

**RSPO PRINCIPLE AND CRITERIA
PUBLIC SUMMARY REPORT**

- Initial Assessment**
- Annual Surveillance Assessment (2_3)**
- Recertification Assessment (Choose an item.)**
- Extension of Scope**

Client Company Name / Parent Company: 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 / Carotino Production Unit Carotino Palm Oil Mill
Location of Certification Unit: PT 116, Lot No. 3840, Mukim Ulu Lepar, 26500 Kuantan, Pahang, Malaysia
Date of Final Report: 25/05/2023

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Section 1: Scope of the Assessment

1. Company Details			
Parent Company	J.C Chang Holding 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 / Carotino Production Unit		
Location / Address	PT 116, Lot No. 3840, Mukim Ulu Lepar, 26500 Kuantan, Pahang, Malaysia		
Website	www.carotino.com		
Management Representative	Mr Seow Chee Chiang	E-mail	seowcc@jcc.com.my
Telephone	+607 2231633 (Head Office) +607-223 1633 (Mill)	Facsimile	+607 224 1546 (Head Office) +607-223 1546 (Mill)

2. Certification Information			
Certificate Number	RSPO 649410	Certificate Start Date	27/04/2020
Date of First Certification	27/04/2010	Certificate Expiry Date	26/04/2025
Scope of Certification	Production of Palm Oil and Palm Kernel		
Visit Objectives	1) Determination of the conformity of the client's management system, or parts of it, with audit criteria. 2) Evaluation of the ability of the management system to ensure the client organization meets applicable statutory, regulatory and contractual requirements.		
Assessment Cycle	<input type="checkbox"/> Pre Assessment (Choose an item.) <input type="checkbox"/> Initial Assessment <input checked="" type="checkbox"/> Annual Surveillance Assessment (ASA 2_3) <input type="checkbox"/> Recertification Assessment (Choose an item.) <input type="checkbox"/> Scope Extension		
Applicable Standards / Normative Reference	RSPO Certification System for P&C and RSPO ISH 2020 <input type="checkbox"/> Choose an item. <input checked="" type="checkbox"/> Malaysia National Interpretation 2019 for RSPO P&C 2018 for the Production of Sustainable Palm Oil		
Supply Chain Module	<input checked="" type="checkbox"/> Identity Preserved; <input type="checkbox"/> Mass Balance	Mill Capacity	45 mt/hr
ISH certification Phase	<input type="checkbox"/> Eligibility <input type="checkbox"/> Milestone A <input type="checkbox"/> Milestone B <input checked="" type="checkbox"/> Not Applicable		
Is this a remote audit or on-site audit	<input checked="" type="checkbox"/> On-site audit (Option AI)	<input checked="" type="checkbox"/> On-site audit (Option AII)	<input type="checkbox"/> Remote audit (Option B)

3. Other Certifications			
Certificate Number	Standard(s)	Certificate Issued by	Expiry Date
500450685 MSPO4	MS2530-4:2013 MSPO Part 4: General Principles for Palm Oil Mills	DQS Certification (M) Sdn Bhd	02/09/2024
500450684 MSPO3	MS2530-3:2013 MSPO Part 3: General Principles for Oil Palm Plantations and Organized Smallholders	DQS Certification (M) Sdn Bhd	09/10/2025
50450685 MSPO SCCS	MSPO Supply Chain Certification	DQS Certification (M) Sdn Bhd	02/09/2024
EU-ISCC-Cert- DE119-60221376	ISCC EU (International Sustainability and Carbon Certification)	ASG cert GmbH	04/10/2023

4. Location(s) of Mill & Supply Bases			
Name (Mill / Supply Base / Group Manager / Smallholders)	Location	GPS Coordinates	
		Latitude	Longitude
Carotino Palm Oil Mill	PT 116, Lot No. 3840, Mukim Ulu Lepar 26500 Kuantan, Pahang	3° 45'59.86" N	102° 49' 5.67" E
Asia Oil Palm Estate 1	PT 116, Lot No. 3840, Mukim Ulu Lepar 26500 Kuantan, Pahang	3° 48'59.86" N	102° 49' 5.57" E
Hwa Li 1 Estate	LOT 51, 52, 53, 54, 55, 56, 415, 406, 513, 523, 524 ,317, 318, Mukim Keratong, Rompin, Pahang	2° 44' 40.74" N	103° 1' 59.41" E
Carotino Estate	Lot 2389, Mukim Bera, Bera, Pahang	2° 50' 43.25" N	102° 43' 29.21" E
Maran Estate	Lot 929, 6460, 245, 351, 957, 930, Mukim Lepar, Kuantan, Pahang	3° 44' 31.28" N	102° 50' 42.93" E
Pahang Oil Palm Estate 1	Lot No 23604, 23605, 23600, 23601, 23602, 23603, 23606, 23607, & 23608, Mukim Ulu Lepar-Kuantan Pahang	3° 48' 35.70" N	102° 49' 15.59" 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
Asia Oil Palm Estate 1	1,948.71	0	218.71	2,167.42	89.91%
Hwa Li 1 Estate	1,929.74	0	227.66	2,157.40	89.45%
Carotino Estate	1,509.09	0	150.12	1,659.21	90.95%
Maran Estate	1,786.27	0	334.13	2,120.40	84.24%
Pahang Oil Palm Estate 1	1,835.21	0	317.89	2,153.10	85.24%
Total	9,009.02	0	1,248.51	10,257.53	87.83

