Not Applicable
6.2	<p>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.</p>	<p>No business to consumer communication on product specific claim made by Sedenak Palm Oil Mill and only produce crude and unfinished product. This is not applicable for POM.</p>	Not Applicable
6.3	<p>When on-pack claims on RSPO-certified sustainable oil palm products are used, the RSPO trademark and associated identification number must be present.</p>	<p>No business to consumer communication on product specific claim made by Sedenak Palm Oil Mill and only produce crude and unfinished product. This is not applicable for POM.</p>	Not Applicable
6.4	<p>Business to consumer communication shall not include information about the claimant’s RSPO membership status.</p>	<p>No business to consumer communication on product specific claim made by Sedenak Palm Oil Mill and only produce crude and unfinished product. This is not applicable for POM.</p>	Not Applicable

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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 Sedenak Palm Oil Mill 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 Sedenak Palm Oil Mill 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 Sedenak Palm Oil Mill 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 www.rspo.org .	No business to consumer communication on product specific claim made by Sedenak Palm Oil Mill and only produce crude and unfinished product. This is not applicable for POM.	Not Applicable

MODULE B – MASS BALANCE SPECIFIC RULES (delete if not applicable)
Minimum Mass Balance content

	95% or above of the oil palm content must be RSPO MB-certified.	Sedenak POM is producing crude palm product and does not involved in any labelling of end-product.	Complied
	Where there is any percentage of non-certified oil palm within the product, the reason for this must be fully justified and an action plan for moving to fully certified oil palm must be in place, in accordance with the requirements of the RSPO SCCS. In addition, the non-certified volume must be covered by equivalent volume of RSPO Credits.	Sedenak POM is producing crude palm product and does not involved in any labelling of end-product.	Complied
Labelling and trademark (MB)			
	<p>Members are allowed to use the RSPO label in one of the following ways:</p> <ul style="list-style-type: none"> Surrounded by the text: 'Certified sustainable palm oil'. The RSPO label MUST contain the tag 'MIXED'. The tag MIXED designates oil palm products sourced under the Mass Balance (MB) supply chain system, which administratively balances inputs and outputs of certain palm oil volumes. The tag 'MIXED' on a product does not guarantee that the product itself contains the certified material; some or all of it may reside in a product that does not carry a claim. The RSPO label can also include the statement: '[The palm oil contained in this product] contributes to the production of certified sustainable palm oil'. Wherever the RSPO trademark is displayed, the applicable trademark license number must be shown immediately under or next to the trademark or the 'statement'. Font must be Calibri, font size must be at least 4 pt (1.4 mm or 0.06 inch). In on-pack communications, the RSPO trademark can be printed anywhere on the pack. Further guidance on use of the trademark is provided in the RSPO Trademark License Terms and Conditions and in Annex 1 of the Rules on Market Communications & Claims document. 	Sedenak POM is producing crude palm product and does not involved in any labelling of end-product.	Not Applicable
Messaging (MB)			

	<p>Messaging ALLOWED in storytelling in product-related communications includes:</p> <ul style="list-style-type: none"> • [Oil palm products]/[palm oil]/[palm kernel oil] from RSPO-certified mills and plantations were mixed with non-certified oil palm products in the supply chain. • The volume of [oil palm products][palm oil]/[palm kernel oil] in this product reflects an equivalent volume of palm oil or palm kernel oil produced by RSPO certified mills and plantations. <p>In off-product communications, reference to (or images of) particular RSPO-certified production units, if the relationship to those units can be shown in company records is allowed.</p> <p>Messaging NOT ALLOWED in storytelling in product-related communications:</p> <ul style="list-style-type: none"> • Anything that can lead consumers to believe that RSPO-certified palm products are (certified to be) part of the product. 	<p>Sedenak POM is producing crude palm product and does not involved in any labelling of end-product.</p>	<p>Not Applicable</p>
<p>Principle 4: Respect community and human rights and deliver benefits</p>			
<p>Criterion 4.1: The unit of Certification respects human rights, which includes respecting the rights of Human Rights Defenders.</p>			
<p>4.1.1</p>	<p>(C) A policy to respect human rights, including prohibiting retaliation against Human Rights Defenders (HRD), is documented and communicated to all levels of the workforce, operations, FFB suppliers and local communities and prohibits intimidation and harassment by the unit of certification and contracted services, including contracted security forces.</p> <p>- Critical (Major) compliance -</p>	<p>Kulim (Malaysia) Berhad has a Sustainability Policy which signed by the new Managing Director on 1/10/2020. The policy which among others, states it 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, whistle-blowers, complainants and community spokespersons.</p> <p>The policy is provided in either English or Bahasa Malaysia, or both to relevant external stakeholders. Translated policy briefed to internal stakeholders among foreign workers by each countries</p>	<p>Complied</p>

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		workers’ representatives. Briefing to all workers was conducted from time to time during daily morning muster assembly. Latest policy briefing to external stakeholders with explanation made during latest Sedenak Complex (Northern Region) External Stakeholder Meeting; Date: 22/9/2022; Venue: The Legend Golf and Country Resort, Sedenak. The meeting involved the management of all estates and mill within Sedenak Complex and attended by external stakeholders among local community representatives, local school headmasters and teachers, vendors among contractors and suppliers and relevant government and authorities personnel.	
4.1.2	The unit of certification does not instigate violence or use any form of harassment in their operations. - Minor compliance -	Based on directives and policies by group company Kulim (Malaysia) Berhad all estates and mill within Sedenak complex ensured all personnel are treated fairly and protected from any form of discrimination that would constitute a violation of their human rights. Interview conducted with the workers confirmed that the management does not instigate violence or use any form of harassment to them in estate operations.	Complied
Criterion 4.2: There is a mutually agreed and documented system for dealing with complaints and grievances, which is implemented and accepted by all affected parties			
4.2.1	(C) The mutually agreed system, open to all affected parties, resolves disputes in an effective, timely and appropriate manner, ensuring anonymity of complainants, HRD, community spokespersons and whistle-blowers, where requested, without risk of reprisal or intimidation and follows the RSPO policy on respect for HRD. - Critical (Major) compliance -	Kulim (M) Berhad has developed Sustainability Policy dated 1/10/2020 where the company respect, support and protect international human rights against violence, threats, all forms of retaliation and contribute to the effective elimination of all forms of violations of human rights and fundamental freedoms of individuals and peoples which includes Environmental Human Rights Defenders, whistle-blowers, complainants and community spokesperson.	Complied
4.2.2	Procedures are in place to ensure that the system is understood by the affected parties, including by illiterate parties.	Briefings on grievance procedures are given to ensure that the system is understood by affected parties. To ensure understanding	Complied

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	- Minor compliance -	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. Interview conducted with the workers confirmed that they understood the procedure.	
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, aggrieved parties were informed of the progress of their grievance, and the outcome was communicated and acknowledged by the complainant.	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 -	Clause 5.5 of Grievance Mechanism Doc. # SQD/SMS/4.1; Issue # 1; Date: 1/8/2020 gives the option to engage independent legal, technical advice and third-party mediator.	Complied
Criterion 4.3: 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 -	Contribution made as per sample as following: - Contribution to Sekolah Kebangsaan Sedenak for smart TV installation - Donation to Klinik Desa Sedenak for participating in competition held by Pejabat Kesihatan Kulai Contribution to Sekolah Agama Sedenak for Hari Anugerah Cemerlang	Complied
Criterion 4.4: Use of the land for oil palm does not diminish the legal, customary or user rights of other users without their free, prior and informed consent.			
4.4.1	(C) Documents showing legal ownership or lease, or authorised use of customary land authorised by customary landowners through a Free, Prior and Informed Consent (FPIC) process. Documents Related to the	Based on Manual Procedure Land Encroachment; Doc. # PROP/MP/5; Rev. 4; Date: 9/6/2020, documents showing legal ownership available as following:	Complied

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	<p>history of land tenure and the actual legal or customary use of the land are available.</p> <p>- Critical (Major) compliance -</p>	<ul style="list-style-type: none"> - Kuala Kabong Estate Land Title # HSD 71140; PT # PTD 35021; Area: 1,718.2174 ha; District: Kulai; Sub-district: Mukim Bukit Batu - Sedenak Estate, total 10 land titles sighted with total 2808.00Ha and 2617.47 ha planted hectare. - Sedenak Palm Oil Mill is located in Sedenak Estate compound with total hectarage of 7.71 hectare and sighted the legal ownerships under Mahamurni Sdn Bhd which is one of subsidiaries of Mahamurni Plantations Sdn Bhd verified the land title Lot No.: 136. 	
4.4.2	<p>Copies of documents evidencing agreement-making processes and negotiated agreements detailing the FPIC process are available and include:</p>	<p>There is no land dispute in all estates and mill within Sedenak complex since last audit. The land belongs to Kulim (M) Berhad as per land ownership documents verified. Interview conducted with the local community representatives also confirmed this.</p> <p>In case of any arising land dispute, the process will be handled based on the procedure for Land Encroachment; Doc. # PROP/MP/5; Date: 9/6/2020; Rev. # 4. Hence, this indicator is not applicable.</p>	Not Applicable
4.4.2a	<p>Evidence that a plan has been developed through consultation and discussion in good faith with all affected groups in the communities, with particular assurance that vulnerable, minorities' and gender groups are consulted, and that information has been provided to all affected groups, including information on the steps that are taken to involve them in decision making.</p> <p>- Minor compliance -</p>	<p>There is no land dispute in all estates and mill within Sedenak complex since last audit. The land belongs to Kulim (M) Berhad as per land ownership documents verified. Interview conducted with the local community representatives also confirmed this.</p> <p>In case of any arising land dispute, the process will be handled based on the procedure for Land Encroachment; Doc. # PROP/MP/5; Date: 9/6/2020; Rev. # 4. Hence, this indicator is not applicable.</p>	Not Applicable
4.4.2b	<p>Evidence that the unit of certification has respected communities' decisions to give or withhold their consent to the operation at the time that these decisions were taken.</p>	<p>There is no land dispute in all estates and mill within Sedenak complex since last audit. The land belongs to Kulim (M) Berhad as</p>	Not Applicable

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	- Minor compliance -	per land ownership documents verified. Interview conducted with the local community representatives also confirmed this. In case of any arising land dispute, the process will be handled based on the procedure for Land Encroachment; Doc. # PROP/MP/5; Date: 9/6/2020; Rev. # 4. Hence, this indicator is 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 status of their land at the expiry of the unit of certification's title, concession or lease on the land. - Minor compliance -	There is no land dispute in all estates and mill within Sedenak complex since last audit. The land belongs to Kulim (M) Berhad as per land ownership documents verified. Interview conducted with the local community representatives also confirmed this. In case of any arising land dispute, the process will be handled based on the procedure for Land Encroachment; Doc. # PROP/MP/5; Date: 9/6/2020; Rev. # 4. Hence, this indicator is not applicable.	Not Applicable
4.4.3	(C) Maps of an appropriate scale showing the extent of recognised legal, customary or user rights are developed through participatory mapping involving affected parties (including neighbouring communities where applicable, and relevant authorities). - Critical (Major) compliance -	There is no land dispute in all estates and mill within Sedenak complex since last audit. The land belongs to Kulim (M) Berhad as per land ownership documents verified. Interview conducted with the local community representatives also confirmed this. In case of any arising land dispute, the process will be handled based on the procedure for Land Encroachment; Doc. # PROP/MP/5; Date: 9/6/2020; Rev. # 4. Hence, 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 -	There is no land dispute in all estates and mill within Sedenak complex since last audit. The land belongs to Kulim (M) Berhad as per land ownership documents verified. Interview conducted with the local community representatives also confirmed this. In case of any arising land dispute, the process will be handled based on the procedure for Land Encroachment; Doc. #	Not Applicable

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		PROP/MP/5; Date: 9/6/2020; Rev. # 4. Hence, this indicator is not applicable.	
4.4.5	<p>(C) Evidence is available to show that communities are represented through institutions or representatives of their own choosing, including by legal counsel if they so choose.</p> <p>- Critical (Major) compliance -</p>	<p>There is no land dispute in all estates and mill within Sedenak complex since last audit. The land belongs to Kulim (M) Berhad as per land ownership documents verified. Interview conducted with the local community representatives also confirmed this.</p> <p>In case of any arising land dispute, the process will be handled based on the procedure for Land Encroachment; Doc. # PROP/MP/5; Date: 9/6/2020; Rev. # 4. Hence, this indicator is not applicable.</p>	Not Applicable
4.4.6	<p>There is evidence that implementation of agreements negotiated through FPIC is annually reviewed in consultation with affected parties.</p> <p>- Minor compliance -</p>	<p>There is no land dispute in all estates and mill within Sedenak complex since last audit. The land belongs to Kulim (M) Berhad as per land ownership documents verified. Interview conducted with the local community representatives also confirmed this.</p> <p>In case of any arising land dispute, the process will be handled based on the procedure for Land Encroachment; Doc. # PROP/MP/5; Date: 9/6/2020; Rev. # 4. Hence, this indicator is not applicable.</p>	Not Applicable
<p>Criterion 4.5: No new plantings are established on local peoples' land where it can be demonstrated that there are legal, customary or user rights, without their FPIC. This is dealt with through a documented system that enables these and other stakeholders to express their views through their own representative institutions.</p>			
4.5.1	<p>(C) Documents showing identification and assessment of demonstrable legal, customary and user rights are available.</p> <p>- Critical (Major) compliance -</p>	<p>No new plantings are established on local peoples' land. This was verified through stakeholders' consultation. Hence, this indicator is not applicable.</p>	Not Applicable
4.5.2	<p>(C) FPIC is obtained for all oil palm development through a comprehensive process, including in particular, full respect for their legal and customary rights to the territories, lands and resources via local communities' own representative institutions, with all the relevant information and documents made available, with option of resourced</p>	<p>No new plantings are established on local peoples' land. This was verified through stakeholders' consultation. Hence, this indicator is not applicable.</p>	Not Applicable

	access to independent advice through a documented, long-term and two-way process of consultation and negotiation. - Critical (Major) compliance -		
4.5.3	Evidence is available that affected local peoples understand they have the right to say 'no' to operations planned on their lands before and during 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. - Minor compliance -	No new plantings are established on local peoples' land. This was verified through stakeholders' consultation. Hence, this indicator is not applicable.	Not Applicable
4.5.4	To ensure local food and water security, as part of the FPIC process, participatory SEIA and participatory land-use planning with local peoples, the full range of food and water provisioning options are considered. There is transparency of the land allocation process. - Minor compliance -	No new plantings are established on local peoples' land. This was verified through stakeholders' consultation. Hence, this indicator is not applicable.	Not Applicable
4.5.5	Evidence is available that the affected communities and rights holders have had the option to access to information and advice that is independent of the project proponent, concerning the legal, economic, environmental and social implications of the proposed operations on their lands. - Minor compliance -	No new plantings are established on local peoples' land. This was verified through stakeholders' consultation. Hence, this indicator is not applicable.	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 -	No new plantings are established on local peoples' land. This was verified through stakeholders' consultation. Hence, this indicator is not applicable.	Not Applicable

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4.5.7	New lands are not acquired for plantations and mills after 15 November 2018 as a result of recent (2005 or later) expropriations without consent under the right of eminent domain of the federal and state land acquisition legislations. - Minor compliance -	No new plantings are established on local peoples' land. This was verified through stakeholders' consultation. Hence, this indicator is not applicable.	Not Applicable
4.5.8	(C) New lands are not acquired in areas inhabited by communities in voluntary isolation. - Critical (Major) compliance -	No new plantings are established on local peoples' land. This was verified through stakeholders' consultation. Hence, this indicator is not applicable.	Not Applicable
Criterion 4.6: Any negotiations Concerning compensation for loss of legal, customary or user rights are dealt with through a documented system that enables indigenous peoples, local communities and other stakeholders to express their views through their own representative institutions.			
4.6.1	(C) A mutually agreed procedure for identifying legal, customary or user rights, and a procedure for identifying people entitled to compensation, is in place. - Critical (Major) compliance -	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 4/9/2007. This procedure is to ensure any negotiation with regards to compensation for loss of local rights are dealt with fairly.	Complied
4.6.2	(C) A mutually agreed procedure for calculating and distributing fair compensation (monetary or otherwise) is established and implemented, monitored and evaluated in a participatory way, and corrective actions taken as a result of this evaluation. - Critical (Major) compliance -	An SOP known as Negotiations Concerning Compensation Program dated 4/9/2007 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 4/9/2007. 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 -	There was no dispute that involved compensation in Sedenak Complex. Hence, this indicator is not applicable	Not Applicable

