

**RSPO PRINCIPLE AND CRITERIA
PUBLIC SUMMARY REPORT**

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

Johor Corporation
Client company Address: Level 16, Menara Komtar, Johor Bahru City Centre, 80000 Johor Bahru, Johor Darul Takzim, Malaysia
Certification Unit: Mahamurni Plantations Sdn Bhd - Tereh Palm Oil Mill
Location of Certification Unit: Batu 26, Road Committee, Jalan Kampung Peta, Jalan Mersing, 86000 Kluang, Johor, Malaysia
Date of Final Report: 03/12/2022

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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, Malaysia		
Palm Oil Mill / Group Manager / Estate (Certification Unit)	Mahamurni Plantations Sdn Bhd - Tereh Palm Oil Mill		
Location / Address	Batu 26, Road Committee, Jalan Kampung Peta, Jalan Mersing, 86000 Kluang, Johor, Malaysia		
Website	www.kulim.com.my		
Management Representative	Salasah Elias	E-mail	salalah@kulim.com.my
Telephone	07-8611611	Facsimile	07-8631084

2. Certification Information			
Certificate Number	RSPO 613086	Certificate Start Date	23/01/2019
Date of First Certification	23/01/2009	Certificate Expiry Date	22/01/2024
Scope of Certification	Production Palm Oil and Palm Kernel		
Visit Objectives	To conduct a surveillance assessment and look for positive evidence to ensure that elements of the scope of certification and the requirements of the management standard are effectively addressed by the organisation's management system and that the system is demonstrating the ability to support the achievement of statutory, regulatory and contractual requirements and the organisation's specified objectives, as applicable with regard to the scope of the management standard, and to confirm the on-going achievement and applicability of the forward strategic plan and where applicable to identify potential areas for improvement of the management system.		
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"/> RSPO P&C 2018 for the Production of Sustainable Palm Oil <input checked="" type="checkbox"/> Malaysia National Interpretation 2019 for RSPO P&C 2018 for the Production of Sustainable Palm Oil		
Supply Chain Module	<input checked="" type="checkbox"/> Identity Preserved; <input type="checkbox"/> Mass Balance	Mill Capacity	60 mt/Hour
ISH certification Phase	<input type="checkbox"/> Eligibility <input type="checkbox"/> Milestone A <input type="checkbox"/> Milestone B <input checked="" type="checkbox"/> Not Applicable		

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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)
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3. Other Certifications			
Certificate Number	Standards	Certificate Issued by	Expiry Date
EU-ISCC-Cert-PL214-20230521	ISCC	ASG Cert GmbH	16/06/2023
A158823	HALAL MS 1500:2009	JAKIM	15/09/2023
MSPO 698004	MS 2530-4:2013	BSI Services (M) Sdn. Bhd.	01/04/2024
MSPO 698005	MS 2530-3:2013	BSI Services (M) Sdn. Bhd.	01/04/2024
BVC-MSPO/SC-0029	MSPO SCCS	Bureau Veritas	10/03/2025

4. Location(s) of Mill & Supply Bases			
Name (Mill / Supply Base)	Location	GPS Coordinates	
		Latitude	Longitude
Tereh Palm Oil Mill	Batu 26, Road Committee, Jalan Kampung Peta, Jalan Mersing, 86000 Kluang, Johor Darul Takzim.	2° 13' 03.06" N	103° 21' 05.00" E
Tereh Utara Estate	Batu 26, Road Committee, Jalan Kampung Peta, Jalan Mersing, 86000 Kluang, Johor Darul Takzim.	2° 15' 05.20" N	103° 20' 36.04" E
Tereh Selatan Estate	Ptd 3326, Hsd 6766, Mukim Niyor, Daerah Kluang, Johor Darul Takzim	2° 11' 38.37" N	103° 21' 8.37" E
Selai Estate	GRN 562233, Lot 8848, Mukim Paloh, Daerah Kluang, Johor Darul Takzim	2° 06' 14.41" N	103° 23' 14.81" E
Mutiara Estate	PN 74877, Lot 3918, Mukim Kahang, Daerah Kluang, Johor Darul Takzim	2° 17' 16.61" N	103° 28' 52.13" E
Sg Tawing Estate	PTD 2137, Hsd 6060, Mukim Paloh, Daerah Kluang, Johor Darul Takzim	2°17' 46.75" N	103° 21' 11.58" E
Wawasan Estate	YPJ Plantations Sdn Bhd, 510, 81900 Kota Tinggi, Johor Darul Takzim	2° 14' 15.10" N	103° 22' 45.12" E
Felda Paloh Estate	FGV Plantations (M) Sdn Bhd, 111, 86007 Kluang, Johor Darul Takzim	2° 14' 51.07" N	103° 22' 07.50" E
Rengam Estate	Lot 1912, Grn 84384, Mukim Rengam, Daerah Kluang, Johor Darul Takzim	1° 53' 21.97" N	103° 24' 49.02" 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
Tereh Utara Estate	2,829.72	78.73	178.76	3,087.37	91.82
Tereh Selatan Estate	2,534.13	54.76	118.33	2,707.22	93.74
Sungai Tawing Estate	2,084.29	28.38	113.1	2,225.77	93.64
Mutiara Estate	3,496.86	32.74	165.45	3,695.06	94.64
Selai Estate	3,278.38	48.29	208.4	3,535.07	92.74
Rengam Estate	2,333.99	14.11	70.14	2,418.24	96.52
Felda Paloh Estate	1,187.98	0	143.82	1,331.8	89.20
Wawasan Estate	361.91	0.39	0	362.3	99.89
Total	18,107.26	257.40	998.00	19,362.83	93.56

Note:

1. Tereh Utara Estate - Resurvey replanting area (infrastructure), enlargement pond and buffer zone on 29/06/2022.
2. Tereh Selatan Estate - Resurvey replanting area and update the area statement on 09/05/2022.
3. Mutiara Estate - Resurvey replanting area, the additional planted area from infrastructure (roads) on 13/04/2022.

6. Plantings & Cycle						
Estate / Smallholders	Age (Years) - ha				Mature	Immature
	0 - 3	4 - 14	15 - 25	>25		
Tereh Utara Estate	430.24	0	2,399.48	0	2,404.32	430.24
Tereh Selatan Estate	433.57	272.19	1,828.37	0	2,235.04	433.57
Sungai Tawing Estate	231.82	237.88	1,162.49	452.1	1,852.47	231.82
Mutiara Estate	863.68	1,163.31	1,450.86	19.01	2,633.19	863.68
Selai Estate	0	1,026.19	2,252.19	0	3,278.38	0
Rengam Estate	423.34	846.01	1,064.64	0	1,910.65	423.34
Felda Paloh Estate	623.33	0	0	564.65	564.65	623.33
Wawasan Estate	0	60.76	80	221.15	361.91	0
Total (ha)	3,005.98	3,606.34	10,238.03	1,256.91	15,101.29	3,005.98

Note: Only Mature area is considered as production area

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7. Summary of Certified Tonnage of FFB (Own Certified Scope)				
Estate / Smallholders	Tonnage (MT) / year			
	Estimated last year (Jan 22 – Dec 22)	Actual (Mar 22 – Sep 22)		Forecast (Jan 23 – Dec 23)
		Previous license period (-)	Current license period (Mar 22 – Sep 22)	
Tereh Utara Estate	60,908.00	-	24,545.51	51,553.00
Tereh Selatan Estate	49,129.00	-	23,769.95	44,690.00
Selai Estate	85,205.00	-	48,510.54	88,636.00
Mutiara Estate	53211.00	-	32,370.83	61,888.00
Sg Tawing Estate	37,871.00	-	20,295.03	36,340.00
Wawasan Estate	7,909.00	-	3,064.31	2,484.00
Felda Paloh	20,644.00	-	4,912.02	6,484.00
Rengam Estate	45,123.00	-	25,950.02	52,925.00
Total	360,000.00		183,418.21	345,000.00

8. Summary of Certified Tonnage of FFB (from other certified unit(s))				
Estate / Smallholders	Tonnage (MT) / year			
	Estimated last year (Jan 22 – Dec 22)	Actual (Mar 22 – Sep 22)		Forecast (Jan 23 – Dec 23)
		Previous license period (-)	Current license period (Mar 22 – Sep 22)	
Sungai Papan Estate		-	2,404.72	
Siang Estate		-	785.16	
Bukit Layang Estate		-	104.40	
Basir Ismail Estate		-	339.74	
Sedenak Estate		-	957.34	
Kuala Kabong Estate		-	363.03	
Labis Bahru Estate		-	996.43	
Total			5,950.82	

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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 22 – Dec 22)	Actual (Mar 22 – Sep 22)		Forecast (Jan 23 – Dec 23)
		Previous license period (-)	Current license period (Mar 22 – Sep 22)	
NA	-	-	-	-
Total				

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	Mar 2022	25,222.84	-	25,222.84
2	Apr 2022	23,588.56	-	23,588.56
3	May 2022	23,293.86	-	23,293.86
4	Jun 2022	27,101.04	-	27,101.04
5	Jul 2022	27,883.63	-	27,883.63
6	Aug 2022	30,681.62	-	30,681.62
7	Sep 2022	31,597.48	-	31,597.48
	TOTAL	189,369.03	-	189,369.03

10. Summary of Certified Tonnage (MT) (not applicable for ISS)				
Estimated last year (Jan 22 – Dec 22)	Actual (Mar 22 – Sep 22)		Forecast (Jan 23 – Dec 23)	
	Previous license period (-)	Current license period (Mar 22 – Sep 22)		
FFB	FFB		FFB	
360,000.00 mt	-	189,369.03 mt	345,000.00 mt	
	TOTAL	189,369.03		
CPO (OER: 21.50 %)	CPO (OER: 21.12 %)		CPO (OER: 21.50 %)	
77,400.00 mt	-	39,994.15 mt	74,175.00 mt	
	TOTAL	39,994.15		
PK (KER: 5.43 %)	PK (KER: 5.36 %)		PK (KER: 5.43 %)	
19,548.00 mt	-	10,151.84	18,734.00 mt	
	TOTAL	10,151.84 mt		

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10A. Monthly Records of Certified CPO & PK since the last audit			
No.	Month - Year	Certified CPO (MT)	Certified PK (MT)
1	Mar 2022	5,351.48	1,371.04
2	Apr 2022	5,073.39	1,224.83
3	May 2022	5,047.05	1,180.05
4	Jun 2022	5,799.34	1,430.22
5	Jul 2022	5,914.04	1,552.33
6	Aug 2022	6,330.91	1,663.71
7	Sep 2022	6,477.94	1,729.66
TOTAL		39,994.15	10,151.84

11. Summary of Actual Volume sold					
Current License period (Mar 2022 – Sep 2022)					
	RSPO Certified	Other Schemes Certified		Conventional	Total
		ISCC	Others		
CPO (MT)	40,191.93	0	0	0	40,191.93
PK (MT)	9,284.25	0	0	0	9,284.25
Credits	-	-	-	-	-
Previous License period (-)					
CPO (MT)	-	-	-	-	-
PK (MT)	-	-	-	-	-
Credits	-	-	-	-	-
Note.					
1. Opening Stock CPO as at March 2022 – 648.12 mt.					
2. Opening Stock PK as at March 2022 – 125.65 mt.					

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	AAA	XXX	27,237.09	-
2	BBB	XXX	944.25	-
3	CCC	XXX	12,010.59	6,694.43
4	DDD	XXX	-	508.30
5	EEE	XXX	-	268.48

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6	FFF	XXX	-	1,028.16
7	GGG	XXX	-	703.33
8	HHH	XXX	-	81.55
TOTAL			40,191.93	9,284.25

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)
-	-	-	-	-
TOTAL			-	-

11C. Records of CPO & PK Sold as conventional since the last audit (if any)			
No.	Buyers Name	CPO Sold (MT)	PK Sold (MT)
-	-	-	-
TOTAL		-	-

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
-	-	-	-
TOTAL			-

12. Independent Smallholders Certified Tonnage (MT) / Volume									
Phase	Estimated last year (Jan 22 – Dec 22)			Actual (Mar 22 – Sep 22)			Forecast (Jan 23 – Dec 23)		
	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			-			-			-
IS-CSPO	-	-		-	-		-	-	
IS-CSPKO	-	-		-	-		-	-	
IS-CSPKE	-	-		-	-		-	-	
CSPK	-	-		-	-		-	-	

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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)
-	-	-	-	-	-	-
TOTAL		-	-	-	-	-

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 (Mar 22 – Sep 23)							
Credits				-	-	-	-
Physical	-	-	-				
Previous License period (-)							
Credits				-	-	-	-
Physical	-	-	-				

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)
-	-	-	-	-	-	-	-
-	-	-	-	-	-	-	-
TOTAL			-	-	-	-	-

Note:

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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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 **31/10/2022 – 03/11/2022** 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 methodology for collection of objective evidence included physical site inspections, observation of tasks and processes, interviews of staff, workers and their families and external stakeholders, review of documentation and monitoring data. Malaysia National Interpretation 2019 of the RSPO P&C 2018 was used as the normative reference to assess compliance. The comments made by external stakeholders were also taken into account in the assessment.

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

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

Structured worker interviews with male and female workers and staff were held in private at the workplace in the mill and the estates. Fieldworkers were interviewed informally in small groups in the field. In addition, the wives of workers and staff were interviewed in informal group meetings at their housing. Separate visits were made to each of the local communities to meet with the village head and residents. Company officials were not present at any of the internal or external stakeholder interviews. A list of Stakeholders contacted is included as Section 3.4.

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

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 3)	Year 2 (ASA3_1)	Year 3 (ASA3_2)	Year 4 (ASA3_3)	Year 5 (ASA3_4)
Tereh Palm Oil Mill	✓	✓	✓	✓	✓
Tereh Utara Estate	-	✓	-	✓	-
Tereh Selatan Estate	-	✓	-	✓	-
Selai Estate	✓	-	✓	-	✓
Mutiara Estate	-	✓	-	✓	-
Sg Tawing Estate	✓	-	✓	-	✓
Wawasan Estate	✓	-	✓	-	✓
Felda Paloh Estate	-	✓	-	✓	-
Rengam Estate	✓	-	✓	-	✓

Tentative Date of Next Visit: October 30, 2023 - November 3, 2023

Total Number of Mandays: 12 Mandays

2.2 BSI Assessment Team

Name	Role	Competency
Vijay Kanna Pakirisamy (VKP)	Team Leader	<p>Education: Bachelor’s Degree in Agribusiness Science Management with Honours from University Utara Malaysia in 2010.</p> <p>Work Experience: He gained his working exposure in the plantation sector, serving as an Assistant Manager with KL Kepong and IOI Plantations and as a Sr. Assistant Manager with United Plantations Berhad prior to joining BSI as a Client Manager.</p> <p>Training attended: He has completed ISO IMS 9001, 14001, 45001(OHS 18001) Lead Auditor Course in November 2019, Endorsed RSPO P&C Lead Auditor Course in October 2019, Endorsed RSPO SCCS Lead Auditor Course in August 2020, Endorsed MSPO Lead Auditor Course in November 2019 and attended SMETA Requirements Training in April 2021.</p> <p>Aspect covered in this audit:</p>

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		<p>During this assessment, he assessed on the aspects of Occupational, Health & Safety, Estate Best Practises and supply chain requirements.</p> <p>Language proficiency: He is fluent in English, Bahasa Malaysia, Tamil languages.</p>
Mohamed Hidhir Zainal Abidin (MHZ)	Team Member	<p>Education: Holds a Bachelor Degree in Chemical Engineering, graduated from National University of Malaysia on 2006.</p> <p>Work Experience: 4½ years working experience in palm oil industry specifically in palm oil mill as Mill Engineer. More than 10 years of auditing experience with accredited certification body for several schemes include ISO9001, ISO14001, OHSAS18001 (now ISO45001), RSPO, MSPO and RBA Labour Ethics</p> <p>Training attended: He has completed ISO 9001 Lead Auditor Course, ISO 14001 Lead Auditor Course, OHSAS 18001 Lead Auditor Course, Endorsed RSPO P&C Lead Auditor Course, MSPO Awareness Training, Endorsed RSPO SCCS Lead Auditor Course, HCV & HCS Introductory Training and SMETA Requirements Training.</p> <p>Aspect covered in this audit: Policy and commitment, Social requirements, contract agreement, human rights, workers’ welfare, smallholder welfare, Stakeholder Consultation, Legal Requirements, land & Legal issue and RSPO supply chain requirements.</p> <p>Language proficiency: Fluent in Bahasa Malaysia and English.</p>
Muhammad Fadzli Masran (MFM)	Team Member	<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.</p> <p>Training attended: He has completed ISO IMS 9001, 14001, 45001 (OHS 18001) Lead Auditor Course, Endorsed RSPO Lead Auditor Course, MSPO Lead Auditor Course, Endorsed RSPO Supply Chain Certification training course, MSPO Supply Chain Certification System (SCCS) Auditor training Course, CQI and IRCA Certified ISO 9001:2015 Lead Auditor Training Course, HCV and GIS Training and SMETA Requirements Training.</p> <p>Aspect covered in this audit: Economic management plan, mill best practices, estate best practices, natural and biodiversity conservation, Waste management, GHG, HCV.</p> <p>Language proficiency: Fluent in Bahasa Malaysia and English.</p>

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Accompanying Persons:

Name	Role
-	-

2.3 Assessment Plan

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

Date	Time	Subjects	VKP	MHZ	MFM
Sunday, 30/10/2022	-	Auditors travel to Kluang.	✓	✓	✓
Monday, 31/10/2022	0800 - 0900	Auditors Travel to Tereh Selatan Estate	✓	✓	✓
	0900 - 0930	Opening Meeting: Opening Presentation by Audit team leader. – Confirmation of assessment scope and finalize Audit plan (including stakeholder’s consultation). – Verification on previous audit findings	✓	✓	✓
	0930 - 1230	Tereh Selatan Estate 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.	✓	✓	✓
	1230 - 1330	Lunch Break	✓	✓	✓
	1330 - 1630	Document review P1 – P7: (General Documentation e.g. Legal, Manual and Procedure, production & monitoring records, IPM & HCV records, SEIA documents & records, OSH records, review pay documents, records of communication with stakeholder/workers representatives, new planting, CIP and implementation & etc.)	✓	✓	✓
	1630 - 1700	Interim Closing Briefing	✓	✓	✓
	0800 - 0900	Auditors Travel to Tereh Palm Oil Mill	✓	✓	✓

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Date	Time	Subjects	VKP	MHZ	MFM
Tuesday, 01/11/2022	0900 - 1230	Tereh Palm Oil Mill Inspection: FFB receiving, warehouse, workshop, wastes management & Landfill, Effluent Ponds, OSH & ERP, Environment issues, POME application, water treatment. Laboratory, weighbridge and palm product storage area, staff, workers and contractor interview, housing and facility inspection, clinic, Lab, weighbridge and palm product storage area, etc.	✓	✓	✓
	1000 - 1200	Meeting with stakeholders (Government, village rep, smallholders, Union Leader, contractor etc.)	-	✓	-
	1230 - 1330	Lunch Break	✓	✓	✓
	1330 - 1630	Document review P1 – P7: Document Review P1 – P7: SOPs, Review on SEIA documents and records, wage records, employee data, training records, legal permits, mill inspection and internal monitoring records, CIP & implementation. RSPO SCCS general requirements, internal audit, management review, sales and purchasing documents, mass balance accounting and other relevant documents and records	✓	✓	✓
	1630 - 1700	Interim Closing Briefing	✓	✓	✓
Wednesday 02/11/2022	0800 - 0900	Auditors Travel to Mutiara Estate	✓	✓	✓
	0900 - 1230	Mutiara Estate 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.	✓	✓	✓
	1230 - 1330	Lunch Break	✓	✓	✓
	1330 - 1630	Document review P1 – P7: (General Documentation e.g. Legal, Manual and Procedure, production & monitoring records, IPM & HCV records, SEIA documents & records, OSH records, review pay documents, records of communication with stakeholder/workers representatives, new planting, CIP and implementation & etc.)	✓	✓	✓
	1630 - 1700	Interim Closing Briefing	✓	✓	✓

Date	Time	Subjects	VKP	MHZ	MFM
Thursday 03/11/2022	0800 - 0900	Auditors Travel to Tereh Utara Estate	✓	✓	✓
	0900 - 1230	Tereh Utara Estate 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.	✓	✓	✓
	1230 - 1330	Lunch Break	✓	✓	✓
	1330 - 1600	Document review P1 – P7: (General Documentation e.g. Legal, Manual and Procedure, production & monitoring records, IPM & HCV records, SEIA documents & records, OSH records, review pay documents, records of communication with stakeholder/workers representatives, new planting, CIP and implementation & etc.)	✓	✓	✓
	1600 - 1630	Verify any Outstanding Issues and Preparation for Closing Meeting	✓	✓	✓
	1630 - 1700	Closing Meeting	✓	✓	✓

Section 3: Assessment Findings

3.1 Multiple Management Units and Time Bound Plan

Requirement	Assessment	Compliance
Does the time bound plan include all current subsidiaries, estates and mills that is under the control and/or minor shareholding of the holding company?	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	Yes, all the estates and mills certified within 5 years after obtaining RSPO membership. Only Indonesian units, PT RAJ & PT TPR have not been certified yet and is proposed to be certified in 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.	There have not been any new acquisitions.	Complied

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<p>If no, has RSPO Secretariat approval obtained? Was the submission according to the template as announced by the RSPO Secretariat on 21/12/2021.</p>		
<p>Any deviations from the maximum periods requires approval by the RSPO Secretariat.</p>	<p>There have no any deviations from the maximum periods requires approval by the RSPO Secretariat.</p>	<p>Complied</p>
<p>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?</p>	<p>There has no any changes to the time-bound plan since the last audit. This is consistent with the RSPO ACOP reporting. The link provided below: https://rspo.org/members/310/Johor-%20Corporation</p>	<p>Complied</p>
<p>Have there been any isolated lapses in implementation of the plan? If yes a Minor non-compliance shall be raised</p>	<p>There is no isolated lapse in Time Bound Plan except for smallholder proposed certification program that halted due to unstable supply to mill.</p>	<p>Complied</p>
<p>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</p>	<p>There has been no fundamental failure to proceed with the implementation of the plan.</p>	<p>Complied</p>
<p>Un-Certified Units or Holdings</p>		
<p>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.</p>	<p>As of to date there are no new plantings that replace primary forest under Johor Corporation.</p>	<p>Complied</p>
<p>Any new plantings since January 1st 2010 shall comply with the RSPO New Plantings Procedure.</p>	<p>There are no new plantings since January 1st 2010 at Johor Corporation estates.</p>	<p>Complied</p>
<p>Any Land conflicts are being resolved through a mutually agreed process, such as RSPO Complaints System or Dispute Settlement Facility, in accordance with RSPO P&C criteria 4.4, 4.5, 4.6, 4.7 and 4.8.</p>	<p>No land conflict under all certification units as verified in the RSPO RaCP Tracker, updated 01/02/2022.</p>	<p>Complied</p>
<p>Any Labor disputes are being resolved through a mutually agreed process, in accordance with RSPO P&C criterion 4.2</p>	<p>No labour dispute within all certification units.</p>	<p>Complied</p>
<p>Any Legal non- compliance is being addressed through measures consistent with the requirements of RSPO P&C criteria 2.1</p>	<p>No legal non-compliance within all certification units.</p>	<p>Complied</p>
<p>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.</p>	<p>RSPO internal audit assessment for all uncertified units been conducted and the report had been submitted to all unit for improvement plan. The report indicated no systematic failures to proceed with implementation that should be raised as major Nonconformities.</p>	<p>Complied</p>

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<p>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?</p>	<p>No. There is no any Critical (Major) non-compliance raised during the last internal audit.</p>	<p>Complied</p>
<p>Have there been any stakeholder (including NGO) consultation conducted?</p>	<p>None noted. No stakeholder comments or complaints received</p>	<p>Complied</p>

3.2 Progress of scheme smallholders and/or outgrowers

<p>Progress of scheme smallholders or outgrowers towards compliance with relevant standards</p>		
<p>Requirement</p>	<p>Remarks</p>	<p>Compliance</p>
<p>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.</p>	<p>Not applicable as there are no scheme smallholders or scheme outgrowers under the certification unit.</p>	<p>Not Applicable</p>

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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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Sindora Mill	Kulim Estate	Sindora	Certified RSPO in March 2017	<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
		Sungai Papan		
**Basir Ismail				
*Rem				
* **Ulu Tiram				
Sedenak Mill		Sedenak		
Palong Mill		Kuala Kabong		
		Umac		
		Labis Bahru		
		*Mungka		
		*Sepang Loi		
		*Palong		
		*Kemedak		
Pasir Panjang Mill	*Pasir Panjang			
	*Bukit Payung			
	Siang			
	Bukit Kelompok			
	Tunjuk Laut			
	Pasir Logok			

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) Minor nonconformity raised. The Tereh Palm Oil Mill 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 below is the summary of the non-conformity raised during this assessment.

Non-conformity			
NCR Ref #	2270752-202210-N1	Issued Date	03/11/2022
Due Date	Next Surveillance Assessment	Closure Date	"Open"
Indicator & Category (Critical / Minor)	7.3.1 Minor		
Statement of Nonconformity:	The established Waste Management Plan was not effectively implemented.		
Requirement Reference:	A waste management plan which includes reduction, recycling, reusing, and disposal based on toxicity and hazardous characteristics, is documented and implemented.		
Objective Evidence:	<p><u>Tereh Selatan Estate</u></p> <p>The waste management plan stated that Scheduled Waste Management must be conducted as per Work Instruction, Scheduled Waste, Issue no. 1, rev. 0. Dated 01/10/2022. Refer document no. SPO/WI/06.</p> <p>In the SOP established, under section 6 Reference stated the storage of schedule waste were according:</p> <ul style="list-style-type: none"> • 6.4 Waste Card as per 7th Scheduled of Environmental Quality (Scheduled Wastes) Regulations 2005 • 6.5 Work Instructions on scheduled waste management (this document) • 6.6 SOP on packaging and labelling scheduled waste for disposal • 6.7 Standard label for scheduled waste <p>Based on the Scheduled Waste Inventory document for contaminated soil (SW408) and 1L 2T Oil Container (SW409), noted date of generation was recorded at 16/07/2022 and 15/07/2022 respectively. During site visit at Scheduled Waste Store, it was noted that the SW 409 and SW 408 waste was stored without labelling as per Environmental Quality (Scheduled Wastes) Regulations 2005 and Guidelines for Packaging, Labelling and Storage of Scheduled Waste in Malaysia.</p> <p><u>Tereh Utara Estate</u></p> <p>During site visit at Scheduled Waste Store, it was noted that the SW 306 Storage Container was filled and the First-Generation Date at the container was recorded as 29/11/2021. Reviewed the Scheduled Waste Record Book, the first-generation date for SW 306 was also recorded as 29/11/2021 after latest disposal on 07/10/2021. Latest inventory was recorded at 80 L. The scheduled waste has not been disposed and was stored for more than 180 days without prior permission from DOE.</p>		

	As per waste management plan, the scheduled waste management must be conducted as per Work Instruction, Scheduled Waste, issue no. 1, rev. 0. Dated 01/101/2022. Refer document no. SPO/WI/06. As per WI established in section 2.6 Inspection of Scheduled Waste stated that "Scheduled Waste are not stored for more than 180 days from date of first generated and more than 20 MT.
Corrections:	<p><u>Tereh Selatan Estate</u></p> <ol style="list-style-type: none"> The containers were immediately labelled as per Environmental Quality (Scheduled Wastes) Regulations 2005 and Guidelines for Packaging, Labelling and Storage of Scheduled Waste. Refresher Training had been conducted for store operator on 15/11/2022. During the training, the test was given to evaluate the operator's understanding on the training. <p><u>Tereh Utara Estate</u></p> <ol style="list-style-type: none"> Tereh Utara Estate had submitted Collection Transportation Instruction (CTI) to Kualiti Alam on 06/11/2022 and proposed to collect on 17/11/2022,
Root Cause Analysis:	Inadequate monitoring over SW Management Plan by Estate Management.
Corrective Actions:	<p><u>Tereh Selatan Estate</u></p> <ol style="list-style-type: none"> Monthly Monitoring by Estate Management to ensure all label was appropriately in place. A CEPWAM course was arranged by HCMD on 20 – 24/11/2022 for Assistant Manager to become competent SW Personnel. <p><u>Tereh Utara Estate</u></p> <ol style="list-style-type: none"> Monthly Monitoring by Estate Management to ensure scheduled waste will be disposed within 180 days as per DOE requirements. A CEPWAM course was arranged by HCMD on 20 – 24/11/2022 for Assistant Manager to become competent SW Personnel. Training on Scheduled Waste Management will be conducted to the staff in charge tentatively on 28/11/2022.
Assessment Conclusion:	The submitted CAP detailing on proposed actions to be taken to address the raised nonconformity, based on the root cause identified were reviewed and deemed to be appropriate. Thus, the effectiveness of the CAP will be verified during the next surveillance assessment.

Opportunity for Improvements	
OFI #	Description
OFI 1	-

Positive Findings	
PF #	Description
PF 1	Good Implementation of GAP across the estates.

