

**RSPO PRINCIPLE AND CRITERIA
PUBLIC SUMMARY REPORT**

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

J.C. Chang Holdings Sdn Bhd
Client Company / Parent Company Address: Unit 30-01, Level 30, Menara Landmark, No. 12, Jalan Ngee Heng, 80000 Johor Bahru, Johor, Malaysia
Certification Unit: J.C Chang Holdings Sdn Bhd / Asia Production Unit
Location of Certification Unit: KM 45, Off Jalan Lahad Datu – Sandakan, 91100 Lahad Datu, Sabah, Malaysia
Date of Final Report: 02/04/2023

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Section 1: Scope of the Assessment

1. Company Details			
Parent Company	J.C. Chang Holdings Sdn Bhd		
RSPO Membership Number	2-0029-06-000-00	Membership Approval Date	10/05/2006
Address	Unit 30-01, Level 30, Menara Landmark, No. 12, Jalan Ngee Heng, 80000 Johor Bahru, Johor, Malaysia		
Palm Oil Mill / Group Manager / Estate (Certification Unit)	J.C. Chang Holdings Sdn Bhd / Asia Production Unit Asia Palm Oil Mill		
Location / Address	KM 45, Off Jalan Lahad Datu – Sandakan, 91100 Lahad Datu, Sabah, Malaysia		
Website	www.carotino.com		
Management Representative	Mr Seow Chee Chiang	E-mail	seowcc@jcc.com.my
Telephone	+607 223 1633 (Head Office) +6010 965 4828 (Mill)	Facsimile	+607 224 1546

2. Certification Information			
Certificate Number	RSPO 651278	Certificate Start Date	31/01/2023
Date of First Certification	31/01/2013	Certificate Expiry Date	30/01/2028
Scope of Certification	Production of Palm Oil and Palm Kernel		
Visit Objectives	To conduct a recertification 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 type="checkbox"/> Annual Surveillance Assessment (ASA Choose an item.) <input checked="" type="checkbox"/> Recertification Assessment (RA 2) <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 type="checkbox"/> Identity Preserved; <input checked="" 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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3. Other Certifications			
Certificate Number	Standard(s)	Certificate Issued by	Expiry Date
EU-ISCC-Cert-DE119-60213405	ISCC EU (International Sustainability and Carbon Certification)	SCS Global Services	20/12/2022*
50450981 MSPO3	MS2530-3 : 2013 General Principles For Oil Palm Plantations and Organised Smallholders	DQS Certification (M) Sdn Bhd	09/01/2026
50450207 MSPO4	MS2530-4 : 2013 General Principles for Palm Oil Mills	DQS Certification (M) Sdn Bhd	09/01/2026
50450207 MSPO SCCS	MSPO Supply Chain Certification	DQS Certification (M) Sdn Bhd	13/11/2025

Notes: * certificate was valid during onsite audit

4. Location(s) of Mill & Supply Bases			
Name (Mill / Supply Base)	Location	GPS Coordinates	
		Latitude	Longitude
Asia Palm Oil Mill	KM45 Off Jalan Lahad Datu-Sandakan, 91100 Lahad Datu, Sabah, Malaysia	5° 17' 34.01" N	118° 12' 24.54" E
Asia Oil Palm Estate Div.2	Sungai Tenegang, CL 095317383, Tenegang/Koyah, Kinabatangan, Sabah, Malaysia.	5° 18' 16.63" N	118° 11' 56.53" E
Melewar Estate Div.2	KM45, Jalan Lahad Datu-Sandakan, 91100 Lahad Datu, Sabah, Malaysia	5° 15' 58.70" N	118° 09' 35.99" E
Hwa Li Estate Div.3	KM45, Jalan Lahad Datu-Sandakan, 91100 Lahad Datu, Sabah, Malaysia	5° 20' 41.59" N	118° 18' 19.32" 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
Melewar Estate Div.2	1,770.41	-	252.99	2,023.40	87.49
Asia Oil Palm Estate Div.2	2,720.72	-	303.28	3,024.00	89.97
Hwa Li Estate Div.3	3,953.24	-	435.47	4,388.71	90.08
Total	8,444.37	-	991.74	9,436.11	89.49

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6. Plantings & Cycle						
Estate / Smallholders	Age (Years) - ha				Mature	Immature
	0 - 3	4 - 14	15 - 25	>25		
Melewar Estate Div. 2	588.88	-	-	1,181.53	1,181.53	588.88
Asia Oil Palm Estate Div.2	421.46	996.78	22.52	1,279.96	2,299.26	421.46
Hwa Li Estate Div.3	268.21	-	-	3,685.03	3,685.03	268.21
Total (ha)	1,278.55	996.78	22.52	6,146.52	7,165.82	1,278.55

Note: Only Mature area is considered as production area

7. Summary of Certified Tonnage of FFB (Own Certified Scope)				
Estate / Smallholders	Estimated last year (Jan 22 – Dec 22)	Tonnage (MT) / year		Forecast (Jan 23 – Dec 23)
		Actual (Dec 2021 – Oct 2022)		
		Previous license period (Dec 2021)	Current license period (Jan 2022 – Oct 2022)	
Asia Oil Palm Estate Div.2	38,700.00	2,936.81	27,707.65	41,116.89
Melewar Estate Div.2	21,239.00	1,730.09	18,342.35	25,849.81
Hwa Li Estate Div.3	62,596.00	5,802.74	44,546.04	63,726.35
Total	122,535.00	101,065.68		140,457.39

8. Summary of Certified Tonnage of FFB (from other certified unit(s))				
Estate / Smallholders	Estimated last year (Jan 22 – Dec 22)	Tonnage (MT) / year		Forecast (Jan 23 – Dec 23)
		Actual (Dec 2021 – Oct 2022)		
		Previous license period (Dec 2021)	Current license period (Jan 2022 – Oct 2022)	
Pahang Oil Palm Estate Div.2		1,819.25	22,417.80	21,999.96
Pahang Oil Palm Estate Div.3		1,075.74	11,276.23	1,876.35
Gerola Estate		-	-	1,396.85
Tye Yang Plantation SB		-	-	3,080.00
Melewar Estate 1		-	-	1,846.80
Total		36,589.02		30,199.96

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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 (Dec 2021 – Oct 2022)		Forecast (Jan 23 – Dec 23)
		Previous license period (Dec 2021)	Current license period (Jan 2022 – Oct 2022)	
Independent FFB Supplier / Outgrowers	-	1,691.37	16,659.76	-
Total	-	18,351.13		-

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	Dec 2021	13,364.63	1,691.37	15,056.00
2	Jan 2022	13,552.27	1,692.04	15,244.31
3	Feb 2022	10,894.82	1,236.65	12,131.47
4	Mac 2022	12,884.17	1,440.22	14,324.39
5	Apr 2022	12,902.45	1,463.78	14,366.23
6	May 2022	10,856.24	1,225.82	12,082.06
7	June 2022	13,515.06	1,571.30	15,086.36
8	July 2022	10,722.59	1,607.91	12,330.50
9	Aug 2022	12,660.61	2,146.30	14,806.91
10	Sept 2022	12,535.93	2,074.28	14,610.21
11	Oct 2022	13,765.93	2,201.46	15,967.39
TOTAL		137,654.70	18,351.13	156,005.83

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10. Summary of Certified Tonnage (MT) (not applicable for ISS)			
Estimated last year (Jan 22 – Dec 22)	Actual (Dec 2021 – Oct 2022)		Forecast (Jan 23 – Dec 23)
	Previous license period (Dec 2021)	Current license period (Jan 2022 – Oct 2022)	
FFB	FFB		FFB
122,535.00 mt	13,364.63 mt	124,290.07 mt	140,457.39 mt
	TOTAL	137,654.70 mt	
CPO (OER: 18.55 %)	CPO (OER: 20.40 %)		CPO (OER: 19.73 %)
22,730.25 mt	2,777.53 mt	25,303.62 mt	27,712.24 mt
	TOTAL	28,081.15 mt	
PK (KER: 4.64 %)	PK (KER: 5.01 %)		PK (KER: 5.29 %)
5,697.87 mt	695.07 mt	6,204.63 mt	7,430.19 mt
	TOTAL	6,889.10 mt	

Note: There has been an over production of CPO, PK and FFB. It was verified that Asia POM have not informed the CB on the overproduction of the certified tonnage despite the volume already surpassing the forecast provided as of the time of audit. Hence a Critical Non-Conformity was raised under indicator 3.8.7. CPO, PK and FFB extension request for the month of October 2022 to December 2022 has been sent to CB on 02/12/2022 by management representative, Mr. Wong Chun Wei. The volume extension for Asia Palm Oil Mill has been approved by RSPO via email dated 13/12/2022. Total of FFB volume including 3 months extension recorded at 157,000 mt as shown below.

Period	CPO	PK	FFB
Original Forecast	22,730.25	5,697.87	122,535.00
Extended Volumes	9,269.75	2,302.13	34,465.00
Total Volume	32,000.00	8,000.00	157,000.00

10A. Monthly Records of Certified CPO & PK since the last audit			
No.	Month - Year	Certified CPO (MT)	Certified PK (MT)
1	Dec 2021	2,777.53	695.07
2	Jan 2022	2,742.16	740.97
3	Feb 2022	2,170.23	566.04
4	Mac 2022	2,594.30	705.37
5	Apr 2022	2,692.68	685.69
6	May 2022	2,145.53	541.61
7	June 2022	2,760.46	688.66
8	July 2022	2,124.53	508.66
9	Aug 2022	2,606.47	568.54
10	Sept 2022	2,554.78	590.88

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11	Oct 2022	2,912.48	608.21
TOTAL		28,081.15	6,899.10

11. Summary of Actual Volume sold					
Current License period (Jan 2022 – Oct 2022)					
	RSPO Certified	Other Schemes Certified		Conventional	Total
		ISCC	Others		
CPO (MT)	11,459.78	-	-	12,422.25	23,882.02
PK (MT)	5,910.06	-	-	233.48	6,143.54
Credits	-	-	-	-	-
Previous License period (Dec 2021)					
CPO (MT)	1,558.37	-	-	1,094.62	2,652.99
PK (MT)	535.65	-	-	55.31	590.96
Credits	-	-	-	-	-

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

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.	XXX	TR-bac44ca0-78ea	1,514.91	-
2.	XXX	TR-584ff87a-d627	43.46	-
3.	XXX	TR-ac421a0f-809f	974.21	-
4.	XXX	TR-e947c5ad-99da	285.09	-
5.	XXX	TR-b4097086-ed7c	1,151.41	-
6.	XXX	TR-38051f14-6a86	25.79	-
7.	XXX	TR-1206644d-736c	1,358.40	-
8.	XXX	TR-4111fa22-a1ab	198.59	-
9.	XXX	TR-dcd7b94a-9037	25.46	-
10.	XXX	TR-4439c9c0-090c	41.60	-
11.	XXX	TR-b1ddd05e-de8f	1,086.36	-
12.	XXX	TR-30685120-eb3e	971.12	-
13.	XXX	TR-fbd6208e-d9f5	113.64	-
14.	XXX	TR-a3dcd49d-3a20	78.88	-
15.	XXX	TR-c7925c6c-f527	1,353.91	-
16.	XXX	TR-ca83eb1b-b307	746.43	-

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17.	XXX	TR-adabd3bd-7997	346.09	-
18.	XXX	TR-605c03f5-8437	767.42	-
19.	XXX	TR-e81e444b-ab13	653.57	-
20.	XXX	TR-dada8271-c969	549.23	-
21.	XXX	TR-82811dc2-9828	732.58	-
22.	XXX	TR-1ef61a26-82e0	-	428.30
23.	XXX	TR-b77c6de3-e18a	-	107.35
24.	XXX	TR-f0c849c5-1bda	-	409.82
25.	XXX	TR-ce84753e-4915	-	321.70
26.	XXX	TR-2e47000a-b7f2	-	527.46
27.	XXX	TR-803c6888-5316	-	40.18
28.	XXX	TR-3bcecf73-5e24	-	341.39
29.	XXX	TR-d9584f46-73db	-	272.54
30.	XXX	TR-ba8fb031-b25c	-	451.94
31.	XXX	TR-00bf04d2-4d8a	-	258.61
32.	XXX	TR-3f31cc3b-0ec9	-	248.06
33.	XXX	TR-acd204e1-9ea0	-	265.28
34.	XXX	TR-4eec9105-7420	-	284.72
35.	XXX	TR-1c894r54-85b6	-	460.29
36.	XXX	TR-b58cdc4e-bd2b	-	39.71
37.	XXX	TR-ceece37a-46bd	-	449.91
38.	XXX	TR-ca772d57-869c	-	250.09
39.	XXX	TR-5c86420f-b609	-	313.98
40.	XXX	TR-ead21ab1-764c	-	254.90
41.	XXX	TR-b7b41160-1341	-	236.02
42.	XXX	TR-77c43da3-c801	-	238.36
43.	XXX	TR-9c57f0d7-3a22	-	245.10
TOTAL			13,018.15	6,445.71

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			-	-

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11C. Records of CPO & PK Sold as conventional since the last audit (if any)			
No.	Buyers Name	CPO Sold (MT)	PK Sold (MT)
1	XXX	13,516.87	288.79
TOTAL		13,516.87	288.79

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 (Not applicable)			Actual (Not applicable)			Forecast (Not applicable)		
	Eligibility	MS A	MS B	Eligibility	MS A	MS B	Eligibility	MS A	MS B
	40%	70%	100%	40%	70%	100%	40%	70%	100%
FFB			-			-			-
IS-CSPO	-	-		-	-		-	-	
IS-CSPKO	-	-		-	-		-	-	
IS-CSPKE	-	-		-	-		-	-	
CSPK	-	-		-	-		-	-	

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: only applicable for ISH

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13. Independent Smallholders Actual Sold Tonnage / Volume							
	FFB	FFB Conventional	FFB Other schemes	IS-CSPO	CSPK	IS-CSPKO	IS-CSPKE
Current License period							
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: only applicable for ISH							

Section 2: Assessment Process

Certification Body:

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

BSI is a leading global provider of management systems assessment and certification, with more than 92,000 certified locations and clients in over 193 countries. BSI is the UK's National Standards Body. BSI provides independent, third-party certification of management systems. BSI is ASI Accredited (ASI-ACC-067) to conduct RSPO assessment since 31/10/2014 with accredited office located at Kuala Lumpur, Malaysia.

2.1 Assessment Methodology, Programme, Site Visits

The on-site assessment was conducted on **28/11/2022 – 01/12/2022**. The audit programme is included as Section 2.3. Prior to the initial certification and recertification audit, 30 days Public Notification was made through the RSPO and BSI website on **17/10/2022** via website <https://www.rspo.org/certification/public-announcement>.

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

The Critical NC close out on-site assessment was conducted on **20/02/2023**. The audit programs are included in Section 2.3.

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

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

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

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

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

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

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

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

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

Assessment Program					
Name (Mill / Supply Base)	Year 1 (Recertification 2)	Year 2 (ASA2_1)	Year 3 (ASA2_2)	Year 4 (ASA2_3)	Year 5 (ASA2_4)
Asia Palm Oil Mill	✓	✓	✓	✓	✓
Asia Oil Palm Estate Div.2	✓	✓	✓	✓	✓
Melewar Estate Div.2	✓	✓	✓	✓	✓
Hwa Li Estate Div.2	✓	✓	✓	✓	✓

Tentative Date of Next Visit: November 27, 2023 - November 30, 2023

Total Number of Mandays: 12 Mandays

2.2 BSI Assessment Team

Name	Role	Competency
Vijay Kanna Pakirisamy (VKP)	Team Leader	<p>Education: Holds a Bachelor’s Degree in Agribusiness Science Management with Honours from University Utara Malaysia</p> <p>Work Experience: He has 10 years’ experience in Oil Palm Estate Management in leading Oil Palm Companies such as KL Kepong Bhd, IOI Plantations and United Plantations. The last position held was Senior Assistant Manager. His experience includes the day-to-day estate operations and ensured the implementation of RSPO, ISCC and MSPO certification. He has been an sustainable palm oil auditor since 2019.</p> <p>Training attended: He has completed ISO IMS 9001, 14001, 45001(OHS 18001) Lead Auditor Course, Endorsed RSPO P&C Lead Auditor Course, Endorsed RSPO SCCS Lead Auditor Course, Endorsed MSPO Lead Auditor Course, HCV & HCS Introductory Training, SMETA Requirements Training, RSPO Independent Smallholder (IHS) Auditor Training, and Endorsed RSPO P&C Refresher Trainings.</p> <p>Aspect covered in this audit: During this assessment, he assessed on the aspects of Occupational, Health & Safety, Estate Best Practises and RSPO Supply Chain Requirements.</p> <p>Language proficiency: He is fluent in English, Bahasa Malaysia, Tamil.</p>
Mohd Nur Amin bin Mohd Halim (MNA)	Team Member	<p>Education: Holds a Diploma in Office Management & Technology, UiTM</p> <p>Work Experience: He has more than 6 years working experience as a sustainability practitioner in palm oil plantation, mainly handling operational</p>

		<p>excellence, environment & safety and health at the upstream and downstream operations. He has more than 3 years of auditing experience with accredited certification body for several schemes include MSPO and ISCC. He was also the document controller and scheme coordinator for MSPO (OPMC and SCCS) accreditation.</p> <p>Training attended: He has completed Exemplar IMS (9001, 14001 & 45001) Lead Auditor Course, SA 8000 Auditor Course, Endorsed MSPO SCCS Lead Auditor Course, Endorsed MSPO Lead Auditor Course, Endorsed ISCC Waste and Residue Course, HCV & HCS Course, Endorsed ISCC Basic & PLUS Course, CQI & IRCA ISO 14001:2015 Lead Auditor Course and Endorsed RSPO P&C Lead Auditor Course.</p> <p>Aspect covered in this audit:</p> <p>During this audit, he covered Policy and commitment, Social requirements, contract agreement, human rights, workers' welfare, smallholder welfare, Stakeholder Consultation, Legal Requirements and land & Legal issue.</p> <p>Language proficiency: Fluent English and Bahasa Malaysia</p>
<p>Hafriazhar Mohd Moktar (HMM)</p>	<p>Team Member</p>	<p>Education: Holds a Bachelor of Engineering (Hons.) Chemical Engineering, University Technology Malaysia</p> <p>Work Experience: He has 20 years of working experience in multiple engineering disciplines emphasized on science, technology and sustainability. He acquired many skills from being involved in various industrial environments ranging from construction, plantation and mining before auditing. In summary, he started his career as Environmental Officer (2002-2003) in construction, Mill Engineer (2003-2008) in palm oil mill, Project Control Engineer (2008-2011) in mining and Auditor (2011-present) with accredited certification bodies.</p> <p>Training attended: He has completed Social Auditing & SMETA Training, HCV & HCS Introductory Training, ISO 45001 Lead Auditor Training, MSPO Lead Auditor Training, Endorsed RSPO SCCS Lead Auditor Training, Endorsed RSPO P&C Lead Auditor Training, ISO 9001 Lead Auditor Training, ISO 50001 Lead Auditor Training, ISO 14001 Lead Auditor Training and Endorsed RSPO Refresher Training.</p> <p>Aspect covered in this audit: During this assessment, he assessed on the aspects of Environment, HCV, GHG and estate best practises.</p> <p>Language proficiency: Fluent in English and Bahasa Malaysia</p>
<p>Mohamed Hidhir bin Zainal Abidin (MHZ)</p>	<p>Team Member</p>	<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 Labor 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, SMETA Requirements Training, Endorsed RSPO Independent Smallholder (IHS) Auditor Training and Endorsed RSPO Refresher Training.</p>

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		<p>Aspect covered in this audit: During this assessment, he verified the Critical Non-Conformities that were raised.</p> <p>Language proficiency: He is fluent in Bahasa Malaysia and English languages.</p>
<p>Dr Suhaili Bin Sahari</p>	<p>Peer Reviewer</p>	<p>Education: Graduated from University Technology Mara (UiTM), Malaysia in Diploma in Science in 1990. He furthers his first degree in B.Sc (Hons) in Chemistry with Industrial Chemistry in 1995 from Liverpool University, England. He later advances his study in Master in Business Administration (General) in 2002 and graduated in 2005 from University of Multimedia, Malaysia. Completed his PhD from University Science Islam Malaysia (Faculty of Economy and Muamalat - Management) under the supervision of previous University Vice Chancellor Dato' Mohd Muda.</p> <p>Work Experience: Worked with Hong Leong Group of Companies as a production executive cum TQM facilitator and continues to advance in his career as a manager and senior manager in management, production, training and quality for more than 11 years. During his tenure with Hong Leong Group of Companies, he heavily involved in strategic management decision issues such as developing SWOT analysis, Vision, Mission, Business and Corporate Strategy formulation, Acquisition and restructuring strategies. Strategic actions and implementation etc. Then he joint Kumpulan Guthrie and Sime Darby Group of Companies for more than 7 years as a manager, heads of department and Assistant Vice President in management, quality and training. Part of his duty is to strategies the departmental vision; mission, critical success factors and action plan into actions and support the corporate strategic plan.</p> <p>Training attended:</p> <ol style="list-style-type: none"> 1) ISO 9001:2015 Lead Auditor and Internal Auditor 2) Occupation Health & Safety 3) ISO 14001:2015 Standard 4) RSPO Standards: RSPO P&C 2018 MY-NI 2019 5) MSPO Standards: MS 2530:2013 part 1, 2 , 3 and 4 6) Problem Solving Technique: 8 D, ICC, QCC, Systematic PS 7) HACCP MS 1480:2019 8) GAP Standard: Global GAP, Euro GAP 9) ASI Peer Reviewer training

Accompanying Persons:

Name	Role
-	-

2.3 Assessment Plan

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

Date	Time	Subjects	VKP	MNA	HMM
Sunday, 27/11/2022	1020 - 1310	Auditors travel from Kuala Lumpur to Sandakan, Sabah.	✓	✓	✓
Monday, 28/11/2022	0900 - 0930	Opening Meeting: - Opening Presentation by Audit Team Leader. - Confirmation of assessment scope and finalize Audit plan (including stakeholder's consultation).	✓	✓	✓
	0930 - 1230	Asia Oil Palm Estate Div. 2 Field visit, boundary inspection, field operations, staff & workers interview, buffer zone, HCV area, IPM implementation, OSH & ERP, workshop, storage area (agrochemical, fertilizer, lubricant etc), agrochemical mixing area, 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	✓	✓	✓
Tuesday, 29/11/22	0900 - 1230	Asia 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	✓	✓	✓

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Date	Time	Subjects	VKP	MNA	HMM
Wednesday 30/11/2022	0900 - 1230	Hwa Li Estate Div.3 Field visit, boundary inspection, field operations, staff & workers interview, buffer zone, HCV area, IPM implementation, OSH & ERP, workshop, storage area (agrochemical, fertilizer, lubricant etc), agrochemical mixing area, 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	✓	✓	✓
Thursday 01/12/2022	0900 - 1230	Melewar Estate Div.2 Field visit, boundary inspection, field operations, staff & workers interview, buffer zone, HCV area, IPM implementation, OSH & ERP, workshop, storage area (agrochemical, fertilizer, lubricant etc), agrochemical mixing area, 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	✓	✓	✓
	1700	Auditors Travel to Sandakan, Sabah.	✓	✓	✓
Friday 02/12/2022	0750 - 1045	Auditors travel from Sandakan, Sabah to Kuala Lumpur.	✓	✓	✓

CRITICAL NON-CONFORMITY VERIFICATION ASSESSMENT

Date	Time	Subjects	MHZ
Monday, 20.02.2023	0900 – 0930	Opening Meeting at Asia Palm Oil Mill: - Opening Presentation by Audit Team Leader. - Confirmation of assessment scope and finalize Audit plan	✓
	0930 – 1230	1. Verification on Critical NC: <ul style="list-style-type: none"> • 2263996-202210-M1 • 2263996-202210-M2 2. Site observation, workers/ SCCS team interview 3. Document review – implemented evidence	✓
	1230 – 1300	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	The Group has achieved 100% RSPO certification for all existing Operating Units under the management of JC Chang Group at ended year of 2021 which the remaining Operation Units from Takon Production Unit namely Muis Melewar Plantation 1, Muis Melewar Plantation 2 and Pelita Estate had undergone audit on 6-10/12/2021 and recommended for certification under Melewar Production Unit. However, recently JC Chang Group have purchased properties from a RSPO certified company i.e TSH Resources Berhad namely Lahad Datu Palm Oil Mill, Ong Yah Ho Estate and Gomantong Estate. Takeover process was carried out on 23 rd February 2022 for Lahad Datu Palm Oil Mill and Ong Yah Ho Estate (currently known as Sharikat Keratong Sdn. Bhd., Hwa Li 2) whereas for Gomantong Estate (currently known as Gomantong Division as one of Hwa Li 2 division) was on 25 th April 2022. Disclosure form has been submitted to RSPO on 26 th September 2022 and these estates will go for RSPO certification after approval by RSPO.	Complied
Have there been any new acquisitions? If yes, the new acquisitions shall be certified within three (3) years from the date of acquisition. Certification plan for the new acquisition shall be available. 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. Recently JC Chang Group have purchased properties from a RSPO certified company i.e TSH Resources Berhad namely Lahad Datu Palm Oil Mill, Ong Yah Ho Estate and Gomantong Estate. Takeover process was carried out on 23 rd February 2022 for Lahad Datu Palm Oil Mill and Ong Yah Ho Estate (currently known as Sharikat Keratong Sdn. Bhd., Hwa Li 2) whereas for Gomantong Estate (currently known as Gomantong Division as one of Hwa Li 2 division) was on 25 th April 2022. Disclosure form has been submitted to RSPO on 26 th September 2022 and these estates will go for RSPO certification after approval by RSPO.	Complied

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Any deviations from the maximum periods requires approval by the RSPO Secretariat.	There have no any deviations from the maximum periods requires approval by the RSPO Secretariat.	Complied
Have there been any changes to the time-bound plan since the last audit (both new acquisition and existing)? If yes, justification is required. Is this consistent with the ACOP reporting?	Changes involved the newly acquired properties of Lahad Datu Palm Oil Mill, Hwa Li 2 Main Division and Gomantong Division. Yes this is consistent with ACOP Reporting 2021.	Complied
Have there been any isolated lapses in implementation of the plan? If yes a Minor non-compliance shall be raised	No isolated lapses in implementation of the plan.	Complied
Have there been any fundamental failure (e.g. unable to justify delay in planning the assessments) to proceed with implementation of the plan? If yes a Major non-compliance shall be raised	No fundamental failure in implementation of the plan.	Complied
Un-Certified Units or Holdings		
No replacement of primary forest or any area required to maintain or enhance HCVs and HCS in accordance with RSPO P&C criterion 7.12.	As of to date there are 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. Carotino/JC Chang.	Complied
Any new plantings since January 1 st 2010 shall comply with the RSPO New Plantings Procedure.	No new development since January 1 st 2010	Complied
Any Land conflicts are being resolved through a mutually agreed process, such as RSPO Complaints System or Dispute Settlement Facility, in accordance with RSPO P&C criteria 4.4, 4.5, 4.6, 4.7 and 4.8.	No land conflict as per interview with stakeholder and document verification. RaCP concept note have approved by RSPO and the Group have restructure Takon Production Unit to include the remaining Operation Units from Takon Production Unit namely Muis Melewar Plantation 1, Muis Melewar Plantation 2 and Pelita Estate to Melewar Production Unit.	Complied
Any Labor disputes are being resolved through a mutually agreed process, in accordance with RSPO P&C criterion 4.2	No labour dispute reported.	Complied
Any Legal non- compliance is being addressed through measures consistent with the requirements of RSPO P&C criteria 2.1	No legal non-compliance reported and found during the onsite audit.	Complied
Did the company conduct internal audit for those uncertified estates against the uncertified management units requirement and covering the RSPO P&C criterion 2.1 4.2, 4.4, 4.5, 4.6, 4.7, 4.8 and 7.12? If yes, a positive assurance statement shall be available and justified.	Yes. Internal audit conducted with findings highlighted for site further improvement. Internal audit report and management review are available at each respective estate and mill. As for the uncertified management unit, the latest audit was carried out on 13-15/06/2022. Positive assurance can be seen as no negative recommendation made on the issue under clause 2.1 4.2, 4.4, 4.5, 4.6, 4.7, 4.8 and 7.12.	Complied

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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>Yes. Stakeholder Consultation has been conducted annually at each operating unit including uncertified units. Uncertified units are referring to Lahad Datu Palm Oil Mill, Hwa Li 2 Division (previously known as Ong Yah Ho Estate) and Gomantong Division (previously known as Gomantong Estate). Date of consultation : 21st to 24th October 2022.</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

SUSTAINABILITY ASSESSMENT PROGRAMME (TIME BOUND PLAN) FOR FINANCIAL YEAR 2022/23.

Production Unit	Type of Certification Obtained	Type of Sustainability Assessment / Date Planned For Audit		
		RSPO	ISCC	MSPO
<u>Carotino Production Unit</u> Carotino Palm Oil Mill Asia Oil Palm Estate 1 Pahang Oil Palm Estate 1 Maran Estate Hwa Li Estate 1 Carotino Estate	RSPO, ISCC, MSPO	03-06/01/2022	21-24/08/2022	08-11/08/2022
<u>Asia Production Unit</u> Asia Palm Oil Mill Asia Oil Palm Estate 2 Melewar Estate 2 Hwa Li Estate 3	RSPO, ISCC, MSPO	28/11-1/12/2022	12-14/12/2022	03-06/10/2022
<u>Melewar Production Unit</u> Melewar Palm Oil Mill Gerola Estate Tye Yang Estate Melewar Estate 1 Pahang Oil Palm Estate 2 Pahang Oil Palm Estate 3 Pelita Estate Muis Melewar Plantation 1 Muis Melewar Plantation 2	RSPO, ISCC, MSPO	05-09/12/2022	27-30/03/2023	13-16/03/2023

Remarks,

The Group has achieved 100% RSPO certification for all existing Operating Units under the management of JC Chang Group at ended year of 2021 which the remaining Operation Units from Takon Production Unit namely Muis Melewar Plantation 1, Muis Melewar Plantation 2 and Pelita Estate had undergone audit on 6-10/12/2021 and recommended for certification under Melewar Production Unit. However, recently JC Chang Group have purchased properties from a RSPO certified company i.e TSH Resources Berhad namely Lahad Datu Palm Oil Mill, Ong Yah Ho Estate and Gomantong Estate. Takeover process was carried out on 23rd February 2022 for Lahad Datu Palm Oil Mill and Ong Yah Ho Estate (currently known as Sharikat Keratong Sdn. Bhd., Hwa Li 2) whereas for Gomantong Estate (currently known as Gomantong Division as one of Hwa Li 2 division) was on 25th April 2022. Disclosure form has been submitted to RSPO on 26th September 2022 and these estates will go for RSPO certification after approval by RSPO.

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 Two (2) Critical; Two (2) Minor nonconformities and Four (4) Opportunity For Improvement raised. The Asia Production Unit submitted Corrective Action Plans for the nonconformity. Corrective action plans with respect to the nonconformity was reviewed by the BSI audit team and accepted.