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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 -	There was no dispute that involved compensation in Sedenak Complex. Hence, this indicator is not applicable	Not Applicable
Criterion 4.7: Where it can be demonstrated that local peoples have legal, customary or user rights, they are compensated for any agreed land acquisitions and relinquishment of rights, subject to their FPIC and negotiated agreements.			
4.7.1	(C) A mutually agreed procedure for identifying people entitled to compensation is in place. - Critical (Major) compliance -	Kulim (M) Berhad has developed the procedure for Land Encroachment; Doc. # PROP/MP/5; Date: 9/6/2020; Rev. # 4. The objective is to establish and maintain the procedures on handling properties encroachment cases. Flow chart of handling the land encroachment by the company and local communities was developed. Besides, compensation calculation (based on situation and management approval) was described in the procedure as well.	Complied
4.7.2	(C) A mutually agreed procedure for calculating and distributing fair and gender-equal compensation (monetary or otherwise) is established and implemented, monitored and evaluated in a participatory way, and corrective actions taken as a result of this evaluation. - Critical (Major) compliance -	The same procedure for Land Encroachment; Doc. # PROP/MP/5; Date: 9/6/2020; Rev. # 4 will be used for calculating and distributing fair and gender-equal compensation.	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 -	There's no community that have lost access and rights to land for plantation since there was no expansion by the company since last audit. Instead, the company has provided job opportunities to the local communities as this has verified through the master list of employees.	Complied
Criterion 4.8: The right to use the land is demonstrated and is not legitimately contested by local people who can demonstrate that they have legal, customary, or user rights.			
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	No issues related to loss of legal customary rights with indigenous peoples, local communities and other stakeholders reported since last audit through interview conducted with the local communities.	Not Applicable

	is available and provided to parties to a dispute, and that any compensation was accepted following a documented process of FPIC. - Minor compliance -	Boundary stone and trenches were available to demarcate the boundary of land. Hence, this indicator is not applicable	
4.8.2	(C) Land conflict is not present in the area of the unit of certification. Where land conflict exists, acceptable conflict resolution processes (see Criteria 4.2 and 4.6) are implemented and accepted by the parties involved. In the case of newly acquired plantations, the unit of certification addresses any unresolved conflict through appropriate conflict resolution mechanisms. - Critical (Major) compliance -	No issues related to loss of legal customary rights with indigenous peoples, local communities and other stakeholders reported since last audit through interview conducted with the local communities. Boundary stone and trenches were available to demarcate the boundary of land. Hence, 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 -	No issues related to loss of legal customary rights with indigenous peoples, local communities and other stakeholders reported since last audit through interview conducted with the local communities. Boundary stone and trenches were available to demarcate the boundary of land. Hence, 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 -	No issues related to loss of legal customary rights with indigenous peoples, local communities and other stakeholders reported since last audit through interview conducted with the local communities. Boundary stone and trenches were available to demarcate the boundary of land. Hence, this indicator is not applicable	Not Applicable
Principle 5: Support smallholder inclusion			
Criterion 5.1: The unit of certification deals fairly and transparently with all smallholders (Independent and Scheme) and other local businesses.			
5.1.1	Current and previous period prices paid for FFB are publicly available and accessible by smallholders. - Minor compliance -	Current and past FFB prices available in the mill as per MPOB guideline. The mill has displayed the FFB pricing from January to September 2022 at the weighbridge area. The pricing was according	Complied

		to MPOB set price. Grading guideline according to MPOB was publicly displayed at the weighbridge area.	
5.1.2	<p>(C) Evidence is available that the unit of certification explains the FFB pricing to smallholders on request from individual smallholders (at least once a year or upon request).</p> <p>- Critical (Major) compliance -</p>	<p>FFB pricing to smallholders/dealers explained to individual smallholders during contract signing on annual basis. Other than that, they have been remained during stakeholders meeting.</p> <p>FFB price calculation was based on monthly average price of CPO and PK for peninsular Malaysia declared by MPOB. Processing charges was based on tonnage supplied and Extraction rates that based from OER extraction.</p>	Complied
5.1.3	<p>(C) Fair pricing, calculated as a portion of the international CPO price less costs is provided to smallholders in the supply base and documented.</p> <p>- Critical (Major) compliance -</p>	<p>Pricing of FFB is based on MPOB latest price and it was publicly available at weighbridge. No bidding contract between mill and supplier and they are free to send their crop to other mill or collection centre.</p>	Complied
5.1.4	<p>(C) Evidence is available that all parties, including women and independent representative organisations assisting smallholders where requested, are involved in decision-making processes and understand the contracts. These include those involving finance, loans/credits, and repayments through FFB price reductions for replanting and or other support mechanisms where applicable.</p> <p>- Critical (Major) compliance -</p>	<p>No binding contract between mill and FFB suppliers that includes finance, loans/credit and repayments through FFB price reductions for replanting and or other mechanisms at Sedenak POM. Thus, this indicator is not available.</p>	Not Applicable
5.1.5	<p>Contracts are fair, legal and transparent and have an agreed timeframe.</p> <p>- Minor compliance -</p>	<p>Verified agreement between Sedenak POM with Supplier from Estates and Dealer. Based on the review of the contract, all the terms contained therein are fair, legal, transparent and with an agreed timeframe. Sampled the Contract for Purchase of FFB as below.</p> <p>Estate</p> <p>1. Estate: Peladang Kulai, Contract No: 14/SDKM/OCP2022: Agreement validity from 01/01/2022 to 31/12/2022</p>	Complied

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		<p>2. Estate: Peladang Johor, Contract No: 03/SDKM/OCP2022: Agreement validity from 01/01/2022 to 31/12/2022</p> <p>3. Estate: Puncak Rata (M) Sdn Bhd, Contract No: 05/SDKM/OCP2022: Agreement validity from 01/01/2022 to 31/12/2022</p> <p>Dealer</p> <p>1. Dealer: Hwa Lee Oil Palm Trading, Contract No: 18/SDKM/OCP2022: Agreement validity from 01/01/2022 to 31/12/2022</p> <p>2. Dealer: Perniagaan Sri Mahtai, Contract No: 07/SDKM/OCP2022: Agreement validity from 01/01/2022 to 31/12/2022</p> <p>3. Dealer: Hj Mansor & Keluarga Enterprise, Contract No: 24/SDKM/OCP2022: Agreement validity from 01/01/2022 to 31/12/2022</p>	
5.1.6	<p>(C) Agreed payments are made in a timely manner and receipts specifying price, weight, deductions and amount paid are given.</p> <p>- Critical (Major) compliance -</p>	<p>As refer to the agreement, under Clause 3, "Monthly payments shall be made in three (3) instalments. The first instalment payment being made on or before 15th of the month in payment of FFB delivered in the first 10 days of the same month at a price per tonne based on 80% of the previous month's price calculated in accordance with the agreement...." Verified the payment records of FFB suppliers found the payment was not made within the agreed period as per the agreement of Purchase of FFB. Records of payment vouchers, payment memo and transaction record as below:</p> <p>Supplier from Estate</p> <p>1. Estate: Peladang Kulai, Contract No: 14/SDKM/OCP2022: Agreement validity from 01/01/2022 to 31/12/2022</p>	Complied

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		<p>Invoice 1st payment dated 12/05/2022; Invoice No: SISEPOM0522/01/33, Payment Voucher# PV2200901 dated 14/05/2022. Invoice 2nd payment dated 23/05/2022; Invoice No: SISEPOM0522/02/33, Payment Voucher# PV2200947 dated 25/05/2022. Invoice 3rd payment dated 31/05/2022; Invoice No: SISEPOM0522/03/33, Payment Voucher# PV2201098 dated 05/06/2022.</p> <p>2. Estate: Peladang Johor, Contract No: 03/SDKM/OCP2022: Agreement validity from 01/01/2022 to 31/12/2022</p> <p>Invoice 1st payment = Nil. Invoice 2nd payment dated 23/05/2022; Invoice No: SISEPOM0522/02/34, Payment Voucher# PV2200948 dated 25/05/2022. Invoice 3rd payment dated 31/05/2022; Invoice No: SISEPOM0522/03/34, Payment Voucher# PV2201099 dated 05/06/2022.</p> <p>Supplier from Dealer</p> <p>1. Dealer: Hwa Lee Oil Palm Trading, Contract No: 18/SDKM/OCP2022: Agreement validity from 01/01/2022 to 31/12/2022</p> <p>Invoice 1st payment dated 12/05/2022; Invoice No: SISEPOM0522/01/42, Payment Voucher# PV2200904 dated 14/05/2022. Invoice 2nd payment dated 23/05/2022; Invoice No: SISEPOM0522/02/42, Payment Voucher# PV2200950 dated 25/05/2022. Invoice 3rd payment dated 31/05/2022; Invoice No: SISEPOM0522/03/42, Payment Voucher# PV2201088 dated 05/06/2022.</p> <p>2. Dealer: Perniagaan Sri Mahtai, Contract No: 07/SDKM/OCP2022: Agreement validity from 01/01/2022 to 31/12/2022</p> <p>Invoice 1st payment = Nil. Invoice 2nd payment = Nil. Invoice 3rd payment dated 31/05/2022; Invoice No:</p>	
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		<p>SISEPOM0522/03/27, Payment Voucher# PV2201095 dated 05/06/2022.</p> <p>3. Dealer: Hj Mansor & Keluarga Enterprise, Contract No: 24/SDKM/OCP2022: Agreement validity from 01/01/2022 to 31/12/2022</p> <p>Invoice 1st payment dated 12/05/2022; Invoice No: SISEPOM0522/01/44, Payment Voucher# PV2200908 dated 14/05/2022. Invoice 2nd payment dated 23/05/2022; Invoice No: SISEPOM0522/02/44, Payment Voucher# PV2200953 dated 25/05/2022. Invoice 3rd payment dated 31/05/2022; Invoice No: SISEPOM0522/03/44, Payment Voucher# PV2201105 dated 05/06/2022.</p>																			
<p>5.1.7</p>	<p>Weighbridges used for determining payment to smallholders are verified by an independent third party on a regular basis (this can be government).</p> <p>- Minor compliance -</p>	<p>2 units of weighbridges were used for weighing the FFB receive from supplier. Annual calibration has been made from control mechanism the efficiency of the weightage. Records of weighing equipment stamping was maintained on annual basis at visited operating units even though there is no smallholder within Sedenak certification unit. Latest calibration of weighbridge tabulated in the table below:</p> <table border="1" data-bbox="1137 986 1926 1315"> <thead> <tr> <th>Description</th> <th>Weighbridge A</th> <th>Weighbridge B</th> </tr> </thead> <tbody> <tr> <td>Date of Calibration</td> <td>12/08/2022</td> <td>14/02/2022</td> </tr> <tr> <td>Serial Number</td> <td>A000741</td> <td>B217745</td> </tr> <tr> <td>Safety Label Number</td> <td>2.1K Q 025414</td> <td>2.1KQ 025220</td> </tr> <tr> <td>Inspection Number</td> <td>B1972787</td> <td>B 1906198</td> </tr> <tr> <td>Description</td> <td>70, 000 kg</td> <td>70, 000 kg</td> </tr> </tbody> </table>	Description	Weighbridge A	Weighbridge B	Date of Calibration	12/08/2022	14/02/2022	Serial Number	A000741	B217745	Safety Label Number	2.1K Q 025414	2.1KQ 025220	Inspection Number	B1972787	B 1906198	Description	70, 000 kg	70, 000 kg	<p>Complied</p>
Description	Weighbridge A	Weighbridge B																			
Date of Calibration	12/08/2022	14/02/2022																			
Serial Number	A000741	B217745																			
Safety Label Number	2.1K Q 025414	2.1KQ 025220																			
Inspection Number	B1972787	B 1906198																			
Description	70, 000 kg	70, 000 kg																			

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		Calibration Department	Metrology Corporation Malaysia Sdn Bhd	Metrology Corporation Malaysia Sdn Bhd	
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 -	No independent smallholder at Sedenak Certification Unit. Thus, this indicator was not applicable.			Complied
5.1.9	(C) The unit of certification has a grievance mechanism for smallholders and all grievances raised are dealt with in a timely manner. - Critical (Major) compliance -	Grievance Mechanism has been developed to ensure the grievances raise were solve in timely manner. An agreed and documented system which deals with complaints and grievances are available and documented as follows: 1. Grievance Policy dated 01/05/2018. This Policy commits to a transparent process ensuring stakeholder’s grievances and complaints are dealt with fairly, consistently and promptly. 2. Grievance Procedure Doc No. SQD/SMS/4.1 dated 01/08/2020. This SOP is applicable to all parties who deal with the Company who may have complaints and grievances. The grievance mechanism that has been established is applicable to all parties, including smallholders.			Complied
Criterion 5.2: The unit of certification supports improved livelihoods of smallholders and their inclusion in sustainable palm oil value chains.					
5.2.1	The Company consults with interested smallholders (irrespective of type) within the Unit of Certification, including women or other partners in their supply base, to assess their needs for support to improve their livelihoods and their interest in RSPO certification. - Minor compliance -	There are no smallholders within the Unit of Certification. Therefore, this indicator is not applicable			Not Applicable

5.2.2	The unit of certification develops and implements smallholder support programme to improve smallholder livelihood and build their capacity to enhance productivity, quality, organisational and managerial competencies, and specific elements of RSPO certification (including the RSPO Independent Smallholder Standard or RISS). - Minor compliance -	There are no smallholders within the Unit of Certification. Therefore, this indicator is not applicable	Not Applicable
5.2.3	Where applicable, the unit of certification provides support to smallholders to promote legality of FFB production. - Minor compliance -	There are no smallholders within the Unit of Certification. Therefore, this indicator is not applicable	Not Applicable
5.2.4	(C) Evidence exists that the unit of certification trains Scheme Smallholders on pesticide handling. - Critical (Major) compliance -	The mill received no crop from smallholders. The outside crop suppliers being invited in the stakeholders' meetings and briefing cum training are made in these sessions. Details as per minutes of meeting with the stakeholders dated 22/09/2022.	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 within the Unit of Certification. Therefore, this indicator is not applicable	Not Applicable
Principle 6: Respect workers' rights and conditions			
Criterion 6.1: Any form of discrimination is prohibited.			
6.1.1	(C) A publicly available non-discrimination and equal opportunity policy is implemented in such a way to prevent discrimination based on ethnic origin, caste, national origin, religion, disability, gender, sexual orientation, gender identity, union membership, political affiliation or age. - Critical (Major) compliance -	The Policies that have been developed by Kulim (Malaysia) Berhad to deal with equal opportunity and non-discrimination are: a. Business Policy b. Core Labour Standard c. People Policy where fairness and equal opportunities for relevant group such as all employees, including foreign and local are embedded. These Policies prevent discrimination based on ethnic origin, caste,	Complied

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		national origin, religion, disability, gender, sexual orientation, gender identity, union membership, political affiliation or age.	
6.1.2	<p>(C) Evidence is provided that workers and groups including local communities, women, and migrant workers have not been discriminated against including charging of recruitment fees for foreign workers.</p> <p>- Critical (Major) compliance -</p>	<p>Based on verification through interview, documentation review such as employment contract and pay slips, there was no evidence of discrimination of any forms. The recruitment fees were also not charged to any workers.</p> <p>Based on the contract agreement dated 13/2/2020 between Kulim (Malaysia) Berhad and PT Hamparan Karya Insani for manpower supply from Indonesia, the cost of workers' transportation to the respective estates/mill will be borne by Kulim. The Demand Letter issued by Indonesian consulate dated 17/2/2020 also specifies that levy and PLKS fees are to be borne by employer. No recruitment fees are imposed on any of the foreign workers, and this was further confirmed by foreign workers interviewed.</p>	Complied
6.1.3	<p>The unit of certification demonstrates that recruitment selection, hiring, access to training and promotion are based on skills, capabilities, qualities and medical fitness necessary for the jobs available.</p> <p>- Minor compliance -</p>	<p>Based on records of employment verified and consultation made with workers, it was confirmed that no discrimination practiced by the management. All estates and mill within Sedenak complex demonstrated that recruitment selection, hiring, access to training and promotion are based on skills, capabilities, qualities and medical fitness necessary for the jobs available.</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 interview conducted with the female workers, it was confirmed that no pregnancy testing is conducted by the company as a measure for recruitment. Hospital Assistant will be informed if they are pregnant for any job transfer if related to chemical handling.</p>	Complied
6.1.5	<p>(C) A gender committee is in place specifically to raise awareness, identify and address issues of concern, as well as opportunities and improvements for women.</p> <p>- Critical (Major) compliance -</p>	<p>Kulim (M) Berhad has established a women committee called Women Onwards (WOW) as an outreach programme endorsed and funded by the company. Its members comprise female employees</p>	Complied

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		<p>and female dependants of workers. WOW promotes gender equality and empower women’s knowledge and skills.</p> <p>The WOW committee will conduct meeting from time to time to discuss related matters with latest meeting conducted as per sample as following:</p> <ul style="list-style-type: none"> - Sedenak Estate latest Women Onwards (WOW) meeting date: 16/9/2022 at Sedenak WOW Activity Centre (Creche) - Kuala Kabong Estate latest Women Onwards (WOW) meeting date: 27/7/2022 at estate office 	
6.1.6	<p>There is evidence of equal pay for the same work scope.</p> <p>- Minor compliance -</p>	<p>Evidence of equal pay for the same work scope sighted for both male and female workers as per samples as following:</p> <p>Sedenak Estate sample workers:</p> <ul style="list-style-type: none"> - Employee # E370001246; F; GW: Date joined: 7/11/2017 - Employee # E370001518; M; Harvester: Date joined: 15/3/2020 - Employee # E370002658; F; GW: Date joined: 1/8/2022 - Employee # E370000910; M; Harvester: Date joined: 12/2/2015 <p>Kuala Kabong Estate sample workers:</p> <ul style="list-style-type: none"> - Employee # E140000896; M; Harvester: Date joined: 20/1/2019 - Employee # E140001003; F; GW: Date joined: 5/4/2021 - Employee # E140000477; M; Tractor Driver: Date joined: 1/9/2014 - Employee # E140001017; F; GW: Date joined: 12/12/2021 <p>Sedenak POM sample workers:</p> <ul style="list-style-type: none"> - Employee # *E1; M; GW: Date joined: 1/8/2005 	Complied