PF 2	Good understanding by staffs and workers on GAP, H&S and Environment Protections.
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3.3.1 Status of Nonconformities Previously Identified and Observations

Non-conformity			
NCR Ref #	2175579-202203-M1	Issued Date	10/03/2022
Due Date	08/06/2022	Closure Date	31/05/2022
Indicator & Category (Critical / Minor)	3.4.3 – Critical		
Statement of Nonconformity:	Social management and monitoring plan was not comprehensively reviewed updated regularly in a participatory way		
Requirement Reference:	The social and environmental management and monitoring plan is implemented, reviewed and updated regularly in a participatory way.		
Objective Evidence:	<p>FGVPM Ladang Paloh</p> <p>SIA management plan (2/21, dated 20/9/21) has not comprehensively identified pertinent issues related to:</p> <ul style="list-style-type: none"> i) Expensive pricing of goods at sundry shop ii) Communication problem, repatriation of the spokesperson/worker's representative iii) Insufficient medical benefit limit (outpatient) iv) "Kadar Upah Kerja" rate/quantity for piece rated task (bil. 7 for 2022) v) Understanding of salary calculation in the pay slip. <p>The above issues were highlighted during interview with workers representative (Bangladesh, Indonesia and India) and a group of Indian and Bangladeshi workers. Thus, the regular review and update process of SIA management plan was effectively demonstrated in a participatory way.</p>		
Corrections:	<p>i.a. Estate management had discussed with the sundry shop owner on 18.3.2022 with regards to expensive goods price.</p> <p>i.b. Estate had reviewed goods pricing and comparison had been done with other retails shop in estate.</p> <p>i.c. Review SIA management plan and include the issue of expensive goods pricing.</p> <p>ii.a. Estate management to appoint spokesperson/worker's representative to replace repatriation workers by election process.</p> <p>ii.b. Review SIA management plan and include the issue of Communication problem, repatriation of the spokesperson/workers representative.</p> <p>iii.a. Estate Management immediately review the medical benefit limit to workers (outpatient).</p> <p>iii.b. Estate management will conduct the briefing on medical benefit that entitlement to all workers on 14 & 15 Mac 2022</p> <p>iii.c. Review SIA management plan and include the issue of Insufficient medical benefit limit (outpatient).</p>		

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	<p>iv.a. Briefing immediately conducted for) "Kadar Upah Kerja" rate/quantity for piece rated task (bil. 7 for 2022) on 16.3.2022.</p> <p>iv.b. Review SIA management plan and to include the issue of "Kadar Upah Kerja" rate/quantity for piece rated task (bil. 7 for 2022).</p> <p>v.a. Briefing immediately conducted for salary calculation in the pay slip on 16 Mac 2022.</p> <p>v.b. Review SIA management</p> <p>v.c. plan and include the issue salary calculation in the pay slip.</p>
Root Cause Analysis:	<p>i. Inadequate monitoring over price of good by estate management at sundry shop.</p> <p>ii. Estate management had overlooked to appoint spokesperson/worker's representative to replace repatriation workers.</p> <p>iii. Estate was not aware on requirement to review medical benefit limit to workers (outpatient).</p> <p>iv. Inadequate briefing provided on) "Kadar Upah Kerja" rate/quantity for piece rated task (bil. 7 for 2022) to the workers.</p> <p>v. Lack of understanding of salary calculation in the pay slip</p>
Corrective Actions:	<p>i.a. Discussion will be made with respective sundry shop to determine acceptable price for each goods. Estates will establish goods price listing based as per agreed by shop owner throughout discussion. The price listing will be display at necessary section in estate for workers references.</p> <p>i.b. Estate will regularly review goods pricing comparably to other estate retail shop to ensure reasonable and acceptable goods price by sundry shop.</p> <p>ii.a. New Appointment of spokesperson/worker's representative by election from workers. Estate will appoint two representatives to ensure no recurrence issue incurred.</p> <p>iii.a. Estate management will conduct the briefing and periodically review medical benefit limit that entitlement to all workers.</p> <p>iii.b. The briefing will be included in training plan as annually program.</p> <p>iv.a. Periodically refresher briefing will be conducted to all workers and included in training plan as annually program.</p> <p>v.a. Periodically refresher briefing will have conducted to all workers.</p> <p>v.b. The briefing will be included in training plan as annually program.</p>
Assessment Conclusion:	<p><u>Verification during on-site assessment:</u></p> <p>FGV Paloh Estate has issue reminder letter to the sundry shop (TZ One Enterprise) owner to display the goods price s per letter with ref. no (01)3452/SURATPERINGATAN dated 18/03/2022. Other estates has also issued the same letter to all the sundry shops operated in the estates. FGV Paloh Estate has conducted meeting with the sundry shop (TZ One Enterprise) owner on 16/04/2022 and brief on the applicable policy and procedure.</p>

	<p>Sundry shop (TZ One Enterprise) owner has submitted price list of item sold in the shops.</p> <p>FGV Paloh Estates has established Sundry Shops Monitoring Plan. The monitoring was planned to be conducted on quarterly basis. Latest monitoring was conducted monitoring on 30/04/2022 by Estate RSPO Assistant and recorded in "Kertas Semanak Harga Barangan Kedai Runcit" form.</p> <p>The price was displayed at the Sundry Shops. Noted during interview with workers representative, the price was affordable and acceptable.</p> <p>FGV Paloh Estate has conducted election day on 17/03/2022 for all workers to elect workers representative by race. Reviewed the election day report "Minit, Penamaan Calon, Proses Pilihan Raya & Lantikan Wakil Pekerja Bil 01/2022, 14hb-17hb Mac 2022".</p> <p>The estate has issued appointment letter to the workers representative elected by the election. Review appointment letter no. (07)0452/FGVPM-L2-PP-Lantikan, (08)0452/FGVPM-L2-PP-Lantikan and (09)0452/FGVPM-L2-PP-Lantikan dated 18/03/2022.</p> <p>Noted during interview with the workers representative confirmed on the election results and they understand on the workers representative responsibility.</p> <p>FGV Paloh Estate has conducted briefing on the medical benefits entitlement on 14-15/03/2022.</p> <p>FGV Paloh Estate has invited Operation Manager South Zone, FGVPMSB Labor Department to conduct briefing on the medical benefits entitlement on 30/03/2022. Reviewed the training reports, attendants' records and training materials.</p> <p>Noted during interview with workers representative, the understanding on the medical benefits entitlement is satisfactory.</p> <p>FGV Paloh Estate has conducted briefing on "Kadar Upah Kerja" rate/quantity for piece rated task (bil. 7 for 2022) and salary calculation to the workers on 16/03/2022.</p> <p>FGV Paloh Estate has invited FGVPMSB Estate Worker Employment Unit, Human Resources Department to conduct briefing "Kadar Upah Kerja" rate/quantity for piece rated task (bil. 7 for 2022) and salary calculation to the workers on 30/03/2022. Reviewed the training reports, attendants' records and training materials.</p> <p>Noted during interview with workers representative, the understanding on the "Kadar Upah Kerja" rate/quantity for piece rated task (bil. 7 for 2022) and salary calculation was satisfactory.</p> <p>The estate has established training plan FY 2022 and included all the plans for training and refresher briefing in the training plan.</p> <p>The estate has review the Social Impact Assessment report by Senior Executive from Plantation Sustainability Department on 13/03/2022. Refer report no. 01/2022 dated 16/03/2022. Base on the results of the assessment, the estate has established management plan documented in "Jadual 4.2 Pelan Analisis Pengurusan (Management Plan) dan Pelan Penambahbaikan Berterusan (Improvement Plan) bagi Impak Negetif Social di Ladang FGV Paloh". The management plan include issue on:</p> <ol style="list-style-type: none"> 1. Price was not displayed at the sundry shops
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	<ol style="list-style-type: none"> 2. No formal appointment for replacement of spokesperson who are repatriated. 3. Insufficient medical benefits limit 4. Inadequate briefing provided on) "Kadar Upah Kerja" rate/quantity for piece rated task (bil. 7 for 2022) to the workers. 5. Lack of understanding of salary calculation in the pay slip <p>All the corrective action and evidence of implementation were found to be adequate and effectively implemented. The Major NC closed on 31/05/2022.</p>
Effectiveness Closure (for previous audit closed Critical NC):	<p>Social management plan was revised on 27/10/2022 by Sustainability and Innovation team for the Tereh Complex. The review was done in participatory way and has included all inputs from Gender Committee meeting, NUPW meeting and quarterly safety meeting. The other inputs were;</p> <ol style="list-style-type: none"> a. Complaint & Request from internal & external stakeholders b. Management meeting at estates/mill and regional level. c. Dialogue during the morning muster. <p>An onsite face to face interview was also held with affected stakeholders as part of the review process for the management plan. No recurrence of issues observed thus the Critical Nonconformity is remained closed.</p>

Non-conformity			
NCR Ref #	2175579-202203-M2	Issued Date	10/03/2022
Due Date	08/06/2022	Closure Date	31/05/2022
Indicator & Category (Critical / Minor)	6.7.3 - Critical		
Statement of Nonconformity:	Appropriate PPE was found not worn at the place of work to cover all potentially hazardous operation.		
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.		
Objective Evidence:	Tereh POM: During site visit at Boiler area, found the Fireman not wearing the appropriate PPE provided.		
Corrections:	Training has been conducted to all personnel at boiler house namely Boiler man, and Fireman on 10.3.2022.		
Root Cause Analysis:	Insufficient awareness and training to use appropriate personal protective equipment (PPE) for workers.		
Corrective Actions:	Refresher training will be conduct regularly to all personnel at respective station in mill as per training plan.		
Assessment Conclusion:	<p>Verification during on-site assessment:</p> <p>The mill has conducted training on PPE and safety at Boiler Station on 10/03/2022. The training was conducted by the Asst. Manager and attended by Boilermans and</p>		

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	<p>Firemans. Reviewed the training reports, attendants’ records, training materials and training evaluation.</p> <p>The mill has established Internal Annual Training Program FY 2022 and included all the plans for training and refresher briefing in the training plan.</p> <p>All the corrective action and evidence of implementation were found to be adequate and effectively implemented. The Major NC closed on 31/05/2022.</p>
Effectiveness Closure (for previous audit closed Critical NC):	<p>All workers have been provided with appropriate personal protective equipment (PPE), which is provided by the management free of charge. During the site visit to the Mill Operations and Stores, it was sighted that all required PPEs were worn by the personals. Interviews with the sampled workers around the mill indicated that they were well aware and trained on the importance of donning appropriate PPEs during operations. No recurrence of issues observed thus the Critical Nonconformity is remained closed.</p>

Non-conformity			
NCR Ref #	2175579-202203-N1	Issued Date	10/03/2022
Due Date	03/11/2022	Closure Date	03/11/2022
Indicator & Category (Critical / Minor)	6.3.3 - Minor		
Statement of Nonconformity:	Formation of freely elected representatives for migrant workers were not effectively demonstrated.		
Requirement Reference:	Management does not interfere with the formation or operation of registered unions/ labour organizations or associations, or other freely elected representatives for all workers including migrant and contract workers.		
Objective Evidence:	<p><u>FGVPM Ladang Paloh</u></p> <p>New workers representatives were appointed for each nationalities (Bangladesh, Indonesia and India). Based on interview with the workers representatives, they were appointed by management and this was also confirmed by the estate's assistant. No evidence of free elected process for the new foreign workers representative as to date.</p>		
Corrections:	<p>a. Briefing on freely elected representatives for migrant workers by election process immediately conducted on 13.3.2022.</p> <p>b. Estate management will have conducted the election program on 17.3.2022 by circulation of MEMO.</p> <p>The minutes of election will be recorded and kept.</p>		
Root Cause Analysis:	Inadequate awareness on freely elected representatives for migrant workers.		
Corrective Actions:	<p>a. The briefing on freely elected representatives for migrant workers by election process conducted regularly / upon induction briefing.</p> <p>b. The election process will immediately conduct if existing representative completed employment and going back for good. The appointment term was for 3 years, hence, election will be done in every 3 years interval.</p>		
Assessment Conclusion:	Workers representatives were freely elected from each nationality (Bangladesh and Indonesia). Based on interview with the workers representatives, they were		

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	appointed through election process which has been witness by NUPW state representative. Latest meeting was held on 22/05/2022 at Tereh POM with representative from NUPW Kluang. No interference from management for the formation of NUPW member observed thus the minor NC was effectively closed on 03/11/2022.
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Opportunity for Improvement	
OFI#	Description
OFI 1	<p>OFI Statement: OFI Reference Number: 2175579-202203-I1 Clause: 3.6.1</p> <p>Although the Sg. Tawing Estate Risk Register was reviewed on 25.08.2021 its severity and likelihood ranking for activity to inflate tractor tyre could be revised in light of tyre bursting accident in the tyre servicing and replacement industry (workshop).</p> <p>Verification / Follow-up actions: Risk Registers of the sampled estates were verified and the severity and likelihood of each operations were found to be appropriately classified. Sampled the Risk Register for operations related to accidents that have just occurred and the severity and likelihood has been updated accordingly and deemed to be appropriate.</p>
OFI 2	<p>OFI Statement: OFI Reference Number: 2175579-202203-I2 Clause 2.1.2</p> <p>To expedite and follow up the application process for competent person for genset operation.</p> <p>Verification / Follow-up actions: Document evidence were verified for FGVP M Paloh where Genset Operation Competent Person was available. Sighted the Certificate of Competency, (Certificate Number: PJ 11702251; Competency Number: P-J-T-4-B-0099-2019; Certificate Effective Date: 04/03/2019). The competent person was transferred from a sister estate.</p>

3.3.2 Summary of the Nonconformities and Status

CAR Ref.	Category (Critical / Minor)	P&C Indicator	Issued Date	Status & Date (Closure)
1683546-201809-M1	Major	6.5.1	28/09/2018	Closed out on 24/12/2018
1683546-201809-N1	Minor	2.1.3	28/09/2018	Closed out on 14/10/2019
1683546-201809-N2	Minor	4.3.2	28/09/2018	Closed out on 14/10/2019
1838700-201906-N1	Minor	6.5.3	17/10/2019	Closed out on 12/11/2020
1838700-201906-N2	Minor	4.1.3	17/10/2019	Closed out on 12/11/2020
1838700-201906-N3	Minor	4.7.3	17/10/2019	Closed out on 12/11/2020
1984918-202011-N1	Minor	3.7.2	12/11/2020	Closed out on 05/10/2021

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2175579-202203-M1	Major	3.4.3	10/03/2022	Closed out on 31/05/2022
2175579-202203-M2	Major	6.7.3	10/03/2022	Closed out on 31/05/2022
2175579-202203-N1	Minor	6.3.3	10/03/2022	Closed out on 03/11/2022
2175579-202203-M1	Minor	7.3.1	03/11/2022	"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 Tereh Palm Oil Mill Certification Unit’s environmental and social performance, legal and any known dispute issues.

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

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

Stakeholders contacted		
Type of Stakeholder (e.g. Internal, Union, Contractor, Governmental Department, NGO, External, Communities)	Stakeholder name / organization	Means of communication (e.g. face to face interview, email, phone interview, comment from public notice)
Contractor	Ah Teng Earthwork,	Face to face
Contractor	JVellu Enterprise,	Face to face
Contractor	Chahyono Contractor	Face to face
Contractor	Lee Kim Joo	Face to face
External Stakeholder	Canteen Operator, Tereh POM	Face to face
Government Department	SK Ladang Tereh	Face to face
Internal Stakeholder	Workers Representative	Face to face
Internal Stakeholder	Gender Committee Representative	Face to face
Union	NUPW Representative	Face to face

Stakeholders comment	
1	<p>Feedbacks: Gender Committee Representatives & female workers @ WOW (Women on wards) – They informed that no sexual harassment and violence case reported since last audit. The female workers understand the</p>

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	<p>function of Gender committee and aware of the complaint mechanism if there is any issues. They were treated equally without any discrimination by the management.</p> <p>Audit Team verification and response: The management will respect the rights of female employees and monitor if there is any case of sexual harassment and violence happen. No further issue.</p>
2	<p>Feedbacks: Contractors and suppliers informed that there has been no issue with all the units under Tereh Complex. They also confirmed that there is good business relationship and open communication. They are invited for stakeholder meetings, are aware of the Company’s policies, legal and RSPO requirements that they have to comply with including Kulm’s anti bribery policy. Payments are all received within the agreed timeframe stated in invoices and contracts signed.</p> <p>Audit Team verification and response: Verification was done by sampling contracts, stakeholder meeting minutes, purchase orders, invoices and payment vouchers. No further issue.</p>
3	<p>Feedbacks: Schools: Good relationship, collaboration and support with all units within Tereh Complex. SK Ladang Tereh informed that most of the request made were fulfilled within the capacity of the operating units in terms of monetary or manpower assistance. All request was done officially in writing to the respective operating units</p> <p>Audit Team verification and response: The management will continue to assist whenever possible.</p>
4	<p>Feedbacks: Canteen Operator: Canteen tender is open on yearly basis to appoint the canteen operator. The process is transparent no direct negotiation on the appointment of operator. No complaint on the process and management continue to cooperate from time to time.</p> <p>Audit Team verification and response: No further issue.</p>
5	<p>Feedbacks: NUPW worker representatives confirmed that they were voted by the workers, and there is no interference from management. Management also allows them to attend meetings at NUPW HQ. Meetings are also held with the management to discuss workers’ welfare.</p> <p>Audit Team verification and response: Verification was done via sampled minutes of NUPW meetings held between worker representatives and estate and mill management. No further issue.</p>
6	<p>Feedbacks: NUPW worker representatives confirmed that they were voted by the workers, and there is no interference from management. Management also allows them to attend meetings at NUPW HQ. Meetings are also held with the management to discuss workers’ welfare.</p> <p>Audit Team verification and response: Verification was done via sampled minutes of NUPW meetings held between worker representatives and estate and mill management. No further issue.</p>

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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
Tereh Palm Oil Mill Certification Unit has undergone 2 nd Cycle of Replanting. Hence, this is not applicable.					

Previous land owner / user comment	
NA	Feedbacks: -
	Audit Team verification and response: -

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

<p>The audit objectives have been achieved and the certificate scope is appropriate. Based on the results of this audit, it is concluded that Tereh Certification Unit 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 Tereh Certification Unit is remain certified.</p>	
Report prepared by	Acceptance of Assessment Conclusion
Name: Vijay Kanna Pakirisamy	Name: Salasah Elias
Company Name: BSI Services Malaysia 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: 17/11/2022	Date: 27/11/2022

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>Tereh Palm Oil Mill and its supply base make available documents specified in the RSPO P&C to the public. These documents are either available via the Company's website http://www.kulim.com.my or available at the office, or can be accessible at each operating unit:</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 - Summary report of contributions to community development <p>Stakeholders were also informed of the availability of these documents during stakeholder meeting for all units on 27th October 2022. For RSPO certified external supplier, publicly available documents can be found the company website at https://kulim.com.my and also available at operating unit's office.</p>	Complied

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1.1.2	Information is provided in appropriate languages and accessible to relevant stakeholders. - Minor compliance -	The information is provided in either English or Bahasa Malaysia, or both. This was evidenced from the documents itself, and also during stakeholder meeting held on 27 th October 2022 attended by relevant stakeholders.	Complied
1.1.3	(C) Records of requests for information and responses are maintained. - Critical (Major) compliance -	The information is provided in either English or Bahasa Malaysia, or both. This was evidenced from the documents itself, and also during stakeholder meeting held on 27/10/2022 attended by invited stakeholders.	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 -	Kulim (M) Berhad continuous to implement the SOP entitled, Communication and Consultation Procedure, SQD/SMS/1.1, issue:1 ,rev: 0 dated 1 st August 2020. Evidence was available that records for information and responses were being maintained at each unit.	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 Tereh POM (updated on September 2022), Ladang Tereh Estate (8/8/22) 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 PKO buyers, government agencies such as Dept of Safety and Health, Indonesian Consulate, Labour Department, surrounding villages, nearby schools, clinics, etc.	Complied
Criterion 1.2: The unit of certification commits to ethical conduct in all business operations and transactions.			
1.2.1	A policy for ethical conduct is in place and implemented in all business operations and transactions, including recruitment and contracts. - Minor compliance -	Kulim (Malaysia) Berhad has developed an Ethics Policy signed by the Executive Director on 1 May 2018. Additionally, there is also the No Gift and Entertainment Policy also signed by its Executive Director on 1 May 2018. A review of the stakeholder meeting minutes confirmed that these Policies were communicated to all external stakeholders during stakeholder meetings.	Complied

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		The Ethics Policy is also imposed on recruitment agents. Sighted was the contract dated 19 May 2022 for Indonesian manpower supply between Kulim (Malaysia) Berhad and PT Hamparan Karya Insani. This contract contains the contractor’s undertaking that it complies with all applicable laws and codes relating to anti-bribery, fraud and corruption, and undertakes not to offer or accept bribe or any improper advantage from anyone in Kulim (Malaysia) Berhad. For example, latest briefing on ethical conduct was carried out on 30/08/2022 at Tereh Selatan Estate. For Tereh POM, the latest briefing was carried out on 10/04/2022.	
1.2.2	A system is in place to monitor compliance and the implementation of the policy and overall ethical business practice. - Minor compliance -	The system in place to monitor compliance and implementation of the No Gift and Entertainment Policy, Ethics Policy and overall business practice include: <ul style="list-style-type: none"> – Internal audit by Kulim (M) Berhad Sustainability & Innovation for Tereh complex – Contracts Administration Guidelines & Procedures for Kulim Malaysia Bhd (Head Office/Estates/Mill) updated August 2019. This guideline imposes a limit on the value of transaction for each management level; – Integrity ethics declaration signed by all levels of employees (management, workers). – Conflict of Interest Declaration forms signed by all levels of employees. 	Complied
Principle 2: Operate legally and respect rights			
Criterion 2.1: There is compliance with all applicable local, national and ratified international laws and regulations.			
2.1.1	(C) The Unit of Certification complies with legal requirements - Critical (Major) compliance -	Tereh Palm Oil Mill Certification Unit continues to ensure compliance towards all applicable local, national and ratified international laws and regulations. The compliances is guided by the document Sustainable	Complied

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		<p>Management System; Compliance To Legal Requirement; Document Number: SQD/SMS/2.0; Document Date: 01/08/2020; Issue: 01. Among permit and license sampled were:</p> <p><u>Tereh POM</u></p> <ol style="list-style-type: none"> 1. MPOB License; License Number: 50004804000; License Validity Period: 01/06/2022 – 31/05/2023. 2. Permit Barang Kawalan Berjadual; Serial Number: P (J005275); Reference Number: BPGK JH (KLU) 0730 SK; Description: Diesel; Storage Quantity: 11,000 Litres; License validity Period: 11/10/2021 – 10/10/2023. 3. DOE License – License to Occupy or Use the Designated Premises; License Number: 004685; License Validity Period: 01/07/2022 – 30/06/2023. 4. Energy Commission – Private Installation License: License Number: 2022/00303; Serial Number: 53715; License Validity Period: 27/01/2022 – 26/01/2023. <p><u>Tereh Utara Estate</u></p> <ol style="list-style-type: none"> 1. MPOB License; License Number: 501673102000; License Validity Period: 29/03/2022 – 30/04/2023. 2. Permit Barang Kawalan Berjadual; Serial Number: P (J 002078); Reference Number: BPGK JH 0726 SK; Description: Diesel (20,000 Litres) and Petrol (600 Litres); Validity Period: 10/03/2021 – 09/03/2023. 3. SPAN License; Class License Number: SPAN/EKS/(PT)800-4(1)/3/14; License Validity Period: 13/04/2020 – 12/04/2023.
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		<p>4. Energy Commission – Private Installation License; License Number: 2022/00683; Serial Number: 48875; License Validity Period: 29/04/2022 – 28/04/2023.</p> <p>5. License for River Water Diversion and Extraction; License Number: 06/A/Klg/165; File Number: BAKAJ/334/700-20/6/7/5; License Expiry Date: 31/12/2022.</p> <p><u>Tereh Selatan Estate</u></p> <p>1. MPOB License; License Number: 501674902000; License Validity Period: 01/05/2022 – 30/04/2023.</p> <p>2. Permit Barang Kawalan Berjadual; Serial Number: P (J002358); Reference Number: BPGK JH (KLU) 0766; Description: Diesel - 18,000 Litres & Petrol - 1,000 Litres; License Validity Period: 18/06/2021 – 17/06/2023.</p> <p>3. SPAN License; Class License Number: SPAN/EKS/(PT)/800-4(1)/3/14; License Validity Period: 13/04/2020 – 12/04/2023.</p> <p>4. Energy Commission - Private Installation License; License Number: 2021/02621; License Validity Period: 23/10/2022 – 23/10/2023.</p> <p><u>Mutiara Estate</u></p> <p>1. MPOB - FFB License; License Number: 502458002000; License Validity period: 01/11/2022 – 31/10/2023.</p> <p>2. MPOB – Nursery License; License Number: 5619240011000; License Validity Period: 01/05/2022 – 30/04/2023</p> <p>3. Energy Commission – Private Installation License; License Number: 2022/02225; Serial Number: 56986; License Validity period: 26/08/2022 – 25/08/2023.</p>	
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		4. Permit Barang Kawalan Berjadual; Serial Number: P (J 005330); Reference Number: BPGK JH (KLU) 1368 SK; Description: Diesel; Storage Capacity: 30,000 Litres; License Validity Period: 24/02/2022 – 23/02/2024.	
2.1.2	A documented system for ensuring legal compliance is in place. This system has a means to track changes to the laws and regulations. - Minor compliance -	<p>Tereh Palm Oil Mill 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 Certification Unit’s operation.</p> <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, Workers’ Minimum Standard of Housing and Amenities Act, Minimum Wages order 2020 to name a few. Other related legal for COVID19 pandemic under Prevention and Control of Infectious Diseases (Measure Within The Infected Local Areas) Regulation 2020 was also has been identified.</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.</p>	Complied
2.1.3	Legal or authorised boundaries are clearly demarcated and visibly maintained, and there is no planting beyond these legal or authorised boundaries. - Minor compliance -	<p>Legal boundaries was clearly demarcated with red and white colour concrete pole.</p> <p><u>Tereh Selatan Estate</u></p>	Complied

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		<p>As sighted during site visit P06/02 and P06/03 adjacent with IOI Pamol Estate, the legal boundaries was clearly demarcated with red and white colour concrete pole.</p> <p><u>Tereh Utara Estate</u></p> <p>During site visit, sighted the demarcation of estate legal boundaries at field P05/4 adjacent with smallholder’s farm was clearly demarcated with red and white colour concrete pole.</p> <p><u>Mutiara Estate</u></p> <p>Estate legal boundaries was clearly demarcated with red and white colour concrete pole as sighted at field P03/4 adjacent with smallholders farms.</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>The operating units has listed all contracted parties and documented in Stakeholder List. In the list includes internal stakeholders such as employee and workers union and external stakeholders such as suppliers, contractors, transporters, products buyers, head of local communities and other interested parties such as government department. Hospitals, schools and etc. the list was reviewed and updated on annually basis.</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 contracts including FFB supplier, contain specific clauses on meeting applicable legal requirements.</p> <p>For FFB suppliers, the clauses on meeting applicable legal requirements were stated in clause 14 which stated as follows: “The supplier shall be bound to follow and adhere to all rules and regulations set forth by Government of Malaysia, all Kulim Group relevant business policies and compliance to respective mill’s Certification Program Standards.”</p> <p>Reviewed the sampled contracts as follows:</p>	Complied

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		<ul style="list-style-type: none"> a. Contract agreements between Kulim Plantations (M) Sdn. Bhd. with Lee Kim Joo, ref: KMB/C1/17/8(2022) for Loading and Transporting (internal) of FFB from P00, P01, P03, P04, P05, P06, P07, P08 Using Bin System and P99 Using Manual Loading at Ladang Tereh Selatan to Ladang Tereh Mill. Contract period 15/05/2022 until 14/05/2025 b. Contract agreement between Kulim Plantations (M) Sdn. Bhd. with RKP Enterprise, ref: MPSB/LTS 1/50 for Harvesting of FFB in field P17 at Ladang Tereh Selatan. Contract period 01/12/2020 until 31/12/2022 c. Contract agreement between Kulim Plantations (M) Sdn. Bhd. with JVellu Enterprise, ref: KMB/C1/23/11 for Hiring of JCB at Ladang Mutiara. Contract period 15/04/2022 until 14/03/2023. d. Contract agreement between Kulim Plantations (M) Sdn. Bhd. with Galeri Teknik Niaga Sdn Bhd, ref: KMB/C1/56/151 (2022) for Loading and Transporting of Bio Compost form Bio Compost Plant at Ladang Tereh Selatan. Contract period 01/08/2022 until 31/07/2023. 	
2.2.3	<p>All contracts, including those for FFB supply, contain clauses disallowing child, forced and trafficked labour. Where young workers are employed, the contracts include a clause for their protection.</p> <p>- Minor compliance -</p>	<p>All contracts including FFB supplier, contain clauses on disallowing child, forced and trafficked labour. Where young workers are employed, the contracts include a clause for their protection.</p> <p>For FFB suppliers, the clauses on disallowing child, forced and trafficked labour. Where young workers are employed, the contracts include a clause for their protection were stated in clause 14 which stated as follows:</p> <p>"The supplier represents and warrants that the supplier shall comply with applicable labour and employment laws regarding; and prohibit any form of child labour, forced and trafficked labour. Any eligible young labour will be employed only accordance with Children and Young Person (Employment) Act 1966."</p>	Complied