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

Non-conformity			
NCR Ref #	2281103-202212-M1	Issued Date	01/12/2022
Due Date	30/02/2023	Closure Date	22/02/2023
Indicator & Category (Critical / Minor)	3.6.1 (Critical)		
Statement of Nonconformity:	Hazards were not effectively identified and controlled.		
Requirement Reference:	All operations are risk assessed to identify H&S issues. Mitigation plans and procedures are documented and implemented.		
Objective Evidence:	Asia POM 1. During the site visit to the Boiler Station, it was seen that 2 shovels were in motion without reverse siren. The hazards and risk controls related to this operation were not fully identified and assessed in the HIRARC. 2. During the site visit to the FFB Ramp it was sighted that the FFB graders were wearing Gardener Hats. This was not in line with the HIRARC for Grading which states; Suitable PPE is provided: Safety Helmet & Gardener Hat.		
Corrections:	1. Person responsible for monitoring HIRARC (Hazard Identification, Risk Assessment & Risk Control) was appointed to ensure all hazards and risk controls in the mill are properly captured. 2. Mill has prepared a Safety Operation Procedures for Vehicle (Doc. No. Millvehicle ORA2022 dated 30 th November 2022) to cover safety aspects of mill vehicle operations. 3. Mill Vehicle Management Briefing and Training was carried out immediately to all related workforce on 30 th November 2022. 4. Mill has submitted Purchase Order dated 29 th November 2022 on the list of materials for the purpose of repairing of the shovel’s faulty equipment and the issues have been rectified on 9 th December 2022. 5. Interview with workers to review the FFB Grading HIRARC and FFB Grader Training and Briefing (Safety & Use of PPE) were carried out on 30 th November 2022. 6. Person responsible for monitoring of PPE (Personal Protective Equipment) at Grading Station was appointed to ensure the issuance, maintenance and implementation of PPE for FFB Graders are in line with the HIRARC requirement.		

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Root Cause Analysis:	Review of mill HIRARC was not comprehensive to cover all work activity in the mill. The implementation of mill HIRARC was not properly adhered due to miscommunication between management and the workers.
Corrective Actions:	<ol style="list-style-type: none"> 1. Mill to review existing mill HIRARC to ensure all work activities in the mill are properly captured and addressed. 2. Mill to follow all risk control available in the HIRARC without fail. 3. All records of mill vehicle inspection and repair to be kept properly. Operation of any damaged vehicle will be stop temporarily until the issues have been rectified. 4. Mill to immediately review HIRARC should there is any new activity/process/changes in operation. 5. All record of related documentation to be kept accordingly.
Assessment Conclusion:	<p><u>Critical NC Onsite Close Out Verification</u></p> <ol style="list-style-type: none"> 1. Appointment of person in charge for monitoring of HIRARC dated 30/11/2022 was sighted. Details of duties and responsibilities as person in charge clearly written in the appointment letter. 2. Safety Operation Procedures for Vehicle (Doc. No. Millvehicle ORA2022 dated 30/11/2022 was verified. Related safety precaution for vehicle operation and maintenance detailed out in the SOP. 3. Vehicle Management Briefing and Training was carried out immediately to all related workforce on 30/11/2022. Related training records were made available for verification. 4. Purchase Order dated 29/11/2022 on the list of materials for the purpose of repairing of the shovel's faulty equipment and the issues have been rectified on 9th December 2022. Inspection was carried during site visit and found all safety features for shovel are fully functional. 5. FFB Grading HIRARC and FFB Grader Training and Briefing (Safety & Use of PPE) were carried out on 30/11/2022. Related records for briefing was made available for verification. 6. Person responsible for monitoring of PPE (Personal Protective Equipment) at Grading Station was appointed to ensure the issuance, maintenance and implementation of PPE for FFB Graders are in line with the HIRARC requirement. Refer to appointment letter dated 30/11/2022. 7. To ensure all activities and operations capture under HIRARC, quarterly safety meeting is used for frequent review process. One of mandatory agenda pertaining to HIRARC has been included beginning the first quarterly safety meeting for 2023. Meeting of meeting dated 01/02/2023 was sighted and included HIRARC review for first quarter of 2023. 8. Vehicle inspection and repair records for prime movers were sighted. Log book/sheet of shovel repair request was sighted. Latest repair recorded on 18/01/2023 due to problem with starter and rectified on 20/01/2023. Preventive maintenance programme was sighted and related maintenance records were properly kept for reference. 9. HIRARC register, latest review on 16/01/2023 was sighted. Specific HIRARC for vehicle operation and loading ramp activities were included in the register. Risk rating and control measure clearly determined to ensure properly control were in place.

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	Implemented corrective action found to be sufficient to close the major NC effectively on 22/02/2023. Continuous implementation will be further verified in the next assessment.
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Non-conformity															
NCR Ref #	2281103-202212-M2	Issued Date	01/12/2022												
Due Date	30/02/2023	Closure Date	22/02/2023												
Indicator & Category (Critical / Minor)	3.8.7 (Critical)														
Statement of Nonconformity:	Mill has not informed CB on projected overproduction of certified tonnage.														
Requirement Reference:	Purchasing and Goods In ii. The mill shall inform the CB immediately if there is a projected overproduction of certified tonnage.														
Objective Evidence:	<p>There has been an over production of CPO, PK and FFB as stated in the table below.</p> <table border="1" style="width: 100%; border-collapse: collapse; text-align: center;"> <thead> <tr> <th>Period</th> <th>CPO</th> <th>PK</th> <th>FFB</th> </tr> </thead> <tbody> <tr> <td>Forecast (Jan 22 – Dec 22)</td> <td>22,730.25</td> <td>5,697.87</td> <td>122,535.00</td> </tr> <tr> <td>Actual Produced (Jan 22 – Oct 22)</td> <td>25,303.62</td> <td>6,204.62</td> <td>124,290.10</td> </tr> </tbody> </table> <p>It was verified that Asia POM have not informed the CB on the overproduction of the certified tonnage despite the volume already surpassing the forecast provided.</p>			Period	CPO	PK	FFB	Forecast (Jan 22 – Dec 22)	22,730.25	5,697.87	122,535.00	Actual Produced (Jan 22 – Oct 22)	25,303.62	6,204.62	124,290.10
Period	CPO	PK	FFB												
Forecast (Jan 22 – Dec 22)	22,730.25	5,697.87	122,535.00												
Actual Produced (Jan 22 – Oct 22)	25,303.62	6,204.62	124,290.10												
Corrections:	Email to request CPO, PK and FFB extension for the month of October 2022 to December 2022 has been sent to CB on 2 nd December 2022 by management representative, Mr. Wong Chun Wei. The volume extension for Asia Palm Oil Mill has been approved by RSPO via email dated 13 th December 2022.														
Root Cause Analysis:	Person responsible on documentation was not fully aware on the overproduction of CPO & PK where no specific indication of notification to CB in mill procedure.														
Corrective Actions:	<ol style="list-style-type: none"> 1. Mill to review the SOP of MB methodology to capture the specific requirement to notify CB should there is any overproduction. Mill to immediately notify ICT (Internal Control Team) should the quantity produced is reaching 80% of the quantity of CSPO & CSPK claimed for certification via email. ICT will forward the issue to Head Office for further process. 2. Mill to review the appointment letter of the person responsible and CCP monitoring in order to monitor the production of CPO & PK on monthly basis in detail. 3. Retraining to the person responsible on the specific changes on the procedure and CCP monitoring form to be performed. 4. All related records (communication, training, monitoring, etc.) to be kept accordingly. 														
Assessment Conclusion:	Critical NC Onsite Close Out Verification														

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	<ol style="list-style-type: none"> 1. CPO, PK and FFB extension request for the month of October 2022 to December 2022 has been sent to CB on 02/12/2022 by management representative, Mr. Wong Chun Wei. The volume extension for Asia Palm Oil Mill has been approved by RSPO via email dated 13/12/2022. Total of FFB volume including 3 months extension recorded at 157,000 mt. Monitoring of FFB received and RSPO product sold was done on monthly basis and as at 09/02/2023, total FFB received has reached 85.87% of allocated volume (certificate and volume extension) and a request was made to HQ for additional volume extension. The monitoring has triggered the needs to initiate volume extension request once hit 80% of the allocated volume. 2. Appointment for person in charge responsible on the specific changes on the procedure and CCP monitoring form to be performed was sighted. Refer to letter dated 10/12/2022 issued by mill manager. 3. SOP for has been revised under section 5.12 to include statement " Mill to immediately notify ICT (Internal Control Team) should the quantity produced reaching 80% of the quantity of CSPO and CSPK claimed for certification via emails. ICT will forward the issue to head office for further process. <p>Implemented corrective action found to be sufficient to close the major NC effectively on 22/2/2023. Continuous implementation will be further verified in the next assessment.</p>
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Non-conformity			
NCR Ref #	2281103-202212-N1	Issued Date	01/12/2022
Due Date	Next Surveillance Assessment (ASA2-1)	Closure Date	Open
Indicator & Category (Critical / Minor)	3.3.2 (Minor)		
Statement of Nonconformity:	The procedures were not effectively implemented.		
Requirement Reference:	A mechanism to check consistent implementation of procedures is in place.		
Objective Evidence:	<u>Hwa Li Estate Div.3 Estate</u> During the visit to the Spraying Gang at Hwa Li Estate Div.3, the first aid box was inspected. It was sighted that the first aid box contained an expired item (Eye Medicine – Expired July 2022). This was not in line with the procedure – Guidelines on First Aid in the Workplace; Doc. Ref. No.: M/025-02/2014; Subject: First Aid Guidelines; Document Date: 21/09/2014 which states <i>"materials used, expired or spoiled medication should be replaced as soon as possible"</i> . It was noted that monthly monitoring has been done yet the expired item has not been replaced.		
Corrections:	All first aid boxes were gathered by estate HA (Hospital Assistant) to recheck in detail on all first aid items especially items with expiry dates and replacement of the mentioned eye medicine have been carried out.		
Root Cause Analysis:	SOP monitoring for Spraying operation (specific on the First Aid inspection prior work commence) was not implemented effectively where one worker of the Spraying Gang was accidentally replaced the first aid item i.e. eye medicine with the expired one without informing the first aider/HA.		

Corrective Actions:	<ol style="list-style-type: none"> 1. Weekly SOP monitoring for Spraying operation to be amended specifically to include the requirement of First Aid inspection prior work commencement. Staff in charge/First Aider must ensure First Aid is in good condition as per Group Guideline M025 (Guideline on First Aid in the Workplace) and will be safely brought at all times during work. Staff in charge/First Aider will inform HA of any missing/expired First Aid item and will be rectified immediately. 2. Estate to perform re-briefing to all estate workers on the first aid items to ensure that no replacement of any item by their own except estate HA and to properly record in the form should there is any usage of first aid box items. Record of briefing to be kept in the muster call briefing book. 3. HA to perform retraining to all first aiders who fully in charge of first aid box to prevent repeating issue. 4. HA to ensure all first aid box are inspected thoroughly during monthly first aid box inspection as per group guideline M025. Any expired item should be replaced immediately and recorded properly. 5. All related records to be kept accordingly.
Assessment Conclusion:	The submitted CAP detailing on proposed actions to be taken to address the raised minor 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.

Non-conformity			
NCR Ref #	2281103-202212-N2	Issued Date	01/12/2022
Due Date	Next Surveillance Assessment (ASA2-1)	Closure Date	Open
Indicator & Category (Critical / Minor)	3.5.2 (Minor)		
Statement of Nonconformity:	Employment contracts from all sampled based are not being monitor for using the latest revise version.		
Requirement Reference:	Criterion 3.5 - A system for managing human resources is in place. - Employment procedures are implemented, and records are maintained.		
Objective Evidence:	Document review of employment contract for foreign worker found that Asia Palm Oil Mill, Asia Oil Palm Estate 2, Hwa Li Estate 3 and Melewar Estate 2 still used the old version of 'Perjanjian Pekerjaan (Bukan Warganegara) which is still exist with Clause 13. The old version is not in line with the latest revise version of Appendix 2, Employment Contract (Perjanjian Pekerjaan - Bukan Warganegara) as per Guidelines on Workers Employment Terms and Conditions for Sabah Estate Workers, Doc. No.: E/009-08/2021 updated 22/12/2021 issued by HR Department.		
Corrections:	Amendment on the Appendix 2, Employment Contract (Perjanjian Pekerjaan – Bukan Warganegara) as per Guidelines on Workers Employment Terms and Conditions for Sabah Estate Workers, E009 and Guidelines on terms & conditions of employment for Sabah's Mill workers, E013 were carried out and circulated to all operating units via email on 28 th November 2022 and 1 st December 2022		

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	respectively. Date of review was added on the revised version of contract agreement for systematic monitoring approach.
Root Cause Analysis:	Old version of contract agreement was used during contract agreement issuance due to operating units were unaware of the latest version of contract agreement circulated by Head Office and no specific date of review stated on the contract agreement itself.
Corrective Actions:	<ol style="list-style-type: none"> 1. Operating units to be more aware on any updates on procedure/guideline circulated by Head Office via daily checking of company email by person in charge. New and changes of group procedure/guideline must be communicated to the management and/or relevant personnel and implement it wherever necessary. 2. Existing current contract agreement to be maintained thus, no contract substitution is allowed. Any amendment on the contract agreement to be captured in the detail of changes of contract agreement which appended together with the contract agreement. Operating unit to communicate with all foreign workers on the changes of the Clause 13. 3. New version of contract agreement to be used whenever there is any new workers recruited by the operating unit. 4. Operating unit to ensure all details in the contract agreement are complete and precise.
Assessment Conclusion:	The submitted CAP detailing on proposed actions to be taken to address the raised minor 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	Ref: 2281103-202212-I1 Indicator: 7.3.1 <u>Asia Oil Palm Estate 2</u> The implementation of waste management plan for clinical waste could be further improved on promptness of collection from temporary location to designated storage area.
	Ref: 2281103-202212-I2 Indicator 2.2.2 <u>Asia Oil Palm Estate 2, Hwa Li Estate 3 and Melewar Estate 2</u> The replanting contractor shall improve on their worker’s payslip to include employer contribution on EPF, SOCSO and SIP Insurance.
	Ref: 2281103-202212-I3 Indicator 6.2.6 <u>Asia Production Unit</u> The management may enhance the assessment to include calculation with latest revised minimum wages of MYR 1,500.00 per month into Guideline of Implementation Plan for Decent Living Wage for better understanding.

	Ref: 2281103-202212-I4 Indicator 6.2.2. <u>Asia Production Unit</u> The worker master list can be improved on the monitoring period of workers passport and work permits validity.
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Positive Findings	
PF #	Description
PF 1	Good Documentation.
PF 2	Workers Housing in Conducive Conditions
PF 3	Good understanding by staffs and workers on GAP, H&S and Environment Protections

3.3.1 Status of Nonconformities Previously Identified and Observations

Non-conformity			
NCR Ref #	2140837-202112-M1	Issued Date	9/12/2021
Due Date	08/03/2022	Closure Date	14/1/2022
Indicator & Category (Critical / Minor)	6.2.1 (Critical)		
Statement of Nonconformity:	Asia Oil Palm Sdn Bhd (Asia 2 Estate) had not adequately explained to workers Clause 11 of the employment contract which states that medical costs would be fully borne by the company.		
Requirement Reference:	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.		
Objective Evidence:	Asia 2 Estate had not adequately explained clause 11 of the employment contract dated 1 June 2020 to Worker No. AE200768 that medical costs would be fully borne by the Estate. This had resulted in a deduction of RM85 from the worker's salary in May 2021 for the medical treatment for sinus bradycardia he received at Klinik Mabello (Paris), Kota Kinabatangan on 29 March 2021.		
Corrections:	Worker to be briefed thoroughly on Foreign Worker Contract Agreement and explain Clause 11 where medical costs would be fully borne by the Estate. Worker No. AE200768 were called to the Estate office and had been briefed thoroughly by Estate Management pertaining on the Foreign Worker Contract Agreement especially on Clause 11 and revised version. The amount of RM85 deducted from the worker's salary on May 2021 was refund to the worker.		
Root Cause Analysis:	Wrong interpretation by the company the contents of the employment contract (Clause 11) on the responsibility to pay a worker's medical costs where the contract stated that medical cost would be fully borne by the company.		
Corrective Actions:	The Clause 11 in the Foreign Worker Contract Agreement was revised to ensure it would adequately explained that only medical cost related to occupational would be		

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	borne by the company and the revised contract agreement was agreed by both parties.
<p>Assessment Conclusion:</p>	<p>From the onsite verification;-</p> <p>The management already pay back the workers, the payment voucher (CV1221- 01) with total RM 85 dated 22/12/2021 to Benhaimar Kalinggalan Dorongan was verified during assessment.</p> <p>After this cases, the management conducted the training/briefing record dated 22/12/2021 regarding to clause 11 under employment contract with Mr. Benhaimar Kalinggalan Dorongan</p> <p>From the verification on employment contract, the new employment contract been revise by Carotino Asia under clause 11 regarding Cuti Sakit dan Perubatan stated " Majikan akan melantik pakar -pakar perubatan atau klinik untuk perubatan pekerja dengan perbelanjaan perubatan ditanggung sepenuhnya oleh Majikan sekiranya sakit akibat pekerjaan sahaja. Jika Pekerja sakit dan harus diwadkan, Majikan akan memberikan fasiliti kelas maksima 60 hari , pembayaran perubatan akan ditanggung sepenuhnya oleh Majikan sekiranya sakit akibat pekerjaan sahaja ." This employment contract revise on 22/12/2021.</p> <p>Due to this changes of employment contract the management establish the Guidelines on workers employment terms and conditions for Sabah estate workers (Doc. Ref. No. E/009-08/2021) established dated 22/12/2021.</p> <p>Verified as per sampling 5 other workers on their revised employment contract Sampling on employment contract as per below:-</p> <ul style="list-style-type: none"> - ATO0828 - AE200768 - ATO0680 - ATO0613 - AE200498 <p>The contract already amend by the company to the sampling workers on clause 11 dated 22/12/2021 verified as per record. From the interview with the workers, they aware regarding amended clause 11. Therefore the Major NC was closed on 14/01/2022.</p>
<p>Effectiveness Closure (for previous audit closed Critical NC):</p>	<p>Document review for sampled workers’ payslips, verified that no deduction on medical treatment cost from workers’ salary.</p> <p>Document review on Budget Details – General Charges for Fiscal Year 2022/23 (01/07/2022 to 30/06/2023), stated JC Chang Group’s estates has proposed Sick and hospitalisation pay for direct employees’ codes as follow:</p> <ol style="list-style-type: none"> 1. JC Chang Group’s estates include proposal for budget under Code 221701 Worker Welfare – Sick / Hospital Pay for Direct Employees. <p>During the onsite interview with workers, they informed that they have been briefed on the free medical cost. Treatment at panel clinics or hospital, employer will bore the cost as stated in clause 11 in `Perjanjian Pekerjaan` as per Guidelines on Workers Employment Terms and Conditions for Sabah Estate Workers, Doc. No.: E/009-08/2021 updated 22/12/2021.</p> <p>The implementation based on revised clause from employment contract is satisfactory.</p> <p>No recurrence of issued observed, thus the major NC is remained closed.</p>

Opportunity for Improvement	
OFI#	Description
OFI 1	<p>Indicator: 6.2.4</p> <p>OFI Statement:</p> <p>The Certification Unit is already providing adequate welfare, housing and various amenities to all workers. Even if the Employees’ Minimum Standard of Accommodation and Amenities Act 1990 is not applicable to Sabah, as an opportunity for improvement, guidance provided by the Employees’ Minimum Standard of Accommodation and Amenities Act 1990 should be followed with regards to:</p> <ul style="list-style-type: none"> – Fortnightly visits by the VMO (as opposed to the current fortnightly visits) as this would enable the VMO to attend to patients more frequently at the estate/mill clinics; – Provision of milk at the creche as this would provide appropriate nutrition to children below 1 year, and from 1 - 6 years. <p>This is also in tandem with the RSPO MYNI (Revised April 2021) Annex 2 Guidance for Indicator 6.2.4, which states that “for Sabah & Sarawak, in the absence of any State enactment/ ordinance, the Unit of certification should be guided by the provision under the Workers’ Minimum Housing & Amenities Act”.</p> <p>Verification / Follow-up actions:</p> <p>Document review on Budget Details – General Charges for Fiscal Year 2022/23 (01/07/2022 to 30/06/2023), stated JC Chang Group’s estates has proposed for workers welfare and medical under two (2) items from two (2) different codes as follow:</p> <ol style="list-style-type: none"> 1. JC Chang Group’s estates include proposal for budget under Code 221501 Worker Medical – V.M.O.’s Fee for Fortnight visits by visiting medical officer (VMO). 2. JC Chang Group’s estates include proposal for budget under Code 221602 Worker Welfare – Day Care Center (Milk Supplies children in creche).

3.3.2 Summary of the Nonconformities and Status

CAR Ref.	Category (Critical / Minor)	P&C Indicator	Issued Date	Status & Date (Closure)
1554102-201709-M1	Critical	5.3.3	09/11/2017	Closed on 08/01/2018
1554102-201709-N1	Minor	4.1.3	09/11/2017	Closed on 16/11/2018
1706395-201811-M1	Critical	2.1.1	16/11/2018	Closed on 08/02/2019
1706395-201811-N1	Minor	2.1.2	16/11/2018	Closed on 07/11/2019
1845883-201911-N1	Minor	4.7.5	07/11/2019	Closed on 30/11/2020
1993690-202011-M1	Critical	2.3.1	01/12/2020	Closed on 29/01/2021
2036145-202103-M1	Critical	3.4.3	31/03/2021	Closed on 30/04/2021
2140837-202112-M1	Critical	6.2.1	09/12/2021	Closed on 14/01/2022
2281103-202212-M1	Critical	3.6.1	01/12/2022	Closed on 22/02/2023
2281103-202212-M2	Critical	3.8.7	01/12/2022	Closed on 22/02/2023
2281103-202212-N1	Minor	3.3.2	01/12/2022	Open
2281103-202212-N2	Minor	3.5.2	01/12/2022	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 Asia Palm Oil Mill (Asia Production Unit) 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)
Communities	Kedai Ching Hui Min	Face To Face Interview
Contractor	Fong Cheng Co.	Face To Face Interview
NGO	CLC Pahang 2	Face To Face Interview
External Stakeholder	Recruitment Agent	Face To Face Interview

Stakeholders comment	
1	<p>Feedbacks: Grocery shop Kedai Ching Hui Min has three (3) branches with one (1) of the shop is located at Asia Oil Palm Estate 2. While two (2) other shop are located at Hwa Li Estate 3 and its division. All branches shop has communicated with both estate managements on the grocery prices offered to customers whose is also workers for both estates. Onsite interview, the owner informed that he has share the list of grocery prices on monthly basis as initiative of transparency by the shopper. Based on the list, both estate managements will have meeting with the shopper to discuss the agenda on affordable price offered to workers.</p> <p>Audit Team verification and response: Document review sighted the list of grocery prices sold at the shop at Asia Oil Palm Estate 2 and Hwa Li Estate 3. From the minutes of JCC meeting, sighted both estate managements as discuss the list share by the shopper to discuss on the affordable price offer as purposes of price monitoring. No further issue of concern.</p>
2	<p>Feedbacks: A contractor interviewed is Fong Cheng Co. who’s a replanting contractor with services provided on felling, chipping, draining, reeling, terracing, desilting drainage and lining. Onsite interview, contractor agreed that good relationship has been established between JC Chang Group’s estate managements. He informed that he understands on the standard provided by JC Chang Group’s</p>

	<p>estates to be follow before started work in each estates’ fields. Outcome from the interview, the contractor informed his company’s payment terms with JC Chang Group’s estates is 45 days.</p> <p>The contractor informed he being invited into stakeholders consultation meeting annually by JC Chang Group’s estate and being briefed regarding RSPO & MSPO standards and requirement.</p> <p>Audit Team verification and response:</p> <p>Document review on the invoice and payment voucher from sampled estates verified the payment is meet the timeline.</p> <p>Document review on stakeholder consultation meeting from sampled estates verified the contractor name is in the attendance list.</p> <p>No further issues of concern.</p>
<p>3</p>	<p>Feedbacks:</p> <p>Onsite interviewed with teacher from CLC from Pahang Estate 2 with service to provides comprehensive education to foreign workers’ children with Indonesian’s education module in Malaysia.</p> <p>Onsite interview, the teacher agreed that good relationship has been established between Asia Production Unit’s estate managements. He thanks to the management for the support on providing a comfortable hall for Indonesian students to attend with comfortable and convenience learning process with teachers. He welcomed the maintenance provided to the building which being attended as per request if there any malfunction on the building.</p> <p>Based on the interview, the teacher informed that he has the intention to propose a complex of education centre in Asia Production Unit under JC Chang Group. The proposal objective is to gather all Indonesian’s students in one complex to easy monitor students’ performance and teachers would be easy to conduct meeting regularly.</p> <p>He informed he is being invited into stakeholders’ consultation meeting annually by Asia Production Unit’s estate and being briefed regarding RSPO & MSPO standards and requirement. During this session, he has issued the proposal a complex of education centre to Asia Production Unit’s management during stakeholder consultation meeting conducted.</p> <p>Audit Team verification and response:</p> <p>Document review on the latest stakeholder consultation meeting verified the proposal being recorded in the minutes of meeting.</p> <p>In regards to the request for new CLC complex, the management have acknowledged the request but due to budget constraints, the management mentioned that they may have to look into company finance before deciding to act as per request. Nevertheless, at the moment Asia Production Unit management will continue to assist the CLC teacher to conduct regular maintenance of the existing building as per request from time to time.</p>
<p>4</p>	<p>Feedbacks:</p> <p>A recruitment agent interviewed is MNK Agency Sdn Bhd is a manpower recruitment agency and provided services for renewal of foreign workers and their dependents’ passport and work permit.</p> <p>Onsite interview with the agency officer informed they will contact Asia Production Unit’s management to inform when the programme for passport and/or work permit pass application / renewal is open. The Asia Production Unit’s management would then submit details of the workers and their dependents together with the supporting documents for the agents’ submission to the Indonesian / Bangladesh / Indian / Nepal consulate, and thereafter to the Immigration Department. The consulates would also visit the estates to help with the regularisation process.</p> <p>However, since the consulates could only visit on weekends, there would be a long wait due to the long queue. The passport renewal process for dependents can take anytime between one (1) month (if all documents are complete) to 6 months (if documents are not available).</p>

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	<p>The officer informed that Asia Production Unit's management have submitted their list of workers' dependants for passport and/or work permit pass applications / renewals. These applications have been proceeded and now pending approval from the authorities. Approved applications have been paid by Asia Production Unit's management to the agency with payment voucher. The latest passport and/or work permit pass is available at the Asia Production Unit's management offices.</p>
	<p>Audit Team verification and response: Document review sighted the list of workers and their dependents who have already been issued with passports and/ or work permit. Sighted document of renewal / application for new passport and work permit been issued and submitted to the agency for processing.</p>

List of land owner / user contacted					
Name	Years of ownership / used	Land area (ha)	Agreement (Yes / No)	Agreement base on FPIC (Yes/No)	Compliance on the agreement terms and conditions
Not Applicable as all estates under Asia Production Unit have undergone 2 nd Cycle of Replanting.					