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		<ul style="list-style-type: none"> - Employee # *E2; F; GW: Date joined: 15/10/2021 - Employee # *E3; M; GW: Date joined: 21/2/2016 - Employee # *E4; F; GW: Date joined: 3/7/2022 	
Criterion 6.2: Pay and conditions for staff and workers and for contract workers always meet at least legal or industry minimum standards and are sufficient to provide decent living wages (DLW).			
6.2.1	<p>(C) Applicable labour laws, union and/or other collective agreements and documentation of pay and conditions are available to the workers in national languages (English or Bahasa Malaysia) and explained to them in language they understand.</p> <p>- Critical (Major) compliance -</p>	<p>There were employment contracts for staffs and workers. Pay and conditions are documented and achieved the Minimum Wage Order 2022. Sample of employment contracts confirmed that terms and conditions are clearly outlined as per collective agreement and Employment Act 1955 which have been signed by the worker. Records of pay documents including payslips, checkroll and Socso 8A form verified for month of Dec 2021, March 2022 & June 2022 for sample workers as in indicator 6.1.6 above.</p>	Complied
6.2.2	<p>(C) Employment contracts and related documents detailing payments and conditions of employment (e.g. regular working hours, deductions, overtime, sick leave, holiday entitlement, maternity leave, reasons for dismissal, period of notice, etc. in compliance with national legal requirements) and payroll documents give accurate information on compensation for all work performed. This includes a form of record for work done by family members.</p> <p>- Critical (Major) compliance -</p>	<p>Sample of employment contracts confirmed that terms and conditions are clearly outlined as per collective agreement and Employment Act 1955 which have been signed by the worker. Records of pay documents including payslips, checkroll and Socso 8A form verified for month of Dec 2021, March 2022 & June 2022 for sample workers as in indicator 6.1.6 above give accurate information on compensation for all work performed.</p>	Complied
6.2.3	<p>(C) There is evidence of legal compliance for regular working hours, deductions, overtime, sickness, holiday entitlement, maternity leave, reasons for dismissal, period of notice and other legal labour requirements.</p> <p>- Critical (Major) compliance -</p>	<p>Sample of employment contracts confirmed that terms and conditions are clearly outlined as per collective agreement and Employment Act 1955 which have been signed by the worker. Records of pay documents including payslips, checkroll and Socso 8A form verified for month of Dec 2021, March 2022 & June 2022 for sample workers as in indicator 6.1.6 above give the evidence of legal compliance for regular working hours, deductions, overtime,</p>	Complied

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		sickness, holiday entitlement, maternity leave, reasons for dismissal, period of notice and other legal labour requirements.	
6.2.4	<p>(C) The unit of certification provides adequate housing, sanitation facilities, water supplies, medical, educational and welfare amenities to national standards or above, where no such public facilities are available or accessible. National laws, or in their absence the ILO Guidance on Workers’ Housing Recommendation No. 115, are used. In the case of acquisitions of non-certified units, a plan is developed detailing the upgrade of infrastructure. A reasonable time (5years) is allowed to upgrade the infrastructure.</p> <p>- Critical (Major) compliance -</p>	<p>The estate management has provided free housing facilities to all the workers. Basic amenities such as water and electricity were provided to the workers. Linesite inspection was carried out as per Work Instruction for Housing Inspection on monthly basis by Hospital Assistant (HA) and Visiting Medical Officer (VMO). Latest inspection was conducted as following:</p> <ul style="list-style-type: none"> - Kuala Kabong Estate VMO Visit Report Latest visit date: 20/9/2022 by Dr. Shamsul Abdul Rahman from Klinik Adham Cawangan Kelapa Sawit - Latest housing inspection Kuala Kabong Estate date: 21/9/2022 for Block A to Block G House # LQ1 to LQ38. 	Complied
6.2.5	<p>The unit of certification makes efforts to improve workers' access to adequate, sufficient and affordable food.</p> <p>- Minor compliance -</p>	<p>The estate ensured improved access to food through provision of grocery shop within estates as per Tenancy Agreement between Kulim (Malaysia) Berhad, Ladang Kuala Kabong and Basrah Binti Atan; Grocery Shop tenant period: 1/1/2021 – 31/12/2022. Sighted September 2022 Goods and Foods Price Listing sold in the grocery shop.</p>	Complied
6.2.6	<p>A DLW is paid to all workers, including piece rate/quotas, for whom the calculation is based on achievable quotas during regular work hours.</p> <p>PROCEDURAL NOTE: STATEMENT FROM THE RSPO STANDARDS STANDING COMMITTEE REGARDING INDICATOR 6.2.6 ON DECENT LIVING WAGE</p> <p>With reference to procedural note of indicator 6.2.6, the RSPO has published a guidance on the DLW calculation in June 2019. The RSPO Secretariat will endeavour to carry out DLW country benchmarks for palm oil producing countries in which RSPO members operate and for which no Global Living Wage Coalition (GLWC) benchmarks exist (As of September 2019, GLWC has developed national benchmarks in Bangladesh, Belize, Brazil, China, Colombia, Costa Rica, Dominican Republic, Ecuador, Ethiopia, Ghana, Guatemala, India, Kenya, Malawi, Mexico, Nicaragua, Pakistan, South Africa, Sri Lanka, Uganda and Vietnam These</p>	<p>The payment of wages is based on the latest minimum wages stipulated under the Minimum Wages Order 2022, which is 57.69 per day, or RM1,500 per month effective from May 2022 onwards. Payslips for June 2022 sighted for sampled workers (refer indicator 6.2.2) confirmed the payment of the minimum wages.</p> <p>Notwithstanding a prevailing wage assessment conducted for Sedenak Certification Unit which resulting in the average take home pay as prevailing wages as per sample as following:</p> <p>Sedenak Estate Prevailing Wages assessment 2021:</p> <ul style="list-style-type: none"> - Total workers: 224 	Complied

<p>benchmarks are developed based on banana, coffee, floriculture, textile, manufacturing, seafood processing and tea industry. The RSPO is in the process of commissioning benchmarks for Malaysia and Indonesia for the palm oil sector and will develop methods to calculate and/or define DLW applicability for all palm oil producing countries in which RSPO members operate).</p> <p><i>Where a GLWC living wage standard (benchmark), or one that fulfils the basic requirements of the RSPO-endorsed living wage methodology, has been established in the country or region of operation, the same should be used as benchmarks.</i></p> <p>In the absence of such benchmarks, the RSPO will collaborate with the GLWC and/or local experts on developing oil palm industry benchmarks (Benchmark in this context may include other approaches and/or methods to calculate the applicability of DLW in the country or region in accordance to the RSPO endorsed method for determining a DLW. Local applicability for benchmarks is important and it may differ based on the needs of each locality or country). These benchmarks will be developed in collaboration and consultation with relevant stakeholders such as palm oil industry members, workers' union, authorities and/or relevant organisations.</p> <p><i>For countries where no living wage standard is established, until such time that an RSPO endorsed benchmark for the country is in place, national minimum wages shall be paid to all workers. In addition to the payment of minimum wages, the Unit of Certification (UoC) shall conduct an assessment of the prevailing wages and in-kind benefits provided to workers in the Unit of Certification aligned with the RSPO Guidance for Implementing a Decent Living Wage (RSPO Guidance for Implementing a Decent Living Wage. The RSPO will also develop further guidance and tools to calculate DLW in line with the RSPO endorsed methodology which may include independent studies by local experts in their respective region or country).</i></p> <p>Once these benchmarks are available, this procedural note is no longer applicable. UoC shall have an implementation plan towards the payment of a DLW with specific targets, and a phased implementation process including:</p> <ul style="list-style-type: none"> • Updated assessment on prevailing wages and in-kind benefits • There is annual progress on the implementation of living wages • Where a minimum wage, based on equivalent of baskets of goods, is stipulated in Collective Bargaining Agreements (CBAs), this should be used as the foundation for the gradual implementation of the living wage payment • The UoC may choose to implement the living wage payment in a specific section as a pilot project; the pilot will then be evaluated and adapted before eventual scale up of the living wage implementation. 	<ul style="list-style-type: none"> - Total cost of in-kind benefits (Housing, Electricity & Water, Education, Creche Facilities, Healthcare, Transport, Clothing, Food, Sports and Recreation Facilities): RM 211.59/worker - Average monthly take home salary per worker: RM 1,727.54 - Prevailing wages: RM 1,939.13 <p>Kuala Kabong Estate Prevailing Wages assessment 2021:</p> <ul style="list-style-type: none"> - Total workers: 106 - Total cost of in-kind benefits (Housing, Electricity & Water, Education, Creche Facilities, Healthcare, Transport, Clothing, Food, Sports and Recreation Facilities): RM 477.03/worker - Average monthly take home salary per worker: RM 1,987.56 - Prevailing wages: RM 2,464.59 <p>Sedenak POM Prevailing Wages assessment 2021:</p> <ul style="list-style-type: none"> - Total workers: 164 - Total cost of in-kind benefits (Housing, Electricity & Water, Education, Creche Facilities, Healthcare, Transport, Clothing, Food, Sports and Recreation Facilities): RM 1,286.14/worker - Average monthly take home salary per worker: RM 2,206.22 - Prevailing wages: RM 3,492.36 	
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	- Minor compliance -		
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>	There was no casual worker employed by all the estates and mill within Sedenak complex. All the workers are permanent workers.	Complied
<p>Criterion 6.3: The unit of Certification respects the rights of all personnel to form and join trade unions of their choice and to bargain collectively. Where the right to freedom of association and collective bargaining are restricted under law, the employer facilitates parallel means of independent and free association and bargaining for all such personnel.</p>			
6.3.1	<p>(C) A published statement recognising freedom of association and right to collective bargaining in national languages (English and/or Bahasa Malaysia) is available and is explained to all workers, in language that they understand, and is demonstrably implemented.</p> <p>- Critical (Major) compliance -</p>	<p>A published statement on freedom of association is available and displayed at the main notice boards within the Sedenak Mill and its supply base. Also sighted in Paragraph 2 of the Employees' Guide Book which confirms and respects workers' rights to join a union recognized by the Kulim (Malaysia) Berhad.</p> <p>Kulim (Malaysia) Berhad's Core Labour Standards on Rights of Employees which states that the company recognises and respects the rights of employees to form and/or join trade unions of their choice which are given due recognition by the company.</p>	Complied
6.3.2	<p>Minutes of meetings between the unit of certification with trade unions or workers representatives, who are freely elected, are documented in national languages (English and/or Bahasa Malaysia) and made available upon request.</p> <p>- Minor compliance -</p>	<p>All workers are given freedom to form or join any association and mainly they are members of NUPW. All NUPW members among workers in mill and estate will choose their own representatives in a poll to become the committee members. Committee members will discuss with management in case of any issue raised by workers with management in a Joint Consultative Committee (JCC) meeting as per sample minutes of meeting records as following:</p> <ul style="list-style-type: none"> - Sedenak Estate latest meeting between Workers Union Committee with Sedenak Estate Manager # 01/2022; Date: 1/9/2022 	Complied

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		<ul style="list-style-type: none"> - Kuala Kabong Estate latest meeting between Workers Union Committee with Kuala Kabong Estate Manager # 01/2022; Date: 18/9/2022 - Sedenak POM latest meeting between Workers Union Committee with Sedenak POM Manager # 03/2022; Date: 21/9/2022 	
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>	All NUPW members among workers in mill and estate will choose their own representatives in a poll to become the committee members.	Complied
Criterion 6.4: Children are not employed or exploited.			
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>	Kulim (Malaysia) Berhad has established Core Labour Standard Policy dated 1/5/2018 where they are not engage 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. 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.	Complied
6.4.2	<p>(C) There is evidence that minimum age requirements are met. Personnel files show that all workers are above the national minimum age or above company policy minimum age, whichever is higher. There is a documented age screening verification procedure.</p> <p>- Critical (Major) compliance -</p>	Documentary evidence is available that minimum age requirements are met. This is based on workers' check roll list and copies of their passport/NRIC details. Based on workers' NRIC and passports, all workers were at least 18 years old when employed.	Complied
6.4.3	<p>(C) Young persons may be employed only for non- hazardous work, with protective restrictions in place for that work.</p> <p>- Critical (Major) compliance -</p>	Based on the workers particulars of assessed and interview conducted with workers in the mill and all estates within Sedenak complex, no young person employed.	Complied

6.4.4	<p>The unit of certification demonstrates communication about its 'no child labour' policy and the negative effects of child labour, and promotes child protection to supervisors and other key staff, smallholders, FFB suppliers and communities where workers live.</p> <p>- Minor compliance -</p>	<p>All contracts included with the addendums as following: "The contractors represent and warrant that the Contractor shall comply with applicable labour and employment laws regarding; and prohibit any form of child labour, forced and trafficked labour. Any eligible your labour will be employed only in accordance with Children and Young Person (Employment) 1966." This was demonstrated by the third party as acknowledgement signing in the Addendum to The Contract Agreement and Addendum to The Letter of Acceptance of agreement sample sighted in indicator 2.2.2 above. Based on the workers particulars of sample vendors assessed, no child labour or young person employed by them too.</p>	Complied
Criterion 6.5: There is no harassment or abuse in the workplace, and reproductive rights are protected.			
6.5.1	<p>(C) A policy to prevent sexual and all other forms of harassment and violence is implemented and communicated to all levels of the workforce.</p> <p>- Critical (Major) compliance -</p>	<p>A Policy to prevent sexual and other forms of harassment are available in Sexual Harassment Policy dated 1/5/2018 signed by Executive Director.</p>	Complied
6.5.2	<p>(C) A policy to protect the reproductive rights of all, especially of women, is implemented and communicated to all levels of the workforce.</p> <p>- Critical (Major) compliance -</p>	<p>Kulim (Malaysia) Berhad's Core Labour Standard dated 1/5/2018 signed by Executive Director provides protection of reproductive rights of all workers. The Labour Standard specifies that the Company recognizes the rights of employees to reproduction and reproductive health, including the right to make decision on reproduction. Based on interviews with the workers, there is evidence that this Standard is being implemented where female workers are entitled to 60 days paid maternity leave, and pregnant women are given light work to do.</p>	Complied

6.5.3	<p>Management has assessed the needs of new mothers, in consultation with the new mothers, and actions are taken to address the needs that have been identified.</p> <p>- Minor compliance -</p>	<p>Assessment of new mothers' needs were done via a census form. The census form assessed the mothers' needs for creche/childcare, antenatal, vaccination, maternity and paternity, postpartum care, prenatal check-up, breastfeeding facilities, awareness and counselling. Also the assessment was also discussed during gender committee meetings as respective operating units.</p>	Complied
6.5.4	<p>A grievance mechanism, which respects anonymity and protects complainants where requested, is established, implemented and communicated to all levels of the workforce.</p> <p>- Minor compliance -</p>	<p>A grievance mechanism, which respects anonymity and protects complainants where requested, is established as per procedure Sustainable Management System; Issue # 1; Grievance; Doc. # SQD/SMS/4.1; Rev. # 0; Date: 1/8/2020.</p> <p>A Grievance/ Complaint Form for Sexual Harassment was developed to record if there is any complaint. Interview conducted with the female workers confirmed that they are aware of the grievance mechanism and no issue reported.</p>	Complied
<p>Criterion 6.6: No forms of forced or trafficked labour are used.</p>			
6.6.1	<p>(C) All workers have entered into employment voluntarily and the following are prohibited:</p> <ul style="list-style-type: none"> • Retention of identity documents or passports (except for administration purposes including legalisation and renewal processes) • Charging the workers for recruitment fees. • Contract substitution • Involuntary overtime • Lack of freedom of workers to resign • Penalty for termination of employment • Debt bondage • Withholding of wages <p>- Critical (Major) compliance -</p>	<p>Based on verification through interview, documentation review such as employment contract and pay slips, there was no evidence of force labour of any forms. The recruitment fees were also not charged to any workers.</p> <p>Based on the contract agreement dated 13/2/2020 between Kulim (Malaysia) Berhad and PT Hamparan Karya Insani for manpower supply from Indonesia, the cost of workers' transportation to the respective estates/mill will be borne by Kulim. The Demand Letter issued by Indonesian consulate dated 17/2/2020 also specifies that levy and PLKS fees are to be borne by employer. No recruitment fees are imposed on any of the foreign workers, and this was further confirmed by foreign workers interviewed.</p>	Complied

6.6.2	<p>(C) Where temporary or migrant workers are employed, a specific labour policy and/or procedures are established and implemented.</p> <p>- Critical (Major) compliance -</p>	<p>A special labour policy and procedures have been established under the Kulim (Malaysia) Berhad Core Labour Standard signed by Executive Director dated 1/5/2018. This Policy:</p> <ul style="list-style-type: none"> - prohibits the employment of children and young persons, forced and bonded labour - provides for signing of written employment contracts in a language they understand with clear remuneration and description of duties - workers' entitlement to housing and basic amenities which are at par with statutory requirements - free of discrimination, coercion or violence - rights of employees to join trade unions - accessibility to grievance procedure - entitled to one day off per week. <p>Based on pay slips, employment contracts, punch cards reviewed, and interviews conducted with workers, all estates and mill within Sedenak complex are able to demonstrate the implementation of this Policy.</p>	Complied
Criterion 6.7: The unit of certification ensures that the working environment under its control is safe and without undue risk to health.			
6.7.1	<p>(C) The responsible person(s) for H&S is identified. There are records of regular meetings between the responsible person(s) and workers. Concerns of all parties about health, safety and welfare are discussed at these meetings, and any issues raised are recorded.</p> <p>- Critical (Major) compliance -</p>	<p>The Estate Sr. Manager has been appointed as person responsible for safety and health in the estate as per appointment letter no SQD/ADMIN.020/21 dated 15/09/2021 signed by the Chairman, ESG Committee (Occupational Safety and Health).</p> <p>The management has established Safety Committee Member consist of Secretary, representatives from Employer and representatives from Employee as per appointment letter by the Estate/Mill Manager. The OSH committee discussed regarding the safety and health of the workers on quarterly basis during the OSH</p>	Complied