		<p>Reviewed the sampled contracts as follows:</p> <ol style="list-style-type: none"> 1. Contract agreements between Kulim Plantations (M) Sdn. Bhd. with Lee Kim Joo, ref: KMB/C1/17/8(2022) for Loading and Transporting (internal) of FFB from P00, P01, P03, P04, P05, P06, P07, P08 Using Bin System and P99 Using Manual Loading at Ladang Tereh Selatan to Ladang Tereh Mill. Contract period 15/5/2022 until 14/5/25. 2. Contract agreement between Kulim Plantations (M) Sdn. Bhd. with RKP Enterprise, ref: MPSB/LTS 1/50 for Harvesting of FFB in field P17 at Ladang Tereh Selatan. Contract period 1/12/2020 until 31/12/22 3. Contract agreement between Kulim Plantations (M) Sdn. Bhd. with JVellu Enterprise, ref: KMB/C1/23/11 for Hiring of JCB at Ladang Mutiara. Contract period 15/4/2022 until 14/3/23. 4. Contract agreement between Kulim Plantations (M) Sdn. Bhd. with Galeri Teknik Niaga Sdn Bhd, ref: KMB/C1/56/151 (2022) for Loading and Transporting of Bio Compost form Bio Compost Plant at Ladang Tereh Selatan. Contract period 1/8/2022 until 31/7/23. 							
<p>Criterion 2.3: All FFB supplies from outside the unit of certification are from legal sources.</p>									
<p>2.3.1</p>	<p>(C) For all directly sourced FFB, the mill requires:</p> <ul style="list-style-type: none"> • Information on geo-location of FFB origins • Evidence of the ownership status or the right/claim to the land, or valid use of land by the grower/smallholder • One or more supporting documents for claims • Valid MPOB license <p>- Critical (Major) compliance -</p>	<p>Tereh mill received only crop from the Kulim Plantation Estates and its own supply bases within the certification scope, or other if any are diversion from the sister mills (RSPO Certified) as results of mill breakdown or annual maintenance.</p> <p>All estates from the same certification scope possessed the following information were sighted and verified during the audit</p> <ol style="list-style-type: none"> 1. Geo locations are as follows: <table border="1" data-bbox="1169 1294 1942 1390"> <thead> <tr> <th>Estate</th> <th>Latitude</th> <th>Longitude</th> </tr> </thead> <tbody> <tr> <td>Tereh Utara Estate</td> <td>2° 15' 05.20" E</td> <td>103° 20' 36.04" N</td> </tr> </tbody> </table>	Estate	Latitude	Longitude	Tereh Utara Estate	2° 15' 05.20" E	103° 20' 36.04" N	<p>Complied</p>
Estate	Latitude	Longitude							
Tereh Utara Estate	2° 15' 05.20" E	103° 20' 36.04" N							

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		<table border="1"> <tr> <td>Tereh Selatan Estate</td> <td>2° 11' 38.37" E</td> <td>103° 21' 8.37" N</td> </tr> <tr> <td>Mutiara Estate</td> <td>2° 17' 16.61" E</td> <td>103° 28' 52.13" N</td> </tr> </table>	Tereh Selatan Estate	2° 11' 38.37" E	103° 21' 8.37" N	Mutiara Estate	2° 17' 16.61" E	103° 28' 52.13" N	
Tereh Selatan Estate	2° 11' 38.37" E	103° 21' 8.37" N							
Mutiara Estate	2° 17' 16.61" E	103° 28' 52.13" N							
		<ul style="list-style-type: none"> 2. All FFB from the supply base estates was supported by the delivery documents and weighbridge tickets. 3. Valid land title with ownership status (refer indicator 4.4.1) 4. Valid MPOB licence <ul style="list-style-type: none"> - Felda Paloh Estate: MPOB license no. 560025002000 valid till 31/03/2023 - Wawasan Estate: MPOB license no. 503879302000 valid till 28.02.2023 							
2.3.2	<p>For all indirectly sourced FFB, the unit of certification obtains from the collection centres, agents or other intermediaries, the evidence as listed in Indicator2.3.1.</p> <p>- Minor compliance -</p>	<p>Inspected and verified delivery records showed there is no indirect sourced FFB at Tereh Palm Oil Mill. All FFB supplied are from Mahamurini Plantation Sdn Bhd own estates and its managed entities. They come from own estate (Tereh Selatan, Tereh Utara, Selai, Sg Tawing, Mutiara, Rengam) and 2 managed entities: Ladang Felda Paloh and Wawasan Paloh (YPJ Oil Palm).</p>	Not Applicable						
<p>Principle 3: Optimise productivity, efficiency, positive impacts and resilience</p>									
<p>Criterion 3.1: There is an implemented management plan that aims to achieve long-term economic and financial viability.</p>									
3.1.1	<p>(C) A business or management plan (minimum three years) is documented that includes, where applicable, a jointly developed business case for Scheme Smallholders.</p> <p>- Critical (Major) compliance -</p>	<p>Annual business plan in the form of annual budget and the projection for 5 years prepared as guidance for future planning. Sighted the annual budget FY 2022 and business plan FY 2023 – FY 2027. The business plan includes:</p> <p>Plantations</p> <ul style="list-style-type: none"> 1. Production – FFB tonnes 	Complied						

		<ul style="list-style-type: none"> 2. General Charges <ul style="list-style-type: none"> a. Supervision b. Rent, rates and taxes c. Office expense d. Maintenance e. Water and lights f. Labour welfare g. Medical 3. Production 4. Maintenance 5. Harvesting Palm Oil Mill <ul style="list-style-type: none"> 1. FFB yield, 2. CPO, 3. OER and KER, 4. General Charges <ul style="list-style-type: none"> a. Supervision b. Rent, rates and taxes c. Office expense d. Maintenance e. Water and lights 	
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		<p>f. Labour welfare</p> <p>g. Medical</p> <p>5. Production</p> <p>6. Maintenance</p>																									
3.1.2	<p>An annual replanting programme projected for a minimum of five years with yearly review, is available.</p> <p>- Minor compliance -</p>	<p>The estates have long range replanting program. Replanting planned for the palm older than 25 years, non-performance field (yield) and Ganoderma infected palm. Observed the replanting program for the next 5 financial year as follows:</p> <table border="1"> <thead> <tr> <th>Estate</th> <th>2022</th> <th>2023</th> <th>2024</th> <th>2025</th> <th>2026</th> </tr> </thead> <tbody> <tr> <td>Tereh Selatan Estate</td> <td>177.08</td> <td>137.45</td> <td>0.00</td> <td>198.08</td> <td>239.93</td> </tr> <tr> <td>Tereh Utara Estate</td> <td>252.89</td> <td>220.94</td> <td>273.39</td> <td>342.45</td> <td>209.17</td> </tr> <tr> <td>Mutiara Estate</td> <td>314.59</td> <td>-</td> <td>258.75</td> <td>255.80</td> <td>-</td> </tr> </tbody> </table>	Estate	2022	2023	2024	2025	2026	Tereh Selatan Estate	177.08	137.45	0.00	198.08	239.93	Tereh Utara Estate	252.89	220.94	273.39	342.45	209.17	Mutiara Estate	314.59	-	258.75	255.80	-	Complied
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Mutiara Estate	314.59	-	258.75	255.80	-																						
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>Management review was conducted on annually basis by Operating Unit as per SOP established.</p> <p>The management review covers agenda such as Internal and External Audit report, Operation Performance and Product Compliance, Customer Feedback, Product Conformity, Performance review, Risk Assessment, Complaint and Grievances, training, Opportunities for Improvement and other issues. Reviewed the minutes meeting conducted on 07/08/2022 at Tereh Palm Oil Mill and 24/07/2022 at Mutiara Estate.</p>	Complied																								

Criterion 3.2: The unit of Certification regularly monitors and reviews their economic, social and environmental performance and develops and implements action plans that allow demonstrable Continuous improvement in key operations.			
3.2.1	<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 continual improvement plan for financial year 2022 was available for the mill and sampled estates. It was established based on the social and environmental impact. To name a few of the action plans established are:</p> <p><u>Tereh POM</u></p> <ol style="list-style-type: none"> 1. Housing <ul style="list-style-type: none"> - Probase Road at Linesite (1km) 2. Facilities <ul style="list-style-type: none"> - New office Building - Install Roofing * Re-concrete at EFB Area. <p><u>Mutiara Estate</u></p> <ol style="list-style-type: none"> 1. OSHA <ul style="list-style-type: none"> - Replacement of Safety Signages. - Repair Fertiliser Stores. 2. Social <ul style="list-style-type: none"> - Repainting Staff Quarters – 6 Units. - Repainting Assistant Bungalow – 1 Unit. - Repainting Workers Quarters – 10 Unit - Repair Parameter Drain at Linesite - Sports Program for Workers (Sports Day) 	Complied
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>RSPO metric template version 2.1 is used for the reporting of Kulim Sedenak 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 Sept</p>	Complied

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	<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>2021 – Aug 2022 (counting back from audit month). Based on verification with input data, no discrepancies of data reported for the said period for all metrics.</p>	
<p>Criterion 3.3: Operating procedures are Appropriately documented, consistently implemented and monitored.</p>			
<p>3.3.1</p>	<p>(C) Standard Operating Procedures (SOPs) for the unit of certification are in place.</p> <p>- Critical (Major) compliance -</p>	<p>Kulim (M) Berhad has established Standard Operating Procedure as guidance for daily operation for the mills and estates.</p> <p>The mill and estates holds 3 SOPs as follows:</p> <ol style="list-style-type: none"> 1. Mill Quality Management updated 2018 (for Palm Oil mill) 2. Agriculture Manual updated 2019 (for Plantations) 3. Sustainable Management System dated 2020 4. Safety Work Procedure dated 2009 <p>The management has established a system to monitor the mill and estates operation such as Internal Audit, Operational Checklist, Workplace Inspection, Management Review Meeting and Mill/Estates Inspection Visit.</p>	<p>Complied</p>
<p>3.3.2</p>	<p>A mechanism to check consistent implementation of procedures is in place.</p> <p>- Minor Compliance -</p>	<p>The following mechanism is available and adopted as standard practices and procedures in the mill and estates operations.</p> <p><u>Tereh Palm Oil Mill</u></p> <ol style="list-style-type: none"> 1. Mill inspectorate Visit program 2x /year 2. Internal audit by Sustainability Unit 2x /year 3. Task Force visits 4. Monthly and weekly ad hoc meetings 5. Daily /monthly production & financial report 	<p>Complied</p>

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		<p>6. Daily and monthly lab analysis report. 7. Daily supervision by the mill Supervisors/Executives</p> <p><u>Supply Base Estates</u></p> <p>1. Plantation Inspectorate Visit program 2x /year 2. Internal audit by Sustainability Unit 2x /year 3. Task Force visits 4. Monthly and weekly ad hoc meeting 5. Daily /monthly production & financial report 6. Daily supervision by the field staff/Executives.</p>	
<p>3.3.3</p>	<p>Records of monitoring and any actions taken are maintained and available. - Minor Compliance -</p>	<p>Kulim Plantations established mechanism to check the effective implementation of the procedure. Among the mechanism such as Mill/Plantation Advisor Visit, Agronomist visit and Internal Audit. Reviewed the records as follows:</p> <p>Tereh Palm Oil Mill</p> <p>1. Mill Advisor visit 04/2022 for visit on 18 & 19/07/2022. Refer report no. MKI/LTM/4/2022. 2. Internal Audit report conducted on 21/07/2022. No issue were raised during the audit.</p> <p>Tereh Selatan Estate</p> <p>1. Plantation Inspectorate visit no. 03/2022 for visit on 10/05/2022 and 16/05/2022. Refer report no. SMS/LTS/03_2022 dated 26/05/2022. 2. Agronomist visit report no. 01/2022 for visit conducted on 15 and 16/06/2022. Refer visit report no. 1/22 (FULL VISIT) dated 28/06/2022.</p>	<p>Complied</p>

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		<p>Tereh Utara Estate</p> <ol style="list-style-type: none"> 1. Internal Audit report conducted on 11/08/2022. No issue were raised during the audit. 2. Plantation Inspectorate visit no. 02/2022 for visit on 21/09/2022. Refer report no. ARM/LTU/2_2022 dated 19/10/2022. 3. Agronomist visit report no. 01/2022 for visit conducted on 25/01/2022 and 02/02/2022. Refer visit report no. 1/22 (FULL VISIT) dated 17/02/2022. <p>Mutiara Estate</p> <ol style="list-style-type: none"> 1. Internal Audit report conducted on 20/07/2022. No issue were raised during the audit. 2. Plantation Inspectorate visit no. 03/2022 for visit on 26 – 28/06/2022. Refer report no. LMSS 3_2022 dated 06/07/2022. 3. Agronomist visit report no. 01/2022 for visit conducted on 21 – 23/08/2022. Refer visit report no. 1/22 (FULL VISIT) dated 19/09/2022. 	
<p>Criterion 3.4: A comprehensive Social and Environmental Impact Assessment (SEIA) is undertaken prior to new plantings or operations, and a social and environmental management and monitoring plan is implemented and regularly updated in ongoing operations.</p>			
3.4.1	<p>(C) In new plantings or operations including mills, an independent SEIA, undertaken through a participatory methodology involving the affected stakeholders and including the impacts of any smallholder/out-grower scheme, is documented.</p> <p>- Critical (Major) compliance -</p>	<p>No new planting in both estates within Tereh POM and supply base. Sustainability & Quality Department has carried out Social Impact Assessment on 15/09/2021 for Tereh POM certification unit. The assessment has involved participation of contractors and internal workers. Checklist Interview was utilized during interview with the stakeholders for SIA. The social impact register is developed based on the scoring of frequency, consequence and likelihood. Social Management Plan will be developed after the social impact register</p>	Complied

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		<p>established. There is no new planting in the 3 estates. This is verified through the following document/facts:</p> <ul style="list-style-type: none"> a) Hectare statement compared to the previous year. b) Interviews with the management <p>The operating units have conducted the aspects and impacts analysis and documented in the Environmental Risk Assessment from. The analysis was reviewed on annually basis. latest review was conducted as follows:</p> <ol style="list-style-type: none"> 1. Tereh Palm Oil Mill <ul style="list-style-type: none"> - Latest review was conducted on 03/08/2022, conducted by the Sr. Asst. manager. Refer document no. EIA-LTM-2022. 2. Tereh Selatan Estate <ul style="list-style-type: none"> - Latest review was conducted 08/08/2022, conducted by the Asst. Manager. Refer document no. KULIM-LTS-2022. 3. Tereh Utara Estate <ul style="list-style-type: none"> - Latest review was conducted 09/08/2022, conducted by the Asst. Manager. Refer document no. KULIM-LTU-2022. 4. Mutiara Estate <ul style="list-style-type: none"> - Latest review was conducted 12/05/2022, conducted by the Asst. Manager. Refer document no. KULIM-LM-2022. 	
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>The Social & Environment Management Plan for period 2020 is available for the CU. The plan among others incorporated the objectives, category, action, frequency, person in charge and monitoring period. Identified issues and mitigation plan were summarized under Social Management Plan for 2022</p>	Complied

<p>3.4.3</p>	<p>(C) The social and environmental management and monitoring plan is implemented, reviewed and updated regularly in a participatory way. - Critical (Major) compliance -</p>	<p>The Social/Environmental Action Plan 2021/22 available for each units were available having information i.e issues, management plan, PIC and time frame. The inputs are reconciled from the meeting minutes;</p> <ul style="list-style-type: none"> a. Gender Committee, NUPW b. Safety Meeting c. Complaint & Request from internal & external stakeholders d. Management meeting at estates/mill and regional level. e. Dialogue during the morning muster. <p>The last review of the social management plan was on 27/10/2022 for Tereh POM certification unit with identification of negative and positive impacts. Mitigation and promotion actions were taken accordingly to the impacts identified.</p> <p>The operating units have established the Environmental Management Plan base on the Environmental Risk Assessment conducted. Reviewed the implementation of the management plan as follows: Tereh Palm Oil Mill</p> <ul style="list-style-type: none"> 1. The mill monitor the condition of pollution control device and landfill on weekly basis to ensure no pollution. Reviewed the monitoring records dated 26/10/2022, 18/10/2022, 11/10/2022 and 04/10/2022. 2. To ensure no diesel spillage, oil/fuel leakage and dust emission from vehicle and machineries, the mill conducted vehicle inspection on periodically basis (monthly, weekly and daily). Reviewed the inspection records book for vehicle and machineries no. T11, T13, E11, E16, T10, T14, V05 and V07 FY 2022. 	<p>Complied</p>
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		<p>3. To ensure no effluent spillage, leakage and bund rupture, the mill conducted daily monitoring at effluent pond on daily basis. The monitoring covers on pond parameter, pump condition and pond condition. Reviewed the monitoring records for the month of August, September and October 2022.</p> <p>4. The mill has established SOP for emergency response plan for bund rupture and oil spillage. Training on the SOP has been conducted on 15/07/2022.</p> <p>Tereh Selatan Estate</p> <p>1. To ensure the electrical genset running in good condition, optimize usage of diesel and reduce pollution, the genset inspection was conducted on monthly basis by competent electrical engineer with competency no. JK-T-2-B-0005-2019. Reviewed the inspection records for the month of July, August and September 2022.</p> <p>2. The estate conducted monitoring at the river buffer zone at inlet and outlet water sampling point in field P01/3, p03/5, p17/2, P07/2, P06/3 AND p07/1 on monthly basis. Reviewed the monitoring records for the month of July, August and September 2022.</p> <p>3. The estate maintain the inventory records for empty chemical containers. Reviewed the inventory of empty chemical container for Chlorine (25L), Glyphosate/Amine (20L), Gmet/ Kennly/ Ally, (500g) and Blocus (25L) FY 2022.</p> <p>Tereh Utara Estate</p> <p>1. To minimum pollution if any oil spillage occur, the estate continuously conducted ERP for oil spillage training to the</p>	
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		<p>workers. Reviewed the training attendance records and training material for training conducted on 02/10/2022t.</p> <ol style="list-style-type: none"> 2. The estate continuously conducted awareness briefing on environmental impact and pollution from replanting to the contractors. Latest briefing was conducted on 27/10/2022 during stakeholders meeting. Reviewed the minutes meeting and meeting Power Point material. 3. To ensure the electrical genset running in good condition, optimize usage of diesel and reduce pollution, the genset inspection was conducted on monthly basis by competent electrical engineer with competency no. JK-T-2-B-0005-2019. Reviewed the inspection records for the month of July, August and September 2022. 4. The estate monitor the condition of pollution control device and conducted cleaning on weekly basis to ensure minimum pollution. Reviewed the monitoring records for the month of September 2022. <p>Mutiara Estate</p> <ol style="list-style-type: none"> 1. The estate monitor and maintained the buffer zone area on monthly basis. Reviewed the maintenance records for the month of July, August and September 2022. The estate monitor the water river water quality on monthly basis. Reviewed the water sampling records for the month of August and September 2022. 2. Empty pesticide container was triple rinse and reuse as premix chemical container or puncture and disposed through licensed contractor. The workers were trained to conduct the triple rinsing work as training records dated 27/02/2022. 	
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		<p>3. The estate continuously conduct training to improve the workers awareness on HCV and RTE. Reviewed the training records dated 20/02/2022.</p> <p>4. To ensure no diesel spillage, oil/fuel leakage and dust emission from vehicle and machineries, the estate conducted vehicle inspection on periodically basis (monthly, weekly and daily). Reviewed the weekly inspection records vehicle no. F94</p> <p>5. The estate monitor the condition of pollution control device and landfill on weekly basis to ensure no pollution. Reviewed the monitoring records for the month of July, August and September 2022. Noted during site visit at the PCD at workshop and store, no pollution/spillage sighted at the area.</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>Reviewed and verified during the audit were the following SOPs:</p> <ul style="list-style-type: none"> - Recruitment of New Foreign Workers Rev. No. 1 Issue No. 1 dated 1 Jan 2019. It was observed that this SOP does not contain procedures related to termination, promotion and retirement of foreign workers. Nevertheless, it was noted that termination is clearly stipulated under workers' employment contracts. And although the procedure for promotion is not available in the SOP for foreign worker, evidence is available that this is being practiced at the Mill via letter dated 29 December 2019 issued to Worker No. 637128 which confirmed his change from General Worker to Kernel Plant operator. - Recruitment of Local Workers for Operating Units Rev No. 00 Issue No. 01 dated 1 October 2020. This SOP contains procedures for recruitment, promotion, retirement, and termination. 	Complied
3.5.2	<p>Employment procedures are implemented, and records are maintained.</p> <p>- Minor Compliance -</p>	<p>Based on the files sighted, Tereh POM and its supply base are able to demonstrate the implementation of the employment procedures, and</p>	Complied

		<p>records are maintained. Records for Malaysian workers include job application form, resume, copies of relevant certificates, NRIC and medical reports. For foreign workers, records include copies of passports, request for salary deductions for paying electricity bills, mosque funds, and consent for passports to be kept in the office.</p> <p>Based on the files sighted, Tereh POM and its supply base are able to demonstrate the implementation of the employment procedures, and records are maintained. Records for Malaysian workers include job application form, resume, copies of relevant certificates, NRIC and medical reports. For foreign workers, records include copies of passports, request for salary deductions for paying electricity bills, mosque funds, and consent for passports to be kept in the office.</p>	
<p>Criterion 3.6: An occupational health and safety (H&S) plan is documented, effectively communicated and implemented.</p>			
<p>3.6.1</p>	<p>(C) All operations are risk assessed to identify H&S issues. Mitigation plans and procedures are documented and implemented. - Critical (Major) compliance -</p>	<p>HIRARC was available for all operations within the mill and estates to identify the hazards, assess and recommended control measures to minimize the risks. Among the HIRARC sampled were Harvesting of FFB, P&D Control, Landfill Activities, manuring and Spraying Activities. Risks were also assessed in accordance to legal requirements and its recommendations were implemented as below.</p> <p><u>Tereh POM</u></p> <ol style="list-style-type: none"> 1. Chemical Health Risk Assessment was done in compliance with USECHH Regulation 2000. The assessment was conducted by QMSPRO Sdn Bhd on 27/03/2018 – 13/08/2018. The CHRA Report (Report Number: JKPP HQ/03/ASS/00/154-2018/057) was available for verification. 2. Medical Surveillance for 2022 was conducted for 44 mill workers on 27/07/2022 for workers exposed to n-hexane, pesticides and hazardous fumes. The medical surveillance was conducted at Uni 	<p>Complied</p>

		<p>Klinik, Permas Jaya. The results indicated that all workers had no abnormal results that were occupational caused.</p> <ol style="list-style-type: none"> 3. Noise Risk Assessment was conducted in compliance with Occupational Safety and Health (Noise Exposure) Regulations 2019. The assessment was conducted by Kulim Safety Training and Services Sdn Bhd on 06/02/2022. The NRA Report (Report Number: JKPP HIE 127/5/3-1 (No.169) – 2020/004) was available for verification. 4. Audiometric test was conducted by PAC Testing & Consulting Sdn. Bhd for 53 mill workers on 25/05/2022. The results indicated 3 workers were diagnosed with Standard Threshold Shift (STS) and required to undergo retest within 3 months. A retest was conducted on 26/08/2022 and results were available for verification. <p><u>Tereh Utara Estate</u></p> <ol style="list-style-type: none"> 1. Chemical Health Risk Assessment (CHRA) was done in compliance with USECHH Regulation 2000. The assessment was conducted by QMSPRO Sdn Bhd on 29/03/2018 – 13/08/2018. The CHRA Report (Report Number: JKPP HQ/03/ASS/00/154-2018/039) was available for verification. 2. Noise Risk Assessment was conducted in compliance with Occupational Safety and Health (Noise Exposure) Regulations 2019. The assessment was conducted by NRA Assessor (JKPP Registration Number: HQ/18/PEB/00/00014) on 20/12/2021. The NRA Report (Report Number: HQ/18/PEB/00/00014 – 2021/015) was available for verification. 3. Audiometric test was conducted by BP Healthcare Group for 8 estate workers on 29/10/2022 based on the requirements in the 	
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		<p>NRA. The results indicated workers were diagnosed to have normal hearing.</p> <p><u>Tereh Selatan Estate</u></p> <ol style="list-style-type: none"> 1. Chemical Health Risk Assessment was conducted to assess the use of hazardous chemicals in the estate. The CHRA Assessment was conducted on 29/03/2018 – 13/08/2018 by QMSPro Sdn Bhd. The CHRA Report (JKKP HQ/03/ASS/00/154-2018/038) was available for verification. Supplementary CHRA Report was conducted due to additional chemicals used in the estate. The assessment was done on 22/12/2020 – 31/01/2021 by QMSPro Sdn Bhd. The CHRA Report (Report Number: JKKP HQ/03/ASS/00/154-2021/024) was available for verification. 2. Medical Surveillance was conducted for 20 estate workers, deemed to be exposed to pesticides, fertilisers and mineral oils. The assessment was conducted on 20/07/2022 at Uni Klinik, Permas Jaya. The results indicated that all workers had no abnormal results that were occupational caused. 3. Noise Risk Assessment was conducted in compliance with Occupational Safety and Health (Noise Exposure) Regulations 2019. The assessment was conducted by Amcen Lab Sdn Bhd on 22/12/2021. The NRA Report (Report Number: HQ/18/PEB/00/00014 – 2021/018) was available for verification. <p><u>Mutiara Estate</u></p> <ol style="list-style-type: none"> 1. Supplementary CHRA Assessment was conducted by QMSPRO Sdn Bhd on 22/12/2020 – 31/01/2021 due to usage of different 	
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		<p>chemicals in the operations. The CHRA Report (Report Number: JKKP HQ/03/ASS/00/154-2021/010) was available for verification.</p> <ol style="list-style-type: none"> 2. Medical Surveillance was conducted for workers expose to hazardous chemicals in the estate. The medical surveillance was conducted by Uni Klinik, Permas Jaya on 21/07/2022 for 27 workers. All workers were declared fit to work as per report. 3. Baseline Noise Risk Assessment was conducted in compliance with Occupational Safety and Health (Noise Exposure) Regulations 2019. The assessment was conducted by DOSH certified assessor, Mr. Lee Kean Heng (JKKP Registration Number: HQ/18/PEB/00/00014) on 19/12/2021. The assessment report (HQ/18/PEB/00/00014 – 2021/014) was available for verification. 	
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>Annual H&S plan established by each Operating Unit are mostly implemented through Annual Training Program 2020 to address the identified health and safety risks. The emphasis is on safe work by providing</p> <ul style="list-style-type: none"> ▪ Knowledge and skills needed to do their work safely and avoid creating hazards that could place themselves or others at risk. ▪ Awareness and understanding of workplace hazards and how to identify, report, and control them. ▪ Specialized training, when their work involves unique hazards. <p>Besides formal classroom training other means include on-the-job training and worksite demonstrations to effectively convey safety concepts, ensuring understanding of hazards and their controls, and promoting good work practices.</p> <p>The safety performance of each Operating Unit is monitored via:</p> <ul style="list-style-type: none"> • Internal Audit conducted by the Kulim Head office Sustainability Palm Oil Department; • Workplace inspection by site OSH Committee; 	Complied

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		<ul style="list-style-type: none"> • Direct involvement of supervisor and rounds by Asst Manager; • Safety occurrence reporting; • Health / medical surveillance; • Chemical exposure monitoring, and <p>The results of monitoring are discussed at meetings and informed to employees, and where applicable, appropriate corrective actions are taken.</p>	
Criterion 3.7: All staff, workers, Scheme Smallholders, out-growers, and contract workers are appropriately trained.			
3.7.1	<p>(C) A documented programme that provides training is in place, which is accessible to all staff, workers, Scheme Smallholders and out-growers, taking into account gender-specific needs, and which covers applicable aspects of the RSPOP&C, in a form they understand, and which includes assessments of training.</p> <p>- Critical (Major) compliance -</p>	<p>The Annual Training Program 2022 was established that covers mainly Health and Safety but extends to include all aspects of RSPO P&C and Supply Chain Certification Standard (SCCS).</p> <p>Means implemented by Kulim Plantation to assess understanding of participants include:</p> <ul style="list-style-type: none"> • Participants completing post-training evaluation/feedback form and give suggestions; • Learners engagement such as interactive quizzes; • Knowledge acquisition and behavioural application rated by immediate supervisor at workplace post training attended. <p>Random interviews with workers showed that they understood what is RSPO, the several subsidiaries policies, what does their work/job SOP states and the consequences if deviated, the need to put on PPE and demonstrate donning PPE and when it should be changed, the use of fire extinguishers, understanding workplace hazards, risks and needed control measures, Covid-19 Safe Practices. etc.</p>	Complied
3.7.2	<p>Records of training are maintained.</p> <p>- Minor Compliance -</p>	<p>Training records are maintained by each Operating Unit. Sample some records at each Operating as follows:</p>	Complied

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		<table border="1"> <thead> <tr> <th>Training</th> <th>Date</th> </tr> </thead> <tbody> <tr> <td>ERP Training – Bund Rupture & Oil Spillage</td> <td>15/07/2022</td> </tr> <tr> <td>PCD Cleaning Training</td> <td>05/07/2022</td> </tr> <tr> <td>Laboratory Sampling and Record testing Training</td> <td>03/07/2022</td> </tr> <tr> <td>Chemical Handling Training</td> <td>06/10/2022</td> </tr> <tr> <td>Shovel and Tractor Driver SOP Training</td> <td>17/07/2022</td> </tr> <tr> <td>LOTO Training</td> <td>11/06/2022</td> </tr> <tr> <td>Boiler Safety and PPE Training</td> <td>10/03/2022</td> </tr> <tr> <td>Scheduled Waste Training</td> <td>28/02/2022</td> </tr> </tbody> </table>		Training	Date	ERP Training – Bund Rupture & Oil Spillage	15/07/2022	PCD Cleaning Training	05/07/2022	Laboratory Sampling and Record testing Training	03/07/2022	Chemical Handling Training	06/10/2022	Shovel and Tractor Driver SOP Training	17/07/2022	LOTO Training	11/06/2022	Boiler Safety and PPE Training	10/03/2022	Scheduled Waste Training	28/02/2022		
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		Water Treatment Training	04/10/2022	
		Fertilizer Sampling Training	15/09/2022	
		PPE Usage Training	07/07/2022	
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		Training	Date	
		Harvesting Training	14/09/2022	
		Spillage Containment Training	24/08/2022	
		Chemical Handling Training	07/09/2022	
		Safety Work at Chemical Store Training	07/09/2022	
		Bagworm Treatment Training	05/10/2022	
		Rat Baiting Training	14/09/2022	
		Triple Rinsing Training	03/08/2022	
		Mutiara Estate		
		Training	Date	
		Harvesting Training	12/10/2022	
		Spraying Training – HCV & Buffer Zone	05/10/2022	
		Schedule Waste training	18/04/2022	