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 Asia Palm Oil Mill (Asia Production 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 Asia Palm Oil Mill (Asia Production Unit) is remain certified.</p>	
Report prepared by	Acceptance of Assessment Conclusion
Name: VIJAY KANNA PAKIRISAMY	Name: <i>Lee Min Chin</i>
Company Name: BSI SERVICES (MALAYSIA) SDN BHD	Company Name: <i>Cardino / JC Chang Group</i>
Title: CLIENT MANAGER	Title: <i>General manager</i>
Signature:	Signature: <i>(I the undersigned, being the most senior relevant management</i>

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>JC Chang Group has established policies available at Asia Production Units' management offices. From onsite visit, sighted Asia Oil Palm Estate 2, Asia Palm Oil Mill, Hwa Li Estate 3 and Melewar Estate 2 display publicly all policies include environment, equal opportunities, safety and health, sexual harassment, social and human rights, corruption prevention, child protection.</p> <p>From document review, Asia Oil Palm Estate 2, Asia Palm Oil Mill, Hwa Li Estate 3 and Melewar Estate 2 maintain the list of documents available for public review such as OSH, social impact and improvement, consultation and communication procedure, details of complaints and grievances, negotiation procedures, records of contributions and donations to local communities, joint consultative committee and gender committee meeting minutes, estate map and boundary, licenses and permits, continuous improvement plan, public summary of certification assessment report, etc.</p> <p>From website review for JC Chang Group's website, sighted Sustainability Brochure for the group are available at http://www.carotino.com/group-mission-and-management-plan.aspx</p>	Complied
1.1.2	<p>Information is provided in appropriate languages and accessible to relevant stakeholders.</p> <p>- Minor compliance -</p>	<p>JC Chang Group's managements established and maintained information in English and Bahasa Malaysia. The information is accessible to the relevant stakeholders.</p>	Complied

		<p>Examples:</p> <p>Asia Palm Oil Mill provided information as per request during DOE Sandakan Office Branch's visit dated 28/07/2022. The request includes with mill's environmental performance record and mill production records. Mill then been requested to provide additional document of 'Field Citation' to response to the comment dated 03/08/2022.</p>	
1.1.3	<p>(C) Records of requests for information and responses are maintained. - Critical (Major) compliance -</p>	<p>JC Chang Group's managements established and maintained information in English and Bahasa Malaysia. The information is accessible to the relevant stakeholders.</p> <p>Examples:</p> <p>Asia Palm Oil Mill provided information as per request during DOE Sandakan Office Branch's visit dated 28/07/2022. The request includes with mill's environmental performance record and mill production records. Mill then been requested to provide additional document of 'Field Citation' to response to the comment dated 03/08/2022.</p>	Complied
1.1.4	<p>(C) Consultation and communication procedures are documented, disclosed, implemented, made available, and explained to all relevant stakeholders by nominated representative. - Critical (Major) compliance -</p>	<p>JC Chang Group established SOP on Mechanisms for Communications and Consultation Doc. No.: E/004-8/2019 dated 12/082019. This SOP describes to implement and improve peace working conditions, communication and consultation system as well as to resolve any complaints and grievances with internal and external stakeholders with 3 major systems of communication designed for achieving the mention purposes namely:-</p> <ol style="list-style-type: none"> 1. Consultation with employees & Others stakeholders (JCC committee) 2. Gender group consultation (Gender committee) 3. Free prior informed consent (FPIC). 	Complied

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		<p>Asia Production Unit conduct external stakeholder meeting for 2022 which includes with Asia Oil Palm Estate 2, Asia Palm Oil Mill, Melewar Estate 2 and Hwa Li Estate 3 dated on 13/09/2022 at Meeting Room Melewar Estate 2.</p> <p>Invitation letter into the meeting was sent to external stakeholders dated 06/09/2022.</p> <p>Despite the meeting, external stakeholders were given the opportunity to consult and communicate using stakeholders' response's form which they can email, WhatsApp or telephone to the Estates and Mill. Document review on the attendants' records, 58 participants had signed with 24 sheets of 'Borang Maklum Balas Impak Social dan Alam Sekitar' returned on end of meeting.</p> <p>Among the response received was from a neighbouring plantation which confirmed that good communication and relationship between estates on sustainability issues, sharing of information and the absence of any negative impacts. Another response was received are to improve educational facility at CLC for students' comfort during learning session and to improve estate road conditions.</p>	
1.1.5	<p>There is a current list of contact and details of stakeholders and their nominated representatives.</p> <p>- Minor compliance -</p>	<p>Asia Oil Palm Estate 2, Asia Palm Oil Mill, Hwa Li Estate 3 and Melewar Estate 2 established individual list of stakeholders. The stakeholders comprise relevant government agencies such as the LHD Office, KWSP Office, SOCSO Office, Hospital Lahad Datu, BOMBA Lahad Datu, Balai Polis Kinabatangan, Kinabatangan District Office, Labour Department, Immigration Department, Department of Environment, Department of Safety and Health, Philippines Embassy and Indonesian Consulate offices. Included are neighbouring estates and smallholders, neighbouring villages, CLC, schools, canteen/shop operators, suppliers, contractors, etc.</p>	Complied

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		<p>Contact details for each stakeholder and their nominated representatives are also available.</p> <p>Document review on list of stakeholders updated as below:</p> <ol style="list-style-type: none"> 1. Asia Oil Palm Estate 2 Estates updated on 01/09/2022. 2. Asia Palm Oil Mill update on 23/11/2022. 3. Hwa Li Estate 3 updated on 30/08/2022. 4. Melewar Estate 2 updated on 24/11/2022. 	
Criterion 1.2: The unit of certification commits to ethical conduct in all business operations and transactions.			
1.2.1	<p>A policy for ethical conduct is in place and implemented in all business operations and transactions, including recruitment and contracts.</p> <p>- Minor compliance -</p>	<p>JC Chang Group established Corruption Prevention Policy signed by Mr. Tee Swee Kee, Plantation Director dated 04/09/2015. This Policy prevents corruption and applies to all entities within the company including contracted third parties and consultants in relation to their work with for the group.</p> <p>The policy is written in English and Bahasa Malaysia.</p> <p>Asia Oil Palm Estate 2, Asia Palm Oil Mill, Hwa Li Estate 3 and Melewar Estate 2 conduct briefing on corruption prevention policy to workers during morning muster daily basis.</p> <p>Asia Oil Palm Estate 2, Asia Palm Oil Mill, Hwa Li Estate 3 and Melewar Estate 2 conduct briefing on external requirement to corruption prevention policy which includes compliance with ethical conduct and corruption prevention to contractors as per attached in the Sustainability Compliance Contract and signed.</p> <p>Document review, sampled contractor Pengangkutan Tera Sdn Bhd signed Sustainability Compliance Contract 01/10/2022.</p>	Complied
1.2.2	<p>A system is in place to monitor compliance and the implementation of the policy and overall ethical business practice.</p> <p>- Minor compliance -</p>	<p>JC Chang Group established Corruption Prevention Policy signed by Mr. Tee Swee Kee, Plantation Director dated 04/09/2015. Asia Production Unit's management monitor compliance to meet the compliance which include:</p>	Complied

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		<p>1. Annual internal audits conduct by ICT team at Asia Oil Palm Estate on 12-14/07/2022, Asia Palm Oil Mill on 18-20/07/2022, Hwa Li Estate 3 on 04-06/07/2022 and Melewar Estate 2 on 21-23/07/2022.</p> <p>2. Signing of Sustainability Compliance Contract by the contractors. Sighted were the contracts between Asia Palm Oil Mill and Pengangkutan Tera Sdn Bhd dated 01/10/2022.</p> <p>3. Purchase authority limits where cheques need to be signed by 2 people, and that any purchases exceeding RM30,000 require the approval at HQ level.</p> <p>Document review on briefing records, Asia Production Unit's management conduct briefing on Corruption Prevention Policy to workers dated 23/11/2022 and 24/11/2022.</p> <p>Onsite interview with Asia Production Unit's management's workers informs they been briefed on the Corruption Prevention Policy during muster morning.</p>	
Principle 2: Operate legally and respect rights			
Criterion 2.1: There is compliance with all applicable local, national and ratified international laws and regulations.			
2.1.1	<p>(C) The Unit of Certification complies with legal requirements</p> <p>- Critical (Major) compliance -</p>	<p>Operating units demonstrated compliances with legal requirements through licenses and permits obtained sighted as per sample as following:</p> <p>Asia Oil Palm Estate 2:</p> <ul style="list-style-type: none"> - MPOB License # 502330302000; Licensed activity: Sales dan transport; Oil palm product: FFB #; Validity period: 1/7/2022 – 30/6/2023; Licensed premise: CL 095317383, Mukim Kinabatangan, Kinabatangan Sabah; Estate Area: 3,024 Ha - JTK Sabah Lesen Untuk Menggaji Pekerja Bukan Pemastautin (Seksyen 118, Ordinan Buruh (Sabah Bab 67); Majikan: Asia Oil 	Complied

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		<p>Palm Sdn. Bhd. (Estate Div 2); License # JTK.H.KBN.600-4/1/1/01261/0048; Covered Employees: Indonesia 130; Philippines 20; Sarawak 0; P. Malaysia 0; Others 0; Validity period: 3/8/2022 – 2/8/2023</p> <ul style="list-style-type: none"> - Permit Barang Kawalan Berjadual; Peraturan 18, Peraturan-Peraturan Kawalan Bekalan (Pindaan) 2021; Serial # P: S005195; Ref. # KPDNHEP.LDT.600.4/4(09/2018)P; Jenis dan Barang Kawalan Berjadual: Diesel Industri; Storage Quantity: 18,000 Liter; Petrol; 400 Liter; Validity Period: 21/11/2021 – 20/11/2024 <p>Asia Palm Oil Mill:</p> <ul style="list-style-type: none"> - MPOB License # 500143104000; Licensed activity: Sales dan transport; Oil palm product: FFB, PK, CPO, SPO #; Purchase and transport: FFB, PK, CPO #; Storage: PK, CPO, SPO #; Milling: FFB #; Export: SPO #; Validity period: 1/12/2021 – 30/11/2022 - JTK Sabah Lesen Untuk Menggaji Pekerja Bukan Pemastautin (Seksyen 118, Ordinan Buruh (Sabah Bab 67); Majikan: Asia Oil Palm Sdn. Bhd. (Estate Div 2); License # JTK.H.KBN.600-4/1/10401/0063; Covered Employees: Indonesia 63; Philippines 9; Sarawak 0; P. Malaysia 0; Others 0; Validity period: 4/1/2022 – 3/1/2023 - DOE License # 003557; File Ref. # ASSH(B)31/152/000/052; Effluent disposal method: Water course discharge; Max processing capacity: 80 mt/hr; BOD limit: 20 mg/L; Validity period: 1/7/2022 – 30/6/2023 - Energy Comission license # LP 12/1/9/1819; Date of issuance: 12/8/2016; Validity period: 15 years; Nominal capacity of electricity generating facility: 6.3 MW; Para 5. The electrical installation shall be operated and maintained by qualified competent person as describe in the At and Regulations 	
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		<ul style="list-style-type: none"> - Permit Barang Kawalan Berjadual; Peraturan 18, Peraturan-Peraturan Kawalan Bekalan (Pindaan) 2021; Serial # P: S005393; Ref. # PPDNKK.SDK.600.07/2018(SK); Jenis dan Barang Kawalan Berjadual: Diesel Euro 2M (Industri); Storage Quantity: 24,000 Liter; Validity Period: 25/10/2021 – 24/10/2024 - Certified Environmental Professional in Scheduled Waste Management (CePSWaM) Serial # CePSWaM/04355; V. Shadeesh (Assistant Mill Manager); Date issued: January 2021 <p>Hwa Li Estate 3:</p> <ul style="list-style-type: none"> - MPOB License # 503266302000; Licensed activity: Sales dan transport; Oil palm product: FFB #; Validity period: 1/12/2022 – 30/11/2023; Licensed premise: CL 095324502, Mukim Tenegang, CL095327138, Mukim Sungai Koyah, Kinabatangan Sabah; Estate Area: 4,277.6 Ha - JTK Sabah Permit Potongan Daripada Gaji Pekerja, Seksyen 113(4), Ordinan Buruh (Sabah Bab 67); Majikan: Syarikat Keratong Sdn. Bhd. (Hwa Li Estate Div 3); License Serial # JTKSBH/PMT/113//2022/0230; Validity period: 9/9/2022 – 8/9/2023 - DOSH Certificate of Fitness; Unfired Pressure Vessel; Reg. # SB PMT 10251; Description: Air Receiver; Validity period: 8/8/2022 – 7/11/2023 - Permit Barang Kawalan Berjadual; Peraturan-Peraturan Kawalan Bekalan 1974 Peraturan 9(2); Serial # P: Q 00006 (LDT); Ref. # KPDNHEP.LDT.600-4/4(17/2004)P; Jenis dan Barang Kawalan Berjadual: Diesel; Storage Quantity: 40,000 Liter; Validity Period: 19/1/2021 – 18/1/2024 	
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		<p>Melewar Estate 2:</p> <ul style="list-style-type: none"> - MPOB License # 502932802000; Licensed activity: Sales dan transport; Oil palm product: FFB #; Validity period: 1/10/2022 – 30/9/2023; Licensed premise: CL 095311201, Tenegang Koyah, Kinabatangan Sabah; Estate Area: 2,023.4 Ha - JTK Sabah Lesen Untuk Menggaji Pekerja Bukan Pemastautin (Seksyen 118, Ordinan Buruh (Sabah Bab 67); Melewar Properties Sdn. Bhd. (Melewar Estate Div 2); License Serial # JTK.H/KBN.600-4/1/01261/0066; Covered Employees: Indonesia 134; Philippines 0; Sarawak 0; P. Malaysia 0; Others 0; Validity period: 5/12/2021 – 4/12/2022 - DOSH Certificate of Fitness; Unfired Pressure Vessel; Reg. # SB PMT 1239; Description: Air Receiver; Validity period: 22/6/2022 – 21/9/2023 - Permit Barang Kawalan Berjadual; Peraturan-Peraturan Kawalan Bekalan 1974 Peraturan 9(2); Serial # P: S005223; Ref. # KPDNHEP.LDT.600-4/4(22/2009)P; Jenis dan Barang Kawalan Berjadual: Diesel Industri; Storage Quantity: 18,000 Liter; Validity Period: 25/2/2022 – 24/2/2025 	
2.1.2	<p>A documented system for ensuring legal compliance is in place. This system has a means to track changes to the laws and regulations.</p> <p>- Minor compliance -</p>	<p>APU established the List of Applicable Law Changes as of November 2022. Among latest updates in the legal register including the Windfall Profit Levy (Oil Palm Fruit) (Amendment) Order 2021, Minimum Wage Order 2022 and Anti-Sexual Harassment Act 2022 etc. AOPE2 Manager has appointed few persons in-charge to keep track of changes in applicable legal requirements and maintained its compliance as per letter dated 04/10/2022.</p>	Complied
2.1.3	<p>Legal or authorised boundaries are clearly demarcated and visibly maintained, and there is no planting beyond these legal or authorised boundaries.</p>	<p>Visit to estate fields found that there is no planting beyond these legal or authorised boundaries. These legal or authorised</p>	Complied

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	<p>- Minor compliance -</p>	<p>boundaries are clearly demarcated and visibly maintained as per sample as following:</p> <p>AOPE2:</p> <ul style="list-style-type: none"> - Boundary to Jhang Sun Estate Sdn. Bhd.; GPS: 5.298256; 118.188588; Block E15 - Boundary to Genting Tenegang Estate; GPS: 5.323572; 118.195316; Block A1 <p>HLE2:</p> <ul style="list-style-type: none"> - Boundary to Genting Bahagia Estate; GPS: 5° 23' 37.57524" N; 118° 20' 9.27744"; Block E03 - Boundary to IOI Morisem Estate; GPS: 5° 21' 35.74656" N; 118° 18' 24.77304"; Block A6 	
<p>Criterion 2.2: All contractors providing operational services and supplying labour, and Fresh Fruit Bunch (FFB) suppliers, comply with legal requirements.</p>			
<p>2.2.1</p>	<p>A list of contracted parties is maintained.</p> <p>- Minor compliance -</p>	<p>Asia Production Unit's management have their own list of contracted parties, stakeholders and suppliers were maintained by all operating units which was updated on a yearly basis. The list includes contractors contact details.</p> <p>Document review on list of stakeholders updated as below:</p> <ol style="list-style-type: none"> 1. Asia Oil Palm Estate 2 Estates updated on 01/09/2022. 2. Asia Palm Oil Mill updated on 23/11/2022 3. Hwa Li Estate 3 updated on 30/08/2022 	<p>Complied</p>
<p>2.2.2</p>	<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>Reviewed the sampled Contractors contract agreement with JC Chang Group stated that all contractors must comply to meet applicable legal requirements applicable to them, disallowing young/child/forced/trafficked labour with protection clause should be made in place and commitment toward requirements as briefed</p>	<p>OFI</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>in JC Chang Group’s Group Policy.</p> <p>JC Chang Group includes Supplement to Contract Agreement to the established contractor’s Contract Agreements that includes the Questionnaire on Legal Compliance and Ethical Conduct, Doc No. E/024-02/2022, dated 20/02/2020.</p> <p>Furthermore, evidence of due diligence is also demonstrated via declaration between contractor based on Sustainability Contract, E023-012019 with reference to Procedure of Due Diligence and Improvement, E/019-01/2019 dated 12/08/2019. Sampled contract including FFB suppliers are required to sign Sustainability Compliance Contract with J.C. Chang Group of Estates. In the contract stated that all contractors must comply as follows.</p> <ul style="list-style-type: none"> - Meeting applicable legal requirements, which can be demonstrated by contracted party in running the business activities on lawful way. - Disallowing child labour, forced labour and trafficked labour in running contracted party’s business activities. If young works are employed, protection clause should be made available for them in running contracted party’s business s activities. <p>Asia Production Unit ensures and monitors the contractors compliance to the declaration via internal audits conducted by the ICT Plantation team. Records of internal audits conducted were available for verification as stated in indicator 3.3.2.</p> <p>Document of the main contract agreements were sampled as follows.</p> <ol style="list-style-type: none"> 1. <u>Asia Oil Palm Estate 2</u> <ul style="list-style-type: none"> - Fong Cheng Co.; Replanting Agreement; Doc. No.: AOP2 (2022-2023) - 01 Date: 01/07/2022. – Scope includes felling, chipping and other infrastructure work for 198.22 Ha at Field 	
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		<p>No. PR22.</p> <p>2. <u>Asia Palm Oil Mill</u></p> <ul style="list-style-type: none"> - Pengangkutan Dagang Tera Sdn Bhd; CPO & PK Transporter Agreement; Doc. No.: 2014B054761 Date: 01/07/2017 and renewal of the agreement with Doc. No.: AOP/P6/(AOM)/25/NKW & AOP/P6(AOM)/26/NKW which dated on 20/05/2022. Scope includes transport the the palm oil and palm kernel from the mill to various destinations specified in scheduled A. <p>3. Hwa Li Estate 3</p> <ul style="list-style-type: none"> - Fong Cheng Co.; Replanting Agreement; Doc. No.: HLE3/REP-Batch1-FY2021-22 Date: 01/03/2022. – Scope includes felling, chipping and other infrastructure work for 258.21 Ha at Field No. PR22A (ex PM96A at Main Div). <p>4. <u>Melewar Estate 2.</u></p> <ul style="list-style-type: none"> - Agensi Pekerjaan Hollywood; Compliance Clause: E023-01/2019; Date: 12/08/2019. <p><u>Opportunity For Improvement:</u> The replanting contractor can further improve on their worker’s payslip by including employer contributions such as EPF, SOCSO and SIP Insurance.</p>	
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>JC Chang Group includes Supplement to Contract Agreement to the established contractor’s Contract Agreements that includes the Questionnaire on Legal Compliance and Ethical Conduct, Doc No. E/024-02/2022, dated 20/02/2020.</p> <p>Document of the main contract agreements as follows.</p> <p>1. <u>Asia Oil Palm Estate 2</u></p>	Complied

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		<ul style="list-style-type: none"> - Fong Cheng Co.; Replanting Agreement; Doc. No.: AOP2 (2022-2023) - 01 Date: 01/07/2022. – Scope includes felling, chipping and other infrastructure work for 198.22 Ha at Field No. PR22. 2. <u>Asia Palm Oil Mill</u> - Pengangkutan Dagang Tera Sdn Bhd; CPO & PK Transporter Agreement; Doc. No.: 2014B054761 Date: 01/07/2017 and renewal of the agreement with Doc. No.: AOP/P6/(AOM)/25/NKW & AOP/P6(AOM)/26/NKW which dated on 20/05/2022. Scope includes transport the the palm oil and palm kernel from the mill to various destinations specified in scheduled A. 3. Hwa Li Estate 3 - Fong Cheng Co.; Replanting Agreement; Doc. No.: HLE3/REP-Batch1-FY2021-22 Date: 01/03/2022. – Scope includes felling, chipping and other infrastructure work for 258.21 Ha at Field No. PR22A (ex PM96A at Main Div). 4. <u>Melewar Estate 2.</u> - Agensi Pekerjaan Hollywood; Compliance Clause: E023-01/2019; Date: 12/08/2019. 	
Criterion 2.3: All FFB supplies from outside the unit of certification are from legal sources.			
2.3.1	<p>(C) For all directly sourced FFB, the mill requires:</p> <ul style="list-style-type: none"> • Information on geo-location of FFB origins • Evidence of the ownership status or the right/claim to the land, or valid use of land by the grower/smallholder • One or more supporting documents for claims • Valid MPOB license <p>- Critical (Major) compliance -</p>	<p>Asia Palm Oil Mill receives certified and non-certified FFB to be processed in the mill. The mill receives RSPO Certified FFB from 3 of its own supply base estates and diverted FFB certified FFB from its sister mill (Melewar Palm Oil Mill). The mill also receives non-certified FFB from 3rd party Outgrowers and Estates. There was a total of 6 outsider suppliers that provide the non-certified FFB to the mill.</p>	Complied

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		<p>Information on geo-location of FFB origins, evidence of land ownership, documents of claims (weighbridge tickets and Delivery Chits) and valid MPOB licenses were available for verification. Sampled the documents as below.</p> <ol style="list-style-type: none"> 1. <u>Meran Sdn Bhd</u> <ol style="list-style-type: none"> a. MPOB License; License Number: 522051002000; Estate Area: 858.2 Ha; License Validity Period: 01/07/2022 – 30/06/2023. b. Sampled Land Title; Country Lease Number: 095311881. 2. <u>Sentrabayu Industries Sdn Bhd</u> <ol style="list-style-type: none"> a. MPOB License; License Number: 503662602000; License Validity Period: 01/04/2022 – 31/03/2023. b. Sampled Land Title; Country Lease Number: 095325876. 3. <u>Benar Waris Sdn Bhd</u> <ol style="list-style-type: none"> a. MPOB License; License Number: 502523302000; License Validity Period: 01/07/2022 – 30/06/2023. b. Sampled Land Title; Country Lease Number; 115360346 & 115360328. 	
2.3.2	<p>For all indirectly sourced FFB, the unit of certification obtains from the collection centres, agents or other intermediaries, the evidence as listed in Indicator 2.3.1.</p> <p>- Minor compliance -</p>	<p>The mill only receives FFB from its own supply base estates, its sister properties and external estates and outgrowers. There were no FFB traders or indirectly resourced FFB received by Asia Palm Oil Mill. Therefore, this indicator is not applicable.</p>	Not Applicable
Principle 3: Optimise productivity, efficiency, positive impacts and resilience			
Criterion 3.1: There is an implemented management plan that aims to achieve long-term economic and financial viability.			
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>For Estates, Business Management Plan established as the Summary of Oil Palm Expenditure for Estimate Year 2022/2023, 2023/2024, 2024/2025 & 2025/2026 which include the Cost of</p>	Complied

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	- Critical (Major) compliance -	Upkeep and Cost of Collection (Mature Harvesting) with consideration of expected FFB produced and mill's OER and KER. No smallholder within Asia Production Unit (APU). For Mill, Business Management Plan established as Three Year Product Projection for Asia Palm Oil Mill – 2023/24, 2034/25 & 2025/26 which include the Production Cost for projected FFB, OER and KER as well as Baseline Production Cost for Baseline OER and KER with forecast price of CPO and PK.																																			
3.1.2	An annual replanting programme projected for a minimum of five years with yearly review, is available. - Minor compliance -	As per Replanting Program Reviewed F/Y 2021/22 (2021 -2044); Appendix 1 as following: <table border="1" style="width: 100%; border-collapse: collapse;"> <thead> <tr> <th rowspan="2">Estate</th> <th colspan="6">Year/area replanting (ha)</th> </tr> <tr> <th>2022</th> <th>2023</th> <th>2024</th> <th>2025</th> <th>2026</th> <th>2027</th> </tr> </thead> <tbody> <tr> <td>AOPE2</td> <td>198.22</td> <td>269.00</td> <td>210.63</td> <td>196.20</td> <td>220.50</td> <td>209.21</td> </tr> <tr> <td>ME2</td> <td>213.09</td> <td>237.23</td> <td>201.85</td> <td>172.09</td> <td>149.85</td> <td>207.42</td> </tr> <tr> <td>HLE3</td> <td>281.12</td> <td>364.02</td> <td>321.63</td> <td>325.15</td> <td>354.59</td> <td>273.75</td> </tr> </tbody> </table> * AOPE2: Asia Oil Palm Estate 2; ME2: Melewar Estate 2; HLE3: Hwa Li Estate 3	Estate	Year/area replanting (ha)						2022	2023	2024	2025	2026	2027	AOPE2	198.22	269.00	210.63	196.20	220.50	209.21	ME2	213.09	237.23	201.85	172.09	149.85	207.42	HLE3	281.12	364.02	321.63	325.15	354.59	273.75	Complied
Estate	Year/area replanting (ha)																																				
	2022	2023	2024	2025	2026	2027																															
AOPE2	198.22	269.00	210.63	196.20	220.50	209.21																															
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HLE3	281.12	364.02	321.63	325.15	354.59	273.75																															
3.1.3	The unit of certification holds management reviews at planned intervals appropriate to the scale and nature of the activities undertake. - Minor compliance -	Latest APU Management Review Meeting was conducted on 26/07/2022 attended by the General Manager, all Estate Managers, all Estate Assistant Managers and Internal Control Team (ICT) personnel.	Complied																																		
Criterion 3.2: The unit of Certification regularly monitors and reviews their economic, social and environmental performance and develops and implements action plans that allow demonstrable Continuous improvement in key operations.																																					
3.2.1	(C) The action plan for continuous improvement is implemented, based on consideration of the main social and environmental impacts and opportunities of the unit of certification.	Continuous improvement plans for all operating units for review period August 2022 – August 2024 were documented under Environment and Social Improvement Plan available at all visited	Complied																																		

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	- Critical (Major) compliance -	operating units. Social and environmental were among pertinent elements covered in the action plan. On top of the established plan, allocation of capital expenditure (CAPEX) for process improvement, social and environmental components were also sighted.	
3.2.2	<p>As part of the monitoring and continuous improvement process, annual reports are submitted to the RSPO Secretariat using the [RSPO metrics template].</p> <p>PROCEDURAL NOTE: The RSPO metrics template is awaiting decision/agreement by RSPO and the issue is still being discussed. Until such metrics is agreed and developed, companies will carry on with existing reporting e.g. PalmGHG, Annual Communication of Progress (ACOP) reporting, and information provided to Certification Body and feedback via RSPO Secretariat is required.</p> <p>- Minor Compliance -</p>	RSPO metric template version 2.1 is used for the reporting of JC Chang - Asia Production Unit's metrics (economic, social and environment). Data reporting period is January to December 2021 for (social and environment metrics) and economic metrics from Oct 2021 – Sep 2022 (counting back from audit month). Based on verification with input data, no discrepancies of data reported for the said period for all metrics.	Complied
Criterion 3.3: Operating procedures are Appropriately documented, consistently implemented and monitored.			
3.3.1	<p>(C) Standard Operating Procedures (SOPs) for the unit of certification are in place.</p> <p>- Critical (Major) compliance -</p>	<p>Estates and POM have maintained and revised if required, the Documented Standard Operating Procedures file that contains both the safe operating procedures and the procedures to implement the various major field operations.</p> <p>The Standard Operation Procedure (SOP) for Asia POM contains the procedures for all activities as below:</p> <ul style="list-style-type: none"> - Reception Station (Q/040-03/2015) - Grading Station (Q/041-03/2015) - Fruit Handling Station (Q/042-02/2015) - Sterilizer Station (Q/043-02/2015) - Threshing Station (Q/045-03/2015) - Press Station (Q/046-03/2015) 	Complied

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		<ul style="list-style-type: none"> - Clarification Station (Q/047-02/2015) - Depericarper Station (Q/048-02/2015) - Nut & Kernel Station (Q/049-02/2015) - Boiler Station (Q/050-02/2015) - Engine Room Station (Q/051-06/2015) - Water Treatment Plant (Q/052-02/2015) - Turner Station (compost plant) (Q/060-01/2014) - Digestion Station (Biogas Plant) (Q/202-01/2016) <p>Estates have adequate SOP documented. Sampled Estate SOP Manual/procedures category for the following operations:</p> <ul style="list-style-type: none"> - Guidelines on Estate Vehicle Maintenance (G/001-01/2018) - Guidelines on Fertilizer Receipts, Management and Application (H/001- 03/2016) - Buffalo Management (K/001-01/2008) - Guidelines on Integrated Pest and Disease Management of Oil Palm (L/001-06/2017) - Rat control and baiting (L/002-07/2016) 	
3.3.2	<p>A mechanism to check consistent implementation of procedures is in place.</p> <p>- Minor Compliance -</p>	<p>The mechanism to check consistent implementation of procedures is in place mainly through internal audits conducted by Internal Compliance Team (ICT). Latest internal audits were conducted as per dates as following:</p> <ul style="list-style-type: none"> - APOM: 18-20/7/2022 - HLE3: 4-6/7/2022 - AOPE2: 12-14/7/2022 - ME2: 21-23/7/2022 	Non-compliance

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		<p>Nevertheless, some of the procedures were not effectively implemented as below;</p> <p><u>Hwa Li Estate Div.3 Estate</u></p> <p>During the visit to the Spraying Gang at Hwa Li Estate Div.3, the first aid box was inspected. It was sighted that the first aid box contained an expired item (Eye Medicine – Expired July 2022). This was not in line with the procedure – Guidelines on First Aid in the Workplace; Doc. Ref. No.: M/025-02/2014; Subject: First Aid Guidelines; Document Date: 21/09/2014 which states "<i>materials used, expired or spoiled medication should be replaced as soon as possible</i>". It was noted that monthly monitoring have been done yet the expired item has not been replaced. Hence, a minor non-conformity has been raised.</p>	
3.3.3	<p>Records of monitoring and any actions taken are maintained and available.</p> <p>- Minor Compliance -</p>	<p>Records of monitoring and actions taken are maintained and available as per sighted in specific indicators for environment (criterion 7.1 – 7.12) and others.</p> <p>Specifically, for APOM, an Environmental Compliance Assessment was conducted by DOE Registered Environmental Compliance Auditor as per report of Environmental Compliance Audit Report (Third Party Audit); DOE Tracking # ASSH(B)31/152/000/052/1/2022; Audit date: 9/6/2022; Report date: 23/6/2022 by Khairul Anuar Bin Abdul Hamid; EA0079/CESSWI3309</p>	Complied
<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</p>	<p>Asia Production Unit’s managements has no new plantings or new operations. The initial Social and Environmental Impact Assessment carried out by Wild Asia in a participatory manner involving</p>	Complied

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	<p>stakeholders and including the impacts of any smallholder/out-grower scheme, is documented.</p> <p>- Critical (Major) compliance -</p>	<p>stakeholders, has been documented in document dated 26/05/2011.</p> <p>For AOPE2 existing replanting, Environmental Impact Assessment (EIA) Proposed Replanting of 1,500.7 Hectares Oil Palm on Part of Lot CL095317383 at Asia Oil palm Estate Division 2, District of Kinabatangan, Sabah; Prepared for: Asia Oil Palm Sdn. Bhd.; Prepared by: North Borneo Environmental Services Sdn. Bhd.; Report Ref. # NOBES/21/116/GR; Date: January 2022</p> <p>For MPE2 existing replanting, Environmental Impact Assessment (EIA) Proposed Replanting of 1,770 Hectares Oil Palm at Melewar Estate Division 2, District of Kinabatangan, Sabah; Prepared for: Melewar Properties Sdn. Bhd.; Prepared by: North Borneo Environmental Services Sdn. Bhd.; Report Ref. # NOBES/18/50; Date: May 2018</p> <p>APOM In-House Environmental and Social Improvement Plan – Asia Palm Oil Mill; Date of Review: 25/6/2022; Next review date: 24/6/2024</p> <p>APOM Environmental Impact Assessments (EIA); Review Date: 07/02/2022; next review date: 6/2/2023 with latest inclusion of EIA for Geotube, Elecrostatic Precipitator.</p>	
<p>3.4.2</p>	<p>For the unit of certification, a SEIA is available and social and environmental management and monitoring plans have been developed with participation of affected stakeholders.</p> <p>- Minor Compliance -</p>	<p>Asia Production Unit’s managements conduct Social and Environmental Improvement Plan updated 25/06/2022. The managements established social and environmental management and monitoring plans included the inputs obtained during JCC and Gender Committee meetings. The meeting includes the agenda of 5 years plan for Asia Improvement Plan (N006) on the positive and negative impact on social and environmental aspect, company policy, due diligent, sustainability contract, stakeholder consultation, land and social conflict. The meeting attended manager, staffs, workers and shopper’s owner.</p>	<p>Complied</p>

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		<p>Agenda of meeting include with social impacts for Asia Production Unit’s management identified includes were foreign worker permit issue delay for renewal and reasonable prices at grocery for workers.</p> <p>Based on the above, there is evidence that the social monitoring plans were developed with participation of affected stakeholders.</p> <p>Monitoring including river water upstream and downstream sampling analysis latest conducted on 10/11/2022 for point W1 to W5. Previous sampling analysis as per sighted:</p> <ul style="list-style-type: none"> - Water Test Report # R22/3/377; Date: 29/3/2022 by KL-Kepong (Sabah) Sdn. Bhd. KDC Laboratory <p>Environmental Compliance report for the “Proposed Replanting of 1,770 Hectares of Oil Palm at CL.095311201, Melewar Estate Division 2, in the District of Kinabatangan, Sabah”; Submission of ECR in 2022 for the month: June (ECR 6); Date issue: 31/10/2022; EIA approval letter reference: JPAS/PP/KTN/600-1/11/1/309 (30); EIA approval date: 13/11/2018; Prepared by: North Borneo Environmental Services Sdn. Bhd. NOBES/19/65/CW.</p>	
3.4.3	<p>(C) The social and environmental management and monitoring plan is implemented, reviewed and updated regularly in a participatory way.</p> <p>- Critical (Major) compliance -</p>	<p>The Social and Environmental Management and Monitoring Plan is implemented, reviewed and updated regularly in a participatory way as sighted for sampled review by the mill i.e. APOM Minit Mesyuarat Pelan Penambahbaikan Alam Sekitar dan Social (SEIA); Date: 25/06/2022</p> <p>The monitoring plans contain impacts identified, action plan, action taken, timeframe, further action/review, person in charge, and timeframe for implementation.</p> <p>Social impacts for Asia Production Unit’s management identified includes were foreign worker permit issue delay for renewal and reasonable prices at grocery for workers.</p>	Complied