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		<p>committee meeting. In the meeting discussed on the matters arising from the previous meetings, committee members reports, accident and incident report and workplace inspection. Reviewed the minutes meeting records FY 2021/22 as follows</p> <table border="1" data-bbox="1137 507 1926 836"> <tr> <td>Estate</td> <td>04/2021</td> <td>01/2022</td> <td>02/2022</td> <td>03/2022</td> </tr> <tr> <td>Sedenak Estate</td> <td>23/12/2021</td> <td>27/03/2022</td> <td>14/07/2022</td> <td>12/09/2022</td> </tr> <tr> <td>Kuala kabong Estate</td> <td>16/12/2021</td> <td>28/03/2022</td> <td>27/06/2022</td> <td>19/09/2022</td> </tr> <tr> <td>Sedenak POM</td> <td>27/12/2021</td> <td>25/03/2022</td> <td>27/06/2022</td> <td>04/09/2022</td> </tr> </table>	Estate	04/2021	01/2022	02/2022	03/2022	Sedenak Estate	23/12/2021	27/03/2022	14/07/2022	12/09/2022	Kuala kabong Estate	16/12/2021	28/03/2022	27/06/2022	19/09/2022	Sedenak POM	27/12/2021	25/03/2022	27/06/2022	04/09/2022	
Estate	04/2021	01/2022	02/2022	03/2022																			
Sedenak Estate	23/12/2021	27/03/2022	14/07/2022	12/09/2022																			
Kuala kabong Estate	16/12/2021	28/03/2022	27/06/2022	19/09/2022																			
Sedenak POM	27/12/2021	25/03/2022	27/06/2022	04/09/2022																			
6.7.2	<p>Accident and emergency procedures are in place and instructions are clearly understood by all workers. Accident procedures are available in national languages (English and/or Bahasa Malaysia) and explained in the language understandable to the workforce. Assigned operatives trained in first aid are present in both field and other operations, and first aid equipment is available at worksites. Records of all accidents are kept and periodically reviewed.</p> <p>- Minor compliance -</p>	<p>Kulim has established accident and emergency procedure consist of accident, fire incident and flood incident.</p> <p>The procedure were brief to all workers and displayed at the notice board. Noted during interview, the understanding of the workers on the procedure were satisfactory.</p> <p>Sedenak Estate</p> <p>The estate continuously conducted training on the accident and emergency procedure to ensure the workers understanding. Latest training was conducted on 16/05/2021.</p> <p>The estate also continuously conducted fire drill training. Latest training was conducted on 23/05/2022.</p>	Complied																				

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		<p>Competent first aider were present at the estate. Reviewed the competent first aider certificate no. FA3674/22/12404 and FA3685/22/12415.</p> <p>The estate provided the first aid kit and mandore was appointed as responsible person. Noted during interview, the mandore understanding on the first aid treatment was satisfactory.</p> <p>The estate conducted first aid kit inspection on monthly basis by the Hospital Assistant. Reviewed the inspection records dated 29/06/2022, 20/07/2022, 08/08/2022 and 22/09/2022.</p> <p>The estate continuously conducted training on the first aid box treatment to ensure the first aider knowledge and understanding. Latest training was conducted on 08/03/2022.</p> <p>Kuala Kabong Estate</p> <p>The estate provided the first aid kit and mandore was appointed as responsible person. Noted during interview, the mandore understanding on the first aid treatment was satisfactory.</p> <p>The estate conducted first aid kit inspection on monthly basis by the Hospital Assistant. Reviewed the inspection records dated 22 - 29/06/2022, 28 - 31/07/2022, 24 - 28/08/2022 and 22 - 24/09/2022.</p> <p>The estate continuously conducted training on the accident and emergency procedure to ensure the workers understanding. The estate has sent the field supervisor to attend the Fire Safety Team Basic Course conducted by Johor Fire department on 08 - 10/08/2022. Reviewed certificate of attendance no. JBPM/ JH(1)/ 05635/ 005635/ 2022</p>	
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		<p>The estate maintain the records of accident in E-Accident system and submitted the headquarters on monthly basis. Reviewed the records as todate of August 2022.</p> <p>The estate maintain the records of major accident and occupational disease occur in the estate and reported to DOSH through JKPP 6 and JKPP 7 form through MyKKP system. Reviewed the JKPP 6 form dated 06/01/2022 and JKPP 7 dated 29/07/2022.</p> <p>The estate also continuously conducted training on fire fighting and fire drill. Review the training records as follows:</p> <ol style="list-style-type: none"> 1. Firefighting and use of fire extinguisher training dated 07/08/2022 2. Firefighting at peat area training dated 07/08/2022 <p>The estate conducted training for appointed first aid kit holders to ensure the understanding of first aid kit usage. Reviewed the training material and training attendances dated 03/02/2022</p> <p>Sedenak Palm Oil Mill</p> <p>The mill provided first kit and placed at designated place such as laboratory, loading ramp, Engine room, effluent and etc. The first aid kit was monitored on monthly basis. Reviewed the monitoring records dated for FFB grading, guard post and office dated 28/06/2022, 27/07/2022, 24/08/2022 and 22/09/2022.</p> <p>The estate maintain the records of major accident and occupational disease occur in the estate and reported to DOSH through JKPP 6 through MyKKP system. Reviewed the JKPP 6 form dated 17/03/2022.</p> <p>The estate also continuously conducted training on Emergency response plan and first aid. Review the training records as follows:</p> <ol style="list-style-type: none"> 1. First Aid training dated 08/09/2022 	
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		<ol style="list-style-type: none"> 2. ERT – Bund rupture and oil spillage training dated 19/08/2022 3. Firefighting system training dated 27/07/2022 4. Fire drill training dated 06/07/2022 <p>The palm oil mill conducted emergency equipment inspection on quarterly basis during workplace inspection. Reviewed the monitoring records dated 21/03/2022, 22/06/2022 and 02/09/2022. The results of the inspection was discussed in the safety committee meeting.</p>	
6.7.3	<p>(C) Workers use appropriate personal protective equipment (PPE), which is provided free of charge to all workers at the place of work to cover all potentially hazardous operations, such as pesticide application, machine operations, land preparation, and harvesting. Sanitation facilities for those applying pesticides are available, so that workers can change out of PPE, wash and put on their personal clothing.</p> <p>- Critical (Major) compliance -</p>	<p>All workers were provided with appropriate PPE as per “Panduan Kerja Selamat”. Refer document no. KULIM/PKS/OSH-1, issue no. 0, revision no. 1 dated 01/03/2021.</p> <p>The operating units maintain the records of PPE usage for all workers. reviewed the PPE issuance records for sampled workers at all estates visited</p> <p>Sedenak Estate</p> <p>Reviewed the PPE issuance records for workers (sprayers) with employment ID. no. as follows:</p> <ol style="list-style-type: none"> 1. E370001576 2. E370000699 3. E370001319 4. E370001377 5. E370002630 6. E370000942 7. E370002634 	Non-compliance

		<p>Sighted during travelling from mill to the estate office pass by field P06, it was noted that a harvester was carrying harvesting equipment on motorbike without sickle cover and safety helmets.</p> <p>Sighted during travelling from mill to the furrow (field P04/1), it was noted that 3 harvesters were not wearing safety helmets during harvesting at P98/1.</p> <p>This was against the Safety Operation Procedure for FFB Harvesting. Refer SOP no. KULIM/PKS/OSH-1, rev. 1 dated 01/03/2021.</p> <p>Kuala Kabong Estate Reviewed the PPE issuance records for workers (harvester) with employment ID. no. as follows:</p> <ol style="list-style-type: none"> 1. E140000896 2. E140000686 3. E140000940 4. E140000833 5. E140000875 6. E140000811 <p>Noted during site visit, the harvester and sprayers was wearing appropriate PPE as per SOP established.</p> <p>Sedenak Palm Oil Mill Reviewed the PPE issuance records for workers (laboratory and workshop) with employment ID. no. as follows:</p> <ol style="list-style-type: none"> 1. E380000624 2. E380000587 	
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		<p>3. E380000555 4. E380000386 5. E380000053 6. E380000469 7. 000950313 8. 000951927 9. E380000184 10. E380000075 11. E380000463</p> <p>Noted during the interview with the workers, the understanding and awareness of PPE usage is satisfactory.</p>	
6.7.4	<p>All workers are provided with medical care and covered by accident insurance. Costs incurred from work- related incidents leading to injury or sickness are covered in accordance with Malaysian law.</p> <p>- Minor compliance -</p>	<p>Medical care is provided to all the employees. Reviewed on workers profile records found that all workers are covered by the accident insurances.</p> <p>Local and foreign workers covered by SOCSO or Perkeso (Pertubuhan Keselamatan Sosial). Reviewed the form 8A, "Jadual Caruman" for June, July and August 2022 for contribution of all employees.</p> <p>For local workers, they were also covered with Employment Insurance Scheme. Reviewed the SIP form, ""Jadual Caruman" for June, July and August 2022 for contribution of all employees.</p>	Complied
6.7.5	<p>Occupational injuries are recorded using Lost Time Accident (LTA) metrics.</p> <p>- Minor compliance -</p>	<p>Records of all accidents are kept. Accident incidences are reviewed during the safety meetings. Records on Lost Time Accident (LTA) metrics was maintained. Accident records are found to be updated. JKKP 8 form were submitted to DOE through MyKKP systems. Sighted the samples of accident statistic FY 2021 as reported to DOSH as follows:</p>	Complied

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Operating units	Accident Cases	LTA	Report ref. no.
Sedenak Estate	19	61	JKKP 8/69480/2021 dated 27/01/2022
Kuala Kabong Estate	14	161	JKKP 8/100268/2021 dated 13/01/2022
Sedenak Palm Oil Mill	2	55	JKKP 8/104294/2021 dated 24/01/2022ffffg

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

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

7.1.1	<p>(C) IPM plans are implemented and monitored to ensure effective pest control. - Critical (Major) compliance -</p>	<p>The estates has incorporated an IPM Plan and Programme for the year 2022 where they have identified the proposed IPM plans for the estate. Among the plans are:</p> <ol style="list-style-type: none"> 1. Rat damage census 2. Rat baiting program 3. Barn owl census 4. Maintenance of barn owl box 5. Beneficial plant planting program <p>Reviewed the records of implementation as follows:</p> <p>Sedenak Estate</p>	Complied
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		<ol style="list-style-type: none"> 1. The estate conducted rat baiting on annually basis base on recommendation of agronomist. Reviewed the rat baiting records for field P00 and P01 conducted in August and September 2022. 2. Latest barn owl census was conducted in October 2021. The occupancy rate was recorded at 60% <p>Kuala Kabong Estate</p> <ol style="list-style-type: none"> 1. The estate conducted rat baiting on annually basis base on recommendation of agronomist. Reviewed the rat baiting records for all field conducted in January and May 2022 with 3 rounds of baiting conducted. 2. Latest barn owl census was conducted in June 2022. The occupancy rate was recorded at 88.37% 	
7.1.2	<p>Species referenced in the Global Invasive Species Database and CABI.org are not to be used in managed areas, unless plans to prevent and monitor their spread are implemented.</p> <p>- Minor compliance -</p>	<p>The estates has conducted assessment on list of species invasiveness used for biological control. No invasive species listed in the CABI.org introduced in the estate.</p> <p>Flora species were used for IPM such as Tunera subulata, Cassia cobanensis, and Antigonan leptopus.</p> <p>Fauna species were used for IPM were Tyto alba.</p>	Complied
7.1.3	<p>There is no use of fire for pest control unless in exceptional circumstances such as plantation sanitation, i.e. where no other effective methods exist, and with prior approval of government authorities.</p> <p>- Minor compliance -</p>	<p>No evidence and records of fire usage for pest control at all estate visited.</p>	Complied
<p>Criterion 7.2: Pesticides are used in ways that do not endanger health of workers, families, communities or the environment.</p>			

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7.2.1	<p>(C) Justification of all pesticides used is demonstrated. Selective products and application methods that are specific to the target pest, weed or disease are prioritised.</p> <p>- Critical (Major) compliance -</p>	<p>Justification of pesticides usage was documented in Kulim (Malaysia) Berhad Agricultural Manual under section H: Justification of Chemical Use. In the section under table H01-2 – H01-6 stated the weed situation, active ingredient chemical brand, product rate/ha and pump dosage.</p>	Complied									
7.2.2	<p>(C) Records of pesticides use (including active ingredients used and their LD50, area treated, amount of active ingredients applied per ha and number of applications) are provided.</p> <p>- Critical (Major) compliance -</p>	<p>Sighted a record of pesticide use (including active ingredients used and their LD 50, area treated, amount of a.i. applied per ha and number of applications) had been maintained from January-December 2021 and January – August 2022 and kept by the estate. reviewed the sampled records of Monitoring Type of pesticides usage per hectare and per ton FFB Production at estates visited as follows:</p> <table border="1" data-bbox="1137 785 1912 967"> <thead> <tr> <th>Estate Name</th> <th>January-December 2021</th> <th>January – August 2022</th> </tr> </thead> <tbody> <tr> <td>Sedenak Estae</td> <td>0.00098</td> <td>0.00171</td> </tr> <tr> <td>Kuala Kabong Estate</td> <td>0.00048</td> <td>0.00039</td> </tr> </tbody> </table>	Estate Name	January-December 2021	January – August 2022	Sedenak Estae	0.00098	0.00171	Kuala Kabong Estate	0.00048	0.00039	Complied
Estate Name	January-December 2021	January – August 2022										
Sedenak Estae	0.00098	0.00171										
Kuala Kabong Estate	0.00048	0.00039										
7.2.3	<p>(C) Any use of pesticides is minimised as part of a plan, eliminated where possible, in accordance with IPM plans.</p> <p>- Critical (Major) compliance -</p>	<p>The estate has established Pesticides Reduction Plan. The plan focusing on mechanization, biological control and chemical use. Among the plan as follows:</p> <ol style="list-style-type: none"> 1. Use rotoslasher for possible field 2. As per IPM plan (beneficial plant and barn owl) 3. Use chemical as per agronomist recommendation and SOP 4. Use chemical specific to target pest, weed and disease 	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>No evidence of prophylactic use of pesticides in the estates visited.</p>	Complied									

	- Minor compliance -		
7.2.5	<p>Pesticides that are categorised as World Health Organisation Class 1A or 1B, or that are listed by the Stockholm or Rotterdam Conventions, and paraquat, are not used, unless in exceptional circumstances, as validated by a due diligence process, or when authorised by government authorities for pest outbreaks.</p> <p>The due diligence refers to:</p> <ul style="list-style-type: none"> a) Judgment of the threat and verify why this is a major threat b) Why there is no other alternative which can be used c) Which process was applied to verify why there is no other less hazardous alternative d) What is the process to limit the negative impacts of the application e) Estimation of the timescale of the application and steps taken to limit application to the specific outbreak. <p>- Minor compliance -</p>	<p>Kulim has ceased the usage and order of Paraquat since 01/03/2015 as per official letter dated 26/02/2015 signed by the Vice President – Estate Operation.</p> <p>The estate has established chemical register listed all the pesticides usage in the estate. Reviewed the chemical register dated 21/02/2022 for Sedenak Estate and 26/01/2022 for Kuala Kabong Estate, no chemical categorised under Class 1A or 1B were used in the estate. verified during site visit at the chemical storage area, no chemical categorised under Class 1A or 1B were keep in the chemical store.</p>	Complied
7.2.6	<p>(C) Pesticides are only handled, used or applied by persons who have completed the necessary training and are always applied in accordance with the product label. All precautions attached to the products are properly observed, applied, and understood by workers (see Criteria 3.6). Personnel applying pesticides must show evidence of regular updates on the knowledge about the activity they carry out.</p> <p>- Critical (Major) compliance -</p>	<p>The pesticides operators has been given training regarding the usage safety and health issue and proper way for chemical application. The training was conducted by the personnel with knowledge on pesticide application such as Estate Manager, Asst. Manager and pesticide supplier. Reviewed the training records as follows:</p> <p>Sedenak Estate</p> <ul style="list-style-type: none"> 1. Pesticide handling, chemical mixing and calibration training dated 04/01/2022 2. Safety work procedure for rat baiting training dated 17/02/2022 	Complied