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		Water Sampling Training	25/05/2022	
		IPM Training	11/03/2022	
		PPE Usage Training	09/04/2022	
		Tractor & MB Safe Driving Training	22/05/2022	
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. - Minor Compliance -	Supply chain training carried out for personnel carrying out the tasks critical to the effective implementation of the Supply Chain Certification Standard (SCCS). Training conducted on 03/09/2021 – attended by Mill representatives.		Complied
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	Identity Preserved Module A mill is deemed to be Identity Preserved (IP) if the FFB processed by the mill are sourced from plantations/estates that are certified against the RSPO Principles and Criteria (RSPO P&C), or against the Group Certification scheme. Certification for CPO mills is necessary to verify the volumes and sources of certified FFB entering the mill, the implementation of any processing controls (for example, if physical separation is used), and volume sales of RSPO certified products. If a mill process certified and uncertified FFB without physically separating them, then only Mass Balance Module is applicable.	Tereh Palm Oil Mill only receives certified FFB from its own certified supply base. Therefore, Tereh POM uses the Identity Preserved supply chain system and module. During the P&C assessment, the audit team verified the volumes and sources of certified FFB entering the mill, the implementation of processing controls and volume sales of RSPO certified products.		Complied
3.8.2	Mass Balance Module 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	Tereh Palm Oil Mill only receives certified FFB from own certified supply base. Therefore, qualifies for the Identity Preserved supply chain system and module. Hence this indicator is not applicable.		Not Applicable

	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.		
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 production for the assessment period is available in table 10 of this summary report.	Complied
3.8.4	The mill shall also meet all registration and reporting requirements for the appropriate supply chain through the RSPO IT platform.	The mill has met all registration and reporting requirements for the appropriate supply chain through the RSPO supply chain managing organization, PalmTrace. The registration of PalmTrace will be carried out by the Marketing Department in HQ. Company has registered in PalmTrace system as follows: Members ID: RSPO_PO1000001263 Member category : Oil Mill	Complied
3.8.5	<p>Documented procedures</p> <p>The mill shall have written procedures and/or work instructions or equivalent to ensure the implementation of all elements of the applicable supply chain model specified. This shall include at minimum the following:</p> <ul style="list-style-type: none"> 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). 	<p><u>Document Procedure</u></p> <p>The SCCS Operations are guided by 2 operating procedures as follows.</p> <ol style="list-style-type: none"> 1. Mahamurni Plantations Sdn Bhd; Procedure Title: CSPO & CSPK Supply Chain; Procedure No: MKTG 04; Document Date: January 2021; Revision; 02. 2. Sustainable Management system – Traceability; Document Number: SQD/SMS/2.1; Document Date: 17/02/2022; Issue No: 01; Rev Number; 06. <p>– Seen the records that included in the procedure are as below</p>	Complied

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	<p>c) Identification of the role of the person having overall responsibility for and authority over the implementation of these requirements and compliance with all applicable requirements. This person shall be able to demonstrate awareness of the mill’s procedures for the implementation of this standard.</p> <p>d) The mill shall have documented procedures for receiving and processing certified and non-certified FFBs including ensuring no contamination in the IP mill.</p>	<p>Weighbridge tickets, Training records, Internal audit report, Invoice and contracts, Delivery and storage records and Daily Production Report.</p> <ul style="list-style-type: none"> – Training records for RSPO Supply Chain & Stamping was sighted where the training was conducted on 03/09/2022 for the critical control point responsible person such as Weighbridge Operators and Security Guards. Seen the attendance list and interviewed with the attendees confirmed that they are understand the procedure. – Head of each operating unit appointed as person responsible for all certification inclusive of RSPO SCCS. Responsibility of the person-in-charge has clearly stated in the appointment letter, SQD/ADMIN/019/21 dated 15/09/2021. – Tereh POM has developed Sustainable Management system – Traceability; Document Number: SQD/SMS/2.1; Document Date: 17/02/2022; Issue No: 01; Rev Number; 06, which has covered the process of incoming of FFB and ensuring no contamination in the IP mill. 	
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> <ul style="list-style-type: none"> a. Conforms to the requirements in the RSPO Supply Chain Certification Standard and the RSPO Market Communications and Claims Documents. b. Effectively implements and maintains the standard requirements within its organisation. <p>ii) Any non-conformities found as part of the internal audit shall be issued corrective action. The outcomes of the internal audits and all actions taken to correct non-conformities shall be subject to management</p>	<p>Kulim (Malaysia) Berhad has developed Internal Audit Procedure (Doc. No.: SQD/SMS/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 21/07/2022 by SQD team. There no non-conformance was raised based on Internal Audit Report. All the clauses in RSPO SCCS and RSPO Market Communications and Claims were covered during the audit.</p>	Complied

	<p>review at least annually. The mill shall maintain the internal audit records and reports.</p>		
<p>3.8.7</p>	<p>Purchasing and Goods In</p> <ul style="list-style-type: none"> i) The mill shall verify and document the tonnage and sources of certified and the tonnage of non-certified FFBs received. ii) The mill shall inform the CB immediately if there is a projected overproduction of certified tonnage. iii) The mill shall have a mechanism in place for handling non-conforming FFB and/or documents. 	<p>When FFB delivered to the mill from the estate, the transporters presented FFB despatch report to the mill weighbridge clerk in order the FFB to be received by the mill.</p> <p>E.g. of information available in the FFB despatch report is as follows:</p> <p>FFB from Own Supply Base</p> <ol style="list-style-type: none"> 1. FFB despatch no. - DB A No. 66691 2. Estate’s names - Sg Tawing Estate 3. Date of delivery – 29/10/2022 4. Field No. - Field P01,P12 & P98 5. Lorry No - JBG 3377 6. Weight - 11650 mt 7. WB ticket: 163107 8. Traceability Identification - RSPO certified FFB (RSPO 613086) <p>Diversion from other certified management unit, - Sindora certification unit (RSPO 697952)</p> <ol style="list-style-type: none"> 1. FFB despatch no. - DB A No. 59997 2. Estate’s names – Basir Ismail Estate 3. Date of delivery – 20/10/2022 4. Field No. - Field P11, P12 & P11R 5. Lorry No – JMJ 5623 6. Weight – 36,540 mt 7. WB ticket: 162309 8. Traceability Identification - RSPO certified FFB (RSPO 697952) 	<p>Complied</p>

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3.8.8	<p>Sales and Goods Out</p> <p>The supplying mill shall ensure that the following minimum information for RSPO certified products is made available in document form. The information shall be complete and can be presented either on a single document or across a range of documents issued for RSPO certified oil palm products (for example, delivery notes, shipping documents and specification documentation):</p> <ol style="list-style-type: none"> 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>Tereh Palm Oil Mill ensured the required information is available in document form.</p> <p>Sampled of CPO contract: CPOIP-M21086 dated 25/11/2021, quantity 9,500 mt (delivery month – October 2022)</p> <ol style="list-style-type: none"> 1. The name and address of the buyer: XXX 2. The name and address of the seller; Ladang Tereh Mill 3. The delivery date: 20/10/2022 4. The date on which the documents were issued: 20/10/2022 5. RSPO Certificate Number: RSPO 613086 6. A description of the product, including the applicable supply chain model: Crude Palm Oil (CSPO) RSPO IP 7. The quantity of the products delivered: 35.240 mt 8. Any related transport documentation: Loading Note - C08083 9. A unique identification number: Weighbridge Ticket Number: C08083 <p>Sampled of PK contract: MPOK 2118 IP dated 19/11/2018, quantity 3,500 mt (delivery month – October 2022)</p> <ol style="list-style-type: none"> 1. The name and address of the buyer: XXX 2. The name and address of the seller: Ladang Tereh Mill 3. The delivery date: 27/10/2022 4. The date on which the documents were issued: 27/10/2022 5. RSPO Certificate Number: RSPO 613086 6. A description of the product, including the applicable supply chain model: Kernel (CSPK) RSPO IP 7. The quantity of the products delivered: 45.620 mt 8. Any related transport documentation: Loading Note – K02098 9. A unique identification number: Weighbridge Ticket Number: K02098 	Complied
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<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 CPO and PK process, bulking facilities outsourced by the mill. Transporter for PK was assigned by buyer. For CPO, contract agreement with a few contractors as per below:</p> <ol style="list-style-type: none"> 1. Teo Tuan Kwee; Contract Number: MPSB/G1/2 (2020) (TTK) dated 15th June 2020. Date commencement: 1st June 2020, completion date: 31st May 2023. 2. Semai Setia Transport, MPSB/G1/6/2(2020) (SS) dated 15th June 2020. Date commencement: 1st June 2020, completion date: 31st May 2023. 3. Fica Logistic Sdn Bhd; Contract Number: MPSB/CPO 1/2016 (FICA) dated 25/02/2018. Date commencement: 28/02/2018; Date Completion 31/03/2023 <p>Under clause 6 on the contract; <i>For contract operation in RSPO, ISCC and MSPO certified mills or estates, the contractor is required to comply with all RSPO, ISCC and MSPO requirements related to the execution of the contract.</i></p>	<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>Names and contact details of all contractors used for the physical handling of CSPO listed under stakeholder list September 2022</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 change of names and contract details of transporter for the physical handling of RSPO certified oil palm products. The mill ae aware that the CB are to be informed if there are any changes of updates.</p>	<p>Complied</p>

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<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> <ol style="list-style-type: none"> 1. 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. 2. All volumes of certified CPO and PK that are delivered are deducted from the material accounting system according to conversion ratios stated by RSPO. 3. 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). 	<ol style="list-style-type: none"> 1. The mill has maintained the accurate, complete, up-to-date and accessible records and reports covering all aspects of these Sustainability Management System as below: <ol style="list-style-type: none"> a. Dispatch of CPO/PK delivery order b. Daily Production Report c. FFB Despatch Report from supplying estate d. Training records e. FFB Transaction records 2. Traceability Procedure (Doc. No.: SQD/SMS/1.2, Issue No. 1, Rev. No.: 05 dated 1/8/20, the records retention for all RSPO Supply Chain related records to be retained for a minimum of 5 years' period. 3. Records and balance of all receipts of RSPO certified FFB and deliveries of RSPO certified CPO and PK monitored on a real-time basis on daily/monthly production figure. 	<p>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>Conversion factor of CPO and PK production is depending on the actual OER and KER. Extraction average from March 2022 to September 2022 were 21.12% (OER) & 5.36% (KER).</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.	The facility is using the actual extraction rate and therefore updating of rates is not necessary.	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.	No incoming of uncertified FFB and mill only process RSPO certified FFB from Kulim (M) Berhad group estates. Hence there are no uncertified products being produced, stored or transported for this certification unit.	Complied				
3.8.16	Registration of Transactions i) Shipping Announcement in the RSPO IT platform shall be carried out by the mills when RSPO certified products are sold as certified to refineries, crushers, and traders not more than three months after dispatch with the dispatch date being the Bill of Lading or the dispatch documentation date. ii) Remove: RSPO certified volumes sold under different scheme or as conventional, or in case of underproduction, loss or damage shall be removed in the RSPO IT platform.	Shipping announcement in the RSPO IT platform carried out by the mills when RSPO certified products are sold as certified to refineries. Details of transaction summarized under table ### Total of registered transaction from March 2022 to September 2022; <table border="1" style="margin-left: auto; margin-right: auto;"> <tr> <td style="text-align: center;">CPO</td> <td style="text-align: center;">PK</td> </tr> <tr> <td style="text-align: center;">40,191.93</td> <td style="text-align: center;">9,284.25</td> </tr> </table>	CPO	PK	40,191.93	9,284.25	Complied
CPO	PK						
40,191.93	9,284.25						
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.	Kulim (Malaysia) Berhad has obtained Trademark License from RSPO and seen the trademark license# 1-0080-09-100-00 which valid from 13/8/2021 – 12/8/2023 for IP Model for Tereh Palm Oil Mill. The facility is aware with the requirements of the RSPO Rules on Market Communications and Claims.	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 without the use of trademark logo.	Complied				

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4.2	<p>In corporate communications a member is allowed to:</p> <ol style="list-style-type: none"> Display its RSPO membership status Display the RSPO web address (www.rspo.org) State that the member supports the work of the RSPO State the member’s history with regard to the RSPO. Use the RSPO trademark to promote its membership of the RSPO. <p>Additionally, where an RSPO member displays the RSPO trademark in digital format this must be accompanied by the text ‘Check our progress at www.rspo.org’ where the link must lead to the member’s profile page.</p>	<p>Kulim (Malaysia) Berhad has stated the member’s history with regard to RSPO in the company’s website and annual report without the use of trademark logo.</p>	Complied
4.3	<p>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.</p>	<p>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.</p>	Complied
4.4	<p>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.</p>	<p>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.</p>	Complied
4.5	<p>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.</p>	<p>There was no RSPO corporate logo has been used verified through website, notice board, business card, shipping documentation and procurement/ purchasing document.</p>	Complied
Business to business communications			
5.1	<p>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.</p>	<p>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 (IP) was stamped on the tickets.</p>	Complied
5.2	<p>When confirming the sale of certified oil palm products, members must adhere to the requirements of the RSPO SCCS. This includes stating the</p>	<p>Shipping documentation verified and conformance with the requirements of RSPO SCCS. In the weighbridge ticket, it stated that the product is CSPO (IP) with RSPO certificate number.</p>	Complied

	supply chain model and certificate number under which the claim is being made.		
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>	Tereh Palm Oil Mill is not under distributor or wholesaler category. Thus, this requirement is not applicable.	Not Applicable
MODULE A – IDENTITY PRESERVED & SEGREGATED SPECIFIC RULES			
Certified oil palm content (IP)			
	For IP, 95% or above of the oil palm content must be RSPO IP-certified.	Oil palm content is 100% CPO and claim as RSPO IP-certified.	Complied
	For SG, 95% or above of the oil palm content must be SG, or a combination of SG and IP.	Not Applicable for IOI Gomali POM as the content of Oil Palm is 100%.	Complied
	Where there is any percentage of non-certified oil palm within the product, the reason for this must be fully justified and an action plan for moving to fully certified oil palm must be in place, in accordance with the requirements of the RSPO SCCS. In addition, the volume of non-certified oil palm products must be covered by the purchase of RSPO Credits of equivalent volume.	Oil palm content is 100% CPO and claim as RSPO IP-certified. All infeed material (FFB) is RSPO certified.	Complied
Labelling and trademark (IP)			

	<p>Members are allowed to use the RSPO label in one of the following ways:</p> <ul style="list-style-type: none"> • RSPO trademark which includes the tag 'CERTIFIED' or • RSPO trademark which includes the tag 'This product contains certified sustainable palm oil'. Wherever a RSPO trademark is displayed, the applicable trademark license number must be shown immediately under or next to the trademark or the 'statement'. Font must be Calibri, font size must be at least 4pt (1.4 mm or 0.06 inch). In on-pack communications, the RSPO trademark can be printed anywhere on the pack. 	<p>Tereh POM is producing crude palm product and does not involved in any labelling of end-product.</p>	<p>Not Applicable</p>
Messaging (IP)			
	<p>Messaging ALLOWED in storytelling in product-related communications may include some or all of the following elements:</p> <ul style="list-style-type: none"> • The oil palm products contained in this product have been certified to come from RSPO sources. www.rspo.org • By choosing this product, you are sure it contains RSPO-certified palm oil. For more information: www.rspo.org • RSPO-certified sustainable oil palm products were kept apart from other oil palm products throughout the supply chain. www.rspo.org • Certified sustainable oil palm products can be traced back to RSPO-certified mills and plantations. www.rspo.org • The entire supply chain is monitored by independent, RSPO-accredited auditors. www.rspo.org • RSPO-certified sustainable palm oil has been produced to stringent environmental and social criteria. www.rspo.org • References to (or images of) particular RSPO-certified production units, if the relationship to those units can be shown by company records. 	<p>Tereh POM is producing crude palm product and does not involved in any "messaging".</p>	<p>Not Applicable</p>

Principle 4: Respect community and human rights and deliver benefits			
Criterion 4.1: The unit of Certification respects human rights, which includes respecting the rights of Human Rights Defenders.			
4.1.1	<p>(C) A policy to respect human rights, including prohibiting retaliation against Human Rights Defenders (HRD), is documented and communicated to all levels of the workforce, operations, FFB suppliers and local communities and prohibits intimidation and harassment by the unit of certification and contracted services, including contracted security forces.</p> <p>- Critical (Major) compliance -</p>	<p>Kulim (Malaysia) Berhad has a Sustainability Policy which signed by the new Managing Director on 1st October 2020. The policy which among others, states its commitment to respect, support and protect international human rights against violence, threats, all forms of retaliation, and effective elimination of all forms of violation of human rights which include against HRD, whistle blowers, complainants and community spokespersons. This Policy was communicated to all levels of workforce during briefing held at Tereh Selatan Estate (21/10/2022) and Tereh Utara Estate (21/07/2022).</p>	Complied
4.1.2	<p>The unit of certification does not instigate violence or use any form of harassment in their operations.</p> <p>- Minor compliance -</p>	<p>There is no violence or harassment in the operations. This was assured as there were no reports of any instigation of violence or use of any form of harassments in the certification units. Interview with the workers and staffs also indicated that there was no instigation of violence or use of any form of harassments in the operations.</p>	Complied
Criterion 4.2: There is a mutually agreed and documented system for dealing with complaints and grievances, which is implemented and accepted by all affected parties			
4.2.1	<p>(C) The mutually agreed system, open to all affected parties, resolves disputes in an effective, timely and appropriate manner, ensuring anonymity of complainants, HRD, community spokespersons and whistle-blowers, where requested, without risk of reprisal or intimidation and follows the RSPO policy on respect for HRD.</p> <p>- Critical (Major) compliance -</p>	<p>Kulim (Malaysia) Berhad has established Grievance Procedure (Doc No: SQD/SMS/4.1 dated 01/08/2020). It aims to ensure that KULIM has a documented system for dealing with complaints and grievances that is agreeable to all sides and accepted by all stakeholders.</p>	Complied
4.2.2	<p>Procedures are in place to ensure that the system is understood by the affected parties, including by illiterate parties.</p> <p>- Minor compliance -</p>	<p>Briefings on grievance procedures are given to ensure that the system is understood by affected parties. The external stakeholders were briefed on 29th September 2021 during stakeholder meeting via online platform.</p>	Complied

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		To ensure understanding by illiterate parties, the briefings were given verbally, and when necessary, translators from among the workers (usually a worker representatives) are sought to translate documents including procedures for dealing with complaints and grievances. This was duly confirmed by the workers interviewed. At Tereh Selatan Estate, the briefing on grievance procedure was given on 19/06/2022, and Tereh Utara Estate on 08/07/2022.	
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. This was seen from housing defects report and completion with the acknowledgement 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. No. SQD/SMS/4.1 Issue No. 1 dated 1 August 2020 gives the option to engage independent legal, technical advice and third-party mediator. As for FGV Paloh, conflict resolution mechanism addressed under Group Sustainability Policy, FGV/SED/POL/001, rev: 5, dated 17/11/2020; clause 5.4.2.4	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 -	Evidence was available that contributions to local development was made based on results of consultation with the respective communities. Among the contributions made were: Tereh Selatan Estate: Donation to SK Ladang Tereh and Kindergarten <i>Istiqamah</i> for school activities.	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	Copies of land titles were available and verified. Details of the respective land titles to demonstrate the right to use the land as shown below. Quit rents were paid accordingly. There was no evidence of any part of the land overlapping with customary land owners.	Complied

	<p>history of land tenure and the actual legal or customary use of the land are available.</p> <p>- Critical (Major) compliance -</p>	<table border="1"> <thead> <tr> <th data-bbox="1122 360 1283 411">Estates</th> <th colspan="4" data-bbox="1283 360 1939 411">Land title</th> </tr> <tr> <td data-bbox="1122 411 1283 523"></td> <th data-bbox="1283 411 1507 523">HS(D) No./ PTD Ref/Lot ref.</th> <th data-bbox="1507 411 1641 523">Land Use Type</th> <th data-bbox="1641 411 1765 523">Size (ha)</th> <th data-bbox="1765 411 1939 523">Expiry date</th> </tr> </thead> <tbody> <tr> <td data-bbox="1122 523 1283 679">Mutiara Estate</td> <td data-bbox="1283 523 1507 679">HS (D)16398, PTD 1615 Total titles 9 (3695.06 ha)</td> <td data-bbox="1507 523 1641 679">Cultivation of oil palm</td> <td data-bbox="1641 523 1765 679">404.685</td> <td data-bbox="1765 523 1939 679">Lease period ended on 20/6/2085</td> </tr> <tr> <td data-bbox="1122 679 1283 794">Tereh Utara Estate</td> <td data-bbox="1283 679 1507 794">HS(D) 6766, lot 2641</td> <td data-bbox="1507 679 1641 794">Cultivation of Oil Palm</td> <td data-bbox="1641 679 1765 794">1,608.06</td> <td data-bbox="1765 679 1939 794">Freehold</td> </tr> </tbody> </table>	Estates	Land title					HS(D) No./ PTD Ref/Lot ref.	Land Use Type	Size (ha)	Expiry date	Mutiara Estate	HS (D)16398, PTD 1615 Total titles 9 (3695.06 ha)	Cultivation of oil palm	404.685	Lease period ended on 20/6/2085	Tereh Utara Estate	HS(D) 6766, lot 2641	Cultivation of Oil Palm	1,608.06	Freehold	
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4.4.2	<p>Copies of documents evidencing agreement-making processes and negotiated agreements detailing the FPIC process are available and include:</p>	<p>Based on documents sighted and interviews conducted with stakeholders from nearby villagers, there was no evidence of any dispute with any previous owner or occupants. Therefore, 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>Based on documents sighted and interviews conducted with stakeholders from nearby villagers, there was no evidence of any dispute with any previous owner or occupants. Therefore, 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>- Minor compliance -</p>	<p>Based on documents sighted and interviews conducted with stakeholders from nearby villagers, there was no evidence of any dispute with any previous owner or occupants. Therefore, this indicator is not applicable.</p>		Not Applicable																			

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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 -	Based on documents sighted and interviews conducted with stakeholders from nearby villagers, there was no evidence of any dispute with any previous owner or occupants. Therefore, 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 -	Based on documents sighted and interviews conducted with stakeholders from nearby villagers, there was no evidence of any dispute with any previous owner or occupants. Therefore, this indicator is not applicable.	Not Applicable
4.4.4	All relevant information is available in appropriate forms and languages, including assessments of impacts, proposed benefit sharing, and legal arrangements. - Minor compliance -	Based on documents sighted and interviews conducted with stakeholders from nearby villagers, there was no evidence of any dispute with any previous owner or occupants. Therefore, this indicator is not applicable.	Not Applicable
4.4.5	(C) Evidence is available to show that communities are represented through institutions or representatives of their own choosing, including by legal counsel if they so choose. - Critical (Major) compliance -	Based on documents sighted and interviews conducted with stakeholders from nearby villagers, there was no evidence of any dispute with any previous owner or occupants. Therefore, this indicator is not applicable.	Not Applicable
4.4.6	There is evidence that implementation of agreements negotiated through FPIC is annually reviewed in consultation with affected parties. - Minor compliance -	Based on documents sighted and interviews conducted with stakeholders from nearby villagers, there was no evidence of any dispute with any previous owner or occupants. Therefore, this indicator is not applicable.	Not Applicable

Criterion 4.5: No new plantings are established on local peoples' land where it can be demonstrated that there are legal, customary or user rights, without their FPIC. This is dealt with through a documented system that enables these and other stakeholders to express their views through their own representative institutions.

4.5.1	<p>(C) Documents showing identification and assessment of demonstrable legal, customary and user rights are available.</p> <p>- Critical (Major) compliance -</p>	<p>Based on documents sighted and interviews conducted with stakeholders, there was no evidence of any dispute with any previous owner or occupants. Therefore, this indicator is not applicable.</p>	Not Applicable
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 access to independent advice through a documented, long-term and two-way process of consultation and negotiation.</p> <p>- Critical (Major) compliance -</p>	<p>Based on documents sighted and interviews conducted with stakeholders, there was no evidence of any dispute with any previous owner or occupants. Therefore, this indicator is not applicable.</p>	Not Applicable
4.5.3	<p>Evidence is available that affected local peoples understand they have the right to say 'no' to operations planned on their lands before and during initial discussions, during the stage of information gathering and associated consultations, during negotiations, and up until an agreement with the unit of certification is signed and ratified by these local peoples. Negotiated agreements are non-coercive and entered into voluntarily and carried out prior to new operations.</p> <p>- Minor compliance -</p>	<p>Based on documents sighted and interviews conducted with stakeholders, there was no evidence of any dispute with any previous owner or occupants. Therefore, this indicator is not applicable.</p>	Not Applicable
4.5.4	<p>To ensure local food and water security, as part of the FPIC process, participatory SEIA and participatory land-use planning with local peoples, the full range of food and water provisioning options are considered. There is transparency of the land allocation process.</p> <p>- Minor compliance -</p>	<p>Based on documents sighted and interviews conducted with stakeholders, there was no evidence of any dispute with any previous owner or occupants. Therefore, this indicator is not applicable.</p>	Not Applicable
4.5.5	<p>Evidence is available that the affected communities and rights holders have had the option to access to information and advice that is independent of the project proponent, concerning the legal, economic,</p>	<p>Based on documents sighted and interviews conducted with stakeholders, there was no evidence of any dispute with any previous owner or occupants. Therefore, this indicator is not applicable.</p>	Not Applicable

	environmental and social implications of the proposed operations on their lands. - Minor compliance -		
4.5.6	Evidence is available that the communities (or their representatives) gave consent to the initial planning phases of the operations prior to the issuance of a new concession or land title to the operator. - Minor compliance -	Based on documents sighted and interviews conducted with stakeholders, there was no evidence of any dispute with any previous owner or occupants. Therefore, this indicator is not applicable.	Not Applicable
4.5.7	New lands are not acquired for plantations and mills after 15 November 2018 as a result of recent (2005 or later) expropriations without consent under the right of eminent domain of the federal and state land acquisition legislations. - Minor compliance -	Based on documents sighted no new lands were acquired for plantations and mills after 15 November 2018	Not Applicable
4.5.8	(C) New lands are not acquired in areas inhabited by communities in voluntary isolation. - Critical (Major) compliance -	Based on documents sighted and interviews conducted with stakeholders, there was no evidence of new lands acquired in areas inhabited by communities who live in voluntary isolation.	Complied
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 September 2007. This procedure is to ensure any negotiation with regards to compensation for loss of local rights are dealt with fairly.	Complied
4.6.2	(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.	An SOP known as Negotiations Concerning Compensation Program dated 4 September 2007 was established by Kulim (Malaysia) Berhad to identify legal and customary rights as well as people entitled to compensation as per procedure in place and is contained in the SPO	Complied

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	- Critical (Major) compliance -	Negotiations Concerning Compensation Program dated 4 September 2007. The procedure is to ensure any negotiation with regards to compensation for loss of local rights are dealt with fairly.	
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 -	Tereh POM certification unit does not have any arrangements for scheme smallholdings. Therefore, this indicator is not applicable.	Not Applicable
4.6.4	The process and outcomes of any negotiated agreements, compensation and payments are documented, with evidence of the participation of affected parties, and made publicly available to them. - Minor compliance -	Based on documents sighted and interviews conducted with stakeholders, there was no evidence of any dispute with any previous owner or occupants. Therefore, this indicator is not applicable	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 -	Procedure for identifying legal, customary or user rights, and a procedure for identifying people entitled to compensation is in place and is contained in the SPO Negotiations Concerning Compensation Program dated 4 September 2007. This procedure is to ensure any negotiation with regards to compensation for loss of local rights are dealt with fairly.	Complied
4.7.2	(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 -	An SOP known as Negotiations Concerning Compensation Program dated 4 September 2007 was established by Kulim (Malaysia) Berhad to identify legal and customary rights as well as people entitled to compensation as per procedure in place and is contained in the SPO Negotiations Concerning Compensation Program dated 4 September 2007. The procedure is to ensure any negotiation with regards to compensation for loss of local rights are dealt with fairly, and briefed to stakeholder on 25 October 2020.	Complied