		<p>Document review, Asia Production Unit’s management has taken action to monitor the delay of renewal for foreign worker permit issue with recruitment agency. Asia Production Unit’s management will have meeting with the grocery shop owner to ensure sufficient supplies and stock at reasonable prices.</p> <p>Environmental Management Plans were developed, consisting of Waste Management Plan, Water Management Plan, HCV Area & Biodiversity, Energy Management & Pollution Prevention and IPM Management Plan which were available for verification. Among the implantation of the environment management plan were mainly focused on environmental conservations and reductions of pesticides and fossil fuels. Among the implementation that were verified included the implementation of IPM in the estates such as the well-established beneficial plants, segregation of waste and disposal in accordance with legal requirements, bi-annual monitoring of smoke emission at the mill, well established buffer zones and periodic water quality monitoring among others. The Environment Management Plan is reviewed yearly, usually at the beginning of the year with inputs obtained from the management and workers representatives.</p>	
<p>Criterion 3.5: A system for managing human resources is in place.</p>			
<p>3.5.1</p>	<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>JC Chang Group established Procedure of Recruitment Selection, Hiring, Promotion, Retirement and Termination, Doc. No. E020-01/2019 dated 12/08 2019. The procedure describes is to ensure the mechanism successfully met his objective in stabilizing the growth of workforce in the organization.</p> <p>This procedure is available and briefed to works periodically during muster.</p>	<p>Complied</p>

<p>3.5.2</p>	<p>Employment procedures are implemented, and records are maintained. - Minor Compliance -</p>	<p>JC Chang Group established Procedure of Recruitment Selection, Hiring, Promotion, Retirement and Termination, Doc. No. E020-01/2019 dated 12/08 2019. The procedure describes is to ensure the mechanism successfully met his objective in stabilizing the growth of workforce in the organization.</p> <p>The procedures includes with:</p> <ol style="list-style-type: none"> 1. Recruitment, selection and hiring <ol style="list-style-type: none"> i. No Child labour ii. Young person under 18 years should not be employed iii. No recruitment of woman to work between 10.00pm until 5.00am iv. No employment of pregnant or breastfeeding woman to works related to agrochemical handling v. No discriminatory on local and foreinger. vi. An individual employee file should be opened by person responsible for post-arrival orientation and employee ID should be verified by account department from respective operating unit. A checklist of post-arrival orientation should be documented to facilitate the processes of orientation while, a checklist also should be documented to guide consistency of individual employee filing. The individual employee file should cover at least but not limited to:- employee contract agreement, terms/conditions, training, travel document etc. Management not allowed to retent identity documents or passport, charging the workers for recruitment fees, involuntary overtime, debt bondage and withholding wages. 2. Promotion – Outstanding employee will always attract the management attention. 	<p>Non-compliance</p>
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		<p>3. Retirement – Age of retirement will be based on provision under Minimum Retirement Age, Act 2012 and its regulations.</p> <p>4. Termination – Contract of employment can be terminated freely by either parties (employer and employee with respect to employment contract’s terms and conditions signed during hiring. No penalties should be imposed if the termination is based on employment contract’s terms and conditions signed during hiring. Worker should have a freedom to resign, and management should not hold the balance of wages unless under requirement of income tax clearance; upon income tax clearance done, balance wages should be returned to the employee as soon as possible.</p> <p>Employment procedures are implemented, and all relevant records duly maintained. This was evidenced from the sampled employment files of workers. Each file contains job application forms, relevant certificates if available, personal details, copies of passports or NRICs, medical reports, assessment form, employment contract, training records, etc.</p> <p>Minor Non-conformance:</p> <p>Document review of employment contract for foreign worker found that Asia Palm Oil Mill, Asia Oil Palm Estate 2, Hwa Li Estate 3 and Melewar Estate 2 still used the old version of 'Perjanjian Pekerjaan (Bukan Warganegara) which is still exist with Clause 13.</p> <p>The old version is not in line with the latest revise version of Appendix 2, Employment Contract (Perjanjian Pekerjaan - Bukan Warganegara) as per Guidelines on Workers Employment Terms and Conditions for Sabah Estate Workers, Doc. No.: E/009-08/2021 updated 22/12/2021 issued by HR Department.</p>	
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Criterion 3.6: An occupational health and safety (H&S) plan is documented, effectively communicated and implemented.			
3.6.1	<p>(C) All operations are risk assessed to identify H&S issues. Mitigation plans and procedures are documented and implemented.</p> <p>- Critical (Major) compliance -</p>	<p><u>Asia Palm Oil Mill</u></p> <ol style="list-style-type: none"> 1. HIRAC was available to address all the risks and hazards associated to the operations in the estate. The HIRARC was reviewed on 24/07/2022. <ul style="list-style-type: none"> - During the site visit to the Boiler Station it was seen that 2 shovels were in motion without reverse siren. The hazards and risk controls related to this operation were not fully identified in the HIRARC. - During the site visit to the FFB Ramp it was sighted that the FFB graders were wearing Gardener Hats. This was not in line with the HIRARC for Grading which states; Suitable PPE is provided: Safety Helmet & Gardener Hat. 2. Chemical Health Risk Assessment was conducted in the mill in compliance to the OSHA Act 1994 and the Use and Standard of Exposure of Chemicals Hazardous to Health (USECHH) Regulations 2000. CHRA Report Reference Number: HQ/15/ASS/00/364-2020/12; CHRA Assessor: Anthony Astral Chan (HQ/15/ASS/00/364); Date of Assessment: 27/06/2020. 3. Medical Surveillance Programme has been performed successfully for the year 2022 for the mill workers exposed to hazardous chemicals and fumes. A total of 8 workers have been examined on 31/07/2022 at Klinik Mabello (Paris) Sdn Bhd and the results indicated that there were no workers with abnormal results. 4. Noise Risk Assessment was conducted in compliance with Occupational Safety and Health Act (Noise Regulations) 2019. Noise Risk Assessment (NRA) has been conducted by Sherman Services & Supply, Mr. Gabriel Sherman Zabela (MyKKP 	Non-compliance

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		<p>Registration Number: HQ/14/PEB/00/125) on 06 - 07/10/2019. NRA Report (Report Number: SSS/NOISE-0164/19) available for verification. The recommendation stated by the assessor have been affectively addressed as verified.</p> <p>5. An audiometric testing was done on 02/08/2022 for 77 mill employees deemed to be exposed to excessive noise in the mill. The test was conducted by Klinik Mabello (Paris) Sdn Bhd. The report indicated that 57 workers had normal hearing, 20 workers with abnormal hearing including 11 workers with Standard threshold shift. The workers with STS have been sent for a retest on 11/11/2022. The results were obtained and indicated there were no occupational concerns.</p> <p><u>Asia Complex Estates</u></p> <p>a. HIRARC was available to address all risk and hazards associated to the operations in the estates. Verified the HIRARC for Ramp, Manuring, Harvesting Spraying, Workshop and Genset Operation. Verification done on the documentations and operations indicated that all the risk controls were adhered to.</p> <p>b. Chemical Health Risk Assessment was conducted in the estates in compliance to the OSHA Act 1994 and the Use and Standard of Exposure of Chemicals Hazardous to Health (USECHH) Regulations 2000. The CHRA Report were available for the estates visited as follows.</p> <p>- <u>Asia Oil Palm Estate 2</u> CHRA Report Reference Number: HQ/15/ASS/00/364-2022/22; CHRA Assessor: Anthony Astral Chan (DOSH Registration Number: HQ/15/ASS/00/364; Date of Assessment: 21/09/2022.</p>	
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		<ul style="list-style-type: none"> - <u>Melewar Estate Div 2</u> CHRA Report Reference Number: JKPP KIM127/453/6 (30) - 2018/021; CHRA Assessor: Mohd Amin Bin Adrah (JKPP KIM127/453/6(30)); Date of Assessment: 27/08/2018; Date of Report Submission: 17/10/2018. The estate have conducted 3 additional CHRA assessment since then as there were additional fertilisers introduced in the operations. - <u>Hwa Li Estate Div 3</u> CHRA (Additional Assessment) Report Reference Number: HQ/15/ASS/00/364-2021/46; CHRA Assessor: Anthony Astral Chan (JKPP HQ/15/ASS/00/364); Date of Assessment: 04/08/2021; CHRA Report was available for verification. CHRA (Additional Assessment) Report Reference Number: HQ/15/ASS/00/364-2022/30; CHRA Assessor: Anthony Astral Chan (JKPP HQ/15/ASS/00/364); Date of Assessment: 01/09/2022; CHRA (Additional Assessment) Report was available for verification. c. Medical Surveillance were conducted in the estates based on the recommendation of the CHRA for workers exposed to hazardous chemicals. Results of annual medical surveillance were available in the estates for verification as follows. - <u>Asia Oil Palm Estate 2</u> The medical surveillance programme for the year 2022 has been performed on 17/03/2022 at Mabello Group of Clinics for 34 workers identified to be exposed to hazardous chemicals, fertilisers and fumes in the estate. The results indicated that all workers were fit to work. - <u>Melewar Estate Div 2</u> 	
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		<p>The medical surveillance programme for the year 2022 has been performed on 05/08/2022 for 31 employees at Klinik Mabello (Paris) Sdn Bhd. The results indicated all workers were certified fit to work with no occupational related medical conditions.</p> <ul style="list-style-type: none"> - <u>Hwa Li Estate Div 3</u> The medical surveillance programme for the year 2022 has been performed on 03/08/2022 for 56 employees at Klinik Mabello (Paris) Sdn Bhd. The results indicated all workers were certified fit to work with no occupational related medical conditions. <p>d. Noise Risk Assessment was conducted in compliance with Occupational Safety and Health Act (Noise Regulations) 2019. The NRA Report were available for verification at all the sampled sites. The recommendation stated by the assessor have been affectively addressed as verified.</p> <ul style="list-style-type: none"> - <u>Asia Oil Palm Estate 2</u> Noise Risk Assessment (NRA) has been conducted by Sherman Services & Supply, Mr. Gabriel Sherman Zabela (MyKKP Registration Number: HQ/14/PEB/00/125) on 08/10/2019. NRA Report (Report Number: SSS/NOISE-0166/19) was available for verification. - <u>Melewar Estate Div. 2</u> Noise Risk Assessment (NRA) has been conducted by Sherman Services & Supply, Mr. Gabriel Sherman Zabela (MyKKP Registration Number: HQ/14/PEB/00/125) on 10/10/2019. NRA Report (Report Number: SSS/NOISE-0168/19) available for verification. 	
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		<ul style="list-style-type: none"> - <u>Hwa Li Estate Div 3</u> Noise Risk Assessment (NRA) has been conducted by Sherman Services and Supply, Mr. Gabriel Sherman Zabela (MyKKP Registration Number: HQ/14/PEB/00/125) on 09/10/2019. NRA Report (Report Number: SSS/NOISE-0167/19) was available for verification. e. Audiometric Testing was done in the estates based on the recommendation provided in the Noise Risk Assessment in compliance with OSHA 1994 – OSH (NOISE Exposure) Regulations 2019. Reports for the annual audiometric test was available for verification. - <u>Asia Oil Palm Estate 2</u> Audiometric Test was done on 17/03/2022 for 20 workers deemed to be exposed to excessive noise in the estate. The results indicated that 9 workers had normal hearing and 11 workers had hearing loss including 1 worker with STS and 2 workers with hearing Impairment. The worker with STS and Hearing Impairment has been retested on 07/07/2022. The results indicated 1 worker had STS due to exposure of excessive noise at workplace. The management has reported the issue to DOSH via JKKP7. All reports were available for verification. - <u>Melewar Estate Div. 2</u> Audiometric Test was done on 08/03/2022 for 7 employees deemed to be exposed to excessive noise by Klinik Mabello (Paris). The results indicated that 6 workers have normal hearing and 1 workers had hearing loss which was required to be sent for retest within 3 months. The retest has been conducted for the mentioned worker on 15/06/2022 and results 	
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		<p>available for verification. The recommendations provided have been addressed by the estate accordingly.</p> <ul style="list-style-type: none"> - <u>Hwa Li Estate Div 3</u> <p>Audiometric Test was done on 17/03/2022 for 38 employees deemed to be exposed to excessive noise at the estate by Klinik Mabello (Paris). The results indicated that 25 workers have normal hearing and 13 workers had hearing loss. Out of the 13 workers, 4 workers were categorised with Standard Threshold Shift and required to undergo retest within 3 months. The workers were referred to OHD on 25/06/2022 and the audiometric retest was conducted on 07/2021 for 2 workers as recommended by the OHD.</p>	
<p>3.6.2</p>	<p>(C) The effectiveness of the H&S plan to address health and safety risks to people is monitored. - Critical (Major) compliance -</p>	<p>Annual Health and Safety Plan available for the estate and mill are mostly implemented through Annual Training Program 2022 and monitored via inspections 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 Sustainability Department; • Work Site Inspection (WSI) by site OSH Committee; 	<p>Complied</p>

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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 • Audiometric Monitoring • Daily Monitoring Checklist such as PPE Checklist <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>	A documented training programme has been developed and available in the Training and Safety Briefing Plan for Year 2022. The trainings were sighted to have included Gender Specific Training and involves staffs and workers.	Complied												
3.7.2	<p>Records of training are maintained.</p> <p>- Minor Compliance -</p>	<p>Records of trainings were maintained by the Mill and all estates as below:</p> <p><u>Asia Palm Oil Mill</u></p> <table border="1" style="width: 100%; border-collapse: collapse;"> <thead> <tr> <th style="text-align: left;">Training</th> <th style="text-align: left;">Date</th> </tr> </thead> <tbody> <tr> <td>Confined Space Training</td> <td>18/03/2022</td> </tr> <tr> <td>Noise Conservation Training</td> <td>29/04/2022</td> </tr> <tr> <td>Waste Management & Disposal Training</td> <td>23/08/2022</td> </tr> <tr> <td>PPE Training</td> <td>07/01/2022</td> </tr> <tr> <td>HCV & Open Burning Training</td> <td>22/04/2022</td> </tr> </tbody> </table>	Training	Date	Confined Space Training	18/03/2022	Noise Conservation Training	29/04/2022	Waste Management & Disposal Training	23/08/2022	PPE Training	07/01/2022	HCV & Open Burning Training	22/04/2022	Complied
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		Sexual Harassment Training	15/04/2022																			
<u>Asia Oil Palm Estate 2</u>																						
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		Triple Rinse Training	10/22/1011	
		Waste Management Training	26/10/2022	
		<u>Hwa Li Estate Div 3</u>		
		Training	Date	
		Harvesting Training	10/01/2022	
		SW Management Training	04/07/2022	
		Linesweeper Training	18/07/2022	
		Water Treatment Training	08/08/2022	
		IPM Training	18/05/2022	
		Noise Control Exposure Training	09/03/2022	
		Traceability training	13/01/2022	

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3.7.3	<p>Appropriate training is provided for personnel carrying out the tasks critical to the effective implementation of the Supply Chain Certification Standard (SCCS). Training is specific and relevant to the task(s) performed.</p> <p>- Minor Compliance -</p>	<p>Asia Oil Palm Mill has conducted Supply Chain Trainings for all critical points identified in the Supply Chain Process. The stations identified under the critical points were weighbridge, grading, extraction, clarification, nut & kernel plant, laboratory, despatch, waste management and transporter. The training records were available for verification. Sampled the training records as below.</p> <table border="1" data-bbox="1137 571 1917 922"> <thead> <tr> <th>Training</th> <th>Date</th> </tr> </thead> <tbody> <tr> <td>Weighbridge Training</td> <td>23/05/2022</td> </tr> <tr> <td>Grading Training</td> <td>26/02/2022</td> </tr> <tr> <td>Extraction Station Training</td> <td>11/03/2022</td> </tr> <tr> <td>Mill Laboratory Training</td> <td>28/08/2022</td> </tr> <tr> <td>Security Despatch Training</td> <td>24/06/2022</td> </tr> <tr> <td>Waste Management (Solven Plant) Training</td> <td>20/09/2022</td> </tr> </tbody> </table>	Training	Date	Weighbridge Training	23/05/2022	Grading Training	26/02/2022	Extraction Station Training	11/03/2022	Mill Laboratory Training	28/08/2022	Security Despatch Training	24/06/2022	Waste Management (Solven Plant) Training	20/09/2022	Complied
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<p>Criterion 3.8: Supply chain requirement for mills (note: All supply chain requirements are considered as Critical (C). However, it will not contribute to suspension if there is more than 5 non-compliance within a principle)</p>																	
3.8.1	<p>Identity Preserved Module</p> <p>A mill is deemed to be Identity Preserved (IP) if the FFB processed by the mill are sourced from plantations/estates that are certified against the RSPO Principles and Criteria (RSPO P&C), or against the Group Certification scheme.</p> <p>Certification for CPO mills is necessary to verify the volumes and sources of certified FFB entering the mill, the implementation of any processing controls (for example, if physical separation is used), and volume sales of RSPO certified products. If a mill process certified and uncertified FFB</p>	<p>Asia POM receives and process both certified and non-certified FFB. Therefore Asia POM have opted to use the Mass balance supply chain system module. Hence this indicator is not applicable.</p>	Not Applicable														

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	without physically separating them, then only Mass Balance Module is applicable.		
3.8.2	<p>Mass Balance Module</p> <p>A mill is deemed to be Mass Balance (MB) if the mill process FFB from both RSPO certified and uncertified plantations/estates. A mill may be taking delivery of FFB from uncertified growers, in addition to those from its own and 3rd party certified supply base. In that scenario, the mill can claim only the volume of oil palm products produced from processing of the certified FFB as MB.</p>	Asia POM receives and process both certified and non-certified FFB. Therefore Asia POM have opted to use the Mass balance supply chain system module. During this assessment the audit team verified the volume and sources of certified and non-certified FFB entering the mill, the implementation of processing control and volume sales of the RSPO product.	Complied
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.	<p>The mill has met all registration and reporting requirements for the appropriate supply chain through the RSPO supply chain managing organization, PalmTrace.</p> <p>The registration of PalmTrace will be carried out by the Marketing Department in HQ. Company has registered in PalmTrace system as follows:</p> <p>Members ID: RSPO_PO1000000524</p> <p>Member category : Oil Mill</p>	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>	Asia Palm Oil Mill have established Standard Operation Procedures for SCCS which have been divided to 9 Critical Control Point, stating the procedures for each points. The SOPs are as below.	Complied

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<p>a) Complete and up to date procedures covering the implementation of all the elements of the supply chain model requirements.</p> <p>b) Complete and up to date records and reports that demonstrate compliance with the supply chain model requirements (including training records).</p> <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>	<ol style="list-style-type: none"> 1. Critical Control Point 1: Reception Station; Doc Reference Number: CCP/01-06/2019-AOM; Doc Date: 02/05/2019. 2. Critical Control Point 2: Grading Station; Doc Reference Number: CCP/02-05/2019-AOM; Doc Date: 08/07/2019. 3. Critical Control Point 3: Extraction Station; Doc Reference Number: CCP/03-04/2019-AOM; Doc Date: 12/06/2019. 4. Critical Control Point 4: Clarification Station; Doc Reference Number: CCP/04-04/2019-AOM; Doc Date: 12/06/2019. 5. Critical Control Point 5: Nut & Kernel Station; Doc Reference Number: CCP/05-04/2019-AOM; Doc Date: 12/06/2019. 6. Critical Control Point 6: Lab Monitoring; Doc Reference Number: CCP/06-04/2019-AOM; Doc Date: 19/06/2019. 7. Critical Control Point 7: CPO & PK Despatch; Doc Reference Number: CCP/07-07/2019-AOM; Doc Date: 27/07/2020. 8. Critical Control Point 8: Waste Management – Compost Plant, Solvent Plant and Biogas Plant; Doc Reference Number: CCP/08-02/2019-AOM; Doc Date: 17/07/2019. 9. Critical Control Point 9: Transport’s Ordering; Doc Reference Number: CCP/09-02/2019-AOM; Doc Date: 11/05/2019. <p>– Seen the records that included in the procedure are as below Weighbridge tickets, Training records, Internal audit report, Invoice and contracts, Delivery and storage records and Daily Production Report.</p> <p>– Asia Oil Palm Mill has conducted Supply Chain Trainings for all critical points identified in the Supply Chain Process. The stations identified under the critical points were weighbridge, grading, extraction, clarification, nut & kernel plant, laboratory, despatch, waste management and transporter. The training</p>
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		<p>records were available for verification. Sampled the training records as below.</p> <table border="1" data-bbox="1191 435 1917 783"> <thead> <tr> <th>Training</th> <th>Date</th> </tr> </thead> <tbody> <tr> <td>Weighbridge Training</td> <td>23/05/2022</td> </tr> <tr> <td>Grading Training</td> <td>26/02/2022</td> </tr> <tr> <td>Extraction Station Training</td> <td>11/03/2022</td> </tr> <tr> <td>Mill Laboratory Training</td> <td>28/08/2022</td> </tr> <tr> <td>Security Despatch Training</td> <td>24/06/2022</td> </tr> <tr> <td>Waste Management (Solven Plant) Training</td> <td>20/09/2022</td> </tr> </tbody> </table> <ul style="list-style-type: none"> - Mohd Faisal Bin Awang Amit has been appointed as the PIC on Announcement of Palm Trace as stated in the appointment letter dated 04/07/2022 undersigned by the Mill Engineer. He was also appointed as the PIC for Traceability as stated in the separate appointment letter dated 04/07/2022 undersigned by the mill engineer as well. - As for documented procedures for receiving and processing certified and non-certified FFBS was available under documented procedure of Mechanism for Handling Non-Conforming Oil Pal Product and Document Ref SC/MEC-06/2020-AOM dated 6/10/2020. 	Training	Date	Weighbridge Training	23/05/2022	Grading Training	26/02/2022	Extraction Station Training	11/03/2022	Mill Laboratory Training	28/08/2022	Security Despatch Training	24/06/2022	Waste Management (Solven Plant) Training	20/09/2022	
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Waste Management (Solven Plant) Training	20/09/2022																
3.8.6	<p>Internal Audit</p> <p>i) The mill shall have a written procedure to conduct annual internal audit to determine whether the mill:</p> <p>a. Conforms to the requirements in the RSPO Supply Chain Certification Standard and the RSPO Market Communications and Claims Documents.</p>	<p>JC Chang Group has developed Guideline for Internal Auditing and Management Review of the Sustainability and Supply Chain System; (Doc. Ref No.: T/001-03/2018, Subject: Audit procedures (management Review; Doc Date: 03/06/2018. The frequency of the internal audit to be on a planned basis over the course of a year. The latest internal audit was carried out on 18 - 20/07/2022 by</p>	Complied														

	<p>b. Effectively implements and maintains the standard requirements within its organisation.</p> <p>ii) Any non-conformities found as part of the internal audit shall be issued corrective action. The outcomes of the internal audits and all actions taken to correct non-conformities shall be subject to management review at least annually. The mill shall maintain the internal audit records and reports.</p>	<p>Internal Control Team (ICT). There no 1 Critical 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. The mill have provided the root cause, correction and corrective action plans to the ICT.</p>													
<p>3.8.7</p>	<p>Purchasing and Goods In</p> <p>i) The mill shall verify and document the tonnage and sources of certified and the tonnage of non-certified FFBs received.</p> <p>ii) The mill shall inform the CB immediately if there is a projected overproduction of certified tonnage.</p> <p>iii) The mill shall have a mechanism in place for handling non-conforming FFB and/or documents.</p>	<p>Purchasing and Goods In.</p> <p>1. The mill verifies and documents the tonnage and sources of certified and the tonnage of non-certified FFBs received at the Reception Station. The operation is guided by the procedure - Critical Control Point 1: Reception Station; Doc Reference Number: CCP/01-06/2019-AOM; Doc Date: 02/05/2019. All tonnage are recorded in the Weighbridge – Receiving Slip. Sampled documents of FFB received from Hwa Li Estate (Ticket Number: FFB22004285W; Date: 31/03/2022) and Sentrabayu Enterprise Sdn Bhd (Ticket Number: FFB21003851W; Date: 31/03/2021) was verified.</p> <p>2. The mill are aware that they shall inform the CB immediately if there is a projected overproduction of certified tonnage.</p> <p>There has been an over production of CPO, PK and FFB as stated in the table below.</p> <table border="1" data-bbox="1189 1129 1917 1362"> <thead> <tr> <th>Period</th> <th>CPO</th> <th>PK</th> <th>FFB</th> </tr> </thead> <tbody> <tr> <td>Forecast (Jan 22 – Dec 22)</td> <td>22,730.25</td> <td>5,697.87</td> <td>122,535.00</td> </tr> <tr> <td>Actual Produced (Jan 22 – Oct 22)</td> <td>25,303.62</td> <td>6,204.62</td> <td>124,290.10</td> </tr> </tbody> </table>	Period	CPO	PK	FFB	Forecast (Jan 22 – Dec 22)	22,730.25	5,697.87	122,535.00	Actual Produced (Jan 22 – Oct 22)	25,303.62	6,204.62	124,290.10	<p>Non-compliance</p>
Period	CPO	PK	FFB												
Forecast (Jan 22 – Dec 22)	22,730.25	5,697.87	122,535.00												
Actual Produced (Jan 22 – Oct 22)	25,303.62	6,204.62	124,290.10												

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		<p>It was verified that Asia POM have not informed the CB on the overproduction of the certified tonnage despite the volume already surpassing the forecast provided. Hence a Critical Nonconformity has been raised.</p> <p>3. Asia POM has document Mechanism for Handling Non-Conforming Oil Palm Products And/or Document; Doc Number: SC/MEC-08/2022-AOM; Doc Date: 27/07/2022 , which has covered the process of handling non-conforming products or documents.</p>	
<p>3.8.8</p>	<p>Sales and Goods Out</p> <p>The supplying mill shall ensure that the following minimum information for RSPO certified products is made available in document form. The information shall be complete and can be presented either on a single document or across a range of documents issued for RSPO certified oil palm products (for example, delivery notes, shipping documents and specification documentation):</p> <ul style="list-style-type: none"> a) The name and address of the buyer; b) The name and address of the seller; c) The loading or shipment / delivery date; d) The date on which the documents were issued; 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>Asia POM ensured all minimum information for RSPO certified products is made available in set of documents of all products deliveries as per sample sighted as below:-</p> <p>Sampled of CPO contract: AOP/A0492/07/22 dated 23/06/2022, quantity 1,700 mt (delivery month – July 2022)</p> <ul style="list-style-type: none"> a. The name and address of the buyer: XXX b. The name and address of the seller; Asia Oil Palm Sdn Bhd c. The delivery date: 16/08/2022 d. The date on which the documents were issued: 16/08/2022 e. RSPO Certificate Number: RSPO 651278 f. A description of the product, including the applicable supply chain model: Crude Oil Palm RSPO MB g. The quantity of the products delivered: 30.520 Mt h. Any related transport documentation: MPOB L3 Form – No: F806248 i. A unique identification number: Ticket No: CPORS22000251W <p>Sampled of PK contract: AOP/2474/08/22 dated 23/06/2022, quantity 700 mt (delivery month – July 2022)</p> <ul style="list-style-type: none"> a. The name and address of the buyer: XXX b. The name and address of the seller: Asia Oil Palm Sdn Bhd 	<p>Complied</p>

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		<ul style="list-style-type: none"> c. The delivery date: 15/08/2022 d. The date on which the documents were issued: 15/08/2022 e. RSPO Certificate Number: RSPO 651278 f. A description of the product, including the applicable supply chain model: Palm Kernel RSPO MB g. The quantity of the products delivered: 24.400 Mt h. Any related transport documentation: Palm Kernel Delivery Note: PK 11169 i. A unique identification number: Ticket No: PKRS22000172W 	
<p>3.8.9</p>	<p>Outsourcing Activities</p> <ul style="list-style-type: none"> i) The mill shall not outsource its milling activities. In cases where he mill outsources activities to independent third parties (e.g. subcontractors for storage, transport or other outsourced activities), the mill holding the certificate shall ensure that the independent third party complies with relevant requirements of this RSPO Supply Chain Certification ii) The mill shall ensure the following: <ul style="list-style-type: none"> a) The mill has legal ownership of all input material to be included in outsourced processes b) The mill has an agreement or contract covering the outsourced process with each contractor through a signed and enforceable agreement with the contractor. The onus is on the mill to ensure that certification body (CB) has access to the outsourcing contractor or operation if an audit is deemed necessary. c) The mill has a documented control system with explicit procedures for the outsourced process which is communicated to the relevant contractor. d) The mill shall furthermore ensure (e.g. through contractual arrangements) that independent third parties engaged provide relevant access for duly accredited CBs to their respective 	<p>The outsource in Asia POM was involved only for transportation of products CSPO and CSPK. This implementation was based on the procedure; Doc Ref; SC/07-06/2019-AOM; Critical control point 7: CPO and PK despatch and Transportation dated 30/9/2019. Sighted the recent contract for both CSPO and CSPK were delivered hence requiring outsource process; transportation. Sighted as per below record:-</p> <p>CPO and PK transportation agreement between Asia Oil Palm Sdn Bhd and Pengangkutan Dagang Tera Sdn Bhd; Dated 20/05/2020 and valid until 30/6/2023. The extension can refer to letter AOP/P6(AOM)/25/NKW dated 20/5/2020</p>	<p>Complied</p>

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	operations, systems, and all information, when this is announced in advance.		
3.8.10	The mill shall record the names and contact details of all contractors used for the physical handling of RSPO certified oil palm products.	Names and contact details of transporters that physically handle certified oil palm products were recorded and available for verification in the Stakeholder List – Contractor which was last updated on 23/11/2022.	Complied
3.8.11	The mill shall inform its CB in advance prior to conduct of its next audit of the names and contact details of any new contractor used for the physical handling of RSPO certified oil palm products.	Names and contact details of transporters used for the physical handling of RSPO certified oil palm products to be informed by mill supply chain PIC upon available.	Complied
3.8.12	<p>Record keeping</p> <p>i) The mill shall maintain accurate, complete, up-to-date and accessible records and reports covering all aspects of this RSPO Supply Chain Certification Standard requirements.</p> <p>ii) Retention times for all records and reports shall be a minimum of two (2) years and shall comply with relevant legal and regulatory requirements and be able to confirm the certified status of raw materials or products held in stock.</p> <p>iii) For Identity Preserved Module, the mill shall record and balance all receipts of RSPO certified FFB and deliveries of RSPO certified CPO and PK on a real-time basis.</p> <p>iv) For Mass Balance Module, the mill:</p> <p>a) Shall record and balance all receipts of RSPO certified FFB and deliveries of RSPO certified CPO and PK on a real-time basis and / or three-monthly basis.</p> <p>b) All volumes of certified CPO and PK that are delivered are deducted from the material accounting system according to conversion ratios stated by RSPO.</p>	<p>Asia POM have kept records such as Supply Chain Procedures, SCCS Internal Audits, SCCS Trainings, Mass Balance Records and Despatch Notes that were available for verification.</p> <p>The records are kept for 7 years as per own SOP, Standard Operation Procedure for SCC Standard Mass Balance Calculation; Record Keeping. Doc Ref No: SC/MBC-07/2021-AOM; Document Date: 13/08/2021.</p> <p>Asia Palm Oil Mill receives and processes both certified and non-certified FFB. Hence it uses the Mass Balance Module.</p> <p>a. The mill has recorded and balanced all receipts of RSPO certified FFB and deliveries of RSPO certified CPO and PK on three monthly basis. The records were available in the Quarterly Mass Balance 2022.</p> <p>b. Quarterly Mass balance 2022 was reviewed. All the certified CPO and PK products sold were deducted from the accounting system. Sales of Certified products as ISCC or downgraded as conventional products have been deducted from the accounting system.</p> <p>c. Quarterly Mass balance 2022 was reviewed. All sales of certified CPO and PK were from positive stocks.</p>	Complied