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		<ul style="list-style-type: none"> 3. Safety work procedure for fogging training dated 24/02/2022 4. Chemical handling, CDA spraying and PPE usage training dated 25/02/2022 <p>Kuala Kabong Estate</p> <ul style="list-style-type: none"> 1. PPE awareness and spraying calibration training dated 14/09/2022 2. Safety work procedure training dated 17/07/2022 3. Chemical handling and triple rinsing training dated 14/07/2022 4. Rat baiting training dated 05/07/2022 	
7.2.7	<p>(C) Storage of all pesticides is in accordance with recognised best practices.</p> <p>- Critical (Major) compliance -</p>	<p>Pesticides were found stored in the mill and all estate’s Chemical Store in accordance with the Occupational Safety and Health Act 1994 (Act 514) and Pesticides Act 1974 (Act 149) and their Regulations.</p> <p>The store was under lock and key at all times. All chemical issued out from the store must be through the requisition from store clerk. Safety signage were displayed at the store area. Safety work procedure were also displayed at the notice board at the chemical store.</p>	Complied
7.2.8	<p>All pesticide containers are triple rinsed and punctured before being disposed of and/or handled responsibly if used for other purposes.</p> <p>- Minor compliance -</p>	<p>All used pesticides containers were triple rinse and were reused as premix chemical containers or punctured and disposed as recycle waste to approved contractors.</p> <p>Sedenak Estate</p> <p>The estate maintain the inventory records of triple rinsed chemical containers. Reviewed the records FY 2022 for pesticides container</p>	Complied

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		<p>for Ranger (4L), Kenly (500 g), Miracle (500 ml), Garlon Mix and Glyphosate (20 L). The latest disposal was conducted on 15/05/2022 by Kualiti Alam Sdn. Bhd. Refer consignment note no. 202204151365WBA7.</p> <p>Kuala Kabong Estate</p> <p>The estate maintain the inventory records of triple rinsed chemical containers. Reviewed the records FY 2022 for pesticides container for Ranger, Ally, Miracle and Glyphosate. All triple rinse chemical was disposed through approved contractors, SS Setia. Reviewed latest disposal records as per disposal form dated 03/07/2022.</p>	
7.2.9	<p>(C) Aerial spraying of pesticides is prohibited, unless in exceptional circumstances where no other viable alternatives are available. This requires prior government authority approval. All relevant information is provided to affected local communities at least 48 hours prior to application of aerial spraying.</p> <p>- Critical (Major) compliance -</p>	<p>No evidence of aerial spraying in the estate.</p>	Complied
7.2.10	<p>(C) Specific annual medical surveillance for pesticide operators, and documented action to treat related health conditions, is demonstrated.</p> <p>- Critical (Major) compliance -</p>	<p>The estates conducted medical surveillance on annually basis as per recommendation in the CHRA report.</p> <p>Sedenak Estate</p> <p>Latest medical surveillance was conducted on 12/07/2022 by OHD with DOSH registration no. HQ/15/DOC/00/437. From 26 workers attended the surveillance, 2 workers were found unfit.</p> <p>Kuala kabong Estate</p> <p>Latest medical surveillance was conducted on 13/07/2022 by OHD with DOSH registration no. HQ/15/DOC/00/437. From 17 workers</p>	Complied

		<p>attended the surveillance, 1 workers were found unfit. Notification has been made to DOSH through JKPP 7 form on 29/07/2022.</p> <p>The estates conducted the medical screening for chemical handlers on monthly basis during by Estate Hospital Assistant visit.</p>											
7.2.11	<p>(C) No work with pesticides is undertaken by persons under the age of 18, pregnant or breastfeeding women or other people that have medical restrictions and they are offered alternative equivalent work.</p> <p>- Critical (Major) compliance -</p>	<p>Addressed in Kulim (Malaysia) Berhad, the SOP for Agrochemical Management under Sustainable Management System; Doc Number: SQD/SMS/6.1; Doc Date: 01/08/2020 (Issue 01) states "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>	Complied										
<p>Criterion 7.3: Waste is reduced, recycled, reused and disposed of in an environmentally and socially responsible manner.</p>													
7.3.1	<p>A waste management plan which includes reduction, recycling, reusing, and disposal based on toxicity and hazardous characteristics, is documented and implemented.</p> <p>- Minor compliance -</p>	<p>Sedenak Palm Oil Mill, Sedenak Estate and Kuala Kabong Estate 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 most significant environmental receptors for the estates and mill operations were:</p> <table border="1"> <thead> <tr> <th>Waste type</th> <th>Source</th> <th>Action</th> </tr> </thead> <tbody> <tr> <td>Empty pesticide container (SW409)</td> <td>Chemical store</td> <td rowspan="3">For containers that to be disposed, securely placed in the SW Store. When there is adequate quantity 20MT or due to 180 days, contact the licenced contractor for collection and</td> </tr> <tr> <td>Empty pesticide packaging (SW409)</td> <td>Chemical store</td> </tr> <tr> <td>Empty Hydrocarbon</td> <td>Workshop</td> </tr> </tbody> </table>	Waste type	Source	Action	Empty pesticide container (SW409)	Chemical store	For containers that to be disposed, securely placed in the SW Store. When there is adequate quantity 20MT or due to 180 days, contact the licenced contractor for collection and	Empty pesticide packaging (SW409)	Chemical store	Empty Hydrocarbon	Workshop	Complied
Waste type	Source	Action											
Empty pesticide container (SW409)	Chemical store	For containers that to be disposed, securely placed in the SW Store. When there is adequate quantity 20MT or due to 180 days, contact the licenced contractor for collection and											
Empty pesticide packaging (SW409)	Chemical store												
Empty Hydrocarbon	Workshop												

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		containers (SW409)		disposal			
		Batteries (SW102)	Workshop				
		Spent oil (SW305)	Workshop				
		Contaminated Rags / sacks (SW410)	Fertilizer store, Chemical store				
		Hydrocarbon / pesticide spillages (SW408)	Workshop				
		Contaminated soil (SW409)	Workshop				
		Medical Waste	Clinic				
		Effluent Discharge (Mill)	Furrow				
		POME (Mill)	Extraction of CPO				
		<p>The waste generated from the mill/estates operations as shown below. This Sedenak POM, Sedenak Estate and Kuala Kabong Estate has identified all waste products and its source of pollution and documented in Types of Waste Products and Method of Disposal. The waste identified as follows:</p>					
		<table border="1"> <thead> <tr> <th>Type of waste</th> <th>Details</th> </tr> </thead> </table>		Type of waste	Details		
Type of waste	Details						

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		<table border="1"> <tr> <td data-bbox="1144 368 1205 459">1</td> <td data-bbox="1205 368 1424 459">Scheduled waste</td> <td data-bbox="1424 368 1928 459">SW409, SW102, SW305, SW410, SW408, SW409, SW307, SW410, SW422, SW430, SW307, SW404, SW110, SW110/109</td> </tr> <tr> <td data-bbox="1144 459 1205 655">2</td> <td data-bbox="1205 459 1424 655">Non-Schedule waste</td> <td data-bbox="1424 459 1928 655">Domestic waste, Plastic, Garden waste, Kitchen waste, Scrap Iron, Empty Bags, Empty Pesticide containers, palm by product, Liquid waste, Office waste, Rubber materials, POME, Black Smoke etc.</td> </tr> </table> <p>Training on Schedule Waste has been conducted on 10/04/2022 at Sedenak Estate and 11/07/2022 at Kuala Kabong Estate.</p>	1	Scheduled waste	SW409, SW102, SW305, SW410, SW408, SW409, SW307, SW410, SW422, SW430, SW307, SW404, SW110, SW110/109	2	Non-Schedule waste	Domestic waste, Plastic, Garden waste, Kitchen waste, Scrap Iron, Empty Bags, Empty Pesticide containers, palm by product, Liquid waste, Office waste, Rubber materials, POME, Black Smoke etc.	
1	Scheduled waste	SW409, SW102, SW305, SW410, SW408, SW409, SW307, SW410, SW422, SW430, SW307, SW404, SW110, SW110/109							
2	Non-Schedule waste	Domestic waste, Plastic, Garden waste, Kitchen waste, Scrap Iron, Empty Bags, Empty Pesticide containers, palm by product, Liquid waste, Office waste, Rubber materials, POME, Black Smoke etc.							
7.3.2	<p>Proper disposal of waste material, according to procedures that are fully understood by workers and managers, is demonstrated.</p> <p>- Minor compliance -</p>	<p>Procedure of Schedule waste management has been established. Refer Work Instruction Schedule Waste, Doc. No: SPO/WI/06 dated 01/10/2020. Other reference made was Guidelines for Packaging, Labelling and Storage of Scheduled Wastes In Malaysia.</p> <p>Record of Inventory of Schedule Waste and Disposal Record as per details below:</p> <p><u>Sedenak Estate</u></p> <p><u>Inventory</u></p> <ul style="list-style-type: none"> • File reference Number: AS(B)J11/123/000/177 • Date Reporting: 31/08/2022 • Waste Generated: SW110, SW 305, SW307, SW404, SW408, SW409, SW410 <p><u>Disposal</u></p> <p><u>Sample 1</u></p> <ul style="list-style-type: none"> • Disposal consignment note: 2022041513DSRY4L • Date Disposal: 14/04/2022 	Non-compliance						

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		<ul style="list-style-type: none"> • SW110 – Waste From Electrical and electronics assemblies: 0.0023 MT by Kualiti Alam Sdn Bhd <p><u>Sample 2</u></p> <ul style="list-style-type: none"> • Disposal consignment note: 20220628075H6GDI • Date Disposal: 28/06/2022 • SW404 – Clinical waste: 0.0031 MT by Kualiti Alam Sdn Bhd <p><u>Kuala Kabong Estate</u></p> <p><u>Inventory</u></p> <ul style="list-style-type: none"> • File reference Number: AS(B)J11/123/000/178 • Date Reporting: 26/09/2022 • Waste Generated: SW110, SW305, SW307, SW404, SW408, SW409 and SW410 <p><u>Disposal</u></p> <p><u>Sample 1</u></p> <ul style="list-style-type: none"> • Disposal consignment note: 2022081009WZEG3C • Date Disposal: 18/08/2022 • SW305 - Spent Lubricating Oil: 0.045 MT by Kualiti Alam Sdn Bhd <p><u>Sample 2</u></p> <ul style="list-style-type: none"> • Disposal consignment note: 2022081809YM0JK5 • Date Disposal: 18/08/2022 • SW409 – Disposed Containers, Used Container: 0.4720 MT by Kualiti Alam Sdn Bhd <p><u>Sedenak POM</u></p>	
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		<p><u>Inventory</u></p> <ul style="list-style-type: none"> File reference Number: JAS.JHQ.600-3/1/34 Date Reporting: 25/09/2022 Waste Generated: SW110, SW 305, SW306, SW307, SW408, SW409, SW410, SW429 <p><u>Disposal</u></p> <p>Sample 1</p> <ul style="list-style-type: none"> Disposal consignment note: 2022092018Q1M4XL Date Disposal: 20/09/2022 SW 410 – Rags, Plastic, papers or filters contaminated: 0.200 MT by Kualiti Alam Sdn Bhd <p>Sample 2</p> <ul style="list-style-type: none"> Disposal consignment note: 2022092018IEB0GN Date Disposal: 20/09/2022 SW 306 – Spent hydraulic oil: 0.010 MT by Kualiti Alam Sdn Bhd <p>Domestic waste for the operating units (estates) was disposed internally as follows:</p> <table border="1" style="width: 100%; border-collapse: collapse;"> <thead> <tr> <th style="width: 33%;">Unit</th> <th style="width: 33%;">Disposal site</th> <th style="width: 33%;">Remarks</th> </tr> </thead> <tbody> <tr> <td>Sedenak Estate</td> <td>P98/2</td> <td>Collection 2/3 x week</td> </tr> <tr> <td>Kuala Kabong Estate</td> <td>P99/2</td> <td>Collection 2/3 x week</td> </tr> </tbody> </table> <p>For Sedenak POM, the domestic waste was managed by the Sedenak Estate as per table above.</p>	Unit	Disposal site	Remarks	Sedenak Estate	P98/2	Collection 2/3 x week	Kuala Kabong Estate	P99/2	Collection 2/3 x week
Unit	Disposal site	Remarks									
Sedenak Estate	P98/2	Collection 2/3 x week									
Kuala Kabong Estate	P99/2	Collection 2/3 x week									

		<p>Minor NC</p> <p>The procedures of labelling Schedule Waste generated was not effectively demonstrated</p> <p>Training on schedule waste has been conducted on 10/07/2022 at Sedenak Estate. Latest disposal has been conducted on 14/04/2022 and 28/06/2022. However, during site visit at Schedule Waste Store and document verification at Sedenak Estate, it was found that Labelling for SW409 (Plastic Pesticide Container) that generated on 10/05/2022 was labelled with Inflammable Liquid Waste (Label 1) instead of Toxic Substance (Waste) (Label 8). It was not in line with Environmental Quality (Scheduled Wastes) Regulations 2005 Section 10 Labelling Of Schedule Waste (2) Containers of scheduled wastes shall be clearly labelled in accordance with the types applicable to them as specified in the Third Schedule and marked with the scheduled waste code as specified in the First Schedule for identification and warning purposes. Other reference was Guidelines for Packaging, Labelling and Storage of Scheduled Wastes in Malaysia, Third Schedule, Labelling Requirement For Schedule Waste. Thus, Minor NC was raised.</p>												
7.3.3	<p>The unit of certification does not use open fire for waste disposal.</p> <p>- Minor compliance -</p>	<p>Refer Work Instruction Landfill, Doc No: SPO/WI/03 dated 01/10/2020. Disposal for domestic and non-hazardous waste is through landfilling at designated area within estate. Segregation of non-degradable and degradable waste was done at site and dumping of waste only allowed for degradable waste. Verified at sampled estates as below:</p> <table border="1" data-bbox="1137 1209 1926 1399"> <thead> <tr> <th rowspan="2">Estate</th> <th colspan="3">Landfill</th> </tr> <tr> <th>Block No</th> <th>Pit No</th> <th>Date Open/Closed</th> </tr> </thead> <tbody> <tr> <td>Sedenak</td> <td>P98/02</td> <td>65, 64</td> <td>05/08/2022, 06/07/2022</td> </tr> </tbody> </table>	Estate	Landfill			Block No	Pit No	Date Open/Closed	Sedenak	P98/02	65, 64	05/08/2022, 06/07/2022	Complied
Estate	Landfill													
	Block No	Pit No	Date Open/Closed											
Sedenak	P98/02	65, 64	05/08/2022, 06/07/2022											

		<table border="1"> <tr> <td>Kuala Kabong</td> <td>P99/2</td> <td>38, 37</td> <td>08/06/2022, 03/08/2022</td> </tr> </table>	Kuala Kabong	P99/2	38, 37	08/06/2022, 03/08/2022	
Kuala Kabong	P99/2	38, 37	08/06/2022, 03/08/2022				
		Awareness training on Zero Burning has been conducted on 21/01/2022 at Sedenak Estate and 15/02/2022 at Kuala Kabong Estate.					
Criterion 7.4: Practices maintain soil fertility at, or where possible improve soil fertility to, a level that ensures optimal and sustained yield.							
7.4.1	<p>Good agriculture practices, as contained in SOPs, are followed to manage soil fertility to optimise yield and minimise environmental impacts.</p> <p>- Minor compliance -</p>	<p>SOPs of good agricultural practices to manage soil fertility to optimise yield and minimise environmental impacts were documented in Kulim (Malaysia) Berhad – Agricultural Manual under section D: Manuring. The procedure includes:</p> <p>D01 – General Information D02 – Methods of Applications D03 – Precision Manuring D04 – Quality Check and Storage D05 – EFB Utilization D06 – POME Utilization D07 – MIWAMAS Composting System D08 – Bio-compost Application D09 – Bio-compost : Quality Check</p>		Complied			
7.4.2	<p>Periodic tissue and soil sampling is carried out by Companies to monitor and manage changes in soil fertility and plant health.</p> <p>- Minor compliance -</p>	<p>Foliar and soil sampling was carried out by Internal Agronomist from Agronomy Advisory and Services Department prior to the fertilizer recommendation for the next financial year. Leaf and soil nutrient analysis are commonly used in the diagnosis of fertilizer requirements in oil palms. The frequency for leaf sampling must be conduct for every year while for soil analysis, the frequency for soil sampling is conducted at 5 years intervals (Leaf and Soil Sampling Notes Procedure - Kulim (M) Bhd.</p>		Complied			

		<p>Reviewed the sampling records as follows:</p> <p>Sedenak Estate Latest soil sampling was conducted in April 2022 as per test report no. SI/2022/05/54 dated 11/05/2022. Latest leaf sampling was conducted on 12/04/2022 to 09/05/2022 as per test report no. LI/2022/05/66 dated 17/05/2022.</p> <p>Kuala Kabong Estate Latest soil sampling was conducted in July 2019 as per test report no. SI/1908/0245-0276 dated 30/08/2019. Latest leaf sampling was conducted in January as per test report no. LI/2001/KK/0054-0067 dated 30/01/2020.</p>							
7.4.3	<p>A nutrient recycling strategy is in place, which includes the recycling of Empty Fruit Bunches (EFB), Palm Oil Mill Effluent (POME), palm residues and optimal use of inorganic fertilisers.</p> <p>- Minor compliance -</p>	<p>The following practices are applied in the estates in relation to the nutrient recycling strategy;</p> <ol style="list-style-type: none"> 1. EFB application in designated fields at dosage of 50 mt/ha applied in inter rows subject to Agronomist recommendations. 2. Cut frond are stacked in between the palms rows left to discompose. 3. Bio compost application in selected fields at rate of 7mt/ha <p>Reviewed the sampled application records as follows:</p> <table border="1" data-bbox="1137 1145 1908 1289"> <thead> <tr> <th>Estate</th> <th>Todate as at August 2022</th> </tr> </thead> <tbody> <tr> <td>Sedenak Estate</td> <td>36963.00 mt</td> </tr> <tr> <td>Kuala Kabong Estate</td> <td>0.00 mt</td> </tr> </tbody> </table>	Estate	Todate as at August 2022	Sedenak Estate	36963.00 mt	Kuala Kabong Estate	0.00 mt	Complied
Estate	Todate as at August 2022								
Sedenak Estate	36963.00 mt								
Kuala Kabong Estate	0.00 mt								