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4.7.3	<p>Communities that have lost access and rights to land for plantation expansion are given opportunities including employment and supply contracts to benefit from plantation development.</p> <p>- Minor compliance -</p>	<p>Based on documents sighted and interviews conducted with stakeholders, there was no evidence of any dispute with any previous owner or occupants. However, Tereh POM and its supply base offer job opportunities to local communities living within its vicinity.</p>	Complied
<p>Criterion 4.8: The right to use the land is demonstrated and is not legitimately contested by local people who can demonstrate that they have legal, customary, or user rights.</p>			
4.8.1	<p>Where there are or have been disputes, proof of legal acquisition of title and evidence that mutually agreed compensation has been made to all people who held legal, customary, or user rights at the time of acquisition is available and provided to parties to a dispute, and that any compensation was accepted following a documented process of FPIC.</p> <p>- Minor compliance -</p>	<p>Based on documents sighted and interviews conducted with stakeholders, there was no evidence of any dispute with any previous owner or occupants. Therefore, this indicator is not applicable</p>	Not Applicable
4.8.2	<p>(C) Land conflict is not present in the area of the unit of certification. Where land conflict exists, acceptable conflict resolution processes (see Criteria 4.2 and 4.6) are implemented and accepted by the parties involved. In the case of newly acquired plantations, the unit of certification addresses any unresolved conflict through appropriate conflict resolution mechanisms.</p> <p>- Critical (Major) compliance -</p>	<p>Based on documents sighted and interviews conducted with stakeholders, there was no evidence of any dispute with any previous owner or occupants. Therefore, this indicator is not applicable</p>	Not Applicable
4.8.3	<p>Where there is evidence of acquisition through dispossession or forced abandonment of customary and user rights prior to the current operations and there remain parties with demonstrable customary and land use rights, these claims will be settled using the relevant requirements (Indicators 4.4.2, 4.4.3 and 4.4.4)</p> <p>- Minor compliance -</p>	<p>Based on documents sighted and interviews conducted with stakeholders, there was no evidence of any dispute with any previous owner or occupants. Therefore, this indicator is not applicable</p>	Not Applicable
4.8.4	<p>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).</p>	<p>Based on documents sighted and interviews conducted with stakeholders, there was no evidence of any dispute with any previous owner or occupants. Therefore, this indicator is not applicable</p>	Not Applicable

	- Minor compliance -		
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 -	Tereh Palm Oil Mill is an Identity Preserved Mill as evidenced by Certificate No. RSPO 613086 which is valid from 29 March 2019 to 22 Jan 2024. The Mill processes only FFB from its own estates namely Tereh Selatan Estate, Tereh Utara Estate, Sg Tawing Estate, Sg Sembrong Estate, Mutiara Estate, Selai Estate, Rengam Estate, Enggang Estate and two managed entities, that is, Wawasan Estate, and Felda Paloh. Therefore, this Indicator is not applicable.	Not Applicable
5.1.2	(C) Evidence is available that the unit of certification explains the FFB pricing to smallholders on request from individual smallholders (at least once a year or upon request). - Critical (Major) compliance -	Not applicable as there is no FFB sourced from smallholders	Not Applicable
5.1.3	(C) Fair pricing, calculated as a portion of the international CPO price less costs is provided to smallholders in the supply base and documented. - Critical (Major) compliance -	Not applicable as there is no FFB sourced from smallholders	Not Applicable
5.1.4	(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. - Critical (Major) compliance -	Not applicable as there is no FFB sourced from smallholders	Not Applicable
5.1.5	Contracts are fair, legal and transparent and have an agreed timeframe. - Minor compliance -	Not applicable as there is no FFB sourced from smallholders	Not Applicable

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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>	Not applicable as there is no FFB sourced from smallholders	Not Applicable									
5.1.7	<p>Weighbridges used for determining payment to smallholders are verified by an independent third party on a regular basis (this can be government).</p> <p>- Minor compliance -</p>	<p>Records of weighing equipment stamping was maintained on annual basis at visited operating units even though there is no smallholder within Tereh Palm Oil Mill certification unit. Summary of stamping records as follows:</p> <table border="1"> <thead> <tr> <th>Weighing equipment</th> <th>Model/Capacity</th> <th>Date of stamping/cert. number</th> </tr> </thead> <tbody> <tr> <td>FLINTEC FT-11</td> <td>N900110750, 80,000 kg</td> <td>25/5/22, D054633</td> </tr> <tr> <td>GSE 350</td> <td>986124, 60,000 kg</td> <td>26/5/22, D054634</td> </tr> </tbody> </table>	Weighing equipment	Model/Capacity	Date of stamping/cert. number	FLINTEC FT-11	N900110750, 80,000 kg	25/5/22, D054633	GSE 350	986124, 60,000 kg	26/5/22, D054634	Complied
Weighing equipment	Model/Capacity	Date of stamping/cert. number										
FLINTEC FT-11	N900110750, 80,000 kg	25/5/22, D054633										
GSE 350	986124, 60,000 kg	26/5/22, D054634										
5.1.8	<p>The unit of certification supports Independent Smallholders with certification, where applicable, ensuring mutual agreements between the unit of certification and the smallholders on who runs the internal control system (ICS), who holds the certificates, and who holds and sells the certified material.</p> <p>- Minor compliance -</p>	No independent smallholder at Tereh Palm Oil Mill Certification Unit. Thus, this indicator is not available.	Not Applicable									
5.1.9	<p>(C) The unit of certification has a grievance mechanism for smallholders and all grievances raised are dealt with in a timely manner.</p> <p>- Critical (Major) compliance -</p>	No independent smallholder at Tereh Palm Oil Mill Certification Unit. Thus, this indicator is not available.	Not Applicable									
<p>Criterion 5.2: The unit of certification supports improved livelihoods of smallholders and their inclusion in sustainable palm oil value chains.</p>												
5.2.1	<p>The Company consults with interested smallholders (irrespective of type) within the Unit of Certification, including women or other partners in their</p>	Not applicable as there is no FFB sourced from smallholders.	Not Applicable									

	supply base, to assess their needs for support to improve their livelihoods and their interest in RSPO certification. - Minor compliance -		
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 -	Not applicable as there is no FFB sourced from smallholders.	Not Applicable
5.2.3	Where applicable, the unit of certification provides support to smallholders to promote legality of FFB production. - Minor compliance -	Not applicable as there is no FFB sourced from smallholders.	Not Applicable
5.2.4	(C) Evidence exists that the unit of certification trains Scheme Smallholders on pesticide handling. - Critical (Major) compliance -	Not applicable as there is no FFB sourced from smallholders.	Not Applicable
5.2.5	The unit of certification regularly reviews and publicly reports on the progress of the Smallholder support programme. - Minor compliance -	Not applicable as there is no FFB sourced from smallholders.	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	Complied

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		where fairness and equal opportunities for relevant group such as all employees, including foreign and local are embedded. These Policies prevent discrimination based on ethnic origin, caste, national origin, religion, disability, gender, sexual orientation, gender identity, union membership, political affiliation or age.	
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>	Reviewed during the audit was contract dated 19/05/2022 sent by Kulim (Malaysia) Berhad to PT Hamparan Karya Insani for manpower supply from Indonesia. The agreement states among others that cost of workers' transportation to the respective estates/mill will be borne by Kulim following Kulim's 'Zero Cost Policy'. No recruitment fees are imposed on any of the foreign workers, and this was further confirmed by foreign workers interviewed.	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>Tereh Palm Oil Mill and its supply base were able to demonstrate that recruitment, selection, hiring, access to training and promotion are based on skills, medical fitness for the job available.</p> <p>Sighted in their personal files were job application forms, academic qualifications, previous job experience, medical examination results, letter of job offer and appraisal records.</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>	Based on interview held with representatives of Women On Wards (WOW) Committee members at Tereh POM and estates, pregnancy tests are not conducted on discriminatory manner and health screenings are conducted only when legally mandated (when handling chemicals). However, during audit, there was no women employees were handling chemicals. Spraying and fertiliser application jobs were carried out by male workers.	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>	In place at the Tereh POM and its supply base is Women OnWards (WOW) committee which is a women employee outreach programme endorsed and funded by the Company. Its members comprise female employees and wives of workers. WOW promotes gender equality and	Complied

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		<p>empower women’s knowledge and skills. In 2022, committee meetings were held as follows:</p> <ol style="list-style-type: none"> 1. Tereh POM: 17th June 2022 2. Tereh Selatan Estate: 19th October 2022 3. Mutiara Estate: 28th March 2022 4. Tereh Selatan Utara: 2nd April 2022 <p>Based on minutes sighted, committee members were briefed on sexual harassment, domestic violence, how to make complaints if there was a case, reproductive rights, the new census for new mothers, and briefings on Company policies. As to date, no harassment (physical/verbal) issue reported.</p>	
6.1.6	<p>There is evidence of equal pay for the same work scope.</p> <p>- Minor compliance -</p>	<p>From payslips reviewed, evidence was available that workers receive equal pay for the same work scope. The workers received RM46.15 per day and allowance paid based on MAPA/NUPW circular for Special Gratuitous Payment (SGP), productivity incentive (PI) and price bonus. The latest NUPW CA still in the process of negotiation with MAPA for the new Minimum Wages Order RM1,500.00.</p>	Complied
<p>Criterion 6.2: Pay and conditions for staff and workers and for contract workers always meet at least legal or industry minimum standards and are sufficient to provide decent living wages (DLW).</p>			
6.2.1	<p>(C) Applicable labour laws, union and/or other collective agreements and documentation of pay and conditions are available to the workers in national languages (English or Bahasa Malaysia) and explained to them in language they understand.</p> <p>- Critical (Major) compliance -</p>	<p>Kulim (Malaysia) Berhad is a member of the Malaysian Agricultural Producers Association (MAPA) and is therefore subjected to the agreement between MAPA and the National Union of Plantation Workers (NUPW). Applicable labour laws related to duration, hours of work, overtime, annual/medical leave, public holiday, mutual termination, salary deductions, maternity entitlement, etc are contained in workers’ employment contracts. Sampled were employment contracts for Malaysian and Indonesian workers which have been prepared in Bahasa Malaysia. For Bangladeshi workers, the contracts were in the workers’ language, i.e. Bengali. For Bangladeshi</p>	Complied

		<p>workers whose contracts were in Bahasa Malaysia, they were briefed on the contents. Interviews conducted with the workers confirmed their understanding.</p> <p>Clause 9 of the employment contract also specifically states that unless otherwise stated, all terms and conditions of contract are subjected to the Employment Act 1955 and SOCSO Act 1969, and the current MAPA/NUPW contract.</p> <p>Also confirmed via sampled payslips that wages were paid in accordance with the relevant laws. Salary deductions and overtime were in accordance with the relevant laws (SOCSO, EPF, EIS) and Labour Office permits for example:</p> <ul style="list-style-type: none"> a. Overtime permit approval for 130 hours, ref: BHG. PU/9/134 Jld 14(22) dated 22/12/2021. b. Deduction for <i>Skim Khairat Keluarga Perbadanan Johor</i>, ref: TK(NJ) U-23, 31/3/2019. 	
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>Details of payments and conditions of employment are stated and documented in the employment contracts given to all workers. The contract contains terms related to duration, hours of work, overtime, annual/medical leave, public holiday, mutual termination, salary deductions, maternity entitlement, etc. The terms are in compliance with the Employment Act 1955, Minimum Wages Order 2020, SOCSO Act 1969, EPF Act 1991, EIS Act 2017, and the MAPA/NUPW agreement.</p> <p>Payroll documents, namely the payslip, also give accurate information on compensation for all work done. This includes those who receive daily-rated wages, piece rated wages, payment for any overtime work done, and public holiday pay. Also confirmed via sampled payslips that wages were paid in compliance with national legal requirements. Salary deductions and overtime were in accordance with the relevant laws (SOCSO, EPF, EIS) and Labour Office permits.</p>	Complied

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		<p>None of the sampled workers had any family members performing work.</p> <ul style="list-style-type: none"> - Employment contracts template. - Check-roll records - Employee Master List. 	
<p>6.2.3</p>	<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>Based on review of punch cards, workers’ employment contracts and payslips, evidence was available that Tereh POM and its supply base were able to demonstrate compliance with Employment Contracts 1955 related to regular working hours, overtime, sickness and holiday entitlement, maternity leave, etc. This includes statutory deductions (SOCSO, EPF, EIS) and non-statutory deductions (e.g. mosque funds, electricity bills, etc) in accordance with Labour Office permits. These permits are as detailed out under Indicator 2.1.1 above.</p> <p>Sampled during the audit were the following workers’ employment contracts and payslips for the month of February 2022 (low crop), July 2022 (normal crop) and December 2021 (peak crop).</p> <p><u>Tereh POM (8 workers sampled from total of 101 workers)</u></p> <ol style="list-style-type: none"> 1) Employee ID: E280000224, date joined: 9/11/2009 2) Employee ID: E28000054, date joined: 15/6/1993 3) Employee ID: E28000390, date joined: 3/7/2013 4) Employee ID: E28000393, date joined: 15/6/1993 5) Employee ID: E28000054, date joined: 15/6/1993 6) Employee ID: E28000054, date joined: 15/6/1993 7) Employee ID: E28000054, date joined: 15/6/1993 <p><u>Mutiara Estate (12 workers sampled from total of 214 workers)</u></p> <ol style="list-style-type: none"> 1) Employee ID: 607172, date joined: 17/8/2020 	<p>Complied</p>

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		<p>2) Employee ID: E160003033, date joined: 17/2/2011 3) Employee ID: E160001213, date joined: 20/6/2014 4) Employee ID: E160001086, date joined: 7/8/2018 5) Employee ID: E160003026, date joined: 7/11/2013 6) Employee ID: E16003050, date joined: 7/11/2013 7) Employee ID: E16003038, date joined: 5/8/2022 8) Employee ID: E160003065, date joined: 6/9/2022 9) Employee ID: 607438, date joined: 14/05/2013 10) Employee ID: 607546, date joined: 5/7/2018 11) Employee ID: 607606, date joined: 12/9/2014 12) Employee ID: 607454, date joined: 8/11/2013</p> <p><u>Tereh Utara Estate</u></p> <p>1) Employee ID: E260001596, date joined: 3/11/2019 2) Employee ID: E260001607, date joined: 20/3/2020 3) Employee ID: E260001508, date joined: 12/5/2019 4) Employee ID: E260001562, date joined: 8/8/2019 5) Employee ID: E260001273, date joined: 2/11/2017 6) Employee ID: E260001091, date joined: 7/11/2013 7) Employee ID: E260001567, date joined: 7/11/2013 8) Employee ID: E260001677, date joined: 11/12/2018 9) Employee ID: E260001490, date joined: 26/11/2013 10) Employee ID: E260000364, date joined: 1/11/2010 11) Employee ID: E260000253, date joined: 17/12/2009</p>	
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<p>6.2.4</p>	<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>Based on visits made to the Tereh POM and estate line site, adequate housing, sanitation facilities, water supplies, medical and welfare amenities are being provided to all employees and their family members residing within the premises. Houses have between 2 to 3 bedrooms with between 2 to 3 occupants per house. Electricity and water are available 24 hours a day, and electricity usage of up to 50kW per month is subsidised. Water is provided free of charge. The areas surrounding the housing area are generally clean and well maintained. The houses were generally in good state of repair and grass kept reasonable short. Domestic waste bins are emptied thrice per week. Perimeter drains are clear of any blockages. As part of Workers' Minimum Standards of Housing and Amenities Act in 1966 programme, the following records were observed:</p> <p><u>Tereh POM</u> VMO visit – 2/10/2022, 23/10/22 Line site – 26/10/22, 19/10/22, 12/10/22, 5/10/22</p> <p><u>Tereh Selatan Estate</u> VMO visit – 2/10/2022, 23/10/22 Line site: 26/10/22, 18/10/22, 12/10/22, 5/10/22</p> <p><u>Mutiara Estate</u> VMO visit – 2/10/22, 16/10/22 Line site: 3/10/22, 10/9/22, 17/10/22, 25/10/22</p> <p><u>Tereh Utara Estate</u> VMO visit – 2/10/22, 23/10/22</p>	<p>Complied</p>
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		Line site: 2/10/22, 10/10/22, 16/10/22, 23/10/22																					
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>Evidence is available that efforts are made to improve workers' access to adequate, sufficient and affordable food. A canteen is available at the Tereh POM and is open from 7AM to 7PM serving breakfast, lunch and dinner. At the estates, sundry shop also available. The shop is required to submit the list of items sold to the estate office for price monitoring every 3 months.</p>	Complied																				
6.2.6	<p>A DLW is paid to all workers, including piece rate/quotas, for whom the calculation is based on achievable quotas during regular work hours.</p> <p>PROCEDURAL NOTE: STATEMENT FROM THE RSPO STANDARDS STANDING COMMITTEE REGARDING INDICATOR 6.2.6 ON DECENT LIVING WAGE</p> <p>With reference to procedural note of indicator 6.2.6, the RSPO has published a guidance on the DLW calculation in June 2019. The RSPO Secretariat will endeavour to carry out DLW country benchmarks for palm oil producing countries in which RSPO members operate and for which no Global Living Wage Coalition (GLWC) benchmarks exist (As of September 2019, GLWC has developed national benchmarks in Bangladesh, Belize, Brazil, China, Colombia, Costa Rica, Dominican Republic, Ecuador, Ethiopia, Ghana, Guatemala, India, Kenya, Malawi, Mexico, Nicaragua, Pakistan, South Africa, Sri Lanka, Uganda and Vietnam These benchmarks are developed based on banana, coffee, floriculture, textile, manufacturing, seafood processing and tea industry. The RSPO is in the process of commissioning benchmarks for Malaysia and Indonesia for the palm oil sector and will develop methods to calculate and/or define DLW applicability for all palm oil producing countries in which RSPO members operate).</p> <p><i>Where a GLWC living wage standard (benchmark), or one that fulfils the basic requirements of the RSPO-endorsed living wage methodology, has been established in the country or region of operation, the same should be used as benchmarks.</i></p> <p>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</p>	<p>Based on pay slips sighted, all sampled workers who complete the number of days offered in a month receive at least minimum wages applicable, which is RM1,200 and RM1,500.00 (starting 01/05/2022) per month, or more.</p> <p>Tereh POM and its supply base have also carried out the calculation of prevailing wages and in-kind benefits. The calculation took into account housing, electricity, water, education and healthcare. The breakdown of the prevailing wage calculation is therefore as follows:</p> <table border="1" style="width: 100%; border-collapse: collapse;"> <thead> <tr> <th>Mill/Estate</th> <th>In-kind benefits</th> <th>Average take-home pay</th> <th>Prevailing wage</th> </tr> </thead> <tbody> <tr> <td>Tereh POM</td> <td>RM 1,136.06</td> <td>RM 2,116.94</td> <td>RM 3,253.00</td> </tr> <tr> <td>Tereh Selatan Estate</td> <td>RM 1,265.97</td> <td>RM 1,364.75</td> <td>RM 2,630.73</td> </tr> <tr> <td>Mutiara Estate</td> <td>RM 1,052.91</td> <td>RM 2,400.00</td> <td>RM 3,452.91</td> </tr> <tr> <td>Tereh Utara Estate</td> <td>RM 1,141.39</td> <td>RM 1,483.16</td> <td>RM 2,624.55</td> </tr> </tbody> </table> <p>Based on the breakdown given, the calculation of prevailing wages including in-kind benefits is reasonable.</p>	Mill/Estate	In-kind benefits	Average take-home pay	Prevailing wage	Tereh POM	RM 1,136.06	RM 2,116.94	RM 3,253.00	Tereh Selatan Estate	RM 1,265.97	RM 1,364.75	RM 2,630.73	Mutiara Estate	RM 1,052.91	RM 2,400.00	RM 3,452.91	Tereh Utara Estate	RM 1,141.39	RM 1,483.16	RM 2,624.55	Complied
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	<p>with relevant stakeholders such as palm oil industry members, workers’ union, authorities and/or relevant organisations.</p> <p><i>For countries where no living wage standard is established, until such time that an RSPO endorsed benchmark for the country is in place, national minimum wages shall be paid to all workers. In addition to the payment of minimum wages, the Unit of Certification (UoC) shall conduct an assessment of the prevailing wages and in-kind benefits provided to workers in the Unit of Certification aligned with the RSPO Guidance for Implementing a Decent Living Wage (RSPO Guidance for Implementing a Decent Living Wage. The RSPO will also develop further guidance and tools to calculate DLW in line with the RSPO endorsed methodology which may include independent studies by local experts in their respective region or country).</i></p> <p>Once these benchmarks are available, this procedural note is no longer applicable. UoC shall have an implementation plan towards the payment of a DLW with specific targets, and a phased implementation process including:</p> <ul style="list-style-type: none"> • Updated assessment on prevailing wages and in-kind benefits • There is annual progress on the implementation of living wages • Where a minimum wage, based on equivalent of baskets of goods, is stipulated in Collective Bargaining Agreements (CBAs), this should be used as the foundation for the gradual implementation of the living wage payment • The UoC may choose to implement the living wage payment in a specific section as a pilot project; the pilot will then be evaluated and adapted before eventual scale up of the living wage implementation. <p>- Minor compliance -</p>		
6.2.7	<p>Permanent, full-time employment including contractors’ workers and contracted workers is used for all core work performed by the unit of certification. Casual, temporary and day labour is limited to jobs that are temporary or seasonal</p> <p>- Minor compliance -</p>	<p>Based on documents sighted and interviews conducted with workers and management, Tereh POM its supply base only employ full-time employees. All employees are employed on either permanent or contractual full-time basis. There is no casual, temporary or day labour employed.</p>	Complied
<p>Criterion 6.3: The unit of Certification respects the rights of all personnel to form and join trade unions of their choice and to bargain collectively. Where the right to freedom of association and collective bargaining are restricted under law, the employer facilitates parallel means of independent and free association and bargaining for all such personnel.</p>			

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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 Tereh POM and its supply base. Also sighted were:</p> <ul style="list-style-type: none"> - Paragraph 2 of the Employees’ Guide Book which confirms and respects workers’ rights to join a union recognized by the Kulim (Malaysia) Berhad. - Kulim (Malaysia) Berhad’s Core Labour Standards on Rights of Employees which states that Kulim recognises and respects the rights of employees to form and/or join trade unions of their choice which are given due recognition by KULIM. Briefing/trainings were also held during Policy training held on 21/10/2022 at Tereh Selatan Estate and 10/4/2022 at Tereh POM. 	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>In Tereh POM, NUPW minute of meeting dated 22/5/2022. No complaint raised. At Tereh Selatan Estate, sighted the Union @ NUPW minute of meeting dated 20/10/2022. The meeting has re-emphasised on company’s rules and regulations, worker rights and employment conditions in the estate. Based on minute, so pending issue reported. Other NUPW/Union meetings carried out at visited operating units as per the following:</p> <ol style="list-style-type: none"> 1. Mutiara Estate – 21/07/2022 2. Tereh Utara Estate – 22/07/2022 	Complied
6.3.3	<p>Management does not interfere with the formation or operation of registered unions/ labour organisations or associations, or other freely elected representatives for all workers including migrant and contract workers.</p> <p>- Minor compliance -</p>	<p>New workers representatives were appointed for each nationality (Bangladesh and Indonesia). Based on interview with the workers representatives, they were appointed through election process which has been witness by NUPW state representative. Latest meeting was held on 22/5/2022 at Tereh POM with</p>	Complied
<p>Criterion 6.4: Children are not employed or exploited.</p>			

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6.4.1	<p>A formal policy for the protection of children, including prohibition of child labour and remediation is in place, and included into service contracts and supplier agreements.</p> <p>- Minor compliance -</p>	<p>Kulim (Malaysia) Berhad has established Core Labour Standard Policy dated 1 May 2018 where they are not engaged in or support the use of Child Labour and will provide adequate support to enable children of its employees to attend and remain in school until no longer a child. 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. For example, at Tereh POM briefing was carried out on 01/06/2022 during muster briefing to workers.</p>	Complied
6.4.2	<p>(C) There is evidence that minimum age requirements are met. Personnel files show that all workers are above the national minimum age or above company policy minimum age, whichever is higher. There is a documented age screening verification procedure.</p> <p>- Critical (Major) compliance -</p>	<p>Documentary evidence is available that minimum age requirements are met. This is based on workers' check roll list and copies of their passport/NRIC details. Based on workers' NRIC and passports, all workers were at least 18 years old when employed.</p>	Complied
6.4.3	<p>(C) Young persons may be employed only for non- hazardous work, with protective restrictions in place for that work.</p> <p>- Critical (Major) compliance -</p>	<p>There is no young person employed in Tereh POM and its supply bases based on field observation and worker's master list.</p>	Complied
6.4.4	<p>The unit of certification demonstrates communication about its 'no child labour' policy and the negative effects of child labour, and promotes child protection to supervisors and other key staff, smallholders, FFB suppliers and communities where workers live.</p> <p>- Minor compliance -</p>	<p>Kulim (Malaysia) Berhad has established Core Labour Standard Policy dated 1 May 2018 where they are not engaged in or support the use of Child Labour and will provide adequate support to enable children of its employees to attend and remain in school until no longer a child. This Policy is displayed on main notice boards. This Policy was also communicated during stakeholder meeting held on 27th October 2022. Further, an Addendum to agreements signed with contractors also contains a provision which states that the contractor shall comply with applicable labour and employment laws regarding and prohibit any form of child labour, forced or trafficked labour. Interviews held with contractors and suppliers also confirmed their understanding of this obligation.</p>	Complied

Criterion 6.5: There is no harassment or abuse in the workplace, and reproductive rights are protected.