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	c) The mill can only deliver Mass Balance sales from a positive stock. Positive stock can include product ordered for delivery within three (3) months. However, a mill is allowed to sell short (i.e. product can be sold before it is in stock.														
3.8.13	<p>Extraction Rate</p> <p>The oil extraction rate (OER) and the kernel extraction rate (KER) shall be applied to provide a reliable estimate of the amount of certified CPO and PK from the associated inputs. Mill shall determine and set their own extraction rates based upon past experience, documented and applied it consistently.</p>	<p>The OER and KER are measured daily and reported on a daily, weekly and summarized on a monthly and yearly basis through the mill production report. The OER and KER is derived on an actual CPO and PK production against the FFB received.</p> <table border="1"> <thead> <tr> <th>Month</th> <th>OER %</th> <th>KER %</th> </tr> </thead> <tbody> <tr> <td>August 2022</td> <td>20.44</td> <td>4.39</td> </tr> <tr> <td>September 2022</td> <td>20.23</td> <td>4.62</td> </tr> <tr> <td>October 2022</td> <td>21.03</td> <td>4.34</td> </tr> </tbody> </table>	Month	OER %	KER %	August 2022	20.44	4.39	September 2022	20.23	4.62	October 2022	21.03	4.34	Complied
Month	OER %	KER %													
August 2022	20.44	4.39													
September 2022	20.23	4.62													
October 2022	21.03	4.34													
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	<p>Processing</p> <p>For Identity Preserved Module, the mill shall assure and verify through documented procedures and record keeping that the RSPO certified oil palm product is kept separated from non-certified oil palm products, including during transport and storage to strive for 100% separation.</p>	Not applicable as Asia Palm Oil Mill is opted for Mass Balance module.	Not Applicable												
3.8.16	<p>Registration of Transactions</p> <p>i) Shipping Announcement in the RSPO IT platform shall be carried out by the mills when RSPO certified products are sold as certified to refineries, crushers, and traders not more than three months after dispatch with the dispatch date being the Bill of Lading or the dispatch documentation date.</p>	<p>Shipping Announcement in the RSPO IT was carried out by the mills upon sale of RSPO certified products not more than three months after dispatch. Sampled the shipping announcement as below:</p> <ul style="list-style-type: none"> Product Name: CSPO; Transaction ID: TR-adabd3bd-7797, last delivery on 16/08/2022, created on 19/09/2022 and confirmed on 22/09/2022. 	Complied												

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	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.	– Product Name: CSPK; Transaction ID: TR-ca772d57-869c; Last Delivery on 15/08/2022, Created on 19/08/2022 and confirmed on 22/09/2022. RSPO certified volumes sold under ISCC scheme and as conventional were removed in the RSPO IT platform.	
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.	Asia POM was not made any claims for its sustainable products.	Not Applicable
General corporate communications			
4.1	A corporate communication is one made by any RSPO member that highlights its membership of the RSPO and/or its commitment to the principles of the RSPO. Corporate communication is an 'off-product' claim.	Asia POM was not made any claims for its sustainable products.	Not Applicable
4.2	In corporate communications a member is allowed to: a. Display its RSPO membership status b. Display the RSPO web address (www.rspo.org) c. State that the member supports the work of the RSPO d. State the member's history with regard to the RSPO. e. Use the RSPO trademark to promote its membership of the RSPO. 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.	Asia POM was not made any claims for its sustainable products.	Not Applicable
4.3	In corporate communications RSPO members must not make any statement that may lead consumers to believe that RSPO membership by itself implies the selling of RSPO-certified oil palm products.	Carotino/JC Chang Group does not make any statement that may lead consumers to believe that RSPO membership by itself implies the selling of RSPO-certified oil palm products.	Complied

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4.4	Members must ensure that all communication is consistent, clear and cannot mislead consumers or other stakeholders as to the certified content of oil palm products in the member's own products.	Carotino/JC Chang Group ensure 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.	Complied
4.5	Members are not allowed to use the RSPO corporate logo as shown in the RSPO Rules on Market Communications & Claims document. This is for the sole use of the RSPO secretariat.	No RSPO corporate logo used as evidence during the document audit and site visit.	Complied
Business to business communications			
5.1	Business to Business communication relates to RSPO members in the supply chain selling to and/or communicating with other organizations in the supply chain about the use of certified sustainable oil palm products.	Business to business communication is demonstrated via shipping documentation and sales contract to the next supply chain actor or buyer.	Complied
5.2	When confirming the sale of certified oil palm products, members must adhere to the requirements of the RSPO SCCS. This includes stating the supply chain model and certificate number under which the claim is being made.	The requirements of the RSPO SCCS are adhered to and was verified from the sampled weighbridge tickets of the sales of CPO and PK which have mentioned the MB Module and the RSPO Certificate Number.	Complied
5.3	Where a distributor or wholesaler takes title to products containing certified sustainable oil palm products, the requirements of the RSPO SCCS can follow either of two options: a. If the distributor or wholesaler holds only a Distributor license, it may only communicate RSPO-certified oil palm products by linking the product to the manufacturer using the manufacturer's SCCS certificate number. This covers both brand and own brand products. However, in the case of own brand products it is essential that customers are aware that the product has been made on behalf of the distributor or wholesaler, with specific evidence either through on-pack claims or documentation. b. If the distributor or wholesaler is supply chain-certified they should follow the requirements outlined in section 5.2.	Not applicable as Asia POM is neither distributors nor wholesalers.	Complied

MODULE B – MASS BALANCE SPECIFIC RULES			
Minimum Mass Balance content			
	95% or above of the oil palm content must be RSPO MB-certified.	Oil palm content is 100% CPO and claim as RSPO MB-certified.	Complied
	Where there is any percentage of non-certified oil palm within the product, the reason for this must be fully justified and an action plan for moving to fully certified oil palm must be in place, in accordance with the requirements of the RSPO SCCS. In addition, the non-certified volume must be covered by equivalent volume of RSPO Credits.	Oil palm content is 100% CPO and claim as RSPO MB-certified. All infeed material (FFB) is RSPO certified.	Complied
Labelling and trademark (MB)			
	<p>Members are allowed to use the RSPO label in one of the following ways:</p> <ul style="list-style-type: none"> • Surrounded by the text: 'Certified sustainable palm oil'. • The RSPO label MUST contain the tag 'MIXED'. The tag MIXED designates oil palm products sourced under the Mass Balance (MB) supply chain system, which administratively balances inputs and outputs of certain palm oil volumes. The tag 'MIXED' on a product does not guarantee that the product itself contains the certified material; some or all of it may reside in a product that does not carry a claim. • The RSPO label can also include the statement: '[The palm oil contained in this product] contributes to the production of certified sustainable palm oil'. • Wherever the RSPO trademark is displayed, the applicable trademark license number must be shown immediately under or next to the trademark or the 'statement'. Font must be Calibri, font size must be at least 4 pt (1.4 mm or 0.06 inch). • In on-pack communications, the RSPO trademark can be printed anywhere on the pack. Further guidance on use of the trademark is 	As at to date, no RSPO trademark used by the facility.	Complied

	provided in the RSPO Trademark License Terms and Conditions and in Annex 1 of the Rules on Market Communications & Claims document.		
Messaging (MB)			
	<p>Messaging ALLOWED in storytelling in product-related communications includes:</p> <ul style="list-style-type: none"> • [Oil palm products]/[palm oil]/[palm kernel oil] from RSPO-certified mills and plantations were mixed with non-certified oil palm products in the supply chain. • The volume of [oil palm products][palm oil]/[palm kernel oil] in this product reflects an equivalent volume of palm oil or palm kernel oil produced by RSPO certified mills and plantations. <p>In off-product communications, reference to (or images of) particular RSPO-certified production units, if the relationship to those units can be shown in company records is allowed.</p> <p>Messaging NOT ALLOWED in storytelling in product-related communications:</p> <ul style="list-style-type: none"> • Anything that can lead consumers to believe that RSPO-certified palm products are (certified to be) part of the product. 	As at to date, no RSPO trademark used by the facility.	Complied
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>JC Chang Group established Social and Human Rights Policy signed by Mr. Tee Swee Kee, Plantation Director dated 14/11/2019. Document review, the policy describes company commitment to respect human rights, including prohibition against retaliation towards HRDs.</p> <p>Asia Production Unit’s management conduct briefing on company policies includes Social & Human Rights Policy to workers during</p>	Complied

		<p>muster morning as below:</p> <ol style="list-style-type: none"> 1. Asia Oil Palm Estate 2 conduct on 10/05/2022. 2. Asia Palm Oil Mill conduct on 24/01/2022. 3. Hwa Li Estate 3 conduct on 25/02/2022. 4. Melewar Estate 2 conduct on 26/10/2022. 	
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>JC Chang Group established Social and Human Rights Policy signed by Mr. Tee Swee Kee, Plantation Director dated 14/11/2019. Document review sighted with no evidence of any use of violence or the instigation of violence within Asia Production Unit's managements.</p> <p>Onsite interview with workers informed no instigate violence or harassment by management for task to be completed in field.</p>	Complied
<p>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</p>			
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 whistleblowers, where requested, without risk of reprisal or intimidation and follows the RSPO policy on respect for HRD.</p> <p>- Critical (Major) compliance -</p>	<p>JC Chang Group established Social and Human Rights Policy signed by Mr. Tee Swee Kee, Plantation Director dated 14/11/2019, contains a provision on retaliation against human rights defenders.</p> <p>JC Chang Group established SOP on Mechanisms for Communications and Consultation Doc. No.: E/004-8/2019 dated 12/08/2019. This SOP describes to implement and improve peace working conditions, communication and consultation system as well as to resolve any complaints and grievances with internal and external stakeholders with 3 major systems of communication designed for achieving the mention purposes namely: -</p> <ol style="list-style-type: none"> 1. Consultation with employees & Others stakeholders (JCC committee) 2. Gender group consultation (Gender committee) 3. Free prior informed consent (FPIC). 	Complied

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		Asia Production Unit’s management adopt JC Chang Group SOP of Mechanism for Communication and Consultation with flowchart of handling complaints includes number of days to respond. Document review, the flowchart describes all four step requires on handling the complaints including 10 days to be response from the day of complainant issued complaints to supervisor, assistant manager and manager.	
4.2.2	Procedures are in place to ensure that the system is understood by the affected parties, including by illiterate parties. - Minor compliance -	JC Chang Group established SOP on Mechanisms for Communications and Consultation Doc. No.: E/004-8/2019 dated 12/08/2019 contains a provision that in briefings given to illiterate parties, the confirmation on understanding should be performed using their understood language after briefing, and management should ensure that the stakeholders truly the briefings given. Asia Production Unit’s management conduct briefing on company policies includes Complaints & Grievances procedures to workers during muster morning as below: <ol style="list-style-type: none"> 1. Asia Oil Palm Estate conduct on 10/05/2022 2. Asia Palm Oil Mill conduct on 24/01/2022. 3. Hwa Li Estate 3 conduct on 25/02/2022. 4. Melewar Estate 2 conduct on 09/02/2022. 	Complied
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 -	Asia Production Unit’s managements maintain their Complaints and Grievance books. Document review with no latest complaint or grievance lodged by internal and external stakeholders. Last recorded complaint lodged was received on 23/10/2019. Asia Production Unit’s managements maintain the books to records internal complaints which more to housing defects and maintenance due to worker complaints. The rectification towards the complaints being verified is responded within 10 days as per procedure.	Complied

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4.2.4	<p>The conflict resolution mechanism includes the option of access to independent legal and technical advice, the ability for complainants to choose individuals or groups to support them and/or act as observers, as well as the option of a third-party mediator.</p> <p>- Minor compliance -</p>	<p>JC Chang Group established SOP on Mechanisms for Communications and Consultation Doc. No.: E/004-8/2019 dated 12/08/2019 contains a provision that parties have the option of referring the unresolved complaint / grievance to an independent arbitrator, and the option to access to technical and legal advice, and the ability for complainants to choose individuals or groups to support them and/or act as observers, as well as a third-party mediator.</p>	Complied
Criterion 4.3: The unit of Certification contributes to local sustainable development as agreed by local communities.			
4.3.1	<p>Contributions to community development that are based on the results of consultation with local communities are demonstrated.</p> <p>- Minor compliance -</p>	<p>JC Chang Group contributions to local sustainable development with consultation with local communities and discuss the issues includes social and/or environmental benefits.</p> <p>Asia Production Unit’s management identify environmental and/or social issues that are prevalent in the community and develop and implement solutions to address these issues as part of contributions to sustainable development include the following:</p> <ol style="list-style-type: none"> 1. Providing job opportunities to suitable local communities. 2. Providing infrastructure facilities and maintenance for the CLC school for migrant workers’ children and accommodation for the teachers. 3. Providing transport (school bus) for workers’ children going to SK Sandau dan SK Paris. 4. Providing education aid to staff and workers’ children RM300 (secondary) and RM200 (primary) to purchase school needs. 5. Construct and upkeep roads leading to smallholders’ farms. <p>Asia Production Unit’s management do make donation contribution to stakeholders include the following:</p> <ol style="list-style-type: none"> 1. Donation to Tabung Bencana Alam Kinabatangan 	Complied

		2. Donation to Health District Office	
Criterion 4.4: Use of the land for oil palm does not diminish the legal, customary or user rights of other users without their free, prior and informed consent.			
4.4.1	<p>(C) Documents showing legal ownership or lease, or authorised use of customary land authorised by customary landowners through a Free, Prior and Informed Consent (FPIC) process. Documents Related to the history of land tenure and the actual legal or customary use of the land are available.</p> <p>- Critical (Major) compliance -</p>	<p>Asia Production Unit's management maintain documents of legal ownership or lease of land tenure as follow:</p> <ol style="list-style-type: none"> 1. Asia Oil Palm Estate 2 and Asia Palm Oil Mill shared same documents of land title lease as follow: <ul style="list-style-type: none"> - Lease document: CL 095317383. - Lease tenure to Asia Oil Palm Sdn Bhd - Lease area: 3,024 ha - Lease period from 01/01/1990 to 31/12/2088. - Land use purpose: For cultivation of cultivation of oil palm, cocoa and/or an agricultural crop of economic value. - Asia Palm Oil Mill area is located within Asia Oil Palm Estate 2 which total area of 23.30ha consist of factory plant 6.40 ha, compost plant 2.09 ha, ETP pond 13.23 ha, Biogas Plant 1.17ha and Solvent Plant 0.32ha . 2. Hwa Li Estate 3 established summary of land title include of four (4) land title leased with subject to the provisions and conditions contained in the Land Ordinance, CAP 68 as follow: <ol style="list-style-type: none"> i. Land title no.: CL 95324502, lot no.: PT92090895, 4,047ha, leased to Sharikat Keratong Sdn Bhd for 98 years, the acquired of the land start from 01/01/1994 until 31/12/2092, land purpose for cultivation of an agricultural crop of economic value. ii. Land title no.: CL 095327138, lot no.: PT94091067, 230.60ha, leased to Sarikat Keratong Sdn Bhd for 98 years, the acquired of the land start from 01/01/1999 until 31/12/2097, land purpose for cultivation of oil palm. 	Complied

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		<p>iii. Land title no.: CL 095324600, lot no.: PT91090903, 101.10ha, registered on 16/01/1995 with agreement between Directors of Lands & Survey and Abdul Agas, Maimuna Emik, Jinah Jappar, Jarinah Buangkan, Daud Agas (the original leases). The original leases then transferred to Kumarasamy a/l Suppiah on 13/11/1998. Kumarasamy a/l Suppiah then transferred to Smart Foremost Sdn Bhd on 25/08/2006. Smart Foremost Sdn Bhd then transferred to Asia Ecogreen Sdn Bhd via memo no.: MC1910090018 dated 25/10/2019. The leased for 98 years, start from 01/01/1995 until 31/12/2093, land purpose for cultivation of an agricultural crop of economic value.</p> <p>iv. Land title no.: CL 095326104, lot no.: PT95090394, 10.01ha, registered on 11/11/1997 with agreement between Directors of Lands and Survey and Jailah bt Agas (original lease). Original lease transferred to Kumarasamy a/l Suppiah on 09/04/1995. Kumarasamy a/l Suppiah then transferred to Smart Foremost Sdn Bhd on 25/08/2006. Smart Foremost Sdn Bhd then transferred the land to Asia Ecogreen Sdn Bhd via memo MC1910090013 dated 23/10/2019. The leased for 98 years, start from 01/01/1996 until 31/12/2094, land purpose for cultivation of an agricultural crop of economic value.</p> <p>3. Melewar Estate 2 document land title lease as follow</p> <ul style="list-style-type: none"> - Lease document: CL 095311201. - Lease tenure to Melewar Properties Sdn Bhd - Lease Area: 2,023.40 ha - Lease period: 01/01/1979 to 31/12/2077. - Land use purpose: For cultivation of cultivation of cocoa and/or an agricultural crop of economic value. 	
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		The lands registered on 17/10/1984 with agreement between Directors of Lands and Survey and Firm Corporation Sdn Bhd (original lease). Original lease transferred to Melewar Properties Sdn Bhd via memo 20226449 dated 06/07/1995.	
4.4.2	Copies of documents evidencing agreement-making processes and negotiated agreements detailing the FPIC process are available and include:	There is no evidence of any use local community land that requires negotiations or agreements detailing FPIC processes. Details of the land historical ownership are as per Indicator 4.4.1 above. Therefore, this indicator is not applicable.	Not Applicable
4.4.2a	Evidence that a plan has been developed through consultation and discussion in good faith with all affected groups in the communities, with particular assurance that vulnerable, minorities' and gender groups are consulted, and that information has been provided to all affected groups, including information on the steps that are taken to involve them in decision making. - Minor compliance -	There is no evidence of any local community land that requires discussions or with affected community groups. Details of the land historical ownership are as per Indicator 4.4.1 above. Therefore, this indicator is not applicable.	Not Applicable
4.4.2b	Evidence that the unit of certification has respected communities' decisions to give or withhold their consent to the operation at the time that these decisions were taken. - Minor compliance -	There is no evidence of any local community land that requires discussions or involve consents of affected community groups. Details of the land historical ownership are as per Indicator 4.4.1 above. Therefore, this indicator is not applicable.	Not Applicable
4.4.2c	Evidence that the legal, economic, environmental and social implications of permitting operations on their land have been understood and accepted by affected communities, including the implications for the legal status of their land at the expiry of the unit of certification's title, concession or lease on the land. - Minor compliance -	There is no evidence of any local community land that requires local communities' acceptance. Details of the land historical ownership are as per Indicator 4.4.1 above. 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	There is no evidence of any local community land that requires maps of appropriate scale showing extent of recognized legal,	Not Applicable

	involving affected parties (including neighbouring communities where applicable, and relevant authorities). - Critical (Major) compliance -	customary or user rights affected local communities. Therefore, this indicator is 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 -	All available relevant documents are as per details in Indicator 4.4.1 above. There is no land conflict involved and no proposed benefit sharing nor legal arrangements. 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 -	There is no evidence of any local community land involved and so 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 -	There is no evidence of any local community land involved and so 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	(C) Documents showing identification and assessment of demonstrable legal, customary and user rights are available. - Critical (Major) compliance -	Evidence of rightful and legal land ownership are as per Indicator 4.4.1 above. No other legal, customary or user rights is available.	Complied
4.5.2	(C) FPIC is obtained for all oil palm development through a comprehensive process, including in particular, full respect for their legal and customary rights to the territories, lands and resources via local communities' own representative institutions, with all the relevant information and documents made available, with option of resourced access to independent advice through a documented, long-term and two-way process of consultation and negotiation. - Critical (Major) compliance -	There is no new planting within Asia Production Unit and therefore, this Indicator is not applicable.	Not Applicable

4.5.3	<p>Evidence is available that affected local peoples understand they have the right to say 'no' to operations planned on their lands before and during initial discussions, during the stage of information gathering and associated consultations, during negotiations, and up until an agreement with the unit of certification is signed and ratified by these local peoples. Negotiated agreements are non-coercive and entered into voluntarily and carried out prior to new operations.</p> <p>- Minor compliance -</p>	<p>There is no new planting within Asia Production Unit and 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>There is no new planting within Asia Production Unit and 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, environmental and social implications of the proposed operations on their lands.</p> <p>- Minor compliance -</p>	<p>There is no new planting within Asia Production Unit and therefore, this Indicator is not applicable.</p>	Not Applicable
4.5.6	<p>Evidence is available that the communities (or their representatives) gave consent to the initial planning phases of the operations prior to the issuance of a new concession or land title to the operator.</p> <p>- Minor compliance -</p>	<p>There is no new planting within Asia Production Unit and therefore, this Indicator is not applicable.</p>	Not Applicable
4.5.7	<p>New lands are not acquired for plantations and mills after 15 November 2018 as a result of recent (2005 or later) expropriations without consent under the right of eminent domain of the federal and state land acquisition legislations.</p> <p>- Minor compliance -</p>	<p>There is no new planting within Asia Production Unit and therefore, this Indicator is not applicable.</p>	Not Applicable

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4.5.8	<p>(C) New lands are not acquired in areas inhabited by communities in voluntary isolation.</p> <p>- Critical (Major) compliance -</p>	<p>There is no new planting within Asia Production Unit and therefore, this Indicator is not applicable.</p>	<p>Not Applicable</p>
<p>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.</p>			
4.6.1	<p>(C) A mutually agreed procedure for identifying legal, customary or user rights, and a procedure for identifying people entitled to compensation, is in place.</p> <p>- Critical (Major) compliance -</p>	<p>JC Chang Group established SOP of Identifying Legal and Customary Rights and Identifying People Entitled to Compensation with doc. No.: E/002- 03/2015) dated 08/09/2015.</p> <p>JC Chang Group established FPIC Procedure with doc. No.: E/004-07/2015 dated 08/09/2015</p> <p>JC Chang Group established Resolution and Compensation Procedure with doc. No.: E/002-02/2012 dated 11/09/2012.</p>	<p>Complied</p>
4.6.2	<p>(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.</p> <p>- Critical (Major) compliance -</p>	<p>JC Chang Group established SOP of Identifying Legal and Customary Rights and Identifying People Entitled to Compensation with doc. No.: E/002- 03/2015) dated 08/09/2015.</p> <p>JC Chang Group established FPIC Procedure with doc. No.: E/004-07/2015 dated 08/09/2015</p> <p>JC Chang Group established Resolution and Compensation Procedure with doc. No.: E/002-02/2012 dated 11/09/2012.</p>	<p>Complied</p>
4.6.3	<p>Evidence is available that equal opportunities are provided to both men and women to hold land titles for scheme small holdings.</p> <p>- Minor compliance -</p>	<p>Document review and onsite interviews with local communities informed there is no evidence of any land dispute. Therefore, this Indicator is not applicable.</p>	<p>Not Applicable</p>
4.6.4	<p>The process and outcomes of any negotiated agreements, compensation and payments are documented, with evidence of the participation of affected parties, and made publicly available to them.</p> <p>- Minor compliance -</p>	<p>Document review and onsite interviews with local communities informed there is no evidence of any land dispute. Therefore, this Indicator is not applicable.</p>	<p>Not Applicable</p>

<p>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.</p>			
4.7.1	<p>(C) A mutually agreed procedure for identifying people entitled to compensation is in place. - Critical (Major) compliance -</p>	<p>JC Chang Group established SOP of Identifying Legal and Customary Rights and Identifying People Entitled to Compensation with doc. No.: E/002- 03/2015) dated 08/09/2015. JC Chang Group established FPIC Procedure with doc. No.: E/004-07/2015 dated 08/09/2015 JC Chang Group established Resolution and Compensation Procedure with doc. No.: E/002-02/2012 dated 11/09/2012.</p>	Complied
4.7.2	<p>(C) A mutually agreed procedure for calculating and distributing fair and gender-equal compensation (monetary or otherwise) is established and implemented, monitored and evaluated in a participatory way, and corrective actions taken as a result of this evaluation. - Critical (Major) compliance -</p>	<p>JC Chang Group established SOP of Identifying Legal and Customary Rights and Identifying People Entitled to Compensation with doc. No.: E/002- 03/2015) dated 08/09/2015. JC Chang Group established FPIC Procedure with doc. No.: E/004-07/2015 dated 08/09/2015 JC Chang Group established Resolution and Compensation Procedure with doc. No.: E/002-02/2012 dated 11/09/2012. Document review and onsite interviews with local communities informed there is no evidence of any land dispute. Therefore no evaluation done as there is no evidence of any local people having legal, customary or user rights.</p>	Complied
4.7.3	<p>Communities that have lost access and rights to land for plantation expansion are given opportunities including employment and supply contracts to benefit from plantation development. - Minor compliance -</p>	<p>Document review and onsite interviews with local communities informed there is no evidence of any land dispute. Therefore, this Indicator is not applicable.</p>	Not Applicable
<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	Where there are or have been disputes, proof of legal acquisition of title and evidence that mutually agreed compensation has been made to all people who held legal, customary, or user rights at the time of acquisition is available and provided to parties to a dispute, and that any compensation was accepted following a documented process of FPIC. - Minor compliance -	Document review and onsite interviews with local communities informed there is no evidence of any land dispute. Therefore, this Indicator is not applicable.	Not Applicable
4.8.2	(C) Land conflict is not present in the area of the unit of certification. Where land conflict exists, acceptable conflict resolution processes (see Criteria 4.2 and 4.6) are implemented and accepted by the parties involved. In the case of newly acquired plantations, the unit of certification addresses any unresolved conflict through appropriate conflict resolution mechanisms. - Critical (Major) compliance -	Document review and onsite interviews with local communities informed there is no evidence of any land dispute. Therefore, this Indicator is not applicable.	Not Applicable
4.8.3	Where there is evidence of acquisition through dispossession or forced abandonment of customary and user rights prior to the current operations and there remain parties with demonstrable customary and land use rights, these claims will be settled using the relevant requirements (Indicators 4.4.2, 4.4.3 and 4.4.4) - Minor compliance -	Document review and onsite interviews with local communities informed there is no evidence of any acquisition through dispossession or forced abandonment of customary and user rights prior to the current operations. Therefore, this Indicator is not applicable.	Not Applicable
4.8.4	For any conflict or dispute over the land, the extent of the disputed area is mapped out in a participatory way with involvement of affected parties (including neighbouring communities where applicable). - Minor compliance -	Document review and onsite interviews with local communities informed there is no evidence of any land dispute. Therefore, this Indicator is not applicable.	Not Applicable

Principle 5: Support smallholder inclusion

Criterion 5.1: The unit of certification deals fairly and transparently with all smallholders (Independent and Scheme) and other local businesses.