<p>7.4.4</p>	<p>Records of fertiliser inputs are maintained. - Minor compliance -</p>	<p>The estate maintain the records of manuring application as per recommendation by the agronomist.</p> <p>Observed application records as per agronomist recommendation:</p> <p>Sedenak Estate</p> <table border="1" data-bbox="1137 587 1930 879"> <tr> <td>Month program: Feb 2022</td> <td>Month program: May 2022</td> </tr> <tr> <td>Field: P00/1</td> <td>Field: P04/1</td> </tr> <tr> <td>Ha program: 94.25 ha</td> <td>Ha program: 23.83 ha</td> </tr> <tr> <td>Type: AS</td> <td>Type: MOP</td> </tr> <tr> <td>Rate/palm: 2.00 kg/palm</td> <td>Rate/palm: 1.75 kg/palm</td> </tr> <tr> <td>Month completed: Mar 2022</td> <td>Month completed: May 2022</td> </tr> </table> <p>Kuala kabong Estate</p> <table border="1" data-bbox="1137 970 1930 1262"> <tr> <td>Month program: Feb 2022</td> <td>Month program: Mar 2022</td> </tr> <tr> <td>Field: P01/1F</td> <td>Field: P01/1F</td> </tr> <tr> <td>Ha program: 50.19 ha</td> <td>Ha program: 50.19 ha</td> </tr> <tr> <td>Type: KIE</td> <td>Type: AS</td> </tr> <tr> <td>Rate/palm: 1.25 kg/palm</td> <td>Rate/palm: 1.25 kg/palm</td> </tr> <tr> <td>Month completed: Feb 2022</td> <td>Month completed: Jul 2022</td> </tr> </table>	Month program: Feb 2022	Month program: May 2022	Field: P00/1	Field: P04/1	Ha program: 94.25 ha	Ha program: 23.83 ha	Type: AS	Type: MOP	Rate/palm: 2.00 kg/palm	Rate/palm: 1.75 kg/palm	Month completed: Mar 2022	Month completed: May 2022	Month program: Feb 2022	Month program: Mar 2022	Field: P01/1F	Field: P01/1F	Ha program: 50.19 ha	Ha program: 50.19 ha	Type: KIE	Type: AS	Rate/palm: 1.25 kg/palm	Rate/palm: 1.25 kg/palm	Month completed: Feb 2022	Month completed: Jul 2022	<p>Complied</p>
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Month completed: Feb 2022	Month completed: Jul 2022																										
<p>Criterion 7.5: Practices minimise and control erosion and degradation of soils.</p>																											

7.5.1	<p>(C) Maps identifying marginal and fragile soils, including steep terrain, are available.</p> <p>- Critical (Major) compliance -</p>	<p>The operating units has identified the soil series in the estates and established soil series maps. Soil series identified in the estates as follows:</p> <table border="1" data-bbox="1137 475 1921 885"> <thead> <tr> <th>Estate</th> <th>Soil Series</th> </tr> </thead> <tbody> <tr> <td>Sedenak Estate</td> <td>Alma (0.11%), Batang Merbau (4.97%), Batu Lapan (5.24%), Binjai (0.38%), Bungor (10.24%), Gajah Mati, (2.92%), Kampong Pasu (3.34%), Kaya (1.01%), Rengam (21.82%), Slime Tailings (4.63%), Tai Tak (27.27%), Tawar (3.91%), Tebok (6.52%), (Terap 7.56%), Kawasan Bandaran (0.08%)</td> </tr> <tr> <td>Kuala Kabong Estate</td> <td>Deep Peat (78.18%), Batang Merbau (4.2%), Gajah Mati (10.59%), Rengam (6.82%), Unclassified (0.21%)</td> </tr> </tbody> </table>	Estate	Soil Series	Sedenak Estate	Alma (0.11%), Batang Merbau (4.97%), Batu Lapan (5.24%), Binjai (0.38%), Bungor (10.24%), Gajah Mati, (2.92%), Kampong Pasu (3.34%), Kaya (1.01%), Rengam (21.82%), Slime Tailings (4.63%), Tai Tak (27.27%), Tawar (3.91%), Tebok (6.52%), (Terap 7.56%), Kawasan Bandaran (0.08%)	Kuala Kabong Estate	Deep Peat (78.18%), Batang Merbau (4.2%), Gajah Mati (10.59%), Rengam (6.82%), Unclassified (0.21%)	Complied
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Kuala Kabong Estate	Deep Peat (78.18%), Batang Merbau (4.2%), Gajah Mati (10.59%), Rengam (6.82%), Unclassified (0.21%)								
7.5.2	<p>No replanting on steep slopes (above 25 degrees) unless approved by state governments. In case of replanting is permitted, no replanting in contiguous area of steep terrain (greater than 25 degrees) larger than 25 Ha within the Unit of Certification.</p> <p>- Minor compliance -</p>	<p>Addressed in the Agricultural Manual under chapter as follows:</p> <ol style="list-style-type: none"> 1. A07 – Terrace and Platform Construction 2. A07A – Palm Lining and Terrace 3. A08 – Harvester Path Construction 4. A17 – Protection of Natural Water Courses and 5. A18 – Water Management Plan in Peat Area. <p>No replanting was conducted on steep slopes more than 25 degree.</p>	Complied						
7.5.3	<p>There is no new planting of oil palm on steep terrain.</p> <p>- Minor compliance -</p>	<p>No new planting conducted at all estates visited as verified and sighted during site visit.</p>	Complied						
<p>Criterion 7.6: Soil surveys and topographic information are used for site planning in the establishment of new plantings, and the results are incorporated into plans and operations.</p>									

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7.6.1	<p>(C) To demonstrate the long-term suitability of land for palm oil cultivation, soil maps or soil surveys identifying marginal and fragile soils, including steep terrain, are taken into account in plans and operations. - Critical (Major) compliance -</p>	<p>Soil series and topography map available for estate sampled. No fragile soil categorized in the estates sampled. The estate have taken into account the land terrain, drainage and road systems in planning the 2022 replanting.</p>	Complied																					
7.6.2	<p>Extensive planting on marginal and fragile soils, is avoided, or, if necessary, done in accordance with the soil management plan for best practices. - Minor compliance -</p>	<p>Addressed in the Agricultural Manual under chapter as follows: 1. A07 – Terrace and Platform Construction 2. A07A – Palm Lining and Terrace 3. A08 – Harvester Path Construction 4. A17 – Protection of Natural Water Courses and 5. A18 – Water Management Plan in Peat Area.</p>	Complied																					
7.6.3	<p>Soil surveys and topographic information guide the planning of drainage and irrigation systems, roads and other infrastructure. - Minor compliance -</p>	<p>The Agronomy Advisory and Services Department conducted assessment and provided the estates with topography maps. Sampled topography information at estates sited as follows:</p> <table border="1" data-bbox="1137 882 1865 1265"> <thead> <tr> <th></th> <th>Sedenak Estate (%)</th> <th>Kuala Kabong Estate (%)</th> </tr> </thead> <tbody> <tr> <td>0°-2°</td> <td>18.01</td> <td>76.40</td> </tr> <tr> <td>2°-6°</td> <td>57.51</td> <td>16.89</td> </tr> <tr> <td>6°-12°</td> <td>23.05</td> <td>6.08</td> </tr> <tr> <td>12°-20°</td> <td>1.31</td> <td>0.63</td> </tr> <tr> <td>20°-25°</td> <td>0.11</td> <td>0.00</td> </tr> <tr> <td>>25°</td> <td>0.01</td> <td>0.00</td> </tr> </tbody> </table>		Sedenak Estate (%)	Kuala Kabong Estate (%)	0°-2°	18.01	76.40	2°-6°	57.51	16.89	6°-12°	23.05	6.08	12°-20°	1.31	0.63	20°-25°	0.11	0.00	>25°	0.01	0.00	Complied
	Sedenak Estate (%)	Kuala Kabong Estate (%)																						
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Criterion 7.7: No new planting on peat, regardless of depth after 15 November 2018 and all peatlands are managed responsibly.

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7.7.1	<p>(C) 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>Verification of replanting/new planting programme and site verification found that there is no new planting on peat soil at Kuala Kabong estate.</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>PROCEDURAL NOTE:</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>Kuala Kabong Estate is the only estate that grows oil palm on peat soil in Kulim Group. It covers 78.20% (1269.00 ha) of the plantation area. The peat areas are inventoried, documented, and reported to RSPO Secretariat in document title: RSPO Peat Inventory, Drainability Assessment and Revised BMP for Peat dated August 21, 2019. Refer Peat Drainability Assessment Kuala Kabong Estate for Replanting 2026 and replanting 2025 has been prepared dated 26/10/2021 and 02/09/2021 respectively. Report was prepared by Agronomy Advisory Services Department, Kulim (M) Berhad. Result of assessment as below:</p> <table border="1" data-bbox="1137 823 1921 1267"> <thead> <tr> <th>Peatland Zone</th> <th>Drainage limit Time (DLT)</th> <th>No Replanting Indicator (NRI)</th> <th>Status Result</th> </tr> </thead> <tbody> <tr> <td>2026 A (P00/1, P00/2, P00/3)</td> <td>53</td> <td>13</td> <td>No Issue for Replanting</td> </tr> <tr> <td>2026 B (P00/2, P00/3)</td> <td>66</td> <td>26</td> <td>No Issue for Replanting</td> </tr> <tr> <td>2025</td> <td>78</td> <td>38</td> <td>No Issue for Replanting</td> </tr> </tbody> </table> <p>The assessment result show that No Replanting Indicator, NRI>0. It means that area threshold limit has not yet been reached and can replanting.</p>	Peatland Zone	Drainage limit Time (DLT)	No Replanting Indicator (NRI)	Status Result	2026 A (P00/1, P00/2, P00/3)	53	13	No Issue for Replanting	2026 B (P00/2, P00/3)	66	26	No Issue for Replanting	2025	78	38	No Issue for Replanting	Complied
Peatland Zone	Drainage limit Time (DLT)	No Replanting Indicator (NRI)	Status Result																
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		<p>Training on Calculate of Drainability Assessment has been conducted on 08/10/2020 attended by 12 participants from Agronomy Department and Kuala Kabong Estate management team.</p> <p>Evidence of Reporting of RSPO Peat Inventory, Drainability Assessment and Revised BMP for Peat; RSPO Membership Survey – 2019 has been verified through email corresponded between Kulim Malaysia Berhad with RSPO dated 21/08/2019 and 29/11/2021.</p>	
7.7.3	<p>(C) Subsidence of peat is monitored, documented and minimised. - Critical (Major) compliance -</p>	<p>Kulim Plantation Agricultural Manual is used and adhered to by Kuala Kabong Estate Management. In particular, the procedure A19, Monitoring of subsidence of peat soils guide the area (location), maintenance of subsidence poles installed and the monitoring regime.</p> <p>Subsidence rate data from January 2012 to date 03/08/2022 from 6 Subsidence Pole Points and graphic presentation of each pole measurement timeline vs. its subsidence rate (cm) were sighted maintained.</p> <p>Verified sample of subsidence pole at SP 4 at P01/2 were maintained and in order.</p> <p>Piezometer has been constructed at 11 points in the P00. Reading has been recorded as per August 2022. Refer Piezometer Census Book. Sample field observation of Piezometer at P00/4 found in order.</p>	Complied
7.7.4	<p>(C) A documented water and ground cover management programme is in place. - Critical (Major) compliance -</p>	<p>Water Management in peat areas was implemented accordingly as per procedure refer A18. It is used to provide extensive and effective drainage system in peat soil in order to maintain the water levels during dry period and to drain out the excess water during wet period. A typical pattern and cross sectional of Drainage Network is evident. The intensity of field drains in high water table</p>	Complied

		<p>areas starts at every eight row, fourth row and then at every alternate row of oil palm depending on the water table.</p> <p>To conserve moisture, a series of weirs are constructed across the collection drains to hold back water and raise the water-table to within 50-75 cm from the surface. Water level monitoring pole is erected in the middle of the weir. Daily water level at each weirs is recorded in addition to recently installed piezometers (11 units).</p> <p>The weirs sighted in the field are made of sandbags. To regulate the height of the water table, wooden planks/sandbags, acting as sluice gates, are slotted into the desired level. Except for periodic flushing of acidic water during the rainy seasons, the blocks are always maintained at the predetermined level.</p> <p>Assisted by the water gates (5 nos.) at the discharge ends of the main drains, the weirs are very effective in minimizing the adverse effects of the moisture stress.</p> <p>Records of daily water level recording at 65 weirs were conducted to monitor ground level subsidence of peat soil were evident. Refer Weirs Record book that has been daily maintained as per date 27/09/2022.</p>	
7.7.5	<p>(C) For plantations planted on peat, drainability assessments are conducted following the RSPO Drainability Assessment Procedure, or other RSPO recognised methods, at least five years prior to replanting. The assessment result is used to set the timeframe for future replanting, as well as for phasing out of oil palm cultivation at least 40 years, or two cycles, whichever is greater, before reaching the natural gravity drainability limit for peat. When oil palm is phased out, it is replaced with crops suitable for a higher water table (paludiculture) or rehabilitated with natural vegetation.</p> <p>This is subject to transitional (5 years: 2019 to 2024) arrangement stated in the Drainability Assessment Procedure.</p>	<p>No replanting is envisaged in the next 4-5 years at Kuala Kabong estate. Nonetheless, the RSPO Drainability Manual for replanting of existing oil palm on peatlands, issue November 2019 is used.</p>	Complied

	<p>Within 12 months initial implementation period, company could submit other alternate methodologies to be considered by RSPO for recognition.</p> <p>- Critical (Major) compliance -</p>		
7.7.6	<p>(C) All existing plantings on peat are managed according to the 'RSPO Manual on Best Management Practices (BMPs) for existing oil palm cultivation on peat', version 2 (2019) and associated audit guidance.</p> <p>- Critical (Major) compliance -</p>	<p>Kuala Kabong Estate continued to implement Best Management Practices for oil palm cultivation on peat land much in line with RSPO requirements. Subsidence of peat soils are minimised and monitored. Documented water and ground cover management programme is in place. Also noted within the estate, Kuala Kabong has river reserve and boundary buffer zones that it conserves, maintain and rehabilitate because river reserves that are intact and functional are important habitats for biodiversity and provide ecosystem services. It also helps in:</p> <ul style="list-style-type: none"> • Water Quality Management • Flood Mitigation • Riverbank stabilization; and • Fire Protection <p>In addition, that they benefit to promote and contribute to sustainable peatland management as part of reducing the impacts of oil palm cultivation on peat.</p>	Complied
7.7.7	<p>(C) All areas of unplanted and set-aside peatlands in the managed area (regardless of depth) are protected as "peatland conservation areas"; new drainage, road building and power lines by the unit of certification on peat soils is prohibited; peatlands are managed in accordance with the 'RSPO BMPs for Management and Rehabilitation of Natural Vegetation Associated with Oil Palm Cultivation on Peat', version 2 (2019) and associated audit guidance.</p> <p>- Critical (Major) compliance -</p>	<p>At Kuala Kabong Estate it has set aside an unplanted area, 2.19 ha HCV near RISDA oil palm plantings. It is Peat Swamp Forest. Also, nearby there is man-made stream that function as boundary markers separating Kuala Kabong Estate with neighbours where on its bank trees have been neatly planted in rows, mature and flourish in abundance of more or less same height with each other. The area is scenic, soothing to the eyes and has attracted macaque to dominate and freely roam the protected "peatland conservation area" as sighted by the auditor. This Rehabilitation of Natural Vegetation, that is, adoption by a plantation of an adjacent peat</p>	Complied

		swamp forest area not only can reduce the net GHG emission profile but also can be a useful part of any GHG emission reduction strategy.													
Criterion 7.8: Practices maintain the quality and availability of surface and groundwater.															
7.8.1	<p>A water management plan is in place and implemented to promote more efficient use and continued availability of water sources and to avoid negative impacts on other users in the catchment. The plan addresses the following:</p> <p>a) The unit of certification does not restrict access to clean water or contribute to pollution of water used by communities.</p> <p>b) Workers have adequate access to clean water.</p> <p>- Minor compliance -</p>	<p>The Sedenak Certification Units monitors water quality of outgoing waters to identify any adverse effect from the mill and estate activities. There is no water from mill discharge to waterways. All water from ETP at mill are used for land irrigation. The plan takes into account the efficient use of resources, ensure amongst others that the use of water did not impact on other users, avoid contamination of ground and surface water, and appropriate treatment of mill effluent. The mill and estate water management plans have been established with the recent review made on 01/08/2022. Among topics discussed in the management Plan were:</p> <p>Estate</p> <table border="1"> <thead> <tr> <th>Activity</th> <th>Water Use</th> <th>Action Plan</th> </tr> </thead> <tbody> <tr> <td>Spraying & Manuring</td> <td>Water pollution, degradation of water quality, water availability</td> <td>Buffer Zone area where all the activity (Spraying and Manuring) not allowed in these areas</td> </tr> <tr> <td></td> <td></td> <td>Inlet and outlet water analysis after manuring activity</td> </tr> <tr> <td></td> <td></td> <td>No construction of bunds/weirs/damn</td> </tr> </tbody> </table>	Activity	Water Use	Action Plan	Spraying & Manuring	Water pollution, degradation of water quality, water availability	Buffer Zone area where all the activity (Spraying and Manuring) not allowed in these areas			Inlet and outlet water analysis after manuring activity			No construction of bunds/weirs/damn	Complied
Activity	Water Use	Action Plan													
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		Inlet and outlet water analysis after manuring activity													
		No construction of bunds/weirs/damn													

				across the main rivers or waterways					
		Cleaning process	Wastage of water	Monitor use of water					
				Awareness briefing on water usage efficiently					
				Monitor leakage and periodically maintenance					
		Linesite	Water Pollution	Drinking water analysis as required by SPAN					
				Monitor condition of Septic Tank					
7.8.2	<p>(C) Water courses and wetlands are protected, including maintaining and restoring appropriate riparian and other buffer zones in line with 'RSPO Manual on BMPs for the management and rehabilitation of riparian reserves' (April 2017) or applicable National legislation or specific environmental permit. Smallholders may replant existing planted areas provided there is no evidence of environmental deterioration having occurred during the previous cycle.</p> <p>- Critical (Major) compliance -</p>	<p>Water courses and wetlands are protected including maintaining and restoring appropriate riparian buffer zones. Riparian buffer zones have been identified and demarcated. White and blue stripe marker poles were erected. No chemicals and fertilizer application observed been used in their maintenance. In some areas Guatemala grass were planted along the riverbanks. The guidelines are detailed in the SOP No A17: Protection of Natural of Water Course. The buffer zones established are as follows</p> <table border="1"> <tr> <td>River width (meter)</td> <td>Minimum width for river reserve (m) for peninsular Malaysia and Sarawak</td> </tr> <tr> <td>1-5</td> <td>5</td> </tr> </table>		River width (meter)	Minimum width for river reserve (m) for peninsular Malaysia and Sarawak	1-5	5	Complied	
River width (meter)	Minimum width for river reserve (m) for peninsular Malaysia and Sarawak								
1-5	5								

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5-10	10
10-20	20
20-40	40
>40	50

All estates monitored river water entering and exiting their property. Water sampling for Nitrate Nitrogen and Phosphate was done in months when fertilisers were applied. Analysis was assigned to UTCL Laboratory, Kota Tinggi.