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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. - Critical (Major) compliance -</p>	<p>A Policy to prevent sexual and other forms of harassment are available in Sexual Harassment Policy dated 1 May 2018 signed by Executive Director. Interviews held with women employees also confirmed their awareness of this Policy and its implementation. For example, sexual harassment policy briefing was carried out on 1/6/2022 at Tereh POM and Tereh Selatan Estate on 26/04/2022.</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. - Critical (Major) compliance -</p>	<p>Kulim (Malaysia) Berhad’s Core Labour Standard dated 1 May 2018 signed by Executive Director provides protection of reproductive rights of all workers. The Labour Standard specifies that the Company recognizes the rights of employees to reproduction and reproductive health, including the right to make decision on reproduction. 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> <p>Briefing on reproductive rights were also given during WoW meetings as follows:</p> <ol style="list-style-type: none"> 1. Tereh POM: 17th June 2022 2. Tereh Selatan Estate: 19th October 2022 3. Mutiara Estate: 28th March 2022 4. Tereh Selatan Utara: 2nd April 2022 <p>Interviews held with women employees also confirmed their awareness of this Policy and its implementation</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. - Minor compliance -</p>	<p>For Tereh Selatan Estate, new mothers need assessment was carried out during gender committee meeting on 19/10/2022. 1 new mother was identified and based on the assessment, no additional request and assistance from the new mother.</p>	Complied

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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>Available and reviewed during the audit was Grievance mechanism Doc. No. SQD/SMS/4.1 Issue No. 1 dated 1 Aug 2020. The aim of this mechanism is to have a documented system for dealing with complaints and grievances that is agreeable and accepted by all stakeholders. The scope covers all parties who deal with Kulim (Malaysia) Berhad who may have complaints or grievances. Clause 5.8 states that anonymity of complainants will be respected and protected if requested. For example, grievance mechanism briefing was carried out on 19/06/2022 at Tereh Selatan Estate.</p>	Complied
Criterion 6.6: No forms of forced or trafficked labour are used.			
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>Tereh POM and its supply base are able to demonstrate that all workers have entered into employment voluntarily. This was further confirmed from interviews conducted with the workers themselves.</p> <ol style="list-style-type: none"> 1. Passports: Workers are given the option of either keeping their own passports, or to keep their passports at the management office for safety reasons. Sighted during the audit, letters from workers confirming their preference to keep their passports at the office for safety reasons. 2. Recruitment fees: Reviewed was contract dated 13 February 2020 between Kulim (Malaysia) Berhad and PT Hamparan Karya Insani and PT Wira Karitas for manpower supply from Indonesia. The agreement states among others, that cost of transportation to the respective estates/mill will be borne by Kulim. The Demand Letter issued by Indonesian consulate dated 17 Feb 2020 also specifies that levy and PLKS fees are to be borne by employer. No recruitment fees are imposed on any of the foreign workers. This was further 	Complied

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		<p>confirmed in interviews held with the workers from Indonesia and Bangladesh.</p> <p>3. Contract substitution: Employment contracts with workers, recruitment agent contracts with PT Hamparan Karya Insani and PT Wira Karitas, and interviews held with the workers from Indonesia and Bangladesh confirmed that no contract substitution has occurred within Tereh POM and its supply base.</p> <p>4. Involuntary overtime: Based on documents signed by workers on overtime, and based on interviews conducted, there is no evidence of involuntary overtime within the Tereh Mill and its supply base.</p> <p>5. Lack of freedom of workers to resign & penalty for termination of employment: Clause 5 of employment contracts allow for early termination of contract by giving of 2 months' notice (upon confirmation) and 2 weeks' notice (on probation). There is no mention of any penalty payable.</p> <p>6. Debt bondage & withholding of wages: Based on payslips sighted and interview with workers, there was no evidence of any debt bondage and withholding of wages.</p>	
6.6.2	<p>(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 May 2018. This Policy:</p> <ul style="list-style-type: none"> - prohibits the employment of children and young persons, forced and bonded labour 	Complied

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		<ul style="list-style-type: none"> - 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, Tereh POM and its supply base are able to demonstrate the implementation of this Policy.</p>	
<p>Criterion 6.7: The unit of certification ensures that the working environment under its control is safe and without undue risk to health.</p>			
<p>6.7.1</p>	<p>(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 General Manager/ Senior Manager/ manager/ Deputy Manager/ Assistant In-Charge/ Acting manager of the respective Operating Units are appointed as the Chairman for Safety and Health Committee at the estate as stated in the appointment letter dated 10/01/2021 undersigned by the Chairman, ESG Committee Occupational Safety and Health Main Committee Kulim (M) Berhad.</p> <ol style="list-style-type: none"> 1. Tereh POM - OSHA safety meetings were conducted at an interval of 3 months at the estate to address all the OSH related issues. Sighted the meeting minutes dated 21/09/2022 (03/2022), 16/06/2022 (02/2022), 25/03/2022 (01/2022). 2. Tereh Utara Estate - OSHA safety meetings were conducted at an interval of 3 months at the estate to address all the OSH related issues. Sighted the meeting minutes dated 29/09/2022 (03/2022), 09/06/2022 (02/2022), 20/04/2022 (01/2022). 	<p>Complied</p>

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		<p>3. Tereh Selatan Estate - OSHA safety meetings were conducted at an interval of 3 months at the estate to address all the OSH related issues. Sighted the meeting minutes dated 12/09/2022 (03/2022), 16/06/2022 (02/2022), 17/03/2022 (01/2022).</p> <p>4. Mutiara Estate - OSHA safety meetings were conducted at an interval of 3 months at the estate to address all the OSH related issues. Sighted the meeting minutes dated 10/08/2022 (03/2022), 12/05/2022 (02/2022), 15/02/2022 (01/2022).</p>	
<p>6.7.2</p>	<p>Accident and emergency procedures are in place and instructions are clearly understood by all workers. Accident procedures are available in national languages (English and/or Bahasa Malaysia) and explained in the language understandable to the workforce. Assigned operatives trained in first aid are present in both field and other operations, and first aid equipment is available at worksites. Records of all accidents are kept and periodically reviewed.</p> <p>- Minor compliance -</p>	<p>Emergency Procedures and Safe Working Procedures were available at the office, workshops and chemical stores. Emergency Plans were available for identified incidences such as Fire, Accident, Chemical Spillage and Evacuation. Emergency Response Team was formed in the estate to counter any unwanted emergencies.</p> <ol style="list-style-type: none"> 1. Tereh POM <ul style="list-style-type: none"> - ERP Training – Bund Rupture & Oil Spillage – 15/07/2022 - Fire Drill Training – 01/08/2022 2. <u>Tereh Utara Estate</u> <ul style="list-style-type: none"> - Emergency Response Training (ERP) 2022 – 07/07/2022 3. <u>Tereh Selatan Estate</u> <ul style="list-style-type: none"> - Fire Drill Training and Use of Fire Extinguisher Training – 10/01/2022. - Emergency Response Plan (ERP) and (CPR) – 10/01/2022. 4. <u>Mutiara Estate</u> <ul style="list-style-type: none"> - Fire Drill Training and Use of Fire Extinguisher conducted on 15/05/2022. 	<p>Complied</p>

		<p>First Aid Kits were available at all sampled work units Spraying Gang, Harvesting Gang, Workshop, Boiler Station and Chemical Store. The first aid kits were well equipped with first aid items as stated in the list. All items were seen to be replenished at monitored regularly as per the monitoring checklist. The First Aid Kit holders were aware on how to use the items in case of an emergency.</p> <ul style="list-style-type: none"> - First Aid Training was conducted for 09 first aid kit holders on 13/10/2022 at Tereh Selatan Estate.. - First Aid Training conducted at Tereh POM on 01/08/2022.. - First Aid Training conducted at Mutiara Estate on 27/10/2022. - First Aid Training conducted at Tereh Utara Estate on 14/07/2022. <p>Accident Records were maintained in the operating units and verified as follows.</p> <p><u>Tereh POM</u></p> <p>Accident records for 2022 were maintained and updated on a monthly basis at the mill. The accident investigation have been conducted accordingly and the JKPP 6 forms have been submitted to DOSH and available for verification. The JKPP 8 form have been submitted for the year ending 2021. As for 2021 there were 2 accident cases in the mill. The JKPP 6 forms have been submitted to DOSH accordingly.</p> <p><u>Tereh Utara Estate</u></p> <p>There were 4 accident cases reported for the year 2021 in the estate. The JKPP 8 Form has been submitted to DOSH and available for</p>	
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		<p>verification. As for 2022, there were no accident reported in the estate as of to date.</p> <p><u>Tereh Selatan Estate</u></p> <p>There were 8 accident cases reported for the year 2021 which includes 3 major cases exceeding 4 days LTA. The JKKP 6 Forms have been submitted to DOSH accordingly. The JKKP 8 Form (Reference Number: JKKP 8/96844/2021) for the year ending 2021 have been submitted to DOSH on 09/01/2022 and available for verification. There were 11 accidents reported for the year 2021. The JKKP 6 Forms have been submitted to DOSH and available for verification.</p> <p><u>Mutiara Estate</u></p> <p>Accident records for 2022 were maintained and available for verification. There were 1 reported accident for the year reported in the estate. The JKKP 6 Form have been submitted accordingly and available for verification. As for 2022, there were 2 accident cases reported. The JKKP 8 form have been submitted to DOSH and available for verification.</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 have been provided with appropriate personal protective equipment (PPE), which is provided by the management free of charge. During the field visit to the Spraying Gang and Manuring Gang and visit to the stores of the respective estates and mill, it was sighted that all required PPEs were worn by the personals.</p> <p>The estates have well maintained facilities for the workers to sanitise themselves prior to returning home from work. The showers were all in good working condition. Interview with workers indicated that they were all well aware that they have to sanitise themselves before returning home due to the hazard that the chemical residues could cause.</p>	Complied

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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 by the organization. Local workers and foreign workers were covered under SOCSO scheme. Sighted the contribution form (8A) for July 2022, August 2022 and September 2022 for the mill and all sampled estate as below.</p> <table border="1" data-bbox="1122 507 1946 1187"> <thead> <tr> <th>Operating Unit</th> <th>Month</th> <th>Total Workers</th> <th>Amount</th> </tr> </thead> <tbody> <tr> <td rowspan="3">Tereh POM</td> <td>Jul 2022</td> <td>92</td> <td>RM 8, 346.10</td> </tr> <tr> <td>Aug 2022</td> <td>93</td> <td>RM 8,644.50</td> </tr> <tr> <td>Sep 2022</td> <td>94</td> <td>RM 8,127.50</td> </tr> <tr> <td rowspan="3">Tereh Utara Estate</td> <td>Jul 2022</td> <td>162</td> <td>RM 8,202.10</td> </tr> <tr> <td>Aug 2022</td> <td>169</td> <td>RM 8,019.70</td> </tr> <tr> <td>Sep 2022</td> <td>179</td> <td>RM 8,621.40</td> </tr> <tr> <td rowspan="3">Tereh Selatan Estate</td> <td>Jul 2022</td> <td>121</td> <td>RM 6,054.70</td> </tr> <tr> <td>Aug 2022</td> <td>131</td> <td>RM 6,534.60</td> </tr> <tr> <td>Sep 2022</td> <td>131</td> <td>RM 6,907.90</td> </tr> <tr> <td rowspan="3">Mutiara Estate</td> <td>Jul 2022</td> <td>167</td> <td>RM 9,219.40</td> </tr> <tr> <td>Aug 2022</td> <td>191</td> <td>RM 10,240.50</td> </tr> <tr> <td>Sep 2022</td> <td>221</td> <td>RM 10,504.80</td> </tr> </tbody> </table>	Operating Unit	Month	Total Workers	Amount	Tereh POM	Jul 2022	92	RM 8, 346.10	Aug 2022	93	RM 8,644.50	Sep 2022	94	RM 8,127.50	Tereh Utara Estate	Jul 2022	162	RM 8,202.10	Aug 2022	169	RM 8,019.70	Sep 2022	179	RM 8,621.40	Tereh Selatan Estate	Jul 2022	121	RM 6,054.70	Aug 2022	131	RM 6,534.60	Sep 2022	131	RM 6,907.90	Mutiara Estate	Jul 2022	167	RM 9,219.40	Aug 2022	191	RM 10,240.50	Sep 2022	221	RM 10,504.80	Complied
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6.7.5	<p>Occupational injuries are recorded using Lost Time Accident (LTA) metrics.</p> <p>- Minor compliance -</p>	<p>Occupational Injuries were recorded using the Lost Time Accident metrics as below:</p> <table border="1" data-bbox="1122 1286 1946 1350"> <thead> <tr> <th>Operating Unit</th> <th>2021</th> <th>2022 (to date)</th> </tr> </thead> <tbody> <tr> <td> </td> <td> </td> <td> </td> </tr> </tbody> </table>	Operating Unit	2021	2022 (to date)				Complied																																						
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	Cases	Days	Cases	Days
Tereh POM	2	61	1	14
Tereh Utara Estate	4	26	0	0
Tereh Selatan Estate	8	79	11	27
Mutiara Estate	2	6	1	15

* Death case is categorized as loss of 6000 days.

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 established Integrated Pest Management focusing on controlling the pest infestation such as rat and bagworm. Among the plan established as follows:</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 implementation of the management plan as follows:</p> <ol style="list-style-type: none"> 1. The estate conducted bagworm census when necessary. Reviewed the boundary bagworm census conducted in February 2022. 	Complied
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		<ol style="list-style-type: none"> 2. Rat baiting was conducted at 2 campaign per year. Reviewed the latest campaign conducted in the month of Jun and July 2022. 3. Barn Owl Box ratio in the Tereh Selatan Estate recorded at 1:15 ha. Reviewed the latest barn owl census FY 2022 with occupancy recorded at 46%. 4. Barn Owl Box ratio in the Tereh Utara Estate recorded at 1:15 ha. Reviewed the latest barn owl census conducted in September 2022 with occupancy recorded at 49%. 5. For Mutiara Estate, barn owl box ratio in the estate recorded at 1:12.43 ha for Main Div. and 1:14.29 ha for Sg. Sembrong Div. Reviewed the latest barn owl census FY 2022 with occupancy recorded at 59% for Main Div. and 46% for Sg. Sembrong Div. 	
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>There were no species referenced in the Global invasive Species database and CABI.org sighted within the estate and POM premises.</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 of fire use to control pest in the estates sampled.</p>	Complied
<p>Criterion 7.2: Pesticides are used in ways that do not endanger health of workers, families, communities or the environment.</p>			
7.2.1	<p>(C) Justification of all pesticides used is demonstrated. Selective products and application methods that are specific to the target pest, weed or disease are prioritised.</p> <p>- Critical (Major) compliance -</p>	<p>The written justification of all agrochemicals is available in the Kulim Malaysia Berhad Agricultural Manual; Justification of chemical use; Table H01-2 till Table H01-6. The table states the Weed Situation, Active Ingredient, Chemical Brand Name, Product Rate/Ha and CKS Dossage/18L</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>Records of Pesticide/Agrochemicals used in the estate were recorded and monitored on a monthly basis and available for verification. Data were sampled as below:</p> <table border="1" data-bbox="1122 475 1912 823"> <thead> <tr> <th>Estate</th> <th></th> <th>Jul 22</th> <th>Aug 22</th> <th>Oct 22</th> </tr> </thead> <tbody> <tr> <td rowspan="2">Tereh Selatan Estate</td> <td>a.i / Ha</td> <td>0.0445</td> <td>0.0449</td> <td>0.0247</td> </tr> <tr> <td>LD50</td> <td>2.328</td> <td>1.064</td> <td>4.968</td> </tr> <tr> <td rowspan="2">Tereh Utara Estate</td> <td>a.i / Ha</td> <td>0.0137</td> <td>0.0432</td> <td>0.0220</td> </tr> <tr> <td>LD50</td> <td>0.0009</td> <td>0.0015</td> <td>0.0007</td> </tr> <tr> <td rowspan="2">Mutiarra Estate</td> <td>a.i / Ha</td> <td>0.0686</td> <td>0.2387</td> <td>0.0786</td> </tr> <tr> <td>LD50</td> <td>0.000173</td> <td>0.000856</td> <td>0.009761</td> </tr> </tbody> </table>	Estate		Jul 22	Aug 22	Oct 22	Tereh Selatan Estate	a.i / Ha	0.0445	0.0449	0.0247	LD50	2.328	1.064	4.968	Tereh Utara Estate	a.i / Ha	0.0137	0.0432	0.0220	LD50	0.0009	0.0015	0.0007	Mutiarra Estate	a.i / Ha	0.0686	0.2387	0.0786	LD50	0.000173	0.000856	0.009761	Complied
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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 estates have implemented a Continuous Improvement Plan where they have stated the intention to reduce the usage of chemical through implementation of Integrated Pest Management Plan.</p> <p>Sighted during the site visit at all the estates, the establishment of beneficial plants along the estate roads and immature areas as well as barn owl boxes placed at strategic areas. Paraquat was eliminated. In its place, alternatives such as Glyphosate is used instead.</p>	Complied																																
7.2.4	<p>There is no prophylactic use of pesticides, unless in exceptional circumstances, as identified in national best practice guidelines.</p> <p>- Minor compliance -</p>	<p>There is no prophylactic use of pesticides in all estates visited.</p>	Complied																																
7.2.5	<p>Pesticides that are categorised as World Health Organisation Class 1A or 1B, or that are listed by the Stockholm or Rotterdam Conventions, and paraquat, are not used, unless in exceptional circumstances, as validated by a due diligence process, or when authorised by government authorities for pest outbreaks.</p>	<p>The Chemical Registers for the mill and sampled estates were available for verification and reviewed yearly and as and when there are introductions of new chemicals in the operations.</p> <p>The register showed that only class III & IV pesticides were used at the mill and estates. Paraquat and Monocrotophos was eliminated. In</p>	Complied																																

	<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>its place, less hazardous alternatives such as Glyphosate and Acephate was used instead.</p> <p><u>Mutiara Estate</u></p> <p>Paraquat was eliminated. In its place, alternatives such as Glyphosate is used instead. Monocrotophos was purchased in 2018 for the use of trunk injection to combat bagworm infestations. The management have stated in the continuous improvement plan to "<i>continuously use the chemical until balance is zero. To implement use of chemical Class III (Altacor/Adonis) onwards.</i> The last trunk injection was conducted in February 2020. The management intends to dispose the current stock of Class 1B chemicals and substituting to less hazardous chemicals. The management have also increased the planting of beneficial plants at the bagworm prone areas.</p>													
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>Pesticide operators are given training on the safe handling and application of the pesticides. Suitable personal protective equipment's and application equipment provided to the operators based on the PPE issuance forms.</p> <p>Sampled the training conducted for pesticide handlers as below: -</p> <table border="1" data-bbox="1122 1058 1935 1383"> <thead> <tr> <th><u>Estate</u></th> <th><u>Training</u></th> <th><u>Date</u></th> </tr> </thead> <tbody> <tr> <td rowspan="4">Tereh Selatan Estate</td> <td>Bagworm Treatment Training</td> <td>05/10/2022</td> </tr> <tr> <td>Fogging Application Training</td> <td>06/09/2022</td> </tr> <tr> <td>Triple Rinsing Training</td> <td>03/08/2022</td> </tr> <tr> <td>Chemical Handling Training</td> <td>07/09/2022</td> </tr> </tbody> </table>	<u>Estate</u>	<u>Training</u>	<u>Date</u>	Tereh Selatan Estate	Bagworm Treatment Training	05/10/2022	Fogging Application Training	06/09/2022	Triple Rinsing Training	03/08/2022	Chemical Handling Training	07/09/2022	Complied
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			Safety Work at Chemical Store	07/09/2022	
		Mutiara Estate	Chemical Handling Training	11/04/2022	
			Safety Work at Chemical Store	16/01/2022	
			Triple Rinsing Training	27/02/2022	
		Tereh Utara Estate	Spraying – Buffer Zone Training	26/07/2022	
			Chemical Handling Training	21/03/2022	
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. The stores were at all times locked and at the time of visit the store keeper was seen to unlock the pad-lock to open entrance door for auditor to inspect the store. At the entrance door, signage requiring donning of PPE were visibly posted. The Chemical Store signage with required Hazard Symbols were available at the entrance. The facility ventilation fan was found working with adequate ventilation available, up-to-date chemical register, trade and generic names, and their Safety Data Sheet were available.</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>Excess chemical containers that were not used for premixing have been triple rinsed and punctured was categorized under scheduled waste and disposed through waste contractors.</p> <p>Verified the disposal records for the sampled estates as below.</p> <ol style="list-style-type: none"> Mutiara Estate has disposed the Empty Chemical Container to Licensed 3rd party Contractor, Kualiti Alam Sdn Bhd. Consignment 			Complied

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		<p>Note (C.N Number: 2022042210CGTNZNM) dated 22/04/2022 was available for verification. A total of 0.9335 mt of Empty Chemical Containers was disposed under code SW409.</p> <p>2. Tereh Utara Estate has disposed the Empty Chemical Container to Licensed 3rd party Contractor, Kualiti Alam Sdn Bhd. Consignment Note (C.N Number: 2022051508TR1Y86) dated 13/05/2022 was available for verification. A total of 0.5683 mt of Empty Chemical Containers was disposed under code SW409.</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>	No aerial spraying for pesticide were done in all the estates	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 CHRA of each operating units have recommended the necessity of annual medical surveillance for pesticide applicators exposed to pesticides that are classified as organophosphates. There were no use of organophosphate chemicals in all the estates audited. This was verified via the Chemical Register, visit to the Chemical Store of each operating units as well as interview with the respective estate's pesticide applicators. Nevertheless, the estates conduct monthly health screening at the estate clinics by their own Medical Assistant and records were available for verification. Health surveillance are also done for the workers to identify general health conditions regularly. Records were available and verified as below:</p> <p>1. Mutiara Estate - Medical Surveillance was conducted for workers expose to hazardous chemicals in the estate. The medical surveillance was conducted by Uni Klinik, Permas Jaya on</p>	Complied

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		<p>21/07/2022 for 27 workers. All workers were declared fit to work as per report.</p> <p>2. Tereh Selatan Estate - Medical Surveillance was conducted for 20 estate workers, deemed to be exposed to pesticides, fertilisers and mineral oils. The assessment was conducted on 20/07/2022 at Uni Klinik, Permas Jaya. The results indicated that all workers had no abnormal results that were occupational caused.</p> <p>3. Tereh Utara estate – Medical Surveillance was conducted for 30 workers, deemed to be exposed to pesticides, fertilisers and mineral oils. The assessment was conducted on 27/07/2022 at Uni Klinik, Permas Jaya. The results indicated that all workers had no abnormal results that were occupational caused.</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>All estates visited have prohibited woman workers who are confirmed pregnant or breast-feeding to handle chemicals as per Internal Memo verified in the estates.</p> <p>For 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 <i>"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."</i></p>	Complied				
Criterion 7.3: Waste is reduced, recycled, reused and disposed of in an environmentally and socially responsible manner.							
7.3.1	<p>A waste management plan which includes reduction, recycling, reusing, and disposal based on toxicity and hazardous characteristics, is documented and implemented.</p> <p>- Minor compliance -</p>	<p>The operating units has identified the waste products and source pollution and documented in Waste Management Plan. The plan was reviewed on annually basis. The waste has been identified as follows:</p> <p>Scheduled Waste</p> <table border="1" style="width: 100%; border-collapse: collapse;"> <thead> <tr> <th style="width: 50%;">Waste type</th> <th style="width: 50%;">Source</th> </tr> </thead> <tbody> <tr> <td style="height: 20px;"> </td> <td> </td> </tr> </tbody> </table>	Waste type	Source			Non-compliance
Waste type	Source						

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		Empty chemical containers (SW409)	Process of chemical application at lab and water treatment plant
		Empty chemical packaging (SW 409)	
		Empty hydrocarbon containers (SW 409)	Workshop
		Batteries (SW 102)	
		Spent oil (SW 305)	
		Hydrocarbon / pesticide spillage (SW 408)	
		Contaminated soil (leakage / spillage during transfer) (SW 408)	Fertilizer store, Chemical store
		Contaminated rags / sacks (SW 410)	
		Waste water (PCD)(SW 307)	PCD
		Worn PPE (SW 410)	PPE used by workers
Liquid			

		Mixture of scheduled and non-scheduled waste (SW 422)	Any workstation
		Expired chemical(SW 430)	Chemical store, Fertilizer store
		Waste water (cleaning - lubricant store, Workshop wash-down)(SW 307)	Lubricant store, Workshop
		Medical	
		Used dressing materials (e.g. Gauze, lint & gloves, Covid 19 test kit etc.) and needles (SW 404)	Clinic
		Broken computer equipments (SW 110)	Office
		Spent bulbs , Electrical waste (SW 110/SW 109)	
		Non Scheduled Waste	
		Waste type	Source
		Domestic	Linesite

		Plastics, Bottles (Recyclable material)		
		Garden waste		
		Kitchen waste		
		Scrap		Workshop
		Used welding rod & tools		
		Broken metal equipment's	Process extraction of CPO	
		Mill byproducts		
		POME		
		EFB		
		Shredded Fiber		
		Shell		
		Boiler Ash		
		Liquid Waste		
		Effluent Discharge (land)	Furrow	

		Septic tank overflow & spillage	Linesite	
		Rubber Materials		
		Tyre / broken rubber equipments	Workshop	
		Office		
		Used Paper	Office	
		Spent printer cartridges		
		Emmissions		
		Black smoke / dust/ air pollutant	Mill stack	
<p>The operating units has established waste management plan as per waste identification. The plan was reviewed on annually basis.</p>				
<p><u>Tereh Selatan Estate</u></p>				
<p>Reviewed the waste management plan established that stated scheduled management must be conducted as per Work Instruction, Scheduled Waste, issue no. 1, rev. 0. Dated 01/101/2022. Refer document no. SPO/WI/06. In the SOP established, under section 6 Reference stated the storage of schedule waste were according:</p>				
<ul style="list-style-type: none"> 6.4 Waste Card as per 7th Scheduled of Environmental Quality (Scheduled Wastes) Regulations 2005 				

		<ul style="list-style-type: none"> • 6.5 Work Instructions on scheduled waste management (this document) • 6.6 SOP on packaging and labelling scheduled waste for disposal • 6.7 Standard label for scheduled waste <p>Noted during document review on scheduled inventory for SW 408, contaminated soil and SW 409, plastic container for 1L 2T oil, noted first date of waste generated was recorded at 16/07/2022 and 15/07/2022 respectively. During site visit at scheduled waste store, it was noted that the SW 409, plastic container 1L for 2T oil and SW 408, contaminated soil was stored without proper labelling.</p> <p>This was against Environmental Quality (Scheduled Wastes) Regulations 2005 and Guidelines for Packaging, Labelling and Storage of Scheduled Waste in Malaysia.</p> <p><u>Tereh Utara Estate</u></p> <p>During site visit at Scheduled Waste Store, it was noted that the SW 306 container was filled and the first generation date at the container was recorded at 29/11/2021. Reviewed the Scheduled Waste Record Book, the first generation date for SW 306 was also recorded at 29/11/2021 after latest disposal on 07/10/2021. Latest inventory was recorded at 80 L. Reviewed ESWISS inventory records for the month of October 2022 was also recorded at 80 L. This shows that the scheduled waste was stored for more than 180 days without any permission from DOE.</p> <p>As per waste management plan, the scheduled management must be conducted as per Work Instruction, Scheduled Waste, issue no. 1, rev. 0. Dated 01/10/2022. Refer document no. SPO/WI/06. As per WI established in section 2.6 Inspection of Scheduled Waste Are stated that "Scheduled Waste are not stored for more than 180 days from date of first generated and more than 20 MT.</p>	
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<p>7.3.2</p>	<p>Proper disposal of waste material, according to procedures that are fully understood by workers and managers, is demonstrated.</p> <p>- Minor compliance -</p>	<p>The operating units has established and documented Waste and Pollution Management Plan as per waste identification. The plan was reviewed on annually basis. The plan includes Waste Type, Source, Action, Frequency, Records, and Person Responsible.</p> <p>Kulim (M) Berhad has established procedure to handle scheduled waste generated documented in Labelling, handling, storage and disposal of scheduled waste. Refer documents no LTM/WI/19, rev. no. 2 dated 01/10/2020.</p> <p>The estate demonstrated the proper disposal of waste material base on the waste management plan and SOP established. Review the implementation of the management plan established as follows:</p> <p>The mill maintain the records of inventory of scheduled waste generated by mill operation and notify to DOE through ESWISS. Reviewed the inventory records for the month June, July, August and September 2022.</p> <p>The mill disposed the scheduled waste generated through licensed operator, Kualiti Alam Sdn. Bhd. Reviewed the latest disposal records as follows:</p> <table border="1" data-bbox="1122 1034 1895 1364"> <thead> <tr> <th>Estate</th> <th>Date</th> <th>SW</th> <th>Consignment Note no</th> </tr> </thead> <tbody> <tr> <td rowspan="6">Tereh Palm Oil mill</td> <td rowspan="6">05/09/2022</td> <td>410</td> <td>20220905169E3KIM</td> </tr> <tr> <td></td> <td>20220905150K3MBL</td> </tr> <tr> <td>409</td> <td>2022090516KUZYL</td> </tr> <tr> <td>305</td> <td>2022090515ZMX7NP</td> </tr> <tr> <td>110</td> <td>2022090515AU2Z59</td> </tr> <tr> <td>429</td> <td>20220905150YTHVO</td> </tr> </tbody> </table>	Estate	Date	SW	Consignment Note no	Tereh Palm Oil mill	05/09/2022	410	20220905169E3KIM		20220905150K3MBL	409	2022090516KUZYL	305	2022090515ZMX7NP	110	2022090515AU2Z59	429	20220905150YTHVO	<p>Complied</p>
Estate	Date	SW	Consignment Note no																		
Tereh Palm Oil mill	05/09/2022	410	20220905169E3KIM																		
			20220905150K3MBL																		
		409	2022090516KUZYL																		
		305	2022090515ZMX7NP																		
		110	2022090515AU2Z59																		
		429	20220905150YTHVO																		

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		Tereh Selatan Estate	31/05/2022	409 410 102 109	2022053121B4P7EH 2022053121E4P4GE 2022053121G6F7KH 2022053121E4CG9A 2022053121A8P3BH				
		Tereh Utara Estate	13/05/2022	109 110 307 305 408 409 410	2022051316QZ7GFN 2022051309L74D2W 20220515083SEUH7 2022051508D8QOI5 2022051508G65TJU 2022051508TR1Y86 20220515089AC1QU				
		Mutiarra Estate	22/04/2022 21/07/2022	102 109 110 305 306 307 409 404	2022042210XB6OUH 20220422102JN75K 2022042210SX4WV5 2022042210RYJFTL 20220422107YA1TM 2022042210MGEPW6 2022042210CGTZNM 20220721106KS1Y5				
		<p>The operating units continuously promoted the 3R, The operating units has placed the recycle bin at designated place such as office compound and housing area. Sighted the recycle waste disposal records for Tereh Palm Oil Mill dated 11/10/2022 for 52.5 kg of boxes.</p>							

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		<p>The operating units disposed domestic waste through designated landfill as per SOP established. The domestic collection was conducted at 2/3 times a week base on program established. Reviewed the domestic waste collection records for the month of June, July August and September 2022. Sighted during site visit at landfill (field P04/01 for Tereh Selatan, field P00/4 for Tereh Utara Estate and field P00/1 for Mutiara Estate), noted that only domestic waste were disposed in the landfill.</p> <p>Mill by-product such as fibre and shell were disposed through sell to buyer and used as boiler fuel. As todate September 2022, total of 12,368.67 mt of shell and 39,321.00 mt of fibre were used as boiler fuel while 3,889.00 mt of shell were sold to buyer.</p> <p>The mill disposed EFB by sending to the sister estate for EFB field application or converted to compost as one of the nutrient cycle program. Reviewed the records of EFB field application recorded as todate September 2022 as follows:</p> <table border="1" data-bbox="1122 903 1942 1109"> <thead> <tr> <th>Estate</th> <th>Tonnage</th> </tr> </thead> <tbody> <tr> <td>Tereh Selatan Estate</td> <td>4,785.79</td> </tr> <tr> <td>Tereh Utara Estate</td> <td>16,871.70</td> </tr> <tr> <td>Mutiara Estate</td> <td>51.55</td> </tr> </tbody> </table>	Estate	Tonnage	Tereh Selatan Estate	4,785.79	Tereh Utara Estate	16,871.70	Mutiara Estate	51.55	
Estate	Tonnage										
Tereh Selatan Estate	4,785.79										
Tereh Utara Estate	16,871.70										
Mutiara Estate	51.55										
7.3.3	<p>The unit of certification does not use open fire for waste disposal.</p> <p>- Minor compliance -</p>	<p>No evidence of fire use for waste disposal. Domestic waste was disposed in landfill area. No evidence of scheduled waste or recycle waste were found in the landfill.</p> <p>For replanting, the old palms were felled, shredded, windrowed and left to decompose as sighted in field P2022 at estates visited.</p>	Complied								
<p>Criterion 7.4: Practices maintain soil fertility at, or where possible improve soil fertility to, a level that ensures optimal and sustained yield.</p>											

7.4.1	<p>Good agriculture practices, as contained in SOPs, are followed to manage soil fertility to optimise yield and minimise environmental impacts.</p> <p>- Minor compliance -</p>	<p>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> <ul style="list-style-type: none"> 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 	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> <p>Reviewed the sampling records as follows:</p> <ol style="list-style-type: none"> 1. <u>Tereh Selatan Estate</u> Latest Soil Sampling was conducted in January 2022. Refer report no. SI/2022/01/5 dated 26/01/2022. Latest leaf sampling was conducted on February 2022. Refer report no. LI/2021/02/19 dated 09/02/2022. 	Complied