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5.1.1	<p>Current and previous period prices paid for FFB are publicly available and accessible by smallholders.</p> <p>- Minor compliance -</p>	<p>Asia Production Unit's management displayed the latest and last period prices paid for FFB in front the weighbridge counter on a white board.</p> <p>Onsite visit sighted the price displayed includes dated, 1% of Oil Extraction Rate (OER), percentage (%) of Oil Extraction Rate and FFB prices as for November 2022.</p>	Complied
5.1.2	<p>(C) Evidence is available that the unit of certification explains the FFB pricing to smallholders on request from individual smallholders (at least once a year or upon request).</p> <p>- Critical (Major) compliance -</p>	<p>Asia Production Unit's management includes FFB pricing to suppliers in the Sales and Purchase Agreement.</p> <p>Document review on Sales and Purchase Agreement sighted contractors signed as follow:</p> <ol style="list-style-type: none"> 1. Benar Warisan Sdn Bhd signed agreement dated 31/01/2022. 2. Sentrabayu Industries Sdn Bhd signed agreement dated 31/01/2022. 3. Tapak Jutamaju Sdn Bhd signed agreement dated 31/01/2022. 4. Meran Sdn Bhd signed agreement dated 31/01/2022. 5. KJS Resources Sdn Bhd signed agreement dated 31/01/2022. 6. Kebaco Sdn Bhd signed agreement dated 31/01/2022. <p>Asia Production Unit's managements conduct Sustainability Meeting include agenda of FFB pricing with contractors on 27/07/2022.</p>	Complied
5.1.3	<p>(C) Fair pricing, calculated as a portion of the international CPO price less costs is provided to smallholders in the supply base and documented.</p> <p>- Critical (Major) compliance -</p>	<p>Asia Palm Oil Mill provides the FFB price for all external FFB Suppliers based on the MPOB – Daily FFB Reference Price Summary by Region (Mill Gate) (RM1% OER).</p>	Complied
5.1.4	<p>(C) Evidence is available that all parties, including women and independent representative organisations assisting smallholders where requested, are involved in decision-making processes and understand the contracts. These include those involving finance, loans/credits, and</p>	<p>Asia Palm Oil Mill does not receive FFB from smallholders. All FFB suppliers are from sisters' estates within Asia Production Unit's estates and outgrowers.</p> <p>Document review, Sales and Purchase agreements includes quantity, quality, weights, FFB price calculations, payments,</p>	Complied

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	<p>repayments through FFB price reductions for replanting and or other support mechanisms where applicable.</p> <p>- Critical (Major) compliance -</p>	<p>warranty and duration. The mutually agreed agreement signed by both parties.</p>	
5.1.5	<p>Contracts are fair, legal and transparent and have an agreed timeframe.</p> <p>- Minor compliance -</p>	<p>Asia Production Unit's management includes FFB pricing to suppliers in the Sales and Purchase Agreement.</p> <p>Document review on Sales and Purchase Agreement sighted contractors signed as follow:</p> <ol style="list-style-type: none"> 1. Benar Warisan Sdn Bhd signed agreement dated 31/01/2022. 2. Sentrabayu Industries Sdn Bhd signed agreement dated 31/01/2022. 3. Tapak Jutamaju Sdn Bhd signed agreement dated 31/01/2022. 4. Meran Sdn Bhd signed agreement dated 31/01/2022. 5. KJS Resources Sdn Bhd signed agreement dated 31/01/2022. 6. Kebaco Sdn Bhd signed agreement dated 31/01/2022. <p>Document review, the agreement includes '<i>Full payment shall be made by buyer to seller for the whole month's deliveries not later than 10 working days after the official announcement of the MPOB Crude Palm Oil and kernel prices.</i>'</p>	Complied
5.1.6	<p>(C) Agreed payments are made in a timely manner and receipts specifying price, weight, deductions and amount paid are given.</p> <p>- Critical (Major) compliance -</p>	<p>Asia Production Unit's management includes FFB pricing to suppliers in the Sales and Purchase Agreement.</p> <p>Document review, the agreement includes '<i>Full payment shall be made by buyer to seller for the whole month's deliveries not later than 10 working days after the official announcement of the MPOB Crude Palm Oil and kernel prices.</i>'</p> <p>Document review of payment voucher to suppliers sighted were made in a timely manner within the agreed period.</p>	Complied

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5.1.7	<p>Weighbridges used for determining payment to smallholders are verified by an independent third party on a regular basis (this can be government).</p> <p>- Minor compliance -</p>	<p>Asia Palm Oil Mill conduct annual calibration to two (2) units of weighbridge as per mandatory requirements of Weight and Measures Act 1972.</p> <p>Document review, weighbridge calibration certificates as follow.</p> <ol style="list-style-type: none"> 1. Weighbridge (Asia Palm Oil Mill) <ul style="list-style-type: none"> - Receipt no.: B1700097 - Weighbridge Serial Number: 191950202 - Safety Stamping Number: 2.1K – Q030368; - Model: 60,000 kg - Avery STW ATK 007242; - Calibration Date: 31/01/2022. 2. Weighbridge (Asia Compost Plant) <ul style="list-style-type: none"> - Receipt no.: B1692920 - Weighbridge Serial Number: 180250282 - Safety Stamping Number: 2.1K – Q030602; - Model: 60,000 kg - Avery JM 305 STW ATK 018441; - Calibration Date: 17/11/2022. 	Complied
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>	<p>Asia Palm Oil Mill does not receive FFB from smallholders. All FFB suppliers are from sisters’ estates within Asia Production Unit’s estates and outgrowers.</p> <p>Therefore, this indicator is not applicable.</p>	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>Asia Production Unit’s management adopted JC Chang Group SOP on Mechanisms for Communication and Consultation, Doc No:</p>	Complied

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	- Critical (Major) compliance -	E/004-08/2019 dated 12/08/2019. Document review, Asia Production Unit's management maintain grievance from internal and external stakeholder were available in Complain & Grievance Monitoring Book with no latest grievance recorded since the last audit from external FFB suppliers.	
Criterion 5.2: The unit of certification supports improved livelihoods of smallholders and their inclusion in sustainable palm oil value chains.			
5.2.1	The Company consults with interested smallholders (irrespective of type) within the Unit of Certification, including women or other partners in their supply base, to assess their needs for support to improve their livelihoods and their interest in RSPO certification. - Minor compliance -	Asia Palm Oil Mill does not receive FFB from smallholders. All FFB suppliers are from sisters' estates within Asia Production Unit's estates and outgrowers. Therefore, this indicator is not applicable.	Not Applicable
5.2.2	The unit of certification develops and implements smallholder support programme to improve smallholder livelihood and build their capacity to enhance productivity, quality, organisational and managerial competencies, and specific elements of RSPO certification (including the RSPO Independent Smallholder Standard or RISS). - Minor compliance -	Asia Palm Oil Mill does not receive FFB from smallholders. All FFB suppliers are from sisters' estates within Asia Production Unit's estates and outgrowers. Therefore, this indicator is not applicable.	Not Applicable
5.2.3	Where applicable, the unit of certification provides support to smallholders to promote legality of FFB production. - Minor compliance -	Asia Palm Oil Mill does not receive FFB from smallholders. All FFB suppliers are from sisters' estates within Asia Production Unit's estates and outgrowers. Therefore, this indicator is not applicable.	Not Applicable
5.2.4	(C) Evidence exists that the unit of certification trains Scheme Smallholders on pesticide handling. - Critical (Major) compliance -	Asia Palm Oil Mill does not receive FFB from smallholders. All FFB suppliers are from sisters' estates within Asia Production Unit's estates and outgrowers. Therefore, this indicator is not applicable.	Not Applicable

5.2.5	The unit of certification regularly reviews and publicly reports on the progress of the Smallholder support programme. - Minor compliance -	Asia Palm Oil Mill does not receive FFB from smallholders. All FFB suppliers are from sisters' estates within Asia Production Unit's estates and outgrowers. Therefore, this indicator is not applicable.	Not Applicable
Principle 6: Respect workers' rights and conditions			
Criterion 6.1: Any form of discrimination is prohibited.			
6.1.1	(C) A publicly available non-discrimination and equal opportunity policy is implemented in such a way to prevent discrimination based on ethnic origin, caste, national origin, religion, disability, gender, sexual orientation, gender identity, union membership, political affiliation or age. - Critical (Major) compliance -	JC Chang Group established Equal Opportunities Policy endorsed by Mr. Tee Swee Kee, Plantation Director dated 12/08/2019. Document review, the policy describes company to prevents all forms of discrimination and is publicly available and displayed at the main notice boards. Onsite interviews with workers informed no discrimination is practiced and that equal opportunities are provided to all employees.	Complied
6.1.2	(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. - Critical (Major) compliance -	JC Chang Group established Equal Opportunities Policy endorsed by Mr. Tee Swee Kee, Plantation Director dated 12/08/2019. Document review, Asia Production Unit's management established employment contracts includes with all workers irrespective of nationalities, gender, religion, terms and receive the same wages for the same scope of work. Onsite interviews with Asia Production Unit's workers informed no discrimination is practiced and that equal opportunities to local and foreigner.	Complied
6.1.3	The unit of certification demonstrates that recruitment selection, hiring, access to training and promotion are based on skills, capabilities, qualities and medical fitness necessary for the jobs available. - Minor compliance -	Asia Production Unit's managements were able to demonstrate that the recruitment selection, hiring and access to training were based on skills, capabilities and medical fitness. Document review, all workers filled up a job application form together with copies of NRIC, qualification and previous work	Complied

		experience, medical fitness and assessed their respective suitability to the job vacancies by managers.	
6.1.4	<p>Pregnancy testing is not conducted as a discriminatory measure and is only permissible when it is legally mandated. Alternative equivalent employment is offered for pregnant women.</p> <p>- Minor compliance -</p>	<p>Asia Production Unit’s managements has not discriminate pregnant women.</p> <p>Document review of medical record, there is no evidence that pregnancy tests are being conducted as a discriminatory measure.</p> <p>Onsite interviews with Asia Production Unit’s health assistants informed they only conduct pregnancy tests to female workers handling chemicals as monitoring of chemical exposure to their foetus. A positive female workers on the pregnancy test will resulted with reassigned to not chemical-related task.</p>	Complied
6.1.5	<p>(C) A gender committee is in place specifically to raise awareness, identify and address issues of concern, as well as opportunities and improvements for women.</p> <p>- Critical (Major) compliance -</p>	<p>Asia Production Unit’s managements established gender committees as platform for female workers to channel their concern on equal opportunities for women, reproductive rights, domestic violence, sexual harassment, complaints procedures and confidentiality of complaints.</p> <p>Document review of Gender Committee Minutes of meeting, Asia Production Unit’s gender committees will documented as follow.</p> <ol style="list-style-type: none"> 1. Asia Estate 2 Estate conduct meeting on 22/08/2022, discussions include sexual harassment awareness briefing, domestic violence, encourage foreign parents to send their children to CLC school, reproductive rights, needs of new mothers, housing maintenance and cleanliness. 2. Asia Palm Oil Mill conduct meeting on 14/01/2022 and 13/07/2022, discussions include worker housing conditions, water supply, safety at the housing compound, family planning, reproductive rights, new mother requirement, opportunity for employment and sexual harassment. 	Complied

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		<ol style="list-style-type: none"> 3. Hwa Li Estate 3 conduct meeting on 28/06/2022, discussions include reproductive rights, new mother or baby born requirement, free vaccination for children between 5 till 11 years old and sexual harassment policy. 4. Melewar Estate 2 conduct meeting on 22/02/2022 and 10/08/2022, discussions include worker housing conditions, water supply, safety at the housing compound, family planning, reproductive rights, new mother requirement, opportunity for employment and sexual harassment. 	
6.1.6	<p>There is evidence of equal pay for the same work scope. - Minor compliance -</p>	<p>Asia Production Unit’s managements able to demonstrate evidence of equal pay for the same work scope. Document review, verified through reviews of sampled payslips and employment contracts of workers doing similar work which showed that they received equal pay for equal work. Among the sampled workers were as follows:</p> <ol style="list-style-type: none"> 1. Asia Oil Palm Estate 2: Worker (female, Indonesian, weeder), Worker (female, Indonesian, sweeper), Worker (male, Indonesian, Tractor driver) and Worker (male, Indonesian, Harvester). 2. Asia Palm Oil Mill: Worker (female, Philippine, lab sampling), Worker (female, Indonesia, Biogas Operator Cleaner), Worker and Worker No. 18 (Male, Indonesian, ETP). 3. Hwa Li Estate 3: Worker (female, Philippine, Loose fruit picker), Worker (female, Indonesian, Weeder), Worker (Male, Indonesia, Security Night Watchman) and Worker (Male, Philippine, Harvester). 4. Melewar Estate 2: Worker (Indonesia, female, sprayer), worker (male, Indonesia, harvester) and Worker (female, Indonesian, nursery). 	Complied

Criterion 6.2: Pay and conditions for staff and workers and for contract workers always meet at least legal or industry minimum standards and are sufficient to provide decent living wages (DLW).		
6.2.1	<p>(C) Applicable labour laws, union and/or other collective agreements and documentation of pay and conditions are available to the workers in national languages (English or Bahasa Malaysia) and explained to them in language they understand.</p> <p>- Critical (Major) compliance -</p>	<p>JC Chang Group established employment contracts signed with the workers include regular working hours, statutory deductions, duration of employment, wages payable, working hours, medical benefits including medical leave entitlement, annual leave entitlement, mutual termination of service, etc.</p> <p>Applicable labour laws and documentation of pay and conditions are available to the workers in the employment contracts in Bahasa Malaysia and language workers understand.</p> <p>Onsite interview with workers informed they been briefed on the contents of the employment contract prior to signed. They informed copy is given to each worker for safe keeping.</p> <p>Document review on worker’s payslip sighted written in Bahasa Malaysia.</p> <p>Onsite interviews with workers informed they aware of the terms of the employment contract and their monthly payslips. Number of samples taken are determined based on the formula of $\sqrt{n} \times 0.8$ (n= total number of workers)</p> <p>Document review on the employment contracts and payslips of the following workers includes name of Asia Production Unit’s estate or mill, date of employment contract and payslips.</p> <p>Document review for sampled workers’ payslips, verified no deduction on medical treatment cost from workers’ salary.</p> <p>Document review on Budget Details – General Charges for Fiscal Year 2022/23 (01/07/2022 to 30/06/2023), stated JC Chang Group’s estates has proposed Sick and hospitalisation pay for direct employees’ codes as follow:</p>
		Complied

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		<ul style="list-style-type: none"> JC Chang Group’s estates include proposal for budget under Code 221701 Worker Welfare – Sick / Hospital Pay for Direct Employees. <p>During the onsite interview with workers inform they have been briefed on the free medical cost. Treatment at panel clinics or hospital, employer will bore the cost as stated in clause 11 in ‘Perjanjian Pekerjaan’ as per Guidelines on Workers Employment Terms and Conditions for Sabah Estate Workers, Doc. No.: E/009-08/2021 updated 22/12/2021.</p> <p>The implementation based on revised clause from employment contract is satisfactory.</p> <p>No recurrence of issued observed, thus the major NC is remained closed.</p>	
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>JC Chang Group established employment contracts signed with the workers include regular working hours, statutory deductions, duration of employment, wages payable, working hours, medical benefits including medical leave entitlement, annual leave entitlement, mutual termination of service, etc.</p> <p>Document review on the payroll document (payslips) sighted workers information are accurate with compensation for all work performed. The payslip includes employee name, IC/passport, month of salary, basic, price bonus, productivity incentive, allowances, deductions for SOCSO, EIS, KSWP, total salary for the month, total deductions, gross salary and net salary.</p> <p>Onsite interview with workers informed no family members working to help them with their work.</p> <p>The list of sampled workers’ payslips and employment contracts are as per those indicated under Indicator 6.2.1 above.</p> <p><u>Opportunity For Improvement</u></p>	OFI

		<p>The worker master list may improve on monitoring the period of workers passport and work permits validity.</p>	
<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. - Critical (Major) compliance -</p>	<p>JC Chang Group established employment contracts signed with the workers include regular working hours, statutory deductions, duration of employment, wages payable, working hours, medical benefits including medical leave entitlement, annual leave entitlement, mutual termination of service, etc.</p> <p>Document review on medical certificates is given a paid medical leave, entitled to annual leave. Female employees are entitled to 2 months paid maternity leave.</p> <p>Crosscheck between the employment contracts, payslip, checkroll book, punch cards and onsite interviews with workers themselves confirmed the implementation as per requirement apply as stated in the Sabah Labour Ordinance.</p> <p>There is no evidence of termination, and so compliance with reasons for dismissal and period of notice could not be verified during this audit.</p> <p>Salary deductions are made for statutory deductions such as SOCSO, EPF, and EIS.</p> <p>Non-statutory deductions are made for the following:</p> <ol style="list-style-type: none"> 1. New passports and passport for dependents 2. Medical costs for dependents 3. Purchase of buffalos 4. Surau or church contributions 5. Sports and recreation membership 6. Buffalo safety charge <p>Such non-statutory deductions were made upon receipt of written permits from the Labour Office as follows:</p>	<p>Complied</p>

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		<ol style="list-style-type: none"> 1. Asia Oil Palm Estate 2: Permit dated 09/09/2022 – 08/09/2024 No siri: JTKSBH/PMT/113/2022/0202 2. Asia Palm Oil Mill: Permit dated 08/08/2022 – 07/08/2024 No. Siri JTKSBH/PMT/113/2022/0201. 3. Hwa Li Estate 3: Permit dated 09/09/2022 – 08/09/2024. No Siri: JTKSBH/PMT/113/2022/0230. 4. Melewar Estate 2: Permit dated 09/09/2022 – 08/09/2024 No. Siri JTKSBH/PMT/113/2022/0229. <p>The deduction is limited to: -</p> <ol style="list-style-type: none"> 1. Bayaran Pemprosesan Dokumen Perjalanan (Tidak Termasuk Levi, Jaminan Bank, Bayaran Perkhidmatan Agensi Pekerjaan, Denda kerana Gagal Memperbaharui Permit Kerja/Visa, Pas Khas (special Pass), Kos Rekrut dan Pemeriksaan Kesihatan (WH MEDICARE) 2. Bayaran Passport (Orang Tanggungan) 3. Bayaran kos Perubatan (Orang Tanggungan) 4. Yuran Kelab dan Rekreasi. 	
6.2.4	<p>(C) The unit of certification provides adequate housing, sanitation facilities, water supplies, medical, educational and welfare amenities to national standards or above, where no such public facilities are available or accessible. National laws, or in their absence the ILO Guidance on Workers’ Housing Recommendation No. 115, are used. In the case of acquisitions of non-certified units, a plan is developed detailing the upgrade of infrastructure. A reasonable time (5years) is allowed to upgrade the infrastructure.</p> <p>- Critical (Major) compliance -</p>	<p>Asia Production Unit’s managements provide adequate housing to all its workers for free. All houses have its own sanitation facilities, electricity and water supplies. Treated water is supplied to all other estates from its own source and own generated electricity. Water and electricity are provided free of charge. Other welfare amenities available at the workers’ housing include CLC schools, playing fields, futsal court, creche, grocery shops and places of worship (surau and chapels).</p> <p>Domestic water quality sampling was also carried out. Document review on the sampled of water quality sampling from Asia Palm Oil Mill to worker housing carried out by accredited SAMM 576 with Dynakey Laboratories Sdn Bhd dated 06/07/2022 Lab Ref</p>	Complied

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		<p>W220526/02 total coliform and E.Coli were absent in 100ml.</p> <p>Onsite visit and onsite interview with Estate Health Assistants at clinics informed they have the capacity to give treatment for cough, cold, minor cuts and injuries.</p> <p>Document review on Budget Details – General Charges for Fiscal Year 2022/23 (01/07/2022 to 30/06/2023), stated JC Chang Group’s estates has proposed for workers welfare and medical under two (2) items from two (2) different codes as follow:</p> <ol style="list-style-type: none"> 1. JC Chang Group’s estates include proposal for budget under Code 221501 Worker Medical – V.M.O.’s Fee for Fortnight visits by visiting medical officer (VMO). 2. JC Chang Group’s estates include proposal for budget under Code 221602 Worker Welfare – Day Care Center (Milk Supplies children in creche). <p>Document review on linesite inspection reports carried out by the respective health assistants on weekly basis with latest as follows.</p> <ol style="list-style-type: none"> 1. Asia Oil Palm Estate 2 conduct on 24/11/2022. 2. Asia Palm Oil Mill conduct on 25/11/2022. 3. Hwa Li Estate 3 conduct on 23/11/2022. 4. Melewar Estat 2 conduct on 25/11/2022. 	
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>All operating units were able to demonstrate that efforts have been made to improve workers’ access to adequate, sufficient and affordable food by allowing food canteen sundry shops to operate near the workers’ housing. Workers are also allowed an area to plant vegetables to supplement their diet.</p> <p>Also sighted during the audit were price list as of November 2022 of items sold at Asia Oil Palm Estate 2 grocery shop Chin Kui Min.</p> <p>Asia Oil Palm Estate 2 management conduct price inspection and</p>	Complied

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		<p>document in the report with latest dated 02/08/2022, 02/09/2022, 02/10/2022 and 02/11/2022 with comments, shopper signature and estate management signature.</p> <p>Asia Palm Oil mil management conduct price monitor and discuss grocery price for Kedai Runcit Transasia dated 02/11/2022.</p> <p>Document review on JCC minutes of meeting; Hwa Li Estate 3 includes discussion on monitoring of grocery price, operation time and items for Kedai Chin Kui Min on 08/09/2022 where price of items sold was discussed.</p>	
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:</p> <p>STATEMENT FROM THE RSPO STANDARDS STANDING COMMITTEE REGARDING INDICATOR 6.2.6 ON DECENT LIVING WAGE</p> <p>With reference to procedural note of indicator 6.2.6, the RSPO has published a guidance on the DLW calculation in June 2019. The RSPO Secretariat will endeavour to carry out DLW country benchmarks for palm oil producing countries in which RSPO members operate and for which no Global Living Wage Coalition (GLWC) benchmarks exist (As of September 2019, GLWC has developed national benchmarks in Bangladesh, Belize, Brazil, China, Colombia, Costa Rica, Dominican Republic, Ecuador, Ethiopia, Ghana, Guatemala, India, Kenya, Malawi, Mexico, Nicaragua, Pakistan, South Africa, Sri Lanka, Uganda and Vietnam These benchmarks are developed based on banana, coffee, floriculture, textile, manufacturing, seafood processing and tea industry. The RSPO is in the process of commissioning benchmarks for Malaysia and Indonesia for the palm oil sector and will develop methods to calculate and/or define DLW applicability for all palm oil producing countries in which RSPO members operate).</p> <p><i>Where a GLWC living wage standard (benchmark), or one that fulfils the basic requirements of the RSPO-endorsed living wage methodology, has been established in the country or region of operation, the same should be used as benchmarks.</i></p> <p>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</p>	<p>JC Chang Group has established Guideline of Implementation Plan for Decent Living Wage (DLW), Doc. No.: E027-01/2019 dated 29/11/2019.</p> <p>The guideline as reference for calculating methodology of DLW based on the cost of a basic but decent standard of living. Cost estimates or benchmarks in a particular area should be looked at when determining the DLW. Minimum wage requirements, the value exceeds the calculation of a DLW, the higher amount to be paid to the worker. In the event that the worker has already surpassed the payment of a DLW, there should also be no reduction of wage and/or any benefits in kind taken away from worker.</p> <p>Asia Production Unit’s management conduct assessment on actual average wage calculation of DLW benchmark calculation for JC Chang Group was taken into account of Food, housing, medical, transportation, education, unexpected events (5%), total living basket and net living basket. The amount is calculated as RM1,516.77:</p> <p>Actual average wages: RM1,516.77 plus actual average benefits-in-kind of RM250.59.</p> <p><u>Opportunity For Improvement</u></p>	OFI

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	<p>locality or country). These benchmarks will be developed in collaboration and consultation with relevant stakeholders such as palm oil industry members, workers’ union, authorities and/or relevant organisations.</p> <p><i>For countries where no living wage standard is established, until such time that an RSPO endorsed benchmark for the country is in place, national minimum wages shall be paid to all workers. In addition to the payment of minimum wages, the Unit of Certification (UoC) shall conduct an assessment of the prevailing wages and in-kind benefits provided to workers in the Unit of Certification aligned with the RSPO Guidance for Implementing a Decent Living Wage (RSPO Guidance for Implementing a Decent Living Wage. The RSPO will also develop further guidance and tools to calculate DLW in line with the RSPO endorsed methodology which may include independent studies by local experts in their respective region or country).</i></p> <p>Once these benchmarks are available, this procedural note is no longer applicable. UoC shall have an implementation plan towards the payment of a DLW with specific targets, and a phased implementation process including:</p> <ul style="list-style-type: none"> • Updated assessment on prevailing wages and in-kind benefits • There is annual progress on the implementation of living wages • Where a minimum wage, based on equivalent of baskets of goods, is stipulated in Collective Bargaining Agreements (CBAs), this should be used as the foundation for the gradual implementation of the living wage payment • The UoC may choose to implement the living wage payment in a specific section as a pilot project; the pilot will then be evaluated and adapted before eventual scale up of the living wage implementation. <p>- Minor compliance -</p>	<p>The management may enhance to include calculation with latest revise minimum wages of MYR 1,500 per month into Guideline of Implementation Plan for Decent Living Wage for better understanding.</p>	
<p>6.2.7</p>	<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>Asia Production Unit’s management employ full-time employees, and based on records reviewed and interviews conducted, there are no casual, temporary and day labour employed within all the certification units.</p>	<p>Complied</p>
<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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<p>6.3.1</p>	<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>JC Chang Group established Social and Human Rights Policy signed by Mr. Tee Swee Kee, Plantation Director dated 14/11/2019 include statement of recognizing freedom of association and the right to collective bargaining.</p> <p>Website review and onsite visit observed the Policy is available on displayed at main notice boards at each Asia Production Units.</p> <p>Asia Production Unit’s management conduct briefing on company policies includes Social and Human Rights Policy to workers during muster morning as below:</p> <ol style="list-style-type: none"> 1. Asia 2 Estate: 26 July 2021 and 14 October 2021 2. Asia Palm Oil Mill conduct on 24/01/2022 3. Hwa Li 3 Estate conduct on 25/02/2022. 4. Melewar 2 Estate conduct on 26/10/2022. 	<p>Complied</p>
<p>6.3.2</p>	<p>Minutes of meetings between the unit of certification with trade unions or workers representatives, who are freely elected, are documented in national languages (English and/or Bahasa Malaysia) and made available upon request.</p> <p>- Minor compliance -</p>	<p>Asia Production Unit’ managements appoint workers as representatives and form a Joint Consultative Committee (JCC) with the attendance of management representatives. The committee will document meeting and minutes in understandable language by all representative such as Bahasa Malaysia.</p> <p>Document review, sighted minutes of JCC meetings as follow.</p> <ol style="list-style-type: none"> 1. Asia Oil Palm Estate 2 conduct on 28/05/2022 discussed include housing cleanliness & amenities, overtime, price monitoring of goods sold at the estate sundry shop, complaints / grievances matters and committee member to disseminate the information to another worker. 2. Asia Palm Oil Mill conduct on 25/06/2022 discussed include housing cleanliness & amenities, overtime, price monitoring of goods sold at the estate sundry shop, complaints / grievances matters and committee member to disseminate the information 	<p>Complied</p>

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		<p>to another worker.</p> <p>3. Hwa Li Estate 3 conduct on 08/09/2022 discussed include housing cleanliness & amenities, water & energy saving, daily / piece rated wages, overtime, price monitoring of goods sold at the estate sundry shop, Decent Living Wages (DLW) implementation, complaints / grievances matters and committee member to disseminate the information to other worker.</p> <p>4. Melewar 2 Estate conduct on 28/12/2021 discussed include workers' safety and welfare such as electricity supply, repair of leaking water tank, price monitoring at Mahee Trading and supply of sufficient food item Covid-19 during lockdown, minimum wage, etc.</p>	
6.3.3	<p>Management does not interfere with the formation or operation of registered unions/ labour organisations or associations, or other freely elected representatives for all workers including migrant and contract workers.</p> <p>- Minor compliance -</p>	<p>Asia Production Unit' managements appoint workers as representatives and to form of Joint Consultative Committee (JCC). Workers are free to elect their own representatives to in the JCC. Evidence was available to show that the workers' representatives have been freely chosen by the workers themselves via an election process and they represent their respective nationalities as follow.</p> <ol style="list-style-type: none"> 1. Asia Oil Palm Estate 2 records showed that the election was held on 14/04/2021 and there has no change of member. 2. Asia Palm Oil Mill records showed that the election was held on 09/09/2022. 3. Hwa Li Estate 3 records showed that the election was held on 05/08/2022. 4. Melewar Estate 2 records showed that election held on 09/05/2022. <p>Onsite interviews with workers informed the elections were held free from any management interference.</p>	Complied

Criterion 6.4: Children are not employed or exploited.			
6.4.1	<p>A formal policy for the protection of children, including prohibition of child labour and remediation is in place, and included into service contracts and supplier agreements.</p> <p>- Minor compliance -</p>	<p>JC Chang Group established Child Protection Policy signed by Mr. Tan Swee Kee, Plantation Director dated 20/02/2022 includes company commitment to protect children, include the prohibition against child labour.</p> <p>Document review on Sustainability Compliance signed by contractors on meeting applicable legal requirements and disallowing child, forced and trafficked labour sighted contractors signed as follow:</p> <ol style="list-style-type: none"> 1. Benar Warisan Sdn Bhd signed agreement dated 31/01/2022. 2. Sentrabayu Industries Sdn Bhd signed agreement dated 31/01/2022. 3. Tapak Jutamaju Sdn Bhd signed agreement dated 31/01/2022. 4. Meran Sdn Bhd signed agreement dated 31/01/2022. 5. KJS Resources Sdn Bhd signed agreement dated 31/01/2022. 6. Kebaco Sdn Bhd signed agreement dated 31/01/2022. 	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>JC Chang Group established Child Protection Policy signed by Mr. Tan Swee Kee, Plantation Director dated 20/02/2022 includes company commitment to protect children, include the prohibition against child labour.</p> <p>Document review on Sustainability Compliance signed by contractors on meeting applicable legal requirements and disallowing child, forced and trafficked labour sighted contractors.</p> <p>Onsite interviews, document review and onsite visit in the field, evidence is available that minimum age requirements of 18 years old are met throughout the certification unit.</p> <p>Personnel files contain copies of the workers' NRIC (for Malaysians) and passports (for non-Malaysians). These documents were used to</p>	Complied

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		screen age of the workers when they applied for the job. Visit to the linesite and field also did not reveal any persons under 18 years old working.	
6.4.3	(C) Young persons may be employed only for non- hazardous work, with protective restrictions in place for that work. - Critical (Major) compliance -	There was no evidence that any young persons were employed at the certification unit as evidenced from documentation review, field observations and interviews.	Complied
6.4.4	The unit of certification demonstrates communication about its 'no child labour' policy and the negative effects of child labour, and promotes child protection to supervisors and other key staff, smallholders, FFB suppliers and communities where workers live. - Minor compliance -	JC Chang Group established Child Protection Policy signed by Mr. Tan Swee Kee, Plantation Director dated 20/02/2022 is being displayed at main notice boards. Asia Production Unit's management conduct briefing on company policies includes Child Protection Policy to workers during muster morning as below: 1. Asia Oil Palm Estate 2 conduct on 25/06/2022. 2. Asia Palm Oil Mill conduct on 24/01/2022 3. Hwa Li Estate 3 conduct on 09/08/2022. 4. Melewar Estate 2conduct on 26/10/2022.	Complied
Criterion 6.5: There is no harassment or abuse in the workplace, and reproductive rights are protected.			
6.5.1	(C) A policy to prevent sexual and all other forms of harassment and violence is implemented and communicated to all levels of the workforce. - Critical (Major) compliance -	JC Chang Group's Sexual Harassment Policy signed by Mr. Tan Swee Kee, Plantation Director dated 01/07/2012 describes company commitment to prevent sexual and other forms of harassment is contained in JC Chang Group established SOP on Mechanism for the Prevention and Eradication of Sexual Harassment and Violence in the Workplace, Doc. No.: E/003-01/2008 dated 01/10/2008. The procedure describes the responsibility and legal obligation to maintain a workplace free of sexual harassment and aim to provide guidelines to estates and mills on the establishment and implementation of in-house mechanisms to prevent and eradicate	Complied

		<p>sexual harassment in the workplace.</p> <p>Asia Production Unit’s management conduct briefing on company policies includes Sexual Harassment Policy to workers during muster morning as below:</p> <ol style="list-style-type: none"> 1. Asia Oil Palm Estate 2 conduct on 25/06/2022. 2. Asia Palm Oil Mill conduct on 15/04/2022 3. Hwa Li 3 Estate conduct on 05/07/2022. 4. Melewar 2 Estate conduct on 16/02/2022. 	
6.5.2	<p>(C) A policy to protect the reproductive rights of all, especially of women, is implemented and communicated to all levels of the workforce.</p> <p>- Critical (Major) compliance -</p>	<p>JC Chang established Social and Human Rights Policy signed by Mr. Tan Swee Kee, Plantation Director dated 14/11/2019 describes company commitment to protect reproductive rights of all, especially for women in operations.</p> <p>JC Chang Group established Guideline on Reproductive Right, Doc no.: E/015-02/2015 dated 05/11/2015 which include the right to birth control, freedom from coerced sterilization and contraception, right to access good-quality reproductive healthcare, right to education and access to make free and informed reproductive choices; and right to receive education about sexually transmitted infections and other aspects of sexuality.</p> <p>Asia Production Unit’s management conduct briefing on company policies includes Social and Human Rights Policy and Reproductive Right to workers during muster morning as below:</p> <ol style="list-style-type: none"> 1. Asia Oil Palm Estate 2 conduct on 25/06/2022. 2. Asia Palm Oil Mill conduct on 15/04/2022 3. Hwa Li Estate 3 conduct on 11/08/2022. 4. Melewar Estate 2 conduct on 16/02/2022. <p>Onsite interviews with workers and gender committee members inform the reproductive rights policy is being implemented where</p>	Complied

		<p>they are not prevented from planning their family and mothers given two (2) months paid maternity leave.</p>	
<p>6.5.3</p>	<p>Management has assessed the needs of new mothers, in consultation with the new mothers, and actions are taken to address the needs that have been identified.</p> <p>- Minor compliance -</p>	<p>JC Chang Group established Guideline on Reproductive Right, Doc no.: E/015-02/2015 dated 05/11/2015 which include the right to birth control, freedom from coerced sterilization and contraception, right to access good-quality reproductive healthcare, right to education and access to make free and informed reproductive choices; and right to receive education about sexually transmitted infections and other aspects of sexuality.</p> <p>Management is aware of the requirement to assess the needs of new mothers. Therefore, the new mothers need assessment was conducted to identify the needs. Based on the assessment report, sighted the new mothers needs as follow.</p> <ol style="list-style-type: none"> 1. Request permission for every 2 hours of time off to breastfeed the baby. 2. Special and private place for breast pump in the office. <p>Document review of Birth Register Record books from November 2021 until October 2022, Asia Oil Palm Estate 2, Hwa Li Estate 3 and Melewar Estate 2 have recorded with no new baby was born with signature from estate managers and Dr. Mohamad Fikri B Zainal Abidin, MMC No. 51299, VMO from Klinik Mabello Paris.</p> <p>Document review of Birth Register Record books from November 2021 until October 2022, Asia Palm Oil Mill recorded with 2 new baby were born. Based on the record as follow:</p> <ol style="list-style-type: none"> 1. Hanawati, 32 years old, baby deliver on 10/11/2021 – Deliver the baby at Hospital Kunak, Baby name Malaika Izzati Mahdiyah Binti Maswanto and baby immunisation injection at Klinik Kesihatan Batu Putih. 	<p>Complied</p>