Sedenak Estate

- Date of report: 07/09/2022
- Report No: W1/2022/09/517
- Date Tested: 05/09/2022 – 06/09/2022
- Sample point: W1-1336-Inlet In P01/06, W1-1337-Outlet P01/06

Kuala Kabong Estate

- Date of report: 14/08/2022
- Report No: W1/2022/08/431
- Date Tested; 09/08/2022 – 11/08/022
- Sample point: W1-1187 In Let SP P99/02 and W1-1188 Out Let SP P02/04

Sedenak POM

- Date of report: 14/08/2022
- Report No: W1/2022/08/431
- Date Tested; 09/08/2022 – 11/08/022

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		<ul style="list-style-type: none"> • Sample point: W1-1187 In Let SP P99/02 and W1-1188 Out Let SP P02/04 <p>For Sedenak POM, the water quality at 2 sampling point at Sungai Sayong were monitored as per requirement in Jadual Pematuhan #004532. Refer report details as below:</p> <ul style="list-style-type: none"> • Date of report: 14/09/2022 • Report No: W1/2022/09/523 • Date Tested; 05/09/2022 – 12/09/2022 • Sample point: W1-1343: Jalan Besar, W1-1344: Sebelum Sg Sayong, W1-1345: Up Stream Sg Sayong, W1-1346: Down Stream Sg Sayong 							
7.8.3	<p>Mill effluent is treated to be in compliance with national regulations. Discharge quality of mill effluent, especially Biochemical Oxygen Demand (BOD), is regularly monitored.</p> <p>- Minor compliance -</p>	<p>The effluent treatment plant was made in accordance and interview with operator in charge revealed that the operation was in accordance with standard operation procedure and legal requirements. No overflow was observed, and flow meter reading was recorded daily.</p> <p>Discharge quality of mill effluent, especially Biochemical Oxygen Demand (BOD), is quarterly monitored as per OER. Effluent Analysis conducted by accredited laboratory, Mahamurni Plantations Sdn Bhd and submitted to DOE every 3 months through OER (Online Environmental Report) and in compliance with mill's compliance schedule for quarterly submission. Refer to the latest report for dated July 2022. Monthly analysis was done for final discharge point. Total of 8 parameters (pH, BOD₃, COD, TS, SS, TN, AN and O&G) were tested. Latest analysis report for 1st quarter and 2nd quarters of year 2022.</p> <table border="1" data-bbox="1137 1278 1921 1364"> <thead> <tr> <th data-bbox="1137 1278 1317 1326">Report Date</th> <th data-bbox="1317 1278 1581 1326">Quarter/Week</th> <th data-bbox="1581 1278 1921 1326">BOD</th> </tr> </thead> <tbody> <tr> <td colspan="3" data-bbox="1637 1326 1861 1364" style="text-align: center;">(Limit=2500mg/L)</td> </tr> </tbody> </table>	Report Date	Quarter/Week	BOD	(Limit=2500mg/L)			Complied
Report Date	Quarter/Week	BOD							
(Limit=2500mg/L)									

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		06/04/2022	1 st week/1 st month	314.00		
			5 th week/2 nd Month	408.00		
			9 th week/3 rd Month	471.00		
		02/07/2022	1 st week/1 st month	660.00		
			5 th week/2 nd Month	414.00		
			9 th week/3 rd Month	81.00		
		Effluent discharge at Sedenak POM was through the Furrow System. Verified through site visit at P04/1 found the system were monitored and compliance with Jadual Pematuhan #004532.				
7.8.4	Mill water use per tonne of FFB is monitored and recorded. - Minor compliance -	Mill has maintained monitoring of water usage for processing FFB which are recorded monthly. Water for processing is abstracted from water catchment by using pump. The trend of water usage is tandem with volume of FFB process. Refer Water Usage Record Sedenak POM. Average data as below:				Complied
		Year	FFB Processed	Water/L	Water/FFB	
		2021	411,322.11	431,918.00	1.05	
		Tdt Aug 2022	223,845.47	245,261.00	1.10	
Criterion 7.9: Efficiency of fossil fuel use and the use of renewable energy is optimised						
7.9.1	A plan for efficiency of the use of fossil fuels and to optimise renewable energy is implemented, monitored and documented. - Minor compliance -	A plan for improving the efficiency of the use of fossil fuels is in place and has been incorporated into the Environmental Aspect and Impact activities report for 2022. The document was reviewed/updated on February 2022. The estates and mill record and monitor the diesel utilization over the running hours of gen-set				Complied

and other vehicles running. Performance variation in view of several factors as below:

1. Infrastructure of estates,
2. Community size / no of gen-sets,
3. No. of vehicles / age of machine.
4. Weather interference / crop production volume

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

The Sedenak POM and estate continued to monitor its diesel consumption and records were documented.

The biogas plant that in progress to build up which generates electricity in future will improve the efficiency of fossil fuel consumption.

The diesel utilisation for the mill and estates is provided in the below table.

Sedenak Estate

Period	Diesel	FFB4	Diesel/FFB
Jan – Aug 2022	133,232.00	26,317.80	5.06

Kuala Kabong Estate

Period	Diesel	FFB	Diesel/FFB
Jan – Aug 2022	54,066.00	24,585.18	2.20

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		Sedenak POM			
		Period	Diesel	FFB Processed	Diesel/FFB
		Jan – Aug 2022	295,594.00	223,845.47	1.32
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>(C) GHG emissions are identified and assessed for the unit of certification. Plans to reduce or minimise them are implemented, monitored through the Palm GHG calculator and publicly reported.</p> <p>- Critical (Major) compliance -</p>	<p>The GHG emissions are identified and assessed for the unit certification by sustainability team. RSPO GHG Calculator version 4 is used. The consumption of fertilisers and diesel were verified through Estates:</p> <ul style="list-style-type: none"> • FFB record book • Stock book • Monthly stock issue • Stock requisition note Mill: • Mill Month End Production Report • Monthly production report • Flowmeter & running hours record book • Bio-gas generation daily monitoring log sheet • Effluent analysis report Based on the verification of records; all the sampled issuance was traceable 			Complied
7.10.2	<p>(C) Starting 2014, the carbon stock of the proposed development area and major potential sources of emissions that may result directly from the development are estimated and a plan to minimise them prepared</p>	Not applicable since no new development by the certification unit.			Not Applicable

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	<p>and implemented (following the RSPO GHG Assessment Procedure for New Development).</p> <p>- Critical (Major) compliance -</p>		
7.10.3	<p>(C) Other significant pollutants are identified and plans to reduce or minimise them implemented and monitored.</p> <p>- Critical (Major) compliance -</p>	<p>Assessment of all polluting activities was conducted under Environmental Risk Assessment for identifying activities that contributes significant impact to environment including gaseous emission.</p> <p>As prescribed under DOE's Compliance Schedule, the mill is obliged to conduct stack sampling minimum once a year. Below are the verified reports:</p> <p><u>1st Half 2022</u></p> <ul style="list-style-type: none"> • Report no.: Sedenak5-2/05/2022 • Report date: 25/05/2022 • Result: Dust: 132 mg/m³ (B5) vs limit 150, CO: 536 mg/m³ vs limit 1000 @ 12% CO₂ <p><u>2nd half 2021</u></p> <ul style="list-style-type: none"> • Report no.: PAC-AE-211217 • Report date: 30/11/2021 • Result: Dust: 134 mg/m³ (B5) vs limit 150, CO: 9548 mg/m³ vs limit 1000 @ 12% CO₂ <p>For Air Pollution Control System, management use Electrostatic Precipitator (ESP) for monitoring</p> <p>Continuous Emissions Monitoring System (CEMS) which link to the DOE on real time base were monitored.</p> <p>Sighted Ambient Air Quality Monitoring Report as below:</p> <p><u>1st Quarter 2022</u></p> <ul style="list-style-type: none"> • Report Number: SedenakAmbient-1/02/2022 	Complied

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		<ul style="list-style-type: none"> Date Of monitoring: 13-15/02/2022 Particulate matter: Point A1: 26 µg/m³ & Point A2: 18 µg/m³ Limit: 100 µg/m³ <p><u>2nd Quarter 2022</u></p> <ul style="list-style-type: none"> Report Number: SedenakAmbient-2/05/2022 Date Of monitoring: 25-27/05/2022 Particulate matter: Point A1: 21 µg/m³ & Point A2: 24 µg/m³ Limit: 100 µg/m³ <p>Sighted Online Environmental Reporting (OER) has been submitted to DOE on quarterly basis. The result within parameter as per Jadual Pematuhan AS(B)J31/152/000/054 Jilid 18(12)</p> <p>3rd party visit has been conducted by Thunderworks on 13/09/2022 and report yet to receive.</p>	
Criterion 7.11: Fire is not used for preparing land and is prevented in the managed area			
7.11.1	(C) Land for new planting or replanting is not prepared by burning. - Critical (Major) compliance -	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	Complied
7.11.2	The unit of certification establishes fire prevention and control measures for the areas directly managed by the unit of certification. - Minor compliance -	Kuala Kabong Estate has established fire prevention SOP and control measures for their area. For fire watch, for aerial monitoring Asean Fire Alert has been used for hot spot area/ peat soil area. Estate has subscribed to Asean Fire Alert (AFA) since 7/10/2020. The hotspot area has been identified to AFA during the subscription. This monitoring base on colour of Fire Weather Index (FWI), if the colour changes from blue into yellow the estate will standby for any emergency fire break.	Complied

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		<p>In case of any fire detected by AFA, an alert will be sent to PIC of Kuala Kabong estate. On site preparedness, 3200 gallon of portable water browser is readily available to fight any potential fire.</p> <p>On top AFA, Kuala Kabong estate will perform Estate Patrol. The record of the patrolling was sighted. The patrolling is conducted daily. The patrolling conducted by auxiliary police according to the patrolling schedule. The monitoring for any fire at the estate will also be conducted by workers and Mandore. In case of any fire detected, the Mandore will report to the management/security head. Management also established "Carta Organisasi Pelan Tindakan Kecemasan (ERP) Kebakaran Tanah Gambut LKK 2022".</p>	
7.11.3	<p>The unit of certification engages with adjacent stakeholders on fire prevention and control measures.</p> <p>- Minor compliance -</p>	<p>The certification units have engaged with adjacent stakeholders on fire prevention and control measures. The meeting was conducted at The Legend Golf And Country Resort, Sedenak. Refer Stakeholder Meeting dated 22/09/2022 for Sedenak Complex. Refer section "Pencegahan Kebakaran Tanah Ladang/Kebun/Gambut". This meeting conduct to educate and inform the stakeholder neighbouring with estate regarding to Fire Management at estate area.</p>	Complied
<p>Criterion 7.12: Land clearing does not cause deforestation or damage any area required to protect or enhance High Conservation Values (HCVs) or High Carbon Stock (HCS) forest. HCVs and HCS forests in the managed area are identified and protected or enhanced.</p>			
7.12.1	<p>(C) Land clearing since November 2005 has not damaged primary forest or any area required to protect or enhance HCVs. Land clearing since 15 November 2018 has not damaged HCVs or HCS forests.</p> <p>A historic Land Use Change Analysis (LUCA) is conducted prior to any new land clearing, in accordance with the RSPO LUCA guidance document.</p> <p>- Critical (Major) compliance -</p>	<p>Verified that there is no land development/ land clearing within Sedenak Complex Unit since November 2005.</p>	Complied

<p>7.12.2</p>	<p>(C) HCVs, HCS forests and other conservation areas are identified as follows:</p> <p>a) For existing plantations with an HCV assessment conducted by an RSPO-approved assessor and no new land clearing after 15 November 2018, the current HCV assessment of those plantations remains valid.</p> <p>b) Any new land clearing (in existing plantations or new plantings) after 15 November 2018 is preceded by an HCV-HCS assessment, using the HCSA Toolkit and the HCV-HCSA Assessment Manual. This will include stakeholder consultation and take into account wider landscape-level considerations.</p> <p>PROCEDURAL NOTE: Requirement is further clarified under the Interpretation of Indicator 7.12.2 and Annex 5 (approved by BOG on 12 June 2019). - Critical (Major) compliance -</p>	<p>The Rapid Biodiversity Assessment of Fifteen Oil Palm Plantations of Kulim (M) Berhad Final Report February 2013 (Compiled from unchanged draft of January 2008). HCV assessment for the Sedenak Complex was conducted by A.J.F.M Dekker (RSPO Assessor, HCV/Biodiversity) was available for verification. Sample of HCV Details as below:</p> <table border="1" data-bbox="1137 571 1926 1082"> <tr> <td rowspan="5">KUALA KABONG 22/10/2017</td> <td>P00/04</td> <td>UNPLANTED (RBA 3)</td> <td>0.28</td> </tr> <tr> <td>P00/05</td> <td>UNPLANTED (RBA 3)</td> <td>0.76</td> </tr> <tr> <td>P00/08</td> <td>UNPLANTED (RBA 3)</td> <td>1.15</td> </tr> <tr> <td>P02/04</td> <td>VACANT (RBA 2)</td> <td>0.02</td> </tr> <tr> <td></td> <td>RIVER & BUFFER ZONE (RBA 4)</td> <td>9.80</td> </tr> <tr> <td colspan="3">Total</td> <td>12.01</td> </tr> <tr> <td rowspan="2">SEDENAK 02/03/2020</td> <td></td> <td>POND (RBA 2)</td> <td>25.58</td> </tr> <tr> <td>P06/04</td> <td>DRAIN & BUFFER ZONE (RBA 4)</td> <td>0.81</td> </tr> <tr> <td colspan="3">Total</td> <td>26.39</td> </tr> </table> <p>The structure of the report generally has the description about methodology used, coverage and the findings on presence of HCV and RTE species.</p>	KUALA KABONG 22/10/2017	P00/04	UNPLANTED (RBA 3)	0.28	P00/05	UNPLANTED (RBA 3)	0.76	P00/08	UNPLANTED (RBA 3)	1.15	P02/04	VACANT (RBA 2)	0.02		RIVER & BUFFER ZONE (RBA 4)	9.80	Total			12.01	SEDENAK 02/03/2020		POND (RBA 2)	25.58	P06/04	DRAIN & BUFFER ZONE (RBA 4)	0.81	Total			26.39	<p>Complied</p>
KUALA KABONG 22/10/2017	P00/04	UNPLANTED (RBA 3)		0.28																														
	P00/05	UNPLANTED (RBA 3)		0.76																														
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	P06/04	DRAIN & BUFFER ZONE (RBA 4)	0.81																															
Total			26.39																															
<p>7.12.3</p>	<p><i>Indicator is not applicable in Malaysia context</i></p>	<p>Not applicable</p>	<p>Not Applicable</p>																															
<p>7.12.4</p>	<p>(C) Where HCVs, HCS forests after 15 November 2018, peatland and other conservation areas have been identified, they are protected and/or enhanced. An integrated management plan to protect and/or enhance HCVs, HCS forests, peatland and other conservation areas is developed,</p>	<p>Based on the report, there was no HCV or RTE presence in the plantation. Nonetheless, Sedenak complex estate has its own self-declared conservation areas.</p>	<p>Complied</p>																															