		<p>2. Tereh Utara Estate Latest leaf and soil Sampling was conducted in 21/09/2022 – 06/10/2022 as per letter from the Agronomy Advisory and Services Department dated 13/09/2022. The results has yet to be received by the estate.</p> <p>3. Mutiara Estate Latest Soil Sampling was conducted in December 2021. Refer report no. SI/2022/01/1 dated 07/01/2022. Latest leaf sampling was conducted on September 2022. Refer report no. LI/2022/09/142 dated 15/09/2022.</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 4. POME utilization using tractor tanker and furrow system at 17mt/ha or 125kg/palm at the host estate of Tereh Mill. <p>The estate has established EFB and Bio-Compost application program FY 2022. Reviewed the application records as to date September 2022 as follows:</p> <table border="1" data-bbox="1126 1161 1944 1366"> <thead> <tr> <th rowspan="2">Estate</th> <th colspan="2">Tonnage</th> </tr> <tr> <th>Bio compost</th> <th>EFB</th> </tr> </thead> <tbody> <tr> <td>Tereh Selatan Estate</td> <td>2,207.91</td> <td>4,785.79</td> </tr> <tr> <td>Tereh Utara Estate</td> <td>0.00</td> <td>16,871.70</td> </tr> </tbody> </table>	Estate	Tonnage		Bio compost	EFB	Tereh Selatan Estate	2,207.91	4,785.79	Tereh Utara Estate	0.00	16,871.70	Complied
Estate	Tonnage													
	Bio compost	EFB												
Tereh Selatan Estate	2,207.91	4,785.79												
Tereh Utara Estate	0.00	16,871.70												

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		Mutiara Estate	6,204.74	51.55	
7.4.4	Records of fertiliser inputs are maintained. - Minor compliance -	The fertiliser application was conducted as per recommendation by agronomist base on foliar sampling conducted. The fertiliser application records was available at the estate visited for review. The estate reported the fertilised application to the Agronomy Advisory and Services Department on monthly basis. Reviewed the report for the month of July, August and September 2022.			Complied
Criterion 7.5: Practices minimise and control erosion and degradation of soils.					
7.5.1	(C) Maps identifying marginal and fragile soils, including steep terrain, are available. - Critical (Major) compliance -	The operating units has identified the soil series in the estates and established soil series maps. Soil series identified in the estates as follows:			Complied
		Estate	Soil Series		
		Tereh Selatan Estate	Batang Merbau (12.01%), Batu Lapan (1.37%), Bungor (7.79%), Chermin (1.64%), Jabil (1.2%), Lubok Sendong (3.52%), Rengam (17.79%), Setol (2.54%), Sogomana (3.90%), Tai Tak (19.72%), Siri Tawar (16.10%), Tebok (11.29%), Tepus (1.13%)		
		Tereh Utara Estate	Bungor – Batang Merbau (17.97%), Jabil – tepus (13.68%), Batu lapan (3.94%), Batang merbau (3.40%), Bungor (7.02%), Harimau (0.87%), Rengam (5.74%), Serdang (18.79%), Tai Tak (10.89%), Tawar (6.10%), Tebok (11.56%), Steep (0.04%)		
		Mutiara Estate	Rengam – Tai Tk (12.66%), Tebok – Gong Chenak (2.03%), Local Aluvium (2.08%), Alma (0.68%), Batu Lapan (0.82%), Chempaka (5.18%), Holyrood (11.61%), Lating (8.30%),		

		Lintang (10.13%), Medang (1.82%), Rasau (11.03%), Rengam (1.01%), Tawar (18.95%), tebok (10.42%), Telemong (1.06%).	
7.5.2	No replanting on steep slopes (above 25 degrees) unless approved by state governments. In case of replanting is permitted, no replanting in contiguous area of steep terrain (greater than 25 degrees) larger than 25 Ha within the Unit of Certification. - Minor compliance -	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. No replanting was conducted on steep slopes more than 25 degree.	Complied
7.5.3	There is no new planting of oil palm on steep terrain. - Minor compliance -	No new planting conducted at all estates visited as verified and sighted during site visit.	Complied
Criterion 7.6: Soil surveys and topographic information are used for site planning in the establishment of new plantings, and the results are incorporated into plans and operations.			
7.6.1	(C) To demonstrate the long-term suitability of land for palm oil cultivation, soil maps or soil surveys identifying marginal and fragile soils, including steep terrain, are taken into account in plans and operations. - Critical (Major) compliance -	Soil series and topography map available for estate 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.	Complied
7.6.2	Extensive planting on marginal and fragile soils, is avoided, or, if necessary, done in accordance with the soil management plan for best practices. - Minor compliance -	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.	Complied

7.6.3	<p>Soil surveys and topographic information guide the planning of drainage and irrigation systems, roads and other infrastructure.</p> <p>- Minor compliance -</p>	<p>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="1122 475 1942 858"> <thead> <tr> <th>Degree</th> <th>Tereh Selatan Estate</th> <th>Tereh Utara Estate</th> <th>Mutiara Estate</th> </tr> </thead> <tbody> <tr> <td>0°-2°</td> <td>25.03</td> <td>18.49</td> <td>67.66</td> </tr> <tr> <td>2°-6°</td> <td>53.95</td> <td>35.30</td> <td>29.22</td> </tr> <tr> <td>6°-12°</td> <td>20.08</td> <td>29.72</td> <td>2.86</td> </tr> <tr> <td>12°-20°</td> <td>0.94</td> <td>12.06</td> <td>0.24</td> </tr> <tr> <td>20°-25°</td> <td>0.00</td> <td>3.17</td> <td>0.02</td> </tr> <tr> <td>>25°</td> <td>0.00</td> <td>1.26</td> <td>0.00</td> </tr> </tbody> </table>	Degree	Tereh Selatan Estate	Tereh Utara Estate	Mutiara Estate	0°-2°	25.03	18.49	67.66	2°-6°	53.95	35.30	29.22	6°-12°	20.08	29.72	2.86	12°-20°	0.94	12.06	0.24	20°-25°	0.00	3.17	0.02	>25°	0.00	1.26	0.00	Complied
Degree	Tereh Selatan Estate	Tereh Utara Estate	Mutiara Estate																												
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<p>Criterion 7.7: No new planting on peat, regardless of depth after 15 November 2018 and all peatlands are managed responsibly.</p>																															
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>There is peat soil (category of shallow peat) total of 5.4 ha (0.22%) of total planted field no P00/Block 3D situated in Ladang Mutiara.</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>There is peat soil (category of shallow peat) total of 5.4 ha (0.22%) of total planted field no P00/Block 3D situated in Ladang Mutiara.</p>	Complied																												

7.7.3	<p>(C) Subsidence of peat is monitored, documented and minimised. - Critical (Major) compliance -</p>	<p>Peat subsidence monitoring / reading are taken quarterly and recorded. There are no changes in the subsidence level as reported and recorded.</p>	Complied
7.7.4	<p>(C) A documented water and ground cover management programme is in place. - Critical (Major) compliance -</p>	<p>There is peat soil (category of shallow peat) total of 5.4 ha (0.22%) of total planted field no P00/Block 3D situated in Ladang Mutiara. There is general guidelines for peat subsidence monitoring in the KMB ARM ref A18 - Water Management Plan in Peat Area and A19 Monitoring subsidence in Peat Soil. Among others showing the following;</p> <ol style="list-style-type: none"> 1. Subsidence of peat surface. 2. The rate of peat subsidence gives indirect indication of generous gas emissions. 3. Method to install peat subsidence pole and monitor peat subsidence. 	Complied
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>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>	<p>There is peat soil (category of shallow peat) total of 5.4 ha (0.22%) of total planted field no P00/Block 3D situated in Ladang Mutiara. There is general guidelines for peat subsidence monitoring in the KMB ARM ref A18 - Water Management Plan in Peat Area and A19 Monitoring subsidence in Peat Soil. Among others showing the following;</p> <ol style="list-style-type: none"> 1. Subsidence of peat surface. 2. The rate of peat subsidence gives indirect indication of generous gas emissions. 3. Method to install peat subsidence pole and monitor peat subsidence. 4. Water management in peat soil. 5. The OP planted in this field is 2000 	Complied

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>There is peat soil (category of shallow peat) total of 5.4 ha (0.22%) of total planted field no P00/Block 3D situated in Ladang Mutiara. There is general guidelines for peat subsidence monitoring in the KMB ARM ref A18 - Water Management Plan in Peat Area and A19 Monitoring subsidence in Peat Soil. Among others showing the following;</p> <ol style="list-style-type: none"> 1. Subsidence of peat surface. 2. The rate of peat subsidence gives indirect indication of generous gas emissions. 3. Method to install peat subsidence pole and monitor peat subsidence. 4. Water management in peat soil. 5. The OP planted in this field is 2000. 	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>There is peat soil (category of shallow peat) total of 5.4 ha (0.22%) of total planted field no P00/Block 3D situated in Ladang Mutiara. There is general guidelines for peat subsidence monitoring in the KMB ARM ref A18 - Water Management Plan in Peat Area and A19 Monitoring subsidence in Peat Soil. Among others showing the following;</p> <ol style="list-style-type: none"> 1. Subsidence of peat surface. 2. The rate of peat subsidence gives indirect indication of generous gas emissions. 3. Method to install peat subsidence pole and monitor peat subsidence. 4. Water management in peat soil. 5. The OP planted in this field is 20. 6. Also observed there was no new drainage, road building and power lines by the estate peat soils at the peat soil field. 	Complied

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> <ul style="list-style-type: none"> a) The unit of certification does not restrict access to clean water or contribute to pollution of water used by communities. b) Workers have adequate access to clean water. <p>- Minor compliance -</p>	<p>The operating units has established a water management plan documented in Estates Water Management Plan dated 01/08/2021. In the management plan stated the source of water, mill activity, water use, possible threat, action plan, timeline, monitoring records and person responsible. The action plan focusing on possible threats such as water pollution, drought, and capacity of water reduce in reservoir, flood interruption/clogging of water flow at drainage system, wastage of water and stagnant water at replanting area.</p> <p>The mill monitors the water consumption/FFB on monthly basis. As to date September 2022, mill water usage/FFB processed was recorded at 1.21 mt/FFB processed.</p> <p>The estate monitor the water consumption per ton FFB on monthly basis. As todated September 2022, water consumption per ton FFB recorded at 1.93 L/ton FFB production, for Tereh Selatan Estate, 3.93 L/ton FFB production, for Mutiara Estate and 0.21 L/ton FFB production for Tereh Utara Estate.</p> <p>The workers were provided with adequate access of clean water through water treatment plan. The estate conducted the drinking water analysis by 3rd party lab once every 6 months. For river water sampling on monthly basis. Reviewed the water sampling records as follow:</p> <p><u>Tereh Palm Oil Mill</u></p> <ol style="list-style-type: none"> 1. Drinking Water Analysis <p>Latest drinking water analysis was conducted on 05/06/2022. Refer report no. LW/519(1-2)/22 dated 20/06/2022. The results of treated water analysis was within permissible limit of Drinking</p>	Complied

		<p>Water Quality Standard, Ministry of Health Malaysia; Engineering Services Division, Year 2010.</p> <p><u>Tereh Selatan Estate</u></p> <ol style="list-style-type: none"> 1. Drinking Water Analysis <p>Report for the for 2nd half of 2021 and 1st half of 2022. Refer report no. LW/1137(1-2)/21 dated 22/11/2021 and LW/520(1-2)/22 dated 20/06/2022. The results of treated water analysis was within permissible limit of Drinking Water Quality Standard, Ministry of Health Malaysia; Engineering Services Division, Year 2010.</p> 2. River water analysis <ol style="list-style-type: none"> a. WI/2022/07/390 dated 26/07/2022 b. WI/2022/08/430 dated 14/08/2022 c. WI/2022/09/534 dated 18/09/2022 <p>The results of river water analysis was within permissible limit of National Water Quality Standards for river class II/III</p> <p><u>Tereh Utara Estate</u></p> <ol style="list-style-type: none"> 1. Drinking Water Analysis <p>Latest drinking water sampling analysis was conducted on 05/06/2022. Refer report no. LW/521(1-2)/22, dated 20/06/2022. The results of treated water analysis was within permissible limit of Drinking Water Quality Standard, Ministry of Health Malaysia; Engineering Services Division, Year 2010.</p> 2. River water analysis <ol style="list-style-type: none"> a. WI/2022/10/319 dated 20/10/2022 	
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		<p>b. WI/2022/09/527 dated 15/09/2022 The results of river water analysis was within permissible limit of National Water Quality Standards for river class II/III</p> <p><u>Mutiara Estate</u></p> <p>1. Drinking Water Analysis Latest drinking water sampling analysis was conducted on 05/06/2022. Refer report no. LW/522(1-2)/22, LW/523(1-2)/22, LW/524(1-2)/22, and LW/525(1-2)/22 dated 20/06/2022 . The results of treated water analysis was within permissible limit of Drinking Water Quality Standard, Ministry of Health Malaysia; Engineering Services Division, Year 2010.</p> <p>2. River water analysis</p> <p>a. WI/2022/10/603 dated 19/10/2022 b. WI/2022/10/441 dated 26/10/2022 c. WI/2022/09/545 dated 20/09/2022 d. WI/2022/09/543 dated 20/09/2022</p> <p>The results of river water analysis was within permissible limit of National Water Quality Standards for river class II/III</p>							
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>Kulim (M) Berhad has established procedure for water course and wetland protection documented in the Agricultural Manual under chapter A17 – Protection of Natural Water Courses dated 19/11/2018. The river buffer zone as follows:</p> <table border="1" data-bbox="1126 1220 1912 1366"> <thead> <tr> <th>River size</th> <th>Reserve area on each side (M)</th> </tr> </thead> <tbody> <tr> <td>>40m</td> <td>50m</td> </tr> <tr> <td>Between 20m – 40m</td> <td>40m</td> </tr> </tbody> </table>	River size	Reserve area on each side (M)	>40m	50m	Between 20m – 40m	40m	Complied
River size	Reserve area on each side (M)								
>40m	50m								
Between 20m – 40m	40m								

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		<table border="1" data-bbox="1126 362 1912 512"> <tr> <td>Between 10m – 20m</td> <td>20m</td> </tr> <tr> <td>Between 5m – 10m</td> <td>10m</td> </tr> <tr> <td><5m</td> <td>5m</td> </tr> </table> <p>As stated in the procedure, no development is allowed in the buffer zone area for either replanting or new planting.</p> <p><u>Tereh Selatan Estate</u></p> <p>As sighted at buffer zone for main drain flow through the estate to Sg. Sembrong at field P07/01 and P06/03, the buffer zone was clearly demarcated with white and colour pole and blue ring ant the palms trunk. No evidence of chemical application along the buffer zone area.</p> <p><u>Tereh Utara Estate</u></p> <p>The river buffer zone was clearly demarcated with blue and white colour ring at the palm trunks as sighted at field P03/2, buffer zone for Sg. Tamok.</p> <p><u>Mutiara Estate</u></p> <p>The river buffer zone was clearly demarcated with blue and white colour ring at the palm trunks as sighted at field P00/1 and P03/1, buffer zone for Sungai Keroh.</p>	Between 10m – 20m	20m	Between 5m – 10m	10m	<5m	5m	
Between 10m – 20m	20m								
Between 5m – 10m	10m								
<5m	5m								
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>Mill effluent is treated through biological anaerobic treatment. Regular monitoring was conducted as per requirement. Monthly and quarterly report was submitted to DOE accordingly. Reviewed the Quarterly Return Form to DOE as follows:</p> <p>1st quarter 2022:</p>	Complied						

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Month	Parameter	Results
January	BOD	486.00
	pH	7.20
February	BOD	259.00
	pH	7.50
March	BOD	138.00
	pH	7.40
2 nd quarter 2022:		
Month	Parameter	Results
April	BOD	136.00
	pH	7.70
May	BOD	360.00
	pH	7.60
June	BOD	225.00

		<table border="1" data-bbox="1256 363 1809 427"> <tr> <td></td> <td>pH</td> <td>8.50</td> </tr> </table> <p>3rd quarter 2022:</p> <table border="1" data-bbox="1256 515 1809 1002"> <thead> <tr> <th>Month</th> <th>Parameter</th> <th>Results</th> </tr> </thead> <tbody> <tr> <td rowspan="2">July</td> <td>BOD</td> <td>236.00</td> </tr> <tr> <td>pH</td> <td>8.60</td> </tr> <tr> <td rowspan="2">August</td> <td>BOD</td> <td>394.00</td> </tr> <tr> <td>pH</td> <td>8.20</td> </tr> <tr> <td rowspan="2">September</td> <td>BOD</td> <td>271.00</td> </tr> <tr> <td>pH</td> <td>7.80</td> </tr> </tbody> </table>		pH	8.50	Month	Parameter	Results	July	BOD	236.00	pH	8.60	August	BOD	394.00	pH	8.20	September	BOD	271.00	pH	7.80	
	pH	8.50																						
Month	Parameter	Results																						
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September	BOD	271.00																						
	pH	7.80																						
7.8.4	<p>Mill water use per tonne of FFB is monitored and recorded. - Minor compliance -</p>	<p>The mill monitors the water consumption/FFB on monthly basis. Reviewed the monitoring records as follows:</p> <table border="1" data-bbox="1167 1150 1901 1343"> <thead> <tr> <th rowspan="2">Month FY 2022</th> <th colspan="3">Water consumption per FFB processed (L/FFB)</th> </tr> <tr> <th>Processing</th> <th>Domestic</th> <th>Total</th> </tr> </thead> <tbody> <tr> <td>Jan</td> <td>1.07</td> <td>0.21</td> <td>1.28</td> </tr> </tbody> </table>	Month FY 2022	Water consumption per FFB processed (L/FFB)			Processing	Domestic	Total	Jan	1.07	0.21	1.28	Complied										
Month FY 2022	Water consumption per FFB processed (L/FFB)																							
	Processing	Domestic	Total																					
Jan	1.07	0.21	1.28																					

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			Feb	1.01	0.23	1.24	
			Mar	1.08	0.19	1.27	
			Apr	0.97	0.39	1.36	
			May	0.91	0.39	1.30	
			Jun	1.00	0.30	1.31	
			Jul	0.92	0.28	1.20	
			Aug	0.77	0.22	0.99	
			Sep	0.77	0.24	1.01	
			Oct	N/A	N/A	N/A	
			Nov	N/A	N/A	N/A	
			Dec	N/A	N/A	N/A	
			Average	0.93	0.27	1.21	
<p>The water consumption for mill processing was acceptable as the target was at 1.20L/ton FFB processed.</p>							

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

7.9.1	<p>A plan for efficiency of the use of fossil fuels and to optimise renewable energy is implemented, monitored and documented.</p> <p>- Minor compliance -</p>	<p>Plan to reduce the usage of the non-renewable energy has been established and monitored. Reviewed the implementation records as follows:</p> <p>The operating unit monitor the diesel usage per FFB production on monthly basis. reviewed the records as follows:</p>	Complied
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Month	Tereh POM		Tereh Selatan Estate		Tereh Utara Estate		Mutiara Estate	
	2021	2022	2021	2022	2021	2022	2021	2022
Jan	1.93	0.89	10.68	6.88	6.68	5.30	10.50	12.72
Feb	1.28	1.22	12.19	7.57	6.17	6.14	11.45	12.95
Mar	1.08	1.36	8.29	7.52	6.92	7.11	10.47	10.37
Apr	0.55	0.91	8.34	7.22	5.30	10.55	13.27	10.53
May	1.00	1.01	9.32	6.28	6.28	8.00	10.98	13.34
Jun	2.66	1.17	6.43	7.98	7.58	8.55	11.74	8.29
Jul	0.94	0.66	8.56	7.62	6.18	9.27	11.73	9.36
Aug	0.57	0.44	8.47	6.02	5.53	6.83	10.05	8.82
Sep	0.86	0.40	8.90	5.90	5.98	7.36	9.37	7.52
Oct	0.79	N/A	8.29	N/A	5.91	N/A	9.87	N/A
Nov	0.67	N/A	7.57	N/A	4.99	N/A	9.19	N/A
Dec	0.47	N/A	7.77	N/A	5.31	N/A	9.42	N/A
Ave	0.92		8.54	6.94	5.99	7.54	10.57	10.04

To ensure no diesel spillage, oil/fuel leakage and dust emission from vehicle and machineries, the mill conducted vehicle inspection on periodically basis (monthly, weekly and daily). Reviewed the

		inspection records book for vehicle and machineries no. T11, T13, E11, E16, T10, T14, V05 and V07 FY 2022.	
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>Monitoring and reporting of the significant pollutants to water, gaseous emissions to air and contamination on land are in place. Tools and systems used include the DOE online CEMS monitoring for air emissions, water quality at discharge points as per DID regulations and SW disposal were adhering to DOE requirements. Water samples were regularly taken every month and tested by mill environment officer in charge and analysed to ensure compliance to DOE requirements at final discharge points.</p> <p>Monitoring of the GHG quantity was done through RSPO PalmGHG Calculator Version 4.0 which is submitted to the RSPO Secretariat. Based on verification of various record, the data in the RSPO PalmGHG Calculator was correct.</p>	Complied
7.10.2	<p>(C) Starting 2014, the carbon stock of the proposed development area and major potential sources of emissions that may result directly from the development are estimated and a plan to minimise them prepared and implemented (following the RSPO GHG Assessment Procedure for New Development).</p> <p>- Critical (Major) compliance -</p>	No development within Tereh POM and Supply Base since 2014.	Complied
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>Significant pollutants identification was conducted during environmental impact assessment and plans are documented under environmental management plan. Implementation of plan is being monitored by appointed person in charge with target of time frame for completion.</p> <p>Reviewed the implementation of the management plan as follows:</p>	Complied

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		<ol style="list-style-type: none"> 1. The mill monitored the ESP performance on daily basis. Reviewed the monitoring records in ESP Performance Monitoring Data Recording dated 21/10/2022, 19/10/2022, and 12/10/2022. 2. The estate conducted stack sampling twice a year. Reviewed the latest stack sampling conducted on 20/06/2022. Refer report no. Tereh6-7/06/2022 dated 25/06/2022. The results recorded at 139 mg/m³, within permissible limit at 150 mg/m³. 3. The mill conducted tank and machine on timely basis to ensure no leakage and spillage. To ensure no diesel spillage, oil/fuel leakage and dust emission from vehicle and machineries, the mill conducted vehicle inspection on periodically basis (monthly, weekly and daily). Reviewed the inspection records book for vehicle and machineries no. T11, T13, E11, E16, T10, T14, V05 and V07 FY 2022. 4. Mill by-product such as fibre and shell were disposed through sell to buyer and used as boiler fuel. As to date September 2022, total of 12,368.67 mt of shell and 39,321.00 mt of fibre were used as boiler fuel while 3,889.00 mt of shell were sold to buyer. 	
Criterion 7.11: Fire is not used for preparing land and is prevented in the managed area			
7.11.1	<p>(C) Land for new planting or replanting is not prepared by burning. - Critical (Major) compliance -</p>	<p>As per Kulim (Malaysia) Berhad Environmental Policy dated 01/10/2021 signed by the Managing Director, the company has stated the commitment to practicing zero burning techniques in land preparation for new planting and replanting programs subject to the guidelines for the implementation of the ASEAN policy for zero burning.</p>	Complied
7.11.2	<p>The unit of certification establishes fire prevention and control measures for the areas directly managed by the unit of certification. - Minor compliance -</p>	<p>Kulim (M) Berhad has established Fire Prevention and Control Procedure dated 01/08/2020. The operating units has established fire prevention team. Awareness training on ERP has been conducted as per criteria 3.7.2.</p>	Complied

7.11.3	The unit of certification engages with adjacent stakeholders on fire prevention and control measures. - Minor compliance -	The operating units communicates the fire prevention plan and control measures to all stakeholders during meeting. Reviewed the minutes for Stakeholder consultation meeting conducted on 27/10/2022.	Complied
Criterion 7.12: Land clearing does not cause deforestation or damage any area required to protect or enhance High Conservation Values (HCVs) or High Carbon Stock (HCS) forest. HCVs and HCS forests in the managed area are identified and protected or enhanced.			
7.12.1	(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. A historic Land Use Change Analysis (LUCA) is conducted prior to any new land clearing, in accordance with the RSPO LUCA guidance document. - Critical (Major) compliance -	No new planting and land clearing since 15 November 2018. Kulim Plantation has conducted HCV assessment for all operating units and documented in reports as follows: a. Tereh Selatan Estate Biodiversity assessment of Tereh Selatan Estate dated 04/09/2015. b. Tereh Utara Estate Rapid Biodiversity Assessment of Fifteen Oil Palm Plantations of Kulim (M) Berhad Final Report dated February 2013, Part two: fact sheets: Tereh Utara c. Mutiara Estate Rapid Biodiversity Assessment of Fifteen Oil Palm Plantations of Kulim (M) Berhad Final Report dated February 2013, Part two: fact sheets: Mutiara and Sg. Sembrong.	Complied
7.12.2	(C) HCVs, HCS forests and other conservation areas are identified as follows: 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. 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	Kulim Plantation has conducted HCV assessment for all operating units and documented in reports as follows: 1. Biodiversity assessment of Tereh Selatan Estate dated 04/09/2015. 2. Rapid Biodiversity Assessment of Fifteen Oil Palm Plantations of Kulim (M) Berhad Final Report dated February 2013, Part two: fact sheets: Tereh Utara	Complied

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	<p>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>3. Rapid Biodiversity Assessment of Fifteen Oil Palm Plantations of Kulim (M) Berhad Final Report dated February 2013, Part two: fact sheets: Mutiara and Sg. Sembrong.</p> <p>Among the HCV area and Biodiversity Hotspot identified in the estates as follows:</p> <table border="1" data-bbox="1126 539 1944 1382"> <thead> <tr> <th>Estate</th> <th>Field</th> <th>Description</th> <th>Ha</th> </tr> </thead> <tbody> <tr> <td rowspan="14">Tereh Utara Estate</td> <td>P97/05</td> <td>Pond 2</td> <td>0.38</td> </tr> <tr> <td>P97/05</td> <td>River & Buffer Zone (RBA 8)</td> <td>2.01</td> </tr> <tr> <td>P00/02</td> <td>Mill Pond</td> <td>0.75</td> </tr> <tr> <td>P00/03</td> <td>Pond (RBA 1)</td> <td>14.26</td> </tr> <tr> <td>P00/03</td> <td>Swampy</td> <td>0.32</td> </tr> <tr> <td>P03/09</td> <td>Steep (RBA 9)</td> <td>9.5</td> </tr> <tr> <td>P03/10</td> <td>Undeveloped (RBA 10)</td> <td>13.33</td> </tr> <tr> <td>P03/10</td> <td>Steep (RBA 9)</td> <td>3.68</td> </tr> <tr> <td>P04/02</td> <td>Swamp (RBA 5)</td> <td>11.22</td> </tr> <tr> <td>P04/04</td> <td>Swampy</td> <td>1.15</td> </tr> <tr> <td>P06/04</td> <td>Sentang Area (RBA 2)</td> <td>11.62</td> </tr> <tr> <td>P06/05</td> <td>Steep (RBA 3)</td> <td>3.42</td> </tr> <tr> <td>P07/04</td> <td>Pond 3</td> <td>2.25</td> </tr> <tr> <td colspan="3">Total</td> <td>73.89</td> </tr> <tr> <td></td> <td>P00/01</td> <td>Pond</td> <td>1.84</td> </tr> </tbody> </table>	Estate	Field	Description	Ha	Tereh Utara Estate	P97/05	Pond 2	0.38	P97/05	River & Buffer Zone (RBA 8)	2.01	P00/02	Mill Pond	0.75	P00/03	Pond (RBA 1)	14.26	P00/03	Swampy	0.32	P03/09	Steep (RBA 9)	9.5	P03/10	Undeveloped (RBA 10)	13.33	P03/10	Steep (RBA 9)	3.68	P04/02	Swamp (RBA 5)	11.22	P04/04	Swampy	1.15	P06/04	Sentang Area (RBA 2)	11.62	P06/05	Steep (RBA 3)	3.42	P07/04	Pond 3	2.25	Total			73.89		P00/01	Pond	1.84	
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		Tereh Selatan Estate	P03/03	Grassland	9.68	
			P03/04	Grassland	27.34	
			P03/05	Grassland	10.38	
			P05/01	Pond	5.52	
		Total				54.76
		Mutiara Estate	P00/01	River & Buffer Zone (RBA 7)	3.13	
			P00/01	Pond & Buffer Zone (Rba 12)	0.39	
			P03/01	River & Buffer Zone (RBA 7)	1.82	
			P03/01	Grassland (RBA 11)	4.57	
			P03/02	Grassland (RBA 11)	6.43	
			P16/01	Water Catchment & Buffer Zone (RBA 1)	1.21	
			P16/02	Water Catchment & Buffer Zone (RBA 1)	2.87	
			P18/04	River & Buffer Zone (RBA 3)	1.34	
			P18/04	River & Buffer Zone (RBA 3)	0.44	
			P20	River & Buffer Zone (RBA 3)	2.65	