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		<p>2. Zannah Dakulah, 35 years old, baby deliver on 04/07/2022 – Deliver the baby at Hospital Tawau, Baby name Ahmad Syami Hidayatullah Bin Muhammad Muzairi and baby immunisation injection at Klinik Kesihatan Batu Putih.</p>	
<p>6.5.4</p>	<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>JC Chang Group established SOP on Mechanism for Complaints and Grievances is available in Doc. No. E/001-07/2019 dated 12/08/2019. It respects anonymity and protects complainants when requested.</p> <p>Asia Production Unit’s management conduct briefing on company policies includes Complaints and Grievances procedure to workers during muster morning as below:</p> <ol style="list-style-type: none"> 1. Asia Oil Palm Estate conduct on 10/05/2022 2. Asia Palm Oil Mill conduct on 24/01/2022. 3. Hwa Li 3 Estate conduct on 25/02/2022. 4. Melewar 2 Estate conduct on 09/02/2022. <p>There was no record of any complaint since the last audit. However, interviews with workers confirmed their understanding.</p>	<p>Complied</p>
<p>Criterion 6.6: No forms of forced or trafficked labour are used.</p>			
<p>6.6.1</p>	<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 	<p>JC Chang Group established Guidelines on Terms and Conditions of Employment for Sabah Estate Workers (Doc E/009-08/2021) dated 22/12/2021.</p> <p>Onsite interviews and document review as following.</p> <ol style="list-style-type: none"> 1. Retention of documents: All workers are free to keep their own passports. There is no retention of identity documents or passports unless these are needed for passport/work permit renewal. Those who wish to keep their passports at the office have signed a letter to that effect. 2. Charging of recruitment fee: Workers are not charged any 	<p>Complied</p>

	<ul style="list-style-type: none"> • Debt bondage • Withholding of wages <p>- Critical (Major) compliance -</p>	<p>recruitment fees. Workers employed by the certification unit are directly hired with no recruitment agents as intermediaries.</p> <ol style="list-style-type: none"> 3. Involuntary overtime: Based on interviews conducted with the workers, all overtime work were carried out on a voluntary basis. Workers are free decline any offers for overtime work. 4. Lack of freedom to resign: Workers are free to resign as per stated in their employment contracts. 5. Debt bondage: There is no evidence of any incidence of debt bondage. 6. Withholding of wages: There is no evidence of withholding of wages. 7. Contract substitution: There was no evidence of contract substitution. All workers were directly hired and knew what type of job they would be doing prior to signing their contracts. 	
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>JC Chang Group established Guidelines on Terms and Conditions of Employment for Sabah Estate Workers (Doc E/009-08/2021) dated 22/12/2021.</p> <p>Asia Production Unit’s management has employed migrant workers from Philippines and Indonesia.</p> <p>Document review on the guideline include legalization of foreign workers, no contract substitution, no discrimination, payment of minimum wages, provision of post-arrival orientation on language, safety, laws, regulations.</p>	Complied
<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>			
6.7.1	<p>(C) The responsible person(s) for H&S is identified. There are records of regular meetings between the responsible person(s) and workers. Concerns of all parties about health, safety and welfare are discussed at these meetings, and any issues raised are recorded.</p>	<p>All operating units have formed an OSH Committee in the respective mill and estate to address all issues associated to Health and Safety in the operating units.</p> <p>a. <u>Asia Palm Oil Mill</u></p>	Complied

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	<p>- Critical (Major) compliance -</p>	<p>The Mill Manager, Mr. Stephan Lee Khing Wen has been appointed as the Chairman of the OSH committee in the mill as stated in the appointment letter dated 29/07/2022 undersigned by the Mill Director.</p> <p>b. <u>Asia Oil Palm Estate 2</u> The Estate Manager, Mr. Kiu Hieng Seng has been appointed as the Chairman of the OSH Committee in the state as stated in the appointment letter dated 01/07/2021 undersigned by the Plantation Director.</p> <p>c. <u>Melewar Estate Div. 2</u> The Estate Manager, Mr. Dulmi Hj. Mullar has been appointed as the OSH Chairman in the estate as stated in the appointment letter dated 25/07/2018 undersigned by the Plantation Director.</p> <p>d. <u>Hwa Li Estate Div. 3</u> The Estate Manager Mr. Paul Chong Boon Piu has been appointed as the OSH Chairman in the estate as stated in the appointment letter dated 08/08/2018 undersigned by the General Manager.</p> <p>OSH Committee of the respective operating units conducts regular OSH Meetings to address all issues related to OSH in the operating units.</p> <p>a. Asia Palm Oil Mill have conducted regular OSH Meetings in the mill. The meeting minutes were available for verification dated 02/11/2022 (4th – 2022), 03/08/2022 (3rd – 2022), 04/05/2022 (2nd - 2022) and 11/02/2022 (1st – 2022).</p> <p>b. Asia Oil Palm Estate Div.2 conducted regular OSH Meetings in the estate. The meeting minutes were available for verification</p>	
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		<p>dated 07/09/2022 (03-2022), 08/06/2022 (02-2022) and 09/03/2022 (01-2022).</p> <p>c. Melewar Estate Div. 2 have conducted regular OSH meetings in the estate. The meeting minutes were available for verification dated 07/10/2022 (03-2022), 30/06/2022 (02-2022) and 30/03/2022 (01-2022).</p> <p>d. Hwa Li Estate Div. 3 have conducted quarterly OSH meetings in the estate. The meeting minutes were available for verification dated 28/09/2022 (03/2022), 26/08/2022 (02/2022) and 28/03/2022 (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 Response Plans and Procedures were available in the estates and mills to address potential emergencies such as Flood, Fire, Chemical Spillage, Poisoning, Earthquake/landslide, Accidents, Storm and Wild/ Poisonous Animal Attacks. The plans have been posted at notice boards in the mills and estates and communicated to the workers. Emergency contact numbers have been posted at the notice boards and provided to the workers as well. Interview with the workers such as mandores and store attendants indicated that the workers are aware on the available emergency response plans. Trainings were conducted in the mill and estates to provide awareness to the workers on emergency responses. The trainings were sighted as below.</p> <ol style="list-style-type: none"> 1. <u>Asia Palm Oil Mill</u> <ul style="list-style-type: none"> - ERP & Fire Drill conducted on 01/03/2022 - ERP – Earth Quake and Venomous Animals – 28/09/2022 - ERP – Fire Extinguisher & Hose Reel – 28/06/2022 2. <u>Asia Oil Palm Estate Div.2</u> Fire Extinguisher Training and Fire Drill on 10/02/2022 3. <u>Melewar Estate Div. 2</u> 	<p>Complied</p>

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		<ul style="list-style-type: none"> - Chemical Spillage Emergency Training – 20/05/2022 - ERP at Workplace Training – 20/05/2022 - Fire Drill Briefing – 30/11/2022 <p>4. <u>Hwa Li Estate Div 3.</u></p> <ul style="list-style-type: none"> - Evacuation Drill During Fire Training – 10/10/2022 <p>First aiders were present in the operating units. They have been trained and obtained certificates as the PIC to address first aid in the operating units. Visit to the mill and estates indicated each station and gangs were equipped with first aid kits. Interview with the respective first aid holders indicated that they were well aware on the methods to use the items in the first aid boxes. The boxes are regularly monitored by the mill and estate Hospital Assistants to replenish the used items and replace expired items. Records of items used were also maintained and available in the boxes.</p> <p>1. <u>Asia Palm Oil Mill</u></p> <ul style="list-style-type: none"> - The First Aid Training was conducted on 11/10/2022. - There were 5 First Aiders present in the mill that have completed the knowledge and skill evaluations for basic Occupational First Aid, CPR & AED Training on 05/03/2022 conducted by Certified Emergency Response Training Academy. <p>2. <u>Asia Oil Palm Estate Div.2</u></p> <p>The estate have provided first aid boxes for all operation heads. All first aid holders were trained by the HA with the recent training on 22/03/2022. Interview with the first aid box holder at the Spraying Gang, Manuring Gang and Workshop indicated that they are all aware of the usage of the items in the first aid boxes.</p>	
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		<p>3. <u>Melewar Estate Div. 2</u></p> <ul style="list-style-type: none"> - First aid boxes were available with trained personals at each operation and work site at the estate. Interview with the sampled First Aid Box holders at the Spraying gang and Chemical Stores indicated they were well aware on the usage of the items. - First Aid Kit and Eye Wash Training have been conducted for all holders on 21/03/2022. <p>4. <u>Hwa Li Estate Div. 3</u></p> <ul style="list-style-type: none"> - First Aid Training was conducted for all workers on 22/06/2022. - First Aiders were present in the estate that have completed the knowledge and skill evaluations for basic Occupational First Aid, CPR & AED Training on 12/09/2020 conducted by Certified Emergency Response Training Academy. <p>Accident records were maintained in the estate and available for verification.</p> <p>1. <u>Asia Palm Oil Mill</u></p> <p>For the year 2021 there were no accident reported. The JKPP 8 form have been submitted to DOSH on 11/01/2022 and available for verification. For the year 2022 there were 3 accidents reported including 2 JKPP6 case. The DOSH JKPP 6 submission was available for verification.</p> <p>2. <u>Asia Oil Palm Estate</u></p> <p>For the year 2021 there were 1 minor accident reported for the year with no loses of mandays. The JKPP 8 form have been submitted to DOSH on 11/01/2022 and available for verification.</p>	
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		<p>For the year 2022 there were no accident or near misses reported in the estate.</p> <p>3. <u>Melewar Estate Div. 2</u></p> <p>For the year 2021 there were 2 accidents reported in the estate with no loss of mandays. The JKKP 8 form for the year ending 2021 have been submitted to DOSH via MyKKP on 08/01/2022 (Reference Number: JKKP 8/96452/2022) and was available for verification. As for the year 2022, as of November 2021 there were no accidents reported in the estate .</p> <p>4. <u>Hwa Li Estate Div. 3</u></p> <p>For the year 2021, there were no accident cases reported for the year in the estate The JKKP 8 for the year ending 2021 has been submitted to DOSH on 27/01/2021. There were no accident cases reported for the year 2022 in the estate as of to date.</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, Harvesting gang and Manuring Gang and visit to the stores of the respective estates and mill, it was sighted that all required appropriate PPEs were worn by the personals. Interview with the workers indicated that they were aware on the importance of PPE usage as a control measure to prevent or reduce risks associated to their daily work. They confirmed that all PPEs were provided without any deduction made to their respective salaries. PPE issuance records and workers' payslips were also verified to confirm their statements.</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</p>	Complied

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		before returning home due to the hazard that the chemical residues could cause.																																								
6.7.4	<p>All workers are provided with medical care and covered by accident insurance. Costs incurred from work- related incidents leading to injury or sickness are covered in accordance with Malaysian law.</p> <p>- Minor compliance -</p>	<p>All workers are provided with medical care which is borne by the operating units management. Each operating unit has its own dispensary managed by a certified Hospital Assistant. There are no restrictions for workers to obtain medical aid from the dispensary. In case of major injuries or health issues, workers are referred to private clinics or hospitals which is totally borne by the management as well.</p> <p>All workers are protected via insurance in accordance with Malaysian Law via SOCSO contribution. The monthly contribution was evident via the PERKESO Monthly Salary Contribution (Form 8A) for the workers as following.</p> <table border="1" data-bbox="1137 815 1928 1390"> <thead> <tr> <th>Operating Units</th> <th>Month</th> <th>Total Workers</th> <th>Amount</th> </tr> </thead> <tbody> <tr> <td rowspan="3">Asian Palm Oil Mill</td> <td>Aug 2022</td> <td>130</td> <td>RM 5,248.30</td> </tr> <tr> <td>Sept 2022</td> <td>131</td> <td>RM 5,296.30</td> </tr> <tr> <td>Oct 2022</td> <td>137</td> <td>RM 5,712.20</td> </tr> <tr> <td rowspan="3">Melewar Estate Div. 2</td> <td>Aug 2022</td> <td>133</td> <td>RM 3,048.90</td> </tr> <tr> <td>Sept 2022</td> <td>141</td> <td>RM 3,091.30</td> </tr> <tr> <td>Oct 2022</td> <td>149</td> <td>RM 3,387.30</td> </tr> <tr> <td rowspan="3">Hwa Li Estate Div. 3</td> <td>Aug 2022</td> <td>305</td> <td>RM 6,812.70</td> </tr> <tr> <td>Sept 2022</td> <td>303</td> <td>RM 6,858.60</td> </tr> <tr> <td>Oct 2022</td> <td>305</td> <td>RM 7,095.70</td> </tr> <tr> <td></td> <td></td> <td>Aug 2022</td> <td>181</td> <td>RM 4,453.10</td> </tr> </tbody> </table>	Operating Units	Month	Total Workers	Amount	Asian Palm Oil Mill	Aug 2022	130	RM 5,248.30	Sept 2022	131	RM 5,296.30	Oct 2022	137	RM 5,712.20	Melewar Estate Div. 2	Aug 2022	133	RM 3,048.90	Sept 2022	141	RM 3,091.30	Oct 2022	149	RM 3,387.30	Hwa Li Estate Div. 3	Aug 2022	305	RM 6,812.70	Sept 2022	303	RM 6,858.60	Oct 2022	305	RM 7,095.70			Aug 2022	181	RM 4,453.10	Complied
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6.7.5	Occupational injuries are recorded using Lost Time Accident (LTA) metrics. - Minor compliance -	<p>All accidents incidents are reviewed during the quarterly held safety meetings in the operating units. Records on Lost Time Accident (LTA) are maintained and presented during the meetings. Accident records were updated and available for verification. JKPP 8 have been submitted to DOSH accordingly and available for verification. The LTA for each operating unit has been recorded (year to date November 2022) and available as below.</p> <table border="1"> <thead> <tr> <th rowspan="2">Operating Units</th> <th colspan="2">2021</th> <th colspan="2">2022</th> </tr> <tr> <th>Cases</th> <th>Days</th> <th>Cases</th> <th>Days</th> </tr> </thead> <tbody> <tr> <td>Asia Palm Oil Mill</td> <td>-</td> <td>-</td> <td>3</td> <td>79</td> </tr> <tr> <td>Melewar Div 2</td> <td>2</td> <td>0</td> <td>-</td> <td>-</td> </tr> <tr> <td>Asia Oil Palm Div 2</td> <td>1</td> <td>0</td> <td>0</td> <td>0</td> </tr> <tr> <td>Hwa Li Est Div 3</td> <td>-</td> <td>-</td> <td>-</td> <td>-</td> </tr> </tbody> </table>	Operating Units	2021		2022		Cases	Days	Cases	Days	Asia Palm Oil Mill	-	-	3	79	Melewar Div 2	2	0	-	-	Asia Oil Palm Div 2	1	0	0	0	Hwa Li Est Div 3	-	-	-	-	Complied
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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.																																

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7.1.1	<p>(C) IPM plans are implemented and monitored to ensure effective pest control.</p> <p>- Critical (Major) compliance -</p>	<p>As per Integrated Pest Management Plan; Date Review; 03/01/2022 as following:</p> <table border="1"> <thead> <tr> <th>Pest</th> <th>IPM</th> <th>Plan</th> <th>Action</th> </tr> </thead> <tbody> <tr> <td>Ganoderma</td> <td>Observation and monitoring</td> <td>Census</td> <td>Census</td> </tr> <tr> <td>Rat – Mature area</td> <td>Intervention</td> <td>6-months Census</td> <td>Rat baiting until uptake level < 20%</td> </tr> <tr> <td>Rat – Immature area</td> <td>Intervention</td> <td>Immediate upon sighting</td> <td>Rat baiting until uptake level < 20%</td> </tr> <tr> <td>Leaf eating caterpillar: bagworms (Darna trima, Setora nitens, Setothosea asigna)</td> <td>Observation, Monitoring and Intervention</td> <td>Biological control – predator host (beneficial) plant: Cassia cobanensis and Tunera subulata</td> <td>Beneficial plant planting and maintenance by the roadside</td> </tr> <tr> <td>Leaf eating caterpillar: nettle caterpillar (Metisa plana, Mahasena)</td> <td>Observation, Monitoring and Intervention</td> <td>Census to determine attack rate, if:</td> <td>Insecticide</td> </tr> </tbody> </table>	Pest	IPM	Plan	Action	Ganoderma	Observation and monitoring	Census	Census	Rat – Mature area	Intervention	6-months Census	Rat baiting until uptake level < 20%	Rat – Immature area	Intervention	Immediate upon sighting	Rat baiting until uptake level < 20%	Leaf eating caterpillar: bagworms (Darna trima, Setora nitens, Setothosea asigna)	Observation, Monitoring and Intervention	Biological control – predator host (beneficial) plant: Cassia cobanensis and Tunera subulata	Beneficial plant planting and maintenance by the roadside	Leaf eating caterpillar: nettle caterpillar (Metisa plana, Mahasena)	Observation, Monitoring and Intervention	Census to determine attack rate, if:	Insecticide	Complied
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		corbetti, pteroma pendula))		- 10 small larvae per frond - 5 big larvae per fronds Apply treatment		
		Rhinoceros Oryctes	Prevention	Thin EFB or compost application to avoid breeding	Pheromone traps to trap beetle	
7.1.2	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. - Minor compliance -	None of the species referenced in the Global Invasive Species Database and CABI.org were used in the management of IPM in the estates visited. In JC Chang Group estates, 3 common plant species were used for IPM such as Tunera subulata, Cassia cobanensis, and Antigonan leptopus.				Complied
7.1.3	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. - Minor compliance -	No evidence and records of fire usage for pest control at all estate visited. Asia Production Unit has committed to Zero Burning compliance as spelt out in the JC Chang Group Environmental Policy dated 01/01/2008.				Complied
Criterion 7.2: Pesticides are used in ways that do not endanger health of workers, families, communities or the environment.						
7.2.1	(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.	Estate have maintained and revised if required, the documented standard operating procedures file that contain in the safe operating procedure and to implement the various major field operations. For example, among others the following operations: -				Complied

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	- Critical (Major) compliance -	<ul style="list-style-type: none"> – Justification for Pesticide Usage under IPM (Insecticide, Fungicide and Rodenticide) (B/008-14/2016) – Justifications for pesticide usage under IPM (B/009- 10/2015) 																										
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>The record of pesticide usage was available including active ingredient used and area treated, amount of active ingredient applied per Ha and number of applicants, documented in Monitoring of Pesticide Usage – Units Per Ha, Tonne FFB And Per Tonne Oil. The record as per below for Glufosinate Isopropyl ammonium:-</p> <table border="1"> <thead> <tr> <th colspan="5">A.I used per Ha</th> </tr> <tr> <th>Estate</th> <th>July 2022</th> <th>Aug 2022</th> <th>Sep 2022</th> <th>Oct 2022</th> </tr> </thead> <tbody> <tr> <td>Asia Oil Palm Estate Div.2</td> <td>0.0994</td> <td>0.1335</td> <td>0.1000</td> <td>0.1169</td> </tr> <tr> <td>Hwa Li Estate Div.3</td> <td>0.224</td> <td>-</td> <td>0.209</td> <td>0.219</td> </tr> <tr> <td>Melewar Estate Div.2</td> <td>0.313</td> <td>0.302</td> <td>0.212</td> <td>0.316</td> </tr> </tbody> </table>	A.I used per Ha					Estate	July 2022	Aug 2022	Sep 2022	Oct 2022	Asia Oil Palm Estate Div.2	0.0994	0.1335	0.1000	0.1169	Hwa Li Estate Div.3	0.224	-	0.209	0.219	Melewar Estate Div.2	0.313	0.302	0.212	0.316	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 management has establish the procedure to ensure minimized on pesticide usage such as ;-</p> <p>The quantity of agrochemicals required for various field conditions are documented and justified under Guidelines on Integrated Pest and Disease Management of Oil Palm (Doc Ref. No L/001-07/2019 dated 13/08/2019).</p> <p>The estates have implemented a Continuous Improvement Plan where they have stated the intention to minimize use of certain pesticide by achieving objectives such as below:</p> <ol style="list-style-type: none"> 1. Upgrade and intensify IPM Practices. 	Complied																									

		<ul style="list-style-type: none"> - Barn Owl Boxes - Introduce barn Owl to Sabah Estates - Predator Host Plants <p>2. Weeding Regimes</p> <ul style="list-style-type: none"> - Discrete and Selective Spraying Practices - Use Quality Herbicides/Adjuvents - Use EFB to Circle Mulch Young Replants - Interrow EFB Mulching for Mature Palms - Phasing Out Usage of Paraquat – Paraquat is prohibited to be used in the Group. <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>	
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 due diligence refers to:</p> <p>a) Judgment of the threat and verify why this is a major threat</p> <p>b) Why there is no other alternative which can be used</p>	<p>The Chemical Registers for the mill and 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 its place, less hazardous alternatives such as Glyphosate and Acephate was used instead.</p>	Complied

	<p>c) Which process was applied to verify why there is no other less hazardous alternative</p> <p>d) What is the process to limit the negative impacts of the application</p> <p>e) Estimation of the timescale of the application and steps taken to limit application to the specific outbreak.</p> <p>- Minor compliance -</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="1140 775 1930 1206"> <thead> <tr> <th>Estate</th> <th>Training</th> <th>Date</th> </tr> </thead> <tbody> <tr> <td rowspan="3">Asia Oil Palm Estate Div. 2</td> <td>Chemical Sprayer's SOP Training</td> <td>26/07/2022</td> </tr> <tr> <td>SDS Training</td> <td>17/02/2022</td> </tr> <tr> <td>Spraying Pump & Nozzle Calibration Training</td> <td>21/04/2022</td> </tr> <tr> <td rowspan="2">Melewar Estate Div.2</td> <td>Chemical Handling, Chemical Store Management, Pre-Mixing and PPE Training</td> <td>20/03/2022</td> </tr> <tr> <td>Spraying, SDS, ERP and Buffer Zone Training</td> <td>29/03/2022</td> </tr> </tbody> </table>	Estate	Training	Date	Asia Oil Palm Estate Div. 2	Chemical Sprayer's SOP Training	26/07/2022	SDS Training	17/02/2022	Spraying Pump & Nozzle Calibration Training	21/04/2022	Melewar Estate Div.2	Chemical Handling, Chemical Store Management, Pre-Mixing and PPE Training	20/03/2022	Spraying, SDS, ERP and Buffer Zone Training	29/03/2022	Complied
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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</p>	Complied															

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		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.	
7.2.8	All pesticide containers are triple rinsed and punctured before being disposed of and/or handled responsibly if used for other purposes. - Minor compliance -	Excess chemical containers that were not used for premixing have been triple rinsed and punctured was categorized under recycle waste. The chemical containers are stored in the Empty Chemical Container Store and disposed through waste contractors responsibly. Verified the disposal records for the sampled estates as below. 1. Asia Oil Palm Estate Div. 2 disposes their excess chemical containers to Newgates Industries (Borneo) Sdn Bhd. The latest disposal record dated 26/11/2022 and 26/10/2022 was available for verification. 2. Hwa Li Estate Div. 3 disposes their excess chemical containers to Newgates Industries (Borneo) Sdn Bhd. The latest disposal record dated 28/06/2022 was available for verification. 3. Melewar Estate Div. 2 disposes their excess chemical containers to Newgates Industries (Borneo) Sdn Bhd. The latest disposal record dated 26/10/2022 was available for verification.	Complied
7.2.9	(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. - Critical (Major) compliance -	No aerial spraying for pesticide were done in all the estates.	Complied

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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>Medical Surveillance were conducted in the estates based on the recommendation of the CHRA for workers exposed to hazardous chemicals. Results of annual medical surveillance were available in the estates for verification as follows.</p> <p><u>Asia Oil Palm Estate 2</u></p> <p>The medical surveillance programme for the year 2022 has been performed on 17/03/2022 at Mabello Group of Clinics for 34 workers identified to be exposed to hazardous chemicals, fertilisers and fumes in the estate. The results indicated that all workers were fit to work.</p> <p><u>Melewar Estate Div 2</u></p> <p>The medical surveillance programme for the year 2022 has been performed on 05/08/2022 for 31 employees at Klinik Mabello (Paris) Sdn Bhd. The results indicated all workers were certified fit to work with no occupational related medical conditions.</p> <p><u>Hwa Li Estate Div 3</u></p> <p>The medical surveillance programme for the year 2022 has been performed on 03/08/2022 for 56 employees at Klinik Mabello (Paris) Sdn Bhd. The results indicated all workers were certified fit to work with no occupational related medical conditions.</p>	Complied
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 workers who are under the age of 18, confirmed pregnant or breast-feeding to handle chemicals as per procedure J.C Chang Group; Guidelines on Weeding Regime and Practices; Doc. Ref. No.: B/004-02/2019; Subject: Weeding Regime & Practices; Document Date: 12/08/2019; 21 – <i>No work with pesticides is undertaken by persons under the age of 18 years old, pregnant or breastfeeding women or other people that have medical restrictions should be 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.

<p>7.3.1</p>	<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>Waste management plan established with few SOPs and guidelines as sample as following:</p> <ul style="list-style-type: none"> - OP on Chemical Purchase, Storage, Handling & Disposal of used chemical and container; Doc. Ref. # H/005-02/2015; Doc. Date: 3/8/2015 - General Guidelines on Waste Management Plan; Doc. Ref. # F/001-04/2015; Doc. Date: 23/7/2015 - Guideline on Wastes and Waste Products Identification and Disposal for Estate and Mills; Doc. Ref. # F/007-06/2016; Doc. Date: 22/12/2016 - Guidelines on Garbage Disposal; Doc. Ref. # F/006-06/2016; Doc. Date: 21/12/2016 - Guidelines on Scheduled Wastes Labelling, Storage and Documentation; Doc. Ref. # F/014-04/2017; Doc. Date: 7/1/2017 <p>APOM:</p> <ul style="list-style-type: none"> - Scrap iron: latest disposal: 22/8/2022 by Tong Shern Scrap Metal Sdn. Bhd. - SW 305; Quantity: 1.85 mt; Consignment Note # C 003461; Disposal contractor: Lagenda Bumimas Sdn. Bhd.; Date: 29/8/2022 - SW 410 (Used oil filter); Quantity: 0.0565 mt; Consignment Note # C 003466; Disposal contractor: Lagenda Bumimas Sdn. Bhd.; Date: 29/8/2022 - SW 410 (Used plastic container); Quantity: 0.0750 mt; Consignment Note # C 003463; Disposal contractor: Lagenda Bumimas Sdn. Bhd.; Date: 29/8/2022 - Latest Inventory of Scheduled Wastes for November 2022; APOM DOE file ref. # JAS.SSK.600-3/1/54 	<p>OFI</p>
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		<p>Asia Oil Palm Estate 2:</p> <p>The implementation of waste management plan for clinical waste could be further improved on promptness of collection from temporary location to designated storage area. Hence, an OFI has been raised on the matter.</p>	
7.3.2	<p>Proper disposal of waste material, according to procedures that are fully understood by workers and managers, is demonstrated.</p> <p>- Minor compliance -</p>	<p>Proper disposal of was material was demonstrated its understanding by workers and managers in accordance with legal requirements as well as procedures as per sample as following:</p> <ul style="list-style-type: none"> - Scrap iron: latest disposal: 22/8/2022 by Tong Shern Scrap Metal Sdn. Bhd. - SW 305; Quantity: 1.85 mt; Consignment Note # C 003461; Disposal contractor: Lagenda Bumimas Sdn. Bhd.; Date: 29/8/2022 - SW 410 (Used oil filter); Quantity: 0.0565 mt; Consignment Note # C 003466; Disposal contractor: Lagenda Bumimas Sdn. Bhd.; Date: 29/8/2022 - SW 410 (Used plastic container); Quantity: 0.0750 mt; Consignment Note # C 003463; Disposal contractor: Lagenda Bumimas Sdn. Bhd.; Date: 29/8/2022 	Complied
7.3.3	<p>The unit of certification does not use open fire for waste disposal.</p> <p>- Minor compliance -</p>	<p>No evidence of fire use in waste disposal as sighted during site visit in the housing area. Domestic waste was put in dustbin and collected twice a week and disposed in designated landfill. Noted during interview with workers shows awareness on prohibition of using fire for waste disposal.</p>	Complied
Criterion 7.4: Practices maintain soil fertility at, or where possible improve soil fertility to, a level that ensures optimal and sustained yield.			
7.4.1	<p>Good agriculture practices, as contained in SOPs, are followed to manage soil fertility to optimise yield and minimise environmental impacts.</p>	<p>JC Chang Group has established SOPs of good agricultural practices to manage soil fertility to optimise yield and minimise environmental</p>	Complied

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	<p>- Minor compliance -</p>	<p>impacts documented in Guideline on Soil and Water Conservation, refer document no. C/002-01/2008 dated on 10/11/2018 and Fertilizer Recommendation, refer document no. B/015-01/2013 dated on 19/07/2013. These guidelines outlined the method to ensure palm oil produce optimal and sustained yield.</p> <p>The sustaining of the soil fertility is guided by the organization SOPs content among others as stated in sections of the following documents:</p> <ul style="list-style-type: none"> - Methods of Nutrient Assessment for Oil Palm Fertilizer Recommendation, refer document no. B/015-01/2013. - Soil and water conservation refer document no. C/002-01/2008 	
<p>7.4.2</p>	<p>Periodic tissue and soil sampling is carried out by Companies to monitor and manage changes in soil fertility and plant health.</p> <p>- Minor compliance -</p>	<p>Periodic tissue and soil sampling is carried out as per sample as following:</p> <ul style="list-style-type: none"> - Hwa Li Estate Div. 3 Foliar Test Report Ref. # R22/4/111; Date: 25/4/2022; For Oil Palm Leaf from Field # 97E; Block # E1, E3, E5, E7 & E9; By: KDC Laboratory KL-Kepong (Sabah) Sdn. Bhd. - Hwa Li Estate Div. 3 Soil Test Report Ref. # R22/4/350; Date: 5/5/2022; For Soil Depth IR 0-15cm & 15-30cm from Field # 97E; Block # E1, E5 & E7; By: KDC Laboratory KL-Kepong (Sabah) Sdn. Bhd. - Melewar Estate Div. 2 Foliar Test Report Ref. # R22/3/381; Date: 14/4/2022; For Oil Palm Leaf from Field # 95D; Block D1; Field 97A; Block A1, A3; Field 97D; Block D1; Filed 19B; Block B1; By KDC Laboratory KL-Kepong (Sabah) Sdn. Bhd. - Melewar Estate Div. 2 Soil Test Report Ref. # R22/4/10; Date: 18/4/2022; For Soil Depth IR 0-15cm & 15-30cm from Field # 95D; Block # D1; Field 97A; Block A1 & A7; By: KDC Laboratory KL-Kepong (Sabah) Sdn. Bhd. 	<p>Complied</p>