	<p>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>Biodiversity Improvement Plan has been established at each sample estates. The management plan has included short-term and long-term plan. Among details in the plan as below:</p> <p>Short Term Plan</p> <ol style="list-style-type: none"> 1. RTE Species sighting record and training 2. Erosion control and risk checking 3. SQD Department to organize Bird Survey at respective unit <p>Long Term Plan</p> <ol style="list-style-type: none"> 1. Buffer zone establishment and training 2. Restore the natural vegetation from monitoring and training 3. Wildlife and Habitats protection of flora and fauna. <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 on prohibiting of illegal hunting and water polluting activities were verified on-site found to be satisfactorily maintained.</p>	
7.12.5	<p>Where rights of local communities have been identified in HCV areas, HCS forest after 15 November 2018, peat land and other conservation areas, there is no reduction of these rights without evidence of a negotiated agreement, obtained through FPIC, encouraging their involvement in the maintenance and management of these conservation areas.</p> <p>- Minor compliance -</p>	<p>No local communities have been identified in self-declared HCV areas within sampling Estate.</p>	Complied
7.12.6	<p>All rare, threatened or endangered (RTE) species are protected, whether or not they are identified in an HCV assessment. A programme to regularly educate the workforce about the status of RTE species is in place. Appropriate disciplinary measures are taken and documented in</p>	<p>Although there is no RTE species identified at Sample Estates, there is evidence to continuously prevent and discourage illegal or hunting, fishing, or collecting activities. Signage as well as routine</p>	Complied

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	<p>accordance with company rules and national law if any individual working for the company is found to capture, harm, collect, trade, possess or kill these species.</p> <p>- Minor compliance -</p>	<p>patrolling activities were carried out as part of the efforts to create awareness among employees about biodiversity.</p> <p>Sighted evidence of prohibiting of illegal hunting signage at sample estates. Verified through interview of workers found they have good awareness on it.</p> <p>Awareness Training on Biodiversity has been conducted on 23/03/2022 at Sedenak Estate and 17/03/2022 at Kuala Kabong Estate. Animal sighting has been recorded at Kuala Kabong Estate and Sedenak Estate. Verified the record no RTE has been recorded.</p>	
7.12.7	<p>The status of HCVs, HCS forests after 15 November 2018, other natural ecosystems, peatland conservation areas and RTE species is monitored. Outcomes of this monitoring are fed back into the management plan.</p> <p>- Minor compliance -</p>	<p>The HCV management plan is developed based on recommendation given by the assessor dated 01/08/2021 based on email date. The plan includes monitoring of buffer zone area and conservation area in the estate and surrounding area.</p> <p>Monitoring of action plan was carried out at appropriate frequency as a mechanism to ensure effectiveness of implementation. Report of the monitoring was adequately recorded by the person in-charge on daily basis. Based on the report, no RTE sighted and no evidence of encroachment/trespasses at the identified HCV and conservation area. Management plan as per 7.12.4.</p> <p>Checked daily patrolling and sighting reports confirm that there was no RTE species and illegal activities reported.</p>	Complied
7.12.8	<p>(C) Where there has been land clearing without prior HCV assessment since November 2005, or without prior HCV-HCSA assessment since 15 November 2018, the Remediation and Compensation Procedure (RaCP) applies.</p> <p>- Critical (Major) compliance -</p>	<p>Verified that there is no land clearing without prior HCV assessment since November 2005 occurred at Sedenak Complex.</p>	Complied

Appendix B: GHG Reporting Executive Summary

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

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

The summary of the Net GHG emitted in [2021] for [Sedenak Palm Oil Mill] and supply base are as following:

Emission per product	tCO ₂ e/tProduct
CPO	2.26
PKO	0.00

Extraction	%
OER	20.10
KER	5.25

Production	t/yr
FFB Process	411,322.11
CPO Produced	82,666.33
PKO Produced	0.00

Land Use	Ha
OP Planted Area	23,985.45
OP Planted on peat	1,366.44
Conservation (forested)	14.01
Conservation (non-forested)	229.54
Total	25595.44

Summary of Field Emission and Sink

	Own Crop*		Group		3 rd Party		Total	
	tCO ₂ e	tCO ₂ e / FFB	tCO ₂ e	tCO ₂ e / FFB	tCO ₂ e	tCO ₂ e / FFB	tCO ₂ e	tCO ₂ e / FFB
Emission								
Land Conversion	68,600.82	0.50	16223.38	0.58	29214.38	0.00	114038.57	0.28
CO ₂ Emission from fertilizer	5191.62	0.04	1452.83	0.05	2790.18	0.00	9434.63	0.02
NO ₂ Emission from Peat	10166.16	0.07	0.00	0.00	0.00	0.00	10166.16	0.02
NO ₂ Emission from Fertiliser	4382.93	0.03	1204.66	0.04	2079.48	0.07	7667.08	0.02
Fuel Consumption	1379.34	0.01	431.47	0.02	1390.95	0.00	3201.76	0.01
Peat Oxidation	74150.39	0.54	0.00	0.00	0.00	0.00	74150.39	0.18
Sink								
Crop Sequestration	-65024.47	-0.48	-15377.61	-0.55	-26597.05	0.00	-106999.14	-0.26

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Conservation Sequestration	0.00	0.00	-8.81	0.00	0.00	0.00	-8.81	0.00
Total	98846.77	0.73	3925.92	0.14	40362.21	0.00	143134.90	0.35

**Note: Includes both estates and smallholders*

Summary of Mill Emission and Credit

	tCO ₂ e	tCO ₂ e/tFFB
Emission		
POME	95898.21	0.23
Fuel Consumption	1157.19	0.00
Grid Electricity Utilization	0.00	0.00
Credit		
Export of Grid Electricity	-68.85	00.00
Sales of PKS	-4284.52	-0.01
Sales of EFB	0.00	00.00
Total	92702.03	0.23

Summary of Kernel Crusher Emission and Credit (if applicable)

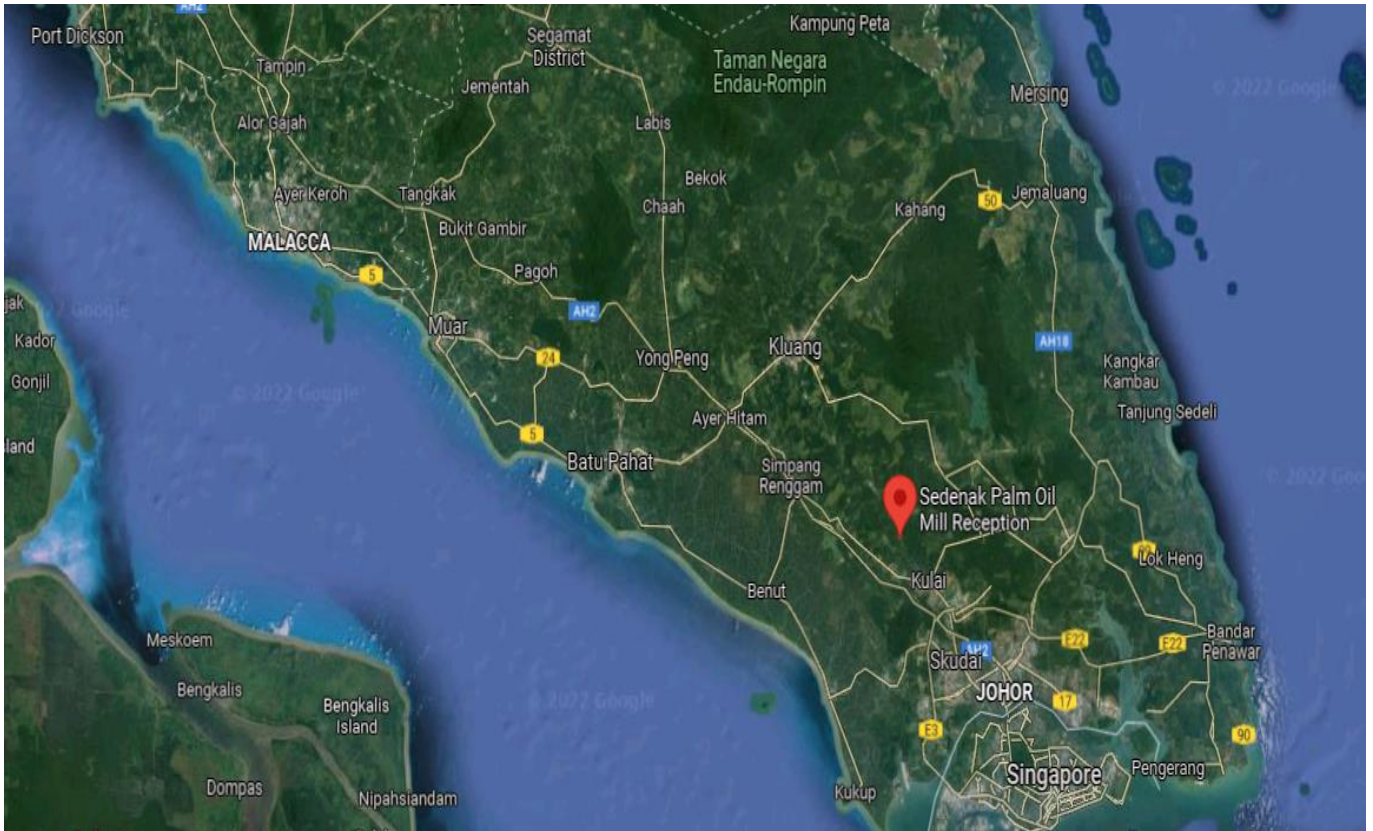
Emissions	tCO ₂ e
PK from own mill	0.00
PK from other source	0.00
Fuel Consumptions	0.00
Total Crusher emissions	0.00

*This mill has no kernel crusher operation.

Palm Oil Mill Effluent (POME) Treatment:	
Divert to Compost (%)	0.00
Divert to anaerobic diversion (%)	100.00

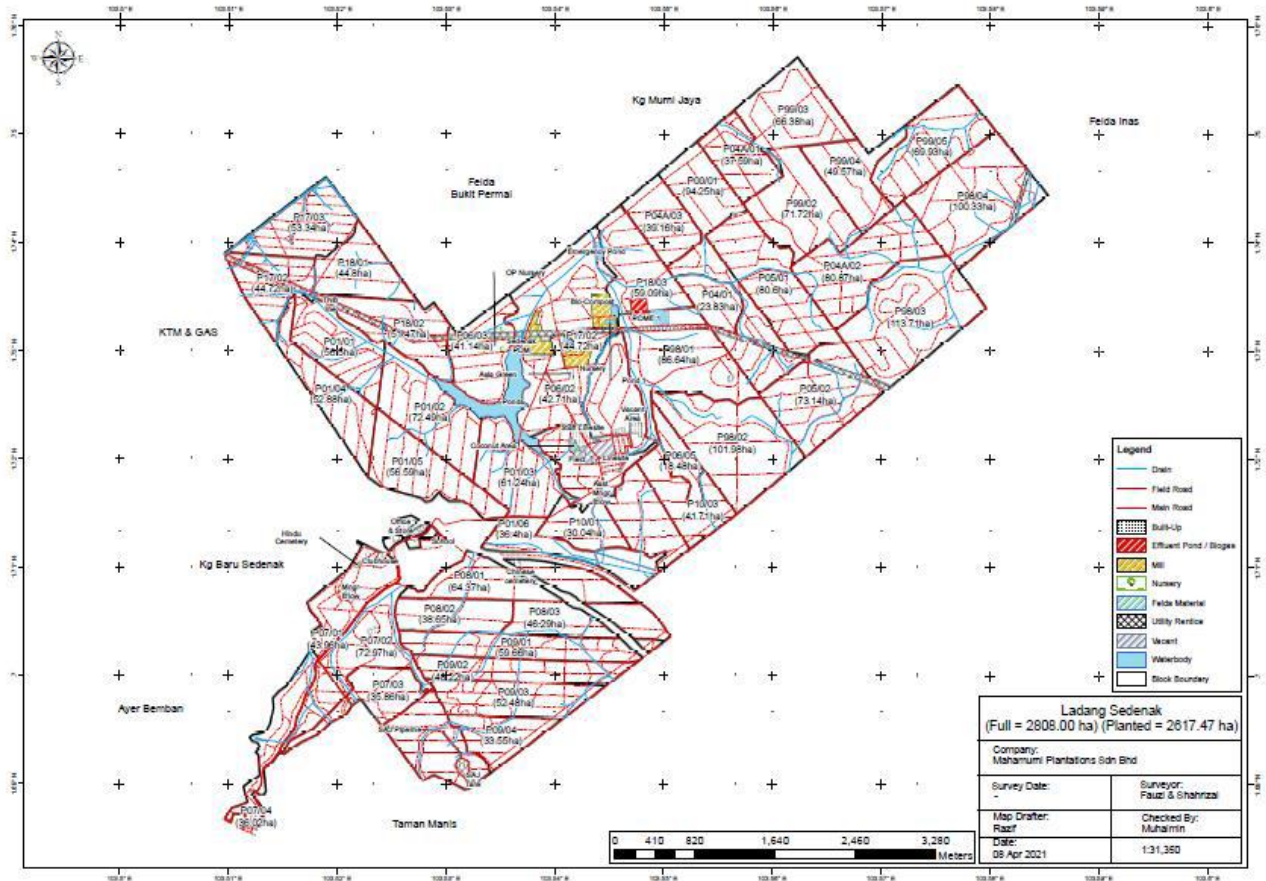
POME Diverted to Anaerobic Digestion:	
Divert to anaerobic pond (%)	100.00
Divert to methane captured (flaring) (%)	0.00
Divert to methane captured (energy generation) (%)	0.00

Appendix C: Location Map of Certification Unit and Supply bases

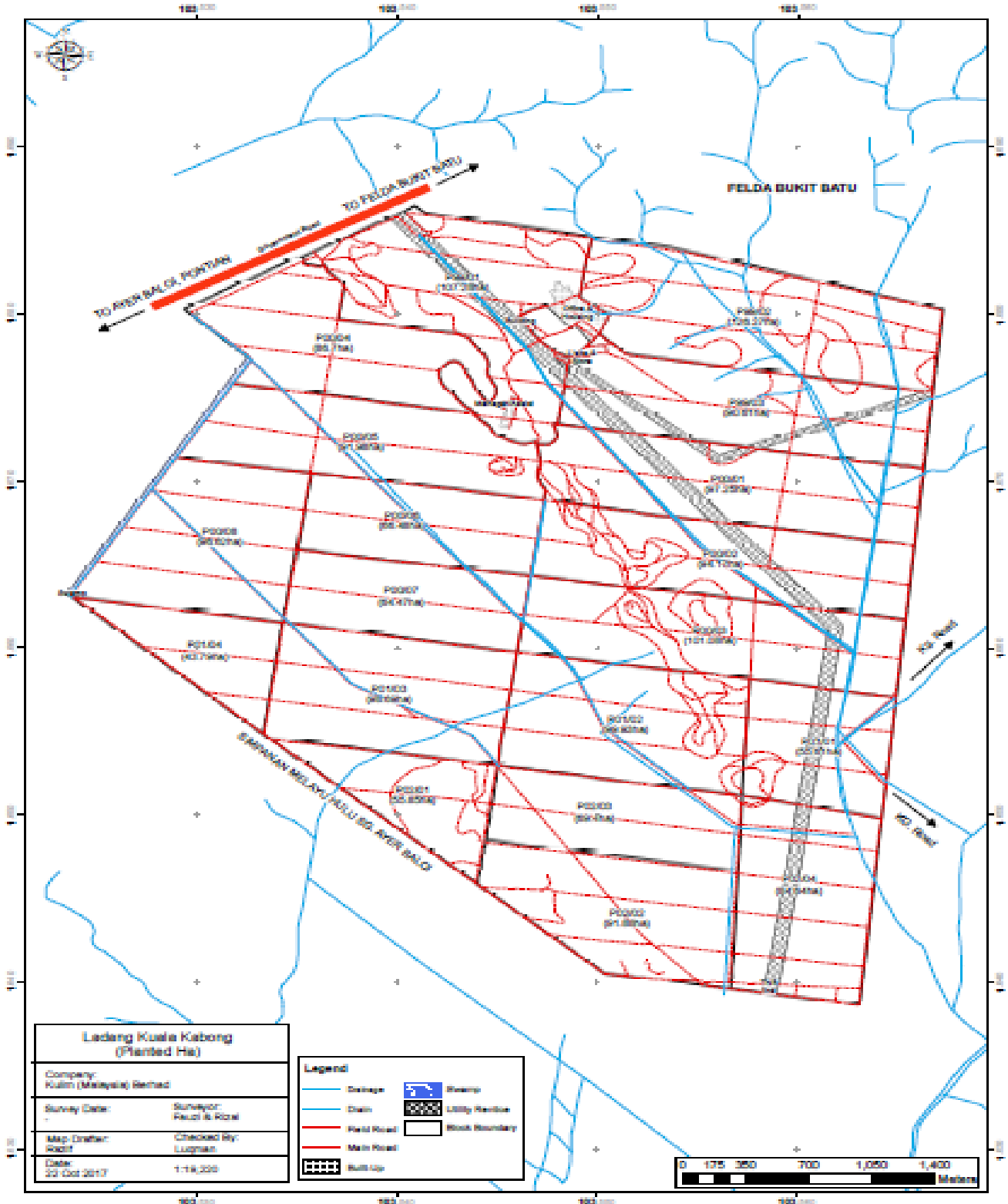


Appendix D: Estate Field Map

Sedenak Estate



Kuala Kabong Estate



Appendix E: List of Smallholder Registered and/or sampled

N/A

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