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			<table border="1"> <tr> <td>P98/01</td> <td>Shrubland (Ex-Pond) (RBA 2)</td> <td>2.15</td> </tr> <tr> <td>P98/01</td> <td>Pond & Buffer Zone (RBA 2)</td> <td>0.81</td> </tr> <tr> <td>P04/01</td> <td>Pond & Buffer Zone (RBA 1)</td> <td>1.37</td> </tr> <tr> <td>P21</td> <td>Forest Strip (RBA 4)</td> <td>1.45</td> </tr> <tr> <td>P21</td> <td>Pond & Buffer Zone (RBA 3)</td> <td>0.43</td> </tr> <tr> <td>P21</td> <td>Vacant (RBA 6)</td> <td>1.68</td> </tr> <tr> <td colspan="2" style="text-align: center;">Total</td> <td>32.74</td> </tr> </table>	P98/01	Shrubland (Ex-Pond) (RBA 2)	2.15	P98/01	Pond & Buffer Zone (RBA 2)	0.81	P04/01	Pond & Buffer Zone (RBA 1)	1.37	P21	Forest Strip (RBA 4)	1.45	P21	Pond & Buffer Zone (RBA 3)	0.43	P21	Vacant (RBA 6)	1.68	Total		32.74	
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P21	Vacant (RBA 6)	1.68																							
Total		32.74																							
7.12.3	<i>Indicator is not applicable in Malaysia context</i>			Not Applicable																					
7.12.4	<p>(C) Where HCVs, HCS forests after 15 November 2018, peatland and other conservation areas have been identified, they are protected and/or enhanced. An integrated management plan to protect and/or enhance HCVs, HCS forests, peatland and other conservation areas is developed, implemented and adapted where necessary, and contains monitoring requirements. The integrated management plan is reviewed at least once every five years. The integrated management plan is developed in consultation with relevant stakeholders and includes the directly managed area and any relevant wider landscape level considerations (where these are identified).</p> <p>- Critical (Major) compliance -</p>	<p>The estates has established Biodiversity Improvement Plan. The plan was divided into immediate action plan and long term strategies. In the plan stated the action, completion date and person responsible.</p> <p>Reviewed the sampled implementation of the management plan as follows:</p> <ol style="list-style-type: none"> 1. The estates sampled continuously conducted animal sighting and reported to the Sustainability and Innovation Department on monthly basis. Reviewed the records for the month of May, June, July, August and September 2022. Among the animal sighted in the estate such as Jungle Fowl, Snake, Monitor Lizard, Hornbill, Crow, Fox, Kingfisher, Wild boar and owl. 2. The estates sampled conducted HCV monitoring on monthly basis. The monitoring covers the observation and action taken to address any issue sighted during the monitoring. Reviewed 		Complied																					

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		<p>the monitoring records for the month of May, June, July, August and September 2022</p> <p>The estates sampled has established buffer zone for main drain and river flow through the estates. The buffer zone was clearly demarcated with blue and white pole and blue and white rings at the palm trunks.</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>There was no rights of local communities been identified in HCV areas, HCS forest after 15/11/2018, peat land and other conservation areas.</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 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>The estates management continue to promote awareness on HCV/RTE to the workers during morning briefing and training. reviewed training records as follows:</p> <ol style="list-style-type: none"> 1. Spraying at HCV/buffer zone area training at Tereh Selatan Estate dated 09/02/2022 2. HCV and buffer zone training for sprayers at Mutiara Estate dated 04/02/2022, 16/04/2022 and 05/10/2022 3. HCV training for harvester at Mutiara Estate dated 21/02/2022 4. Prohibition of hunting Rare, Threatened and Endangered wildlife training dated 20/02/2022 <p>The estates visited has also erected signage on prohibition of capture, harm, collect or kill RTE species and placed at designated places. Sighted the signboard at several strategic places in the estates visited such as office compound, muster ground, housing area and HCV area.</p>	Complied
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>The audit findings have confirmed that there is no new HCVs, HCS forests peatland and other conservation areas been identified after 15/11/2018 in the 3 estates sampled.</p>	Complied

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	<p>- Minor compliance -</p>	<p>Monitoring of these areas are made through the daily field supervision by the field staff and executives.</p> <p>The estates sampled continuously conducted animal sighting and reported to the Sustainability and Innovation Department on monthly basis. Reviewed the records for the month of May, June, July, August and September 2022. Among the animal sighted in the estate such as Jungle Fowl, Snake, Monitor Lizard, Hornbill, Crow, Fox, Kingfisher, Wild boar and owl.</p>	
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>No land clearing without prior HCV assessment since November 2005, or without prior HCV-HCSA assessment since 15 November 2018 within Tereh POM and Supply Base.</p>	Complied

Appendix B: GHG Reporting Executive Summary

The GHG emissions that were produced in **2021** for Tereh POM and supply base was calculated using the PalmGHG Calculator version 3.0.1. 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 Tereh POM and supply base are as following:

Emission per product	tCO ₂ e/tProduct
CPO	0.67
PKO	0.67

Extraction	%
OER	20.88
KER	5.48

Production	t/yr
FFB Process	284,505.07
CPO Produced	59,392.41
PKO Produced	15,584.7

Land Use	Ha
OP Planted Area	24,639.24
OP Planted on peat	1,366.42
Conservation (forested)	49.58
Conservation (non-forested)	261.59
Total	26,316.83

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	155017.19	0.58	1704.27	0.55	9240.31	0.00	165961.77	-
CO ₂ Emission from fertilizer	12017.50	0.04	115.69	0.04	1208.10	0.00	13341.29	-
NO ₂ Emission	9887.14	0.04	151.30	0.05	798.74	0.26	10837.17	-
Fuel Consumption	5565.92	0.02	29.50	0.01	324.17	0.00	5919.59	-
Peat Oxidation	0.00	0.00	456.68	0.15	0.00	0.00	456.68	-
Sink								
Crop Sequestration	-146770.16	-0.55	-1600.15	-0.52	-8758.58	0.00	-157128.89	-
Conservation Sequestration	-428.37	-0.03	0.00	0.00	-3.58	0.00	-431.94	-
Total	35289.22	0.13	857.29	0.28	2809.16	0.00	38955.67	-

*Note: Includes both estates and smallholders

Summary of Mill Emission and Credit

	tCO ₂ e	tCO ₂ e/tFFB
Emission		
POME	44748.35	0.16
Fuel Consumption	816.04	0.00
Grid Electricity Utilization	0.00	0.00
Credit		
Export of Grid Electricity	-346.48	0.00
Sales of PKS	-34286.34	-0.12
Sales of EFB	0.00	0.00
Total	10931.57	0.04

Summary of Kernel Crusher Emission and Credit (if applicable)

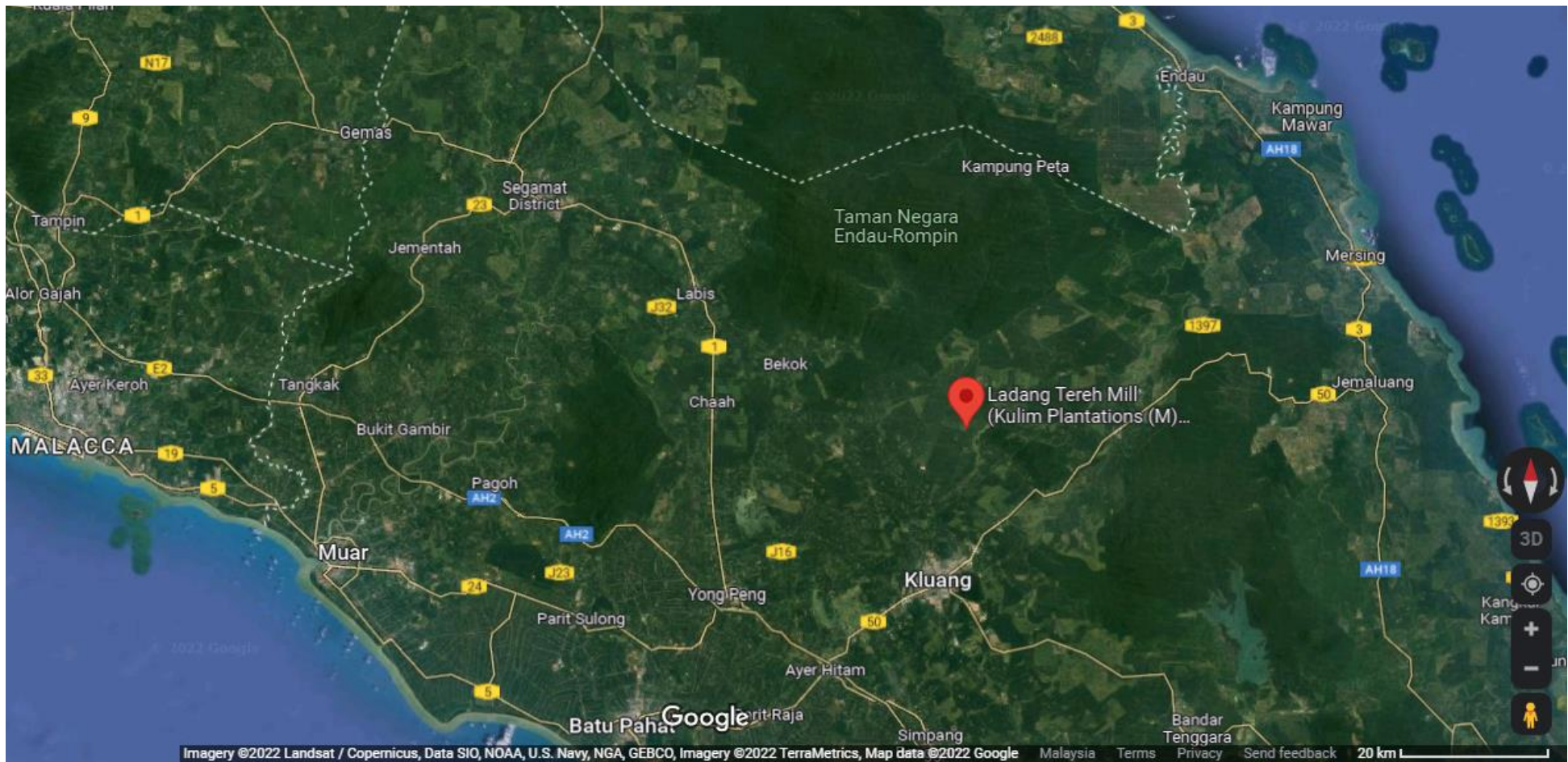
Emissions	tCO ₂ e
PK from own mill	0.00
PK from other source	0.00
Fuel Consumptions	0.00
Total Crusher emissions	0.00

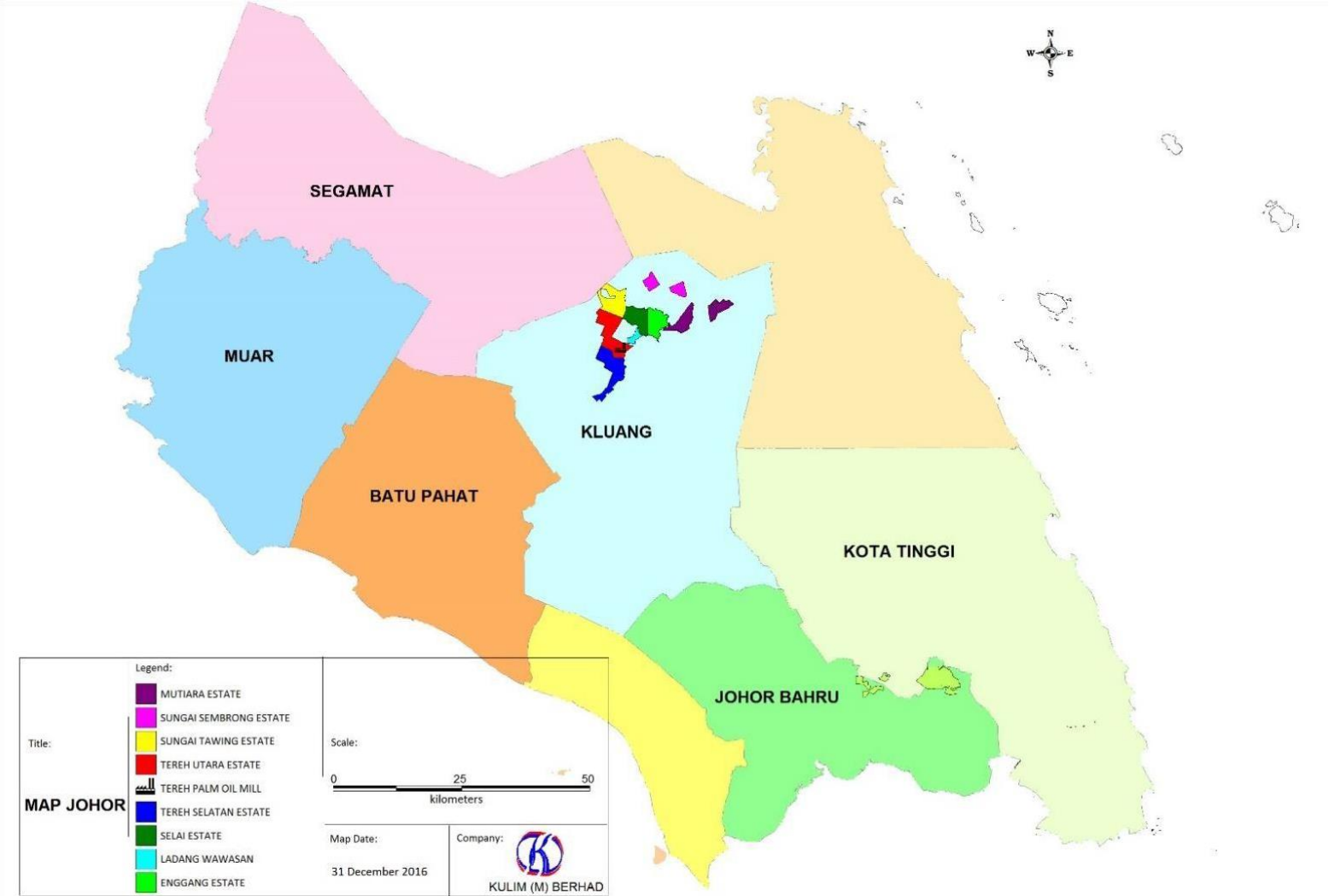
*This mill has no kernel crusher operation.

Palm Oil Mill Effluent (POME) Treatment:	
Divert to Compost (%)	11.00
Divert to anaerobic diversion (%)	89.00

POME Diverted to Anaerobic Digestion:	
Divert to anaerobic pond (%)	53.00
Divert to methane captured (flaring) (%)	45.00
Divert to methane captured (energy generation) (%)	2.00

Appendix C: Location Map of Certification Unit and Supply bases

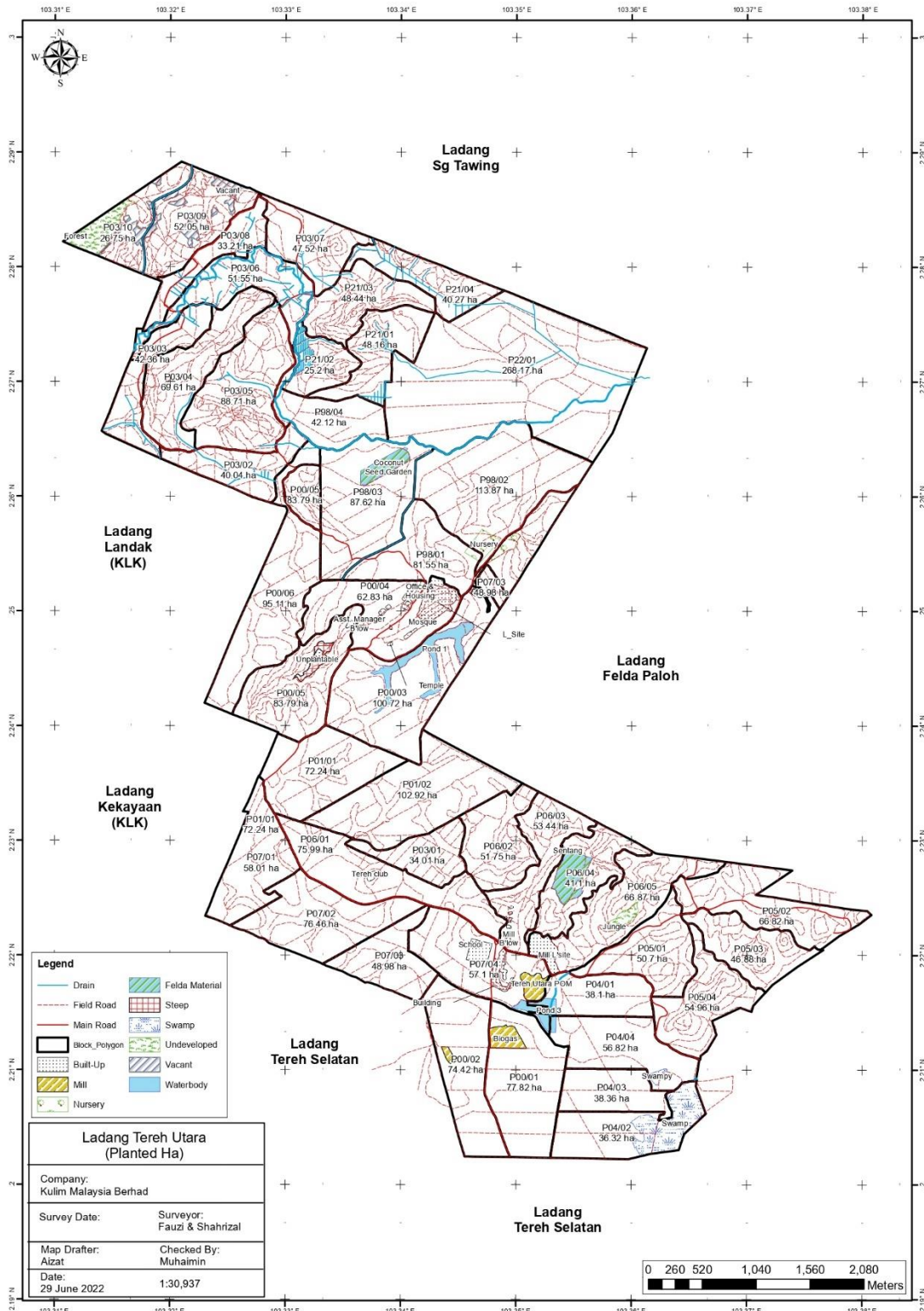




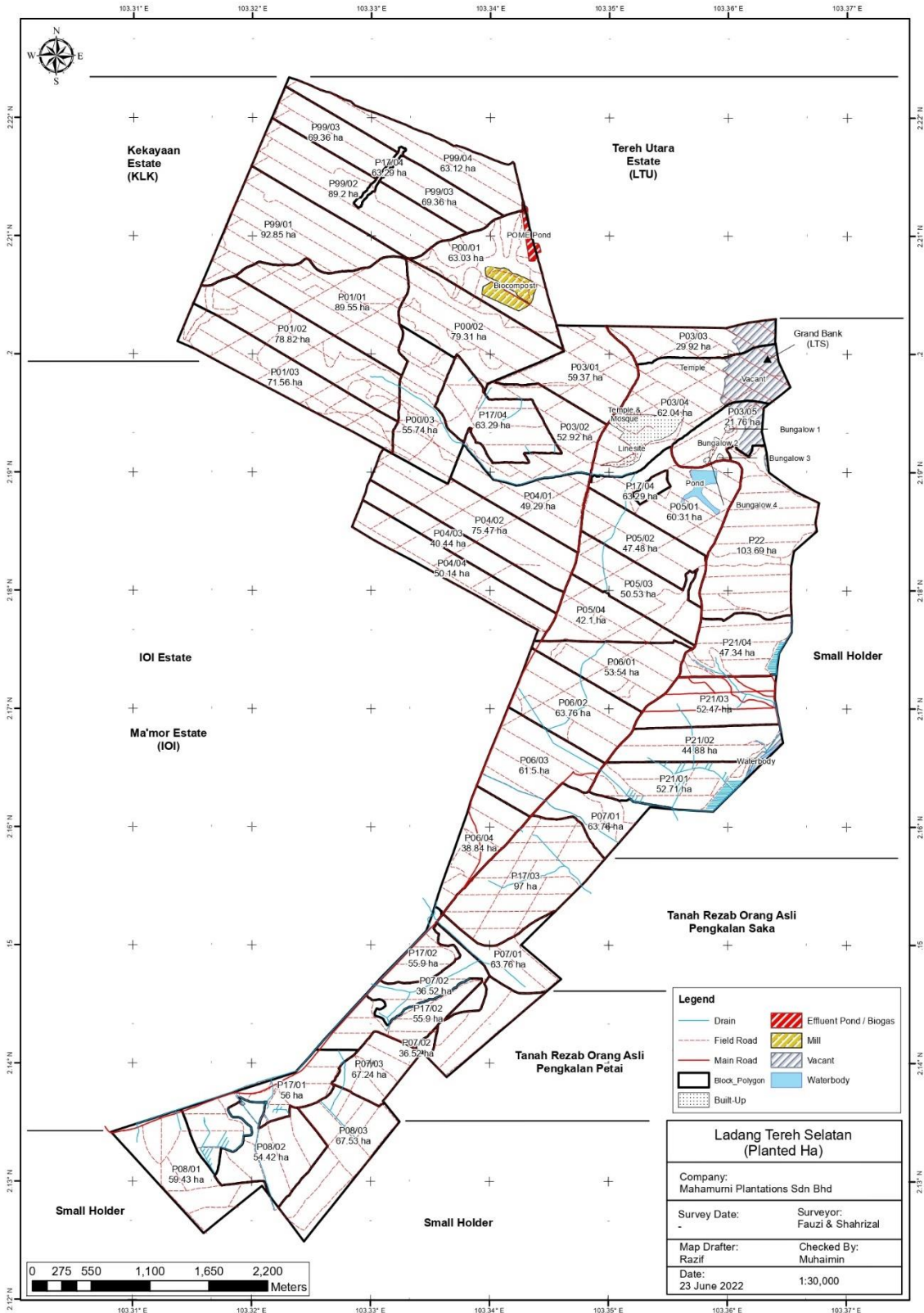
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Appendix D: Estate Field Map

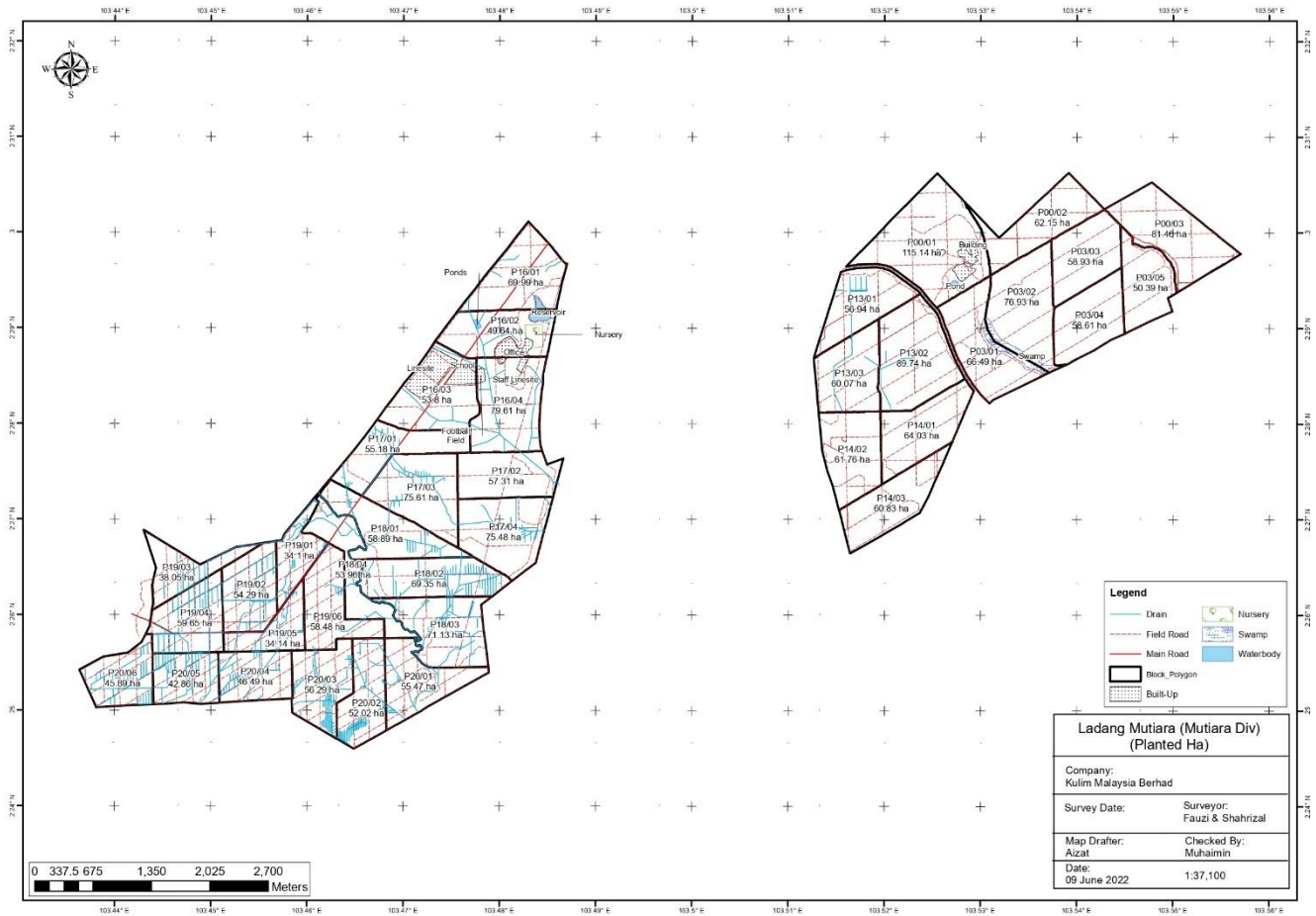
Tereh Utara Estate



Tereh Selatan Estate

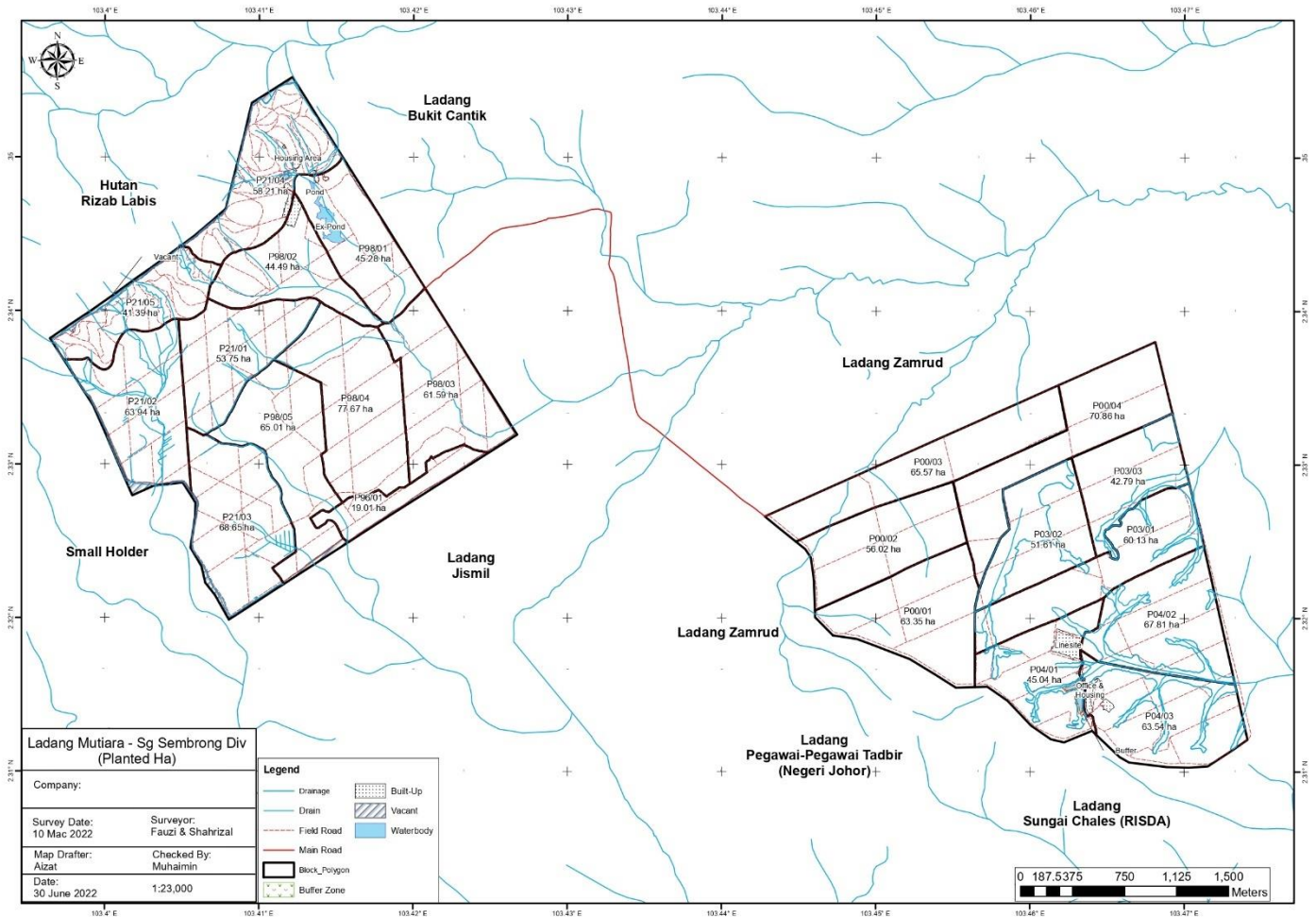


Mutiara Estate (Main Division)



RSPO P&C Public Summary Report
Revision 14 (Aug 2022)

Mutiara Estate (Sembrong Division)



Appendix E: List of Smallholder Registered and/or sampled

Not Applicable

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