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7.4.3	A nutrient recycling strategy is in place, which includes the recycling of Empty Fruit Bunches (EFB), Palm Oil Mill Effluent (POME), palm residues and optimal use of inorganic fertilisers. - Minor compliance -	A nutrient recycling strategy is in place as per Asia Palm Oil Mill's Oil Palm EFB Disposal Inventory Report; Form JAS PPTK-2 for period from 1/10/2022 to 31/10/2022; EFB generation quantity: 3,512.83 mt + 33.48 mt; EFB disposed quantity: 3,516.64 mt	Complied
7.4.4	Records of fertiliser inputs are maintained. - Minor compliance -	Records of fertiliser inputs are maintained based on the updated fertilizer programme by Senior Agronomist i.e., agronomic Fertiliser Programme FY 2021/2022 which programmed for whole calendar year in 5 rounds as per sample in Hwa Li Estate Div. 3 as following: - Round 1 (Oct – Nov 2021) Type: NK Mix; Rate: 2.50 - 3.00 kg/palm - Round 2 (Jan – Feb 2022) Type: NK Mix; Rate: 2.50 kg/palm - Round 3 (Mar – Apr 2022) Type: ERP; Rate: 1.25 - 1.50 kg/palm - Round 4 (May – Jun 2022) Type: NK Mix; Rate: 2.50 - 2.75 kg/palm - Round 5 (Nov 2022) Type: MOP; Rate: 1.50 kg/palm	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 -	Maps identifying marginal and fragile soils, including steep terrain, are available as per sample based on Soil Organic Matter Analysis and Hwa Li Oil Palm Estate Div. 3 Soil Map as sample, the soil types in Hwa Li Oil Palm Estate Div. 3 are as following: - Kinabatangan: 26.30% - Sapi: 1.85% - Lungmanis: 4.90% - Rumidi: 34.77% - Kretam: 32.18%	Complied

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 -	As per site visit verification in field PM 98B no extensive replanting of oil palm on steep terrain. The highest hill only less than 15 degrees around 40% of total estate. For Melewar estate Div. 2 in Field PR 00, verified no extensive replanting of Oil Palm.	Complied
7.5.3	There is no new planting of oil palm on steep terrain. - Minor compliance -	Not applicable as mentioned in indicator 7.5.2 above.	Not Applicable
Criterion 7.6: Soil surveys and topographic information are used for site planning in the establishment of new plantings, and the results are incorporated into plans and operations.			
7.6.1	(C) To demonstrate the long-term suitability of land for palm oil cultivation, soil maps or soil surveys identifying marginal and fragile soils, including steep terrain, are taken into account in plans and operations. - Critical (Major) compliance -	Soil series and topography map available for estate visited. No fragile soil categorized in the estates visited as per soil map. As per topography map established, the slope in all 3 sampled estate were at average of 0° to 20° as per sample Soil Maps for Hwa Li Estate Div. 3 by Param Agriculture Soil Survey (M) Sdn Bhd dated revise 2004. No fragile soil in Hwa Li Estate Div. 3 and major soil series in estate was Kinabatangan series, Sapi series, Lungmanis series, Rumidi Series and Kretam Sories. In Melewar Estate Div. 2 was available for reviewed, referred report R19/3/48 by KDC Laboratory dated 27/2/2019. No fragile soil presence too.	Complied
7.6.2	Extensive planting on marginal and fragile soils, is avoided, or, if necessary, done in accordance with the soil management plan for best practices. - Minor compliance -	Based on soil maps for all estates that were available for verification, which source from British Government's Overseas Development Administration (Land Resources Division) United Kingdom, 1974, for the Sabah Governments no fragile soil in sampling estate.	Complied
7.6.3	Soil surveys and topographic information guide the planning of drainage and irrigation systems, roads and other infrastructure. - Minor compliance -	Based on Soil Organic Matter Analysis and Hwa Li Oil Palm Estate Div. 3 Soil Map as sample, the soil types in Hwa Li Oil Palm Estate Div. 3 are as following:	Complied

		<ul style="list-style-type: none"> - Kinabatangan: 26.30% - Sapi: 1.85% - Lungmanis: 4.90% - Rumidi: 34.77% - Kretam: 32.18% 	
Criterion 7.7: No new planting on peat, regardless of depth after 15 November 2018 and all peatlands are managed responsibly.			
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>	No peat soil identified at all estates sampled. Verified there is no new planting activity in the estate sampled. Hence, the criteria are not applicable.	Not Applicable
7.7.2	<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>	No peat soil identified at all estates sampled. Verified there is no new planting activity in the estate sampled. Hence, the criteria are not applicable.	Not Applicable
7.7.3	<p>(C) Subsidence of peat is monitored, documented and minimised.</p> <p>- Critical (Major) compliance -</p>	No peat soil identified at all estates sampled. Verified there is no new planting activity in the estate sampled. Hence, the criteria are not applicable.	Not Applicable
7.7.4	<p>(C) A documented water and ground cover management programme is in place.</p> <p>- Critical (Major) compliance -</p>	No peat soil identified at all estates sampled. Verified there is no new planting activity in the estate sampled. Hence, the criteria are not applicable.	Not Applicable
7.7.5	<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</p>	No peat soil identified at all estates sampled. Verified there is no new planting activity in the estate sampled. Hence, the criteria are not applicable.	Not Applicable

	<p>cycles, whichever is greater, before reaching the natural gravity drainability limit for peat. When oil palm is phased out, it is replaced with crops suitable for a higher water table (paludiculture) or rehabilitated with natural vegetation.</p> <p>This is subject to transitional (5 years: 2019 to 2024) arrangement stated in the Drainability Assessment Procedure.</p> <p>Within 12 months initial implementation period, company could submit other alternate methodologies to be considered by RSPO for recognition.</p> <p>- Critical (Major) compliance -</p>		
7.7.6	<p>(C) All existing plantings on peat are managed according to the 'RSPO Manual on Best Management Practices (BMPs) for existing oil palm cultivation on peat', version 2 (2019) and associated audit guidance.</p> <p>- Critical (Major) compliance -</p>	No peat soil identified at all estates sampled. Verified there is no new planting activity in the estate sampled. Hence, the criteria are not applicable.	Not Applicable
7.7.7	<p>(C) All areas of unplanted and set-aside peatlands in the managed area (regardless of depth) are protected as "peatland conservation areas"; new drainage, road building and power lines by the unit of certification on peat soils is prohibited; peatlands are managed in accordance with the 'RSPO BMPs for Management and Rehabilitation of Natural Vegetation Associated with Oil Palm Cultivation on Peat', version 2 (2019) and associated audit guidance.</p> <p>- Critical (Major) compliance -</p>	No peat soil identified at all estates sampled. Verified there is no new planting activity in the estate sampled. Hence, the criteria are not applicable.	Not Applicable
<p>Criterion 7.8: Practices maintain the quality and availability of surface and groundwater.</p>			
7.8.1	<p>A water management plan is in place and implemented to promote more efficient use and continued availability of water sources and to avoid negative impacts on other users in the catchment. The plan addresses the following:</p> <p>a) The unit of certification does not restrict access to clean water or contribute to pollution of water used by communities.</p>	<p>Water management plan is in place and implemented as per documented APOM Water Management Plan; Review date: 12/06/2022 with aspect identified as following:</p> <p>- Waterway/water source - monitoring</p>	Complied

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	<p>b) Workers have adequate access to clean water. - Minor compliance -</p>	<ul style="list-style-type: none"> - Leachate prevention by installation of perimeter drain, storm pond and pump back system – target to utilise 100% of semi-decomposed EFB - Outgoing water – monitoring - Renewability of sources <p>Rainfall (FY July – June):</p> <ul style="list-style-type: none"> - FY 2021/22: 2,370 mm; 212 days - FY 2022/23 (to date Oct 2022): 509 mm; 53 days <p>APOM supplied domestic water to all mill and AOPE2 employees and monitored its quality on half-yearly basis. Latest sampling analysis by Dynakey Laboratories Sdn. Bhd. results as following:</p> <ul style="list-style-type: none"> - Analysis certificate # W220526-02-0; Date of sample: 6/7/2022; Marking: Water Sample After (Treated); Results: All parameters met WHO standard quality <p>Drinking water sampling analysis also conducted by estates with own water treatment facilities as following:</p> <ul style="list-style-type: none"> - HLE3 Drinking Water Sampling Analysis Certificate # W220926-02-0 - ME2 Water Test Report # R22/3/315; Date: 24/3/2022 - ME2 Jabatan Kimia Malaysia; Laporan Keputusan Pemeriksaan Bakteria; Date: 16/6/2022; Raw Water & Treated Water in compliance with limit of NIWQS and NDWQS. 	
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</p>	<p>Based on River Water Sampling Procedures; Doc. Version 1; Doc. Date: 4/2/2010, monitoring conducted through river water sampling of Anak Sungai Tenegang River Upstream and Downstream as following:</p>	Complied

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	<p>provided there is no evidence of environmental deterioration having occurred during the previous cycle.</p> <p>- Critical (Major) compliance -</p>	<p>Certificate of analysis # E221013-02-0; Date of sample: 9/10/2022; River Upstream BOD: 3.5 mg/L; River Downstream BOD: 4 mg/L; Final Discharge BOD: 13 mg/L</p>																
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>As per latest sampling analysis by Dynakey Laboratories Sdn. Bhd. as following:</p> <ul style="list-style-type: none"> - Certificate of analysis # E221021-11-0; Date of sample: 20/11/2022; BOD: 11.3 mg/L <p>Summary of sampling analysis results for FY 2022/23 to date are as following:</p> <table border="1"> <thead> <tr> <th>Month</th> <th>FFB processed</th> <th>BOD</th> </tr> </thead> <tbody> <tr> <td>Jul-2022</td> <td>12,330.50 mt</td> <td>16.90 mg/L</td> </tr> <tr> <td>Aug-2022</td> <td>14,806.91 mt</td> <td>6.50 mg/L</td> </tr> <tr> <td>Sep-2022</td> <td>14,610.21 mt</td> <td>14.80 mg/L</td> </tr> <tr> <td>Oct-2022</td> <td>15,967.39 mt</td> <td>13.00 mg/L</td> </tr> </tbody> </table>	Month	FFB processed	BOD	Jul-2022	12,330.50 mt	16.90 mg/L	Aug-2022	14,806.91 mt	6.50 mg/L	Sep-2022	14,610.21 mt	14.80 mg/L	Oct-2022	15,967.39 mt	13.00 mg/L	Complied
Month	FFB processed	BOD																
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7.8.4	<p>Mill water use per tonne of FFB is monitored and recorded.</p> <p>- Minor compliance -</p>	<p>Asia Palm Oil Mill monitored its water consumption for both process and boiler operation as average water use/FFB processed. Records for FY 2021/22 (July 2021 – June 2022) as following:</p> <ul style="list-style-type: none"> - FFB processed: 176,261.24 mt - Process and boiler water consumption: 260,640 m³ - Water consumption ratio: 1.48 m³/mt FFB - Baseline water consumption ratio: 1.45 m³/mt FFB <p>For FY 2021/22 (end October 2022) as following:</p> <ul style="list-style-type: none"> - FFB processed: 57,715.01 mt - Process and boiler water consumption: 98,968 m³ 	Complied															

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		<ul style="list-style-type: none"> - Water consumption ratio: 1.71 m³/mt FFB - Baseline water consumption ratio: 1.45 m³/mt FFB <p>APOM also monitored its domestic water consumption separately as average water use/person. Records for FY 2021/22 (July 2021 – June 2022) as following:</p> <ul style="list-style-type: none"> - Population: 4951 persons (average 400++/month) - Domestic water consumption: 39,014 m³ - Water consumption ratio: 258 litres/person/day - For FY 2021/22 (end October 2022): 253 litres/person/day 	
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>Optimization of renewable energy and efficiency use of fossil fuels are monitored by APOM as following:</p> <ul style="list-style-type: none"> - FY 2021/22 diesel consumption: 1.62 L/mt FFB processed - FY 2021/22 to date diesel consumption: 1.22 L/mt FFB processed 	Complied
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>Main sources of GHG emission identified were methane (CH₄) emission through POME treatment and boiler stack from the mill. Other less significant GHG emissions identified including CO₂, SO_x and NO_x from various sources including fossil fuel, chemical and fertilizer consumptions mainly from estates activities.</p> <p>The emission value is recorded and calculated through the utilisation of RSPO’s Palm GHG Calculator ver. 4.</p>	Complied

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		<p>The GHG emissions were identified and assessed for the unit of certification. Monitoring of the mill’s boiler stack emissions conducted as per latest as following:</p> <ul style="list-style-type: none"> - Stack Emission Monitoring Report July 2022 by Multi-Serve Sdn. Bhd.; Report Ref. # MS/ASIA POM/2022/BOILER NO. 1 (S1) – 1st HALF; Date of monitoring: 15/8/2022; Average Dust Emission Load (Test 1-2): 203.8.2 mg/m3; Boiler # 1 (S1) -1st Half was over the required limit of 150.0 mg/m3 at 203.8 mg/m3 - Stack Emission Monitoring Report October 2022 by Multi-Serve Sdn. Bhd.; Report Ref. # MS/ASIA POM/2022/BOILER NO. 2 (S2) – 2ND HALF; Date of monitoring: 22/10/2022; Average Dust Emission Load (Test 1-2): 183.2 mg/m3; Boiler # 2 (S2) -2nd Half was over the required limit of 150.0 mg/m3 at 183.2 mg/m3. 	
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). - Critical (Major) compliance -</p>	<p>Although the emission has exceeded the limit, however the mill obtained Lesen Melanggar had-had pelepasan yang boleh diterima di bawah Peraturan-Peraturan Kualiti Alam Sekeliling (Udara Bersih) 2014; License # 005143; Date: 29/8/2019; Expired date; 31/12/2022; Jadual Pematuhan JPLP/PBU/12/005143; JAS.SHQ.600-3/1/52; Validity period 29/8/2022 – 31/12/2022</p>	Complied
7.10.3	<p>(C) Other significant pollutants are identified and plans to reduce or minimise them implemented and monitored. - Critical (Major) compliance -</p>	<p>The plans identified as per requirements by authority as per latest DOE visit date 28/7/2022; Feedback response date: 3/8/2022; Surat penjelasan lanjut date: 25/8/2022.</p>	Complied
<p>Criterion 7.11: Fire is not used for preparing land and is prevented in the managed area</p>			
7.11.1	<p>(C) Land for new planting or replanting is not prepared by burning. - Critical (Major) compliance -</p>	<p>JC Chang Group has established Guideline on Group’s Long Term Replanting Planning. Refer document no. A/016-07/2020. In the guideline stated the company prohibited the form of replanting by using fire as part of field preparation.</p>	Complied

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		All old palms standing will be felled, chipped, stalked and decomposed naturally. The group is committed in implementation of "Zero Burning Policy" in the event of replanting.	
7.11.2	The unit of certification establishes fire prevention and control measures for the areas directly managed by the unit of certification. - Minor compliance -	JC Chang Group has established Guidelines on Fire Prevention, Control and Stakeholders Engagement. Refer document no. M/017-03/2020 dated 17/10/2020. The guidelines include of selection, placement, use, maintenance and inspection of fire extinguisher; fire drill training and stakeholder engagement to reduce the fire risks to minimal level.	Complied
7.11.3	The unit of certification engages with adjacent stakeholders on fire prevention and control measures. - Minor compliance -	No evidence of fire or open burning activity Engagement with adjacent stakeholders on the fire prevention was communicated through stakeholder meeting/phone call and correspondent email. Reviewed the correspondent email submitted to the stakeholders as per email dated 19/07/2020 (Hwa Li 3 Estate), 24/09/2020 (Melewar 2 Estate), 05/10/2020 (Asia Oil Palm2 Estate) and respond from the stakeholders through due diligence form attached together with the email. No evidence of fire or open burning activity by neighbouring facility and landowner adjacent to JC Chang's Asia POM certification units found. This confirmed previous engagement conducted was efficiently adhered to by them.	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.	No new land clearing conducted in Asia Production Unit since 15/11/2018	Complied

	<p>A historic Land Use Change Analysis (LUCA) is conducted prior to any new land clearing, in accordance with the RSPO LUCA guidance document.</p> <p>- Critical (Major) compliance -</p>		
7.12.2	<p>(C) HCVs, HCS forests and other conservation areas are identified as follows:</p> <p>a) For existing plantations with an HCV assessment conducted by an RSPO-approved assessor and no new land clearing after 15 November 2018, the current HCV assessment of those plantations remains valid.</p> <p>b) Any new land clearing (in existing plantations or new plantings) after 15 November 2018 is preceded by an HCV-HCS assessment, using the HCSA Toolkit and the HCV-HCSA Assessment Manual. This will include stakeholder consultation and take into account wider landscape-level considerations.</p> <p>PROCEDURAL NOTE: Requirement is further clarified under the Interpretation of Indicator 7.12.2 and Annex 5 (approved by BOG on 12 June 2019).</p> <p>- Critical (Major) compliance -</p>	<p>No new land clearing conducted in Asia Production Unit since 15/11/2018.</p> <p>Asia Production Unit conducted the HCV assessment report conducted on 03 -10/04/2011 and 07 – 08/06/2011 as per Social & Environmental Assessment including a preliminary Management Review, JC Chang group’s Asia and Melewar Production Units, Sabah, Malaysia dated 13/07/2011.</p> <p>No HCV identified within Asia Production Unit as per assessment conducted.</p>	Complied
7.12.3	<i>Indicator is not applicable in Malaysia context</i>	Not applicable.	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>No new land clearing conducted in Asia Production Unit since 15/11/2018.</p> <p>Asia Production Unit conducted the HCV assessment report conducted on 03 -10/04/2011 and 07 – 08/06/2011 as per Social & Environmental Assessment including a preliminary Management Review, JC Chang group’s Asia and Melewar Production Units, Sabah, Malaysia dated 13/07/2011.</p> <p>The estates have established and documented HCV Management Plan. Generally among the plans established were:</p>	Complied

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	- Critical (Major) compliance -	<ul style="list-style-type: none"> a. maintaining signages b. continue to record HCV monitoring such as wildlife sighting, encroachment and illegal hunting c. enhancing HCV awareness among employees. <p>The estates continue to train the workers on HCV and RTE Species. Signage on prohibition of illegal hunting or fishing, no swimming and chemical application at buffer zone area were erected at the HCV area. Noted during site visit, all the signage was well maintained.</p>	
7.12.5	<p>Where rights of local communities have been identified in HCV areas, HCS forest after 15 November 2018, peat land and other conservation areas, there is no reduction of these rights without evidence of a negotiated agreement, obtained through FPIC, encouraging their involvement in the maintenance and management of these conservation areas.</p> <p>- Minor compliance -</p>	Not applicable since there is no land clearing after 15 November 2018.	Not Applicable
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>Asia Production Unit conducted the HCV assessment report conducted on 03 -10/04/2011 and 07 – 08/06/2011 as per Social & Environmental Assessment including a preliminary Management Review, JC Chang group’s Asia and Melewar Production Units, Sabah, Malaysia dated 13/07/2011.</p> <p>No rare, threatened or endangered (RTE) species are protected identified within Asia Production Unit as per assessment conducted. Even though no HCV or RTE species identified during the HCV assessment conducted, the APU has established HCV management plan.</p> <p>Among the plan as follows:</p> <ol style="list-style-type: none"> 1. Briefing to workers to provide information for any sighted animal 	Complied

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		<ul style="list-style-type: none"> 2. Briefing awareness to educate on protection of animals 3. To communicate with all peripheral stakeholders to increase their impact on illegal hunting and RTE protection 4. To apply suitable IPM techniques 5. Erected signboard on prohibition of hunting and fishing <p>Reviewed the implementation of the management plan as follows:</p> <ul style="list-style-type: none"> 1. The estate visited conducted animal sighting on weekly basis. Among the animal sighted in the estate such as Oriental Pied Hornbill, Cattle Egret, Kingfisher and Spotted Dove 2. Estate continuously provided awareness on HCV and RTE to the workers. Latest awareness and refresher training was conducted as per criteria 3.7.2 3. Engagement with adjacent stakeholders on the environmental issue such as HCV, RTE, and river buffer zone was communicated through stakeholder meeting and correspondent email. <p>All estates visited continuously provided awareness on the stakeholder and workers on the HCV and RTE. Sighted the signboard on prohibition of illegal hunting, collection of RTE species, fishing, chemical application at buffer zone area and cutting of trees erected at strategic places in the estate such as estate entrances, riparian buffer zone and conservation area</p>	
7.12.7	<p>The status of HCVs, HCS forests after 15 November 2018, other natural ecosystems, peatland conservation areas and RTE species is monitored. Outcomes of this monitoring are fed back into the management plan.</p> <p>- Minor compliance -</p>	<p>Educational activities on HCV and RTE species were done through a few means such as awareness briefings during morning master, dedicated HCV and RTE trainings and signages such as HCV protection and no hunting area. Interview with workers showed that they have a good understanding on the importance of GCV protection and restriction of capturing/hunting the RTE species.</p>	Complied

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		<p>Awareness trainings on HCV and RTE were available and sampled as below.</p> <ol style="list-style-type: none"> 1. Asia Palm Oil Mill – HCV and RTE Awareness Training conducted on 22/04/2022. 2. Asia Oil Palm Estate 2 – HCV and Environmental Training conducted on 06/04/2022. 	
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 since without prior HCV assessment since November 2005, or without prior HCV-HCSA assessment since 15 November 2018 within Asia Production unit. Thus, this indicator is not available.</p>	Not Applicable

Appendix B: GHG Reporting Executive Summary

The GHG emissions that were produced in **2021** for **Asia Production Unit – Asia POM** and supply base was calculated using the PalmGHG Calculator version 4.0. 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 Asia Production Unit – Asia POM and supply base are as following:

Emission per product	tCO ₂ e/tProduct
CPO	1.46
PKO	1.46

Extraction	%
OER	20.55
KER	5.07

Production	t/yr
FFB Process	175,865.56
CPO Produced	36,136.002
PKO Produced	8,914.286

Land Use	Ha
OP Planted Area	19,853.99
OP Planted on peat	109.40
Conservation (forested)	0.00
Conservation (non-forested)	609.78
Total	20,573.17

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	75,762.38	0.64	12,270.53	0.33	0.00	0.00	88,032.91	-
CO ₂ Emission from fertilizer	4,840.55	0.04	1,057.73	0.03	0.00	0.00	5,898.28	-
NO ₂ Emission	3,842.80	0.03	414.07	0.01	0.00	0.00	4,713.27	-
Fuel Consumption	2,103.94	0.02	335.78	0.01	0.00	0.00	2,439.72	-
Peat Oxidation	0.00	0.00	3,020.14	0.08	0.00	0.00	3,020.14	-
Sink								
Crop Sequestration	-34,637.88	-0.29	-11,580.45	-0.31	0.00	0.00	-46,218.33	-
Conservation Sequestration	0.00	0.00	0.00	0.00	0.00	0.00	0.00	-
Total	51,911.78	0.00	6,388.28	0.17	0.00	0.00	61,691.56	-

**Note: Includes both estates and smallholders*

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Summary of Mill Emission and Credit

	tCO ₂ e	tCO ₂ e/tFFB
Emission		
POME	4,966.01	0.03
Fuel Consumption	855.33	0.00
Grid Electricity Utilization	0.00	0.00
Credit		
Export of Grid Electricity	0.00	0.00
Sales of PKS	-1,519.17	-0.01
Sales of EFB	0.00	0.00
Total	4,302.17	0.02

Summary of Kernel Crusher Emission and Credit (if applicable)

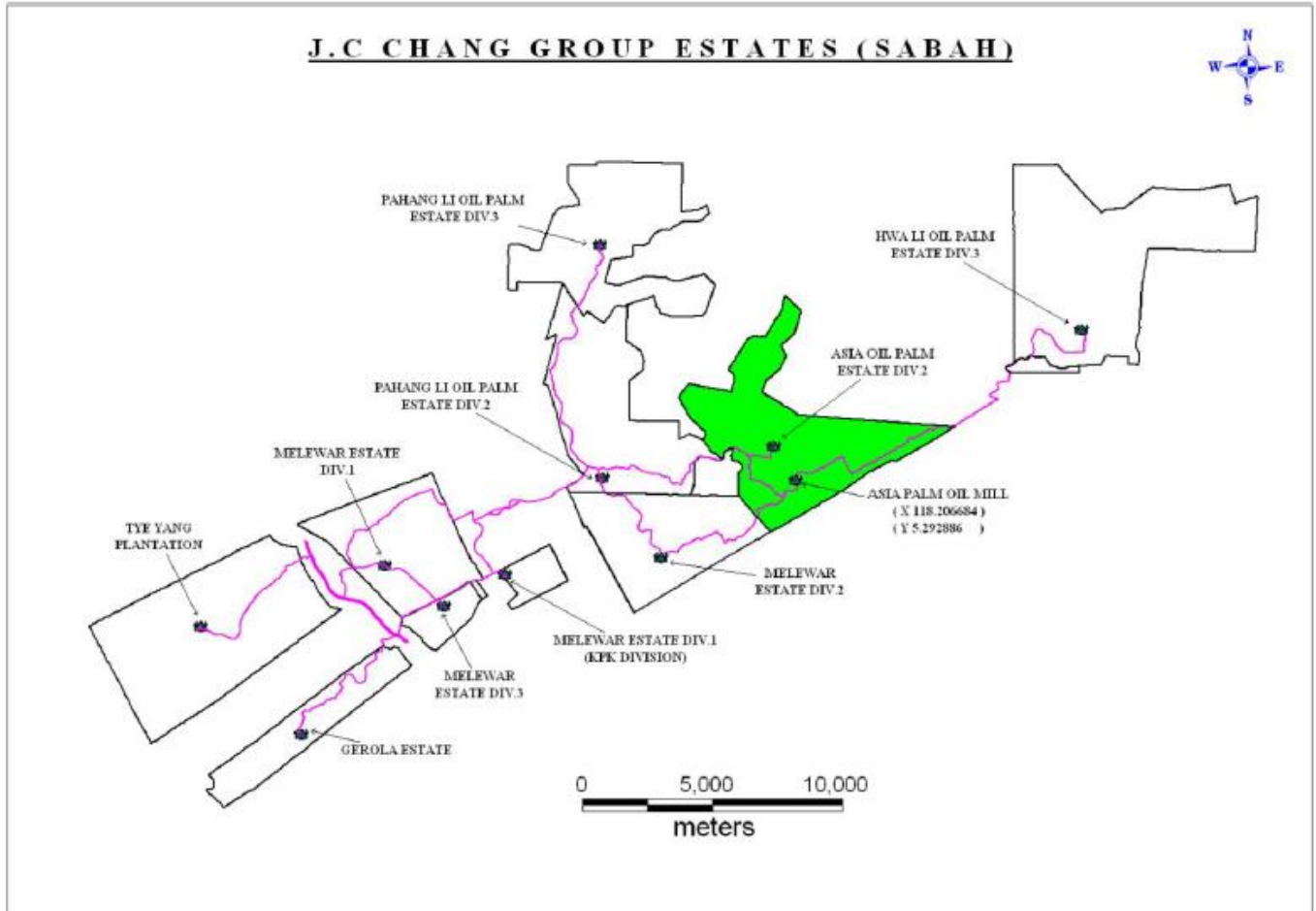
Emissions	tCO ₂ e
PK from own mill	0.00
PK from other source	0.00
Fuel Consumptions	0.00
Total Crusher emissions	0.00

*This mill has no kernel crusher operation.

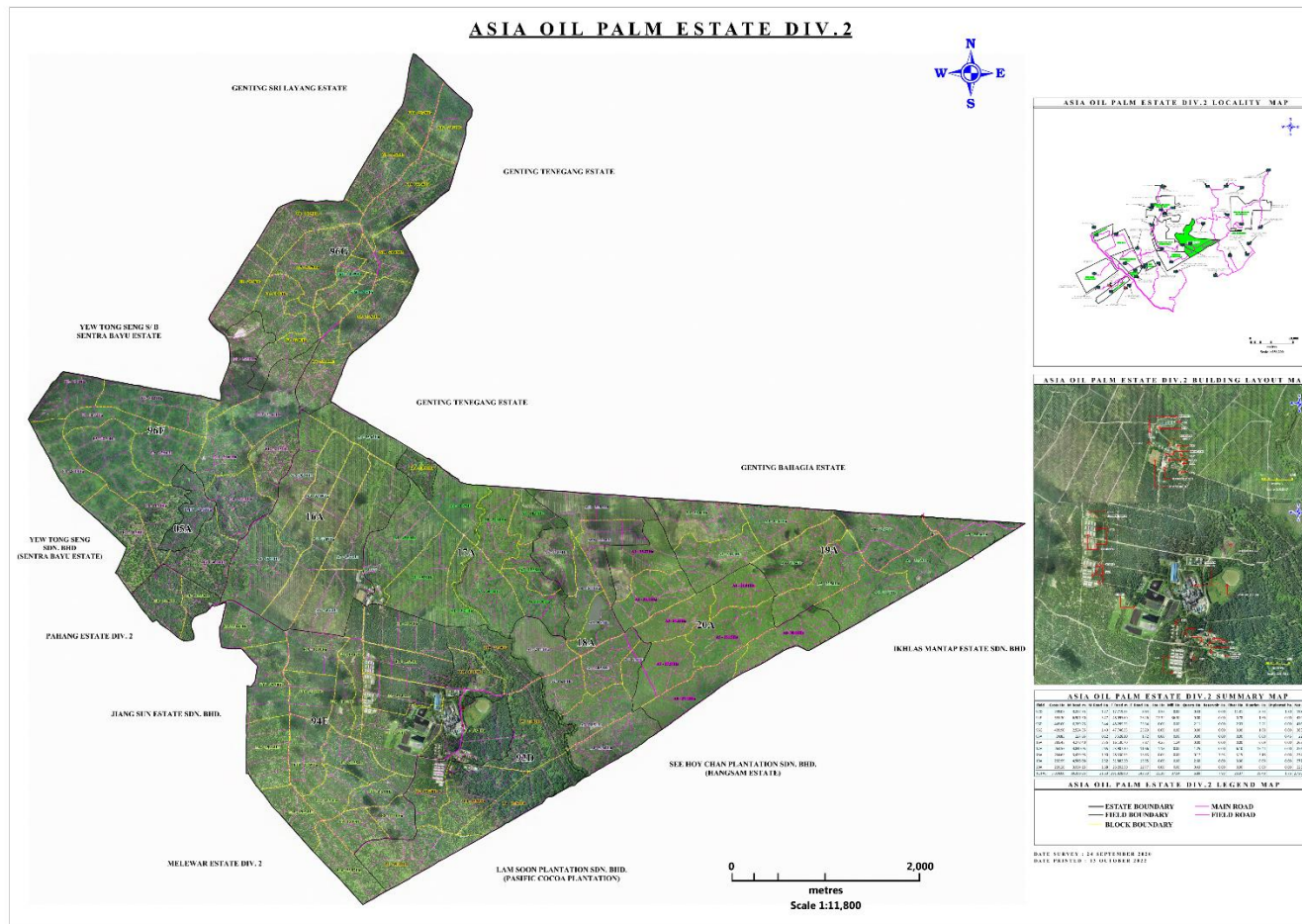
Palm Oil Mill Effluent (POME) Treatment:	
Divert to Compost (%)	0
Divert to anaerobic diversion (%)	100

POME Diverted to Anaerobic Digestion:	
Divert to anaerobic pond (%)	0
Divert to methane captured (flaring) (%)	0
Divert to methane captured (energy generation) (%)	100

Appendix C: Location Map of Certification Unit and Supply bases



Appendix D: Estate Field Map





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