Note:
There is changes in Operating Units name involving 2 estates effective from 01/03/2022 as follows:

- Hwa Li Estate 2 currently refer as Carotino Estate
- Hwa Li Estate 1 currently refer as Hwa Li 1 Estate

6. Plantings & Cycle						
Estate / Smallholders	Age (Years) - ha				Mature	Immature
	0 - 3	4 - 14	15 - 25	>25		
Asia Oil Palm Estate 1	0	137.50	1,811.21	0	1,948.71	0
Hwa Li 1 Estate	0	435.89	1,493.85	0	1,929.74	0
Carotino Estate	0	760.40	0	748.69	1,509.09	0
Maran Estate	113.98	1,554.26	118.03	0	1,672.29	113.98
Pahang Oil Palm Estate 1	0	771.28	1,063.93	0	1,835.21	0
Total (ha)	113.98	3,666.19	4,487.02	748.69	8,895.04	113.98

7. Summary of Certified Tonnage of FFB (Own Certified Scope)				
Estate / Smallholders	Tonnage (MT) / year			
	Estimated last year (Apr 2022 – Mar 2023)	Actual (Jan 2022 – Dec 2022)		Forecast (Apr 2023 – Mar 2024)
		Previous license period (Jan 2022 – Jun 2022)	Current license period (Jul 2022 – Dec 2022)	
Asia Oil Palm Estate 1	44,162.65	13,922.86	12,790.32	46,825.20
Hwa Li 1 Estate	35,245.76	3,223.08	5,628.12	39,164.20
Carotino Estate	12,185.21	8,872.04	9,616.12	14,168.40

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Maran Estate	32,517.89	11,422.61	8,461.48	33,809.20
Pahang Oil Palm Estate 1	41,063.77	16,749.73	15,006.35	41,070.62
Total	165,175.28	105,692.71		175,037.62

Notes:

The actual FFB production was relatively low compare to the certified volume (estimated last year) was due to low cropping trend and insufficient of workers especially skilled harvesters during the period.

8. Summary of Certified Tonnage of FFB (from other certified unit(s))

Estate / Smallholders	Tonnage (MT) / year			Forecast (Apr 2023 – Mar 2024)
	Estimated last year (Apr 2022 – Mar 2023)	Actual (Jan 2022 – Dec 2022)		
		Previous license period (Jan 2022 – Jun 2022)	Current license period (Jul 2022 – Dec 2022)	
N/A		N/A	N/A	
Total		N/A		

9. Summary of Non-Certified Tonnage of FFB (outside supplier – excluded from certificate)

Out growers / smallholders	Tonnage (MT) / year			Forecast (Apr 2023 – Mar 2024)
	Estimated last year (Apr 2022 – Mar 2023)	Actual (Jan 2022 – Dec 2022)		
		Previous license period (Jan 2022 – Jun 2022)	Current license period (Jul 2022 – Dec 2022)	
N/A	N/A	N/A	N/A	N/A
Total	N/A	N/A		N/A

9A. Monthly Records of Certified and Uncertified FFB Received since the last audit Jan 2022 – Dec 2022

No.	Month - Year	Volume of FFB from certified supply base (mt)	Volume of FFB from uncertified supply base (mt)	Total FFB/Month (mt)
1	Jan 2022	9,508.88	-	9,508.88
2	Feb 2022	7,766.41	-	7,766.41
3	March 2022	11,141.54	-	11,141.54
4	April 2022	8,483.96	-	8,483.96
5	May 2022	7,931.08	-	7,931.08
6	June 2022	9,358.45	-	9,358.45

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7	July 2022	8,130.23	-	8,130.23
8	August 22	8,312.62	-	8,312.62
9	Sept 2022	9,291.72	-	9,291.72
10	Oct 2022	8,523.68	-	8,523.68
11	Nov 2022	8,703.37	-	8,703.37
12	Dec 2022	8,540.77	-	8,540.77
TOTAL		105,692.71	-	105,692.71

10. Summary of Certified Tonnage (MT) (not applicable for ISS)			
Estimated last year (Apr 2022 – Mar 2023)	Actual (Jan 2022 – Dec 2022)		Forecast (Apr 2023 – Mar 2024)
	Previous license period (Jan 2022 – Jun 2022)	Current license period (Jul 2022 – Dec 2022)	
FFB	FFB		FFB
165,175.28 mt	54,190.32 mt	51,502.39 mt	175,037.62 mt
	TOTAL	105,692.71	
CPO (OER: 20.62 %)	CPO (OER: 19.05 %)		CPO (OER: 20.13 %)
34,065.46 mt	10,523.71 mt	9,609.69 mt	35,236.15 mt
	TOTAL	20,133.40 mt	
PK (KER: 5.12 %)	PK (KER: 4.47 %)		PK (KER: 5.18 %)
8,460.95 mt	2,403.81 mt	2,257.85 mt	9,059.90 mt
	TOTAL	4,661.66 mt	

Notes:
The actual FFB, CPO and PK production was relatively low compare to the certified volume (estimated last year) was due to low cropping trend and insufficient of workers especially skilled harvesters during the period.

10A. Monthly Records of Certified CPO & PK since the last audit Jan 2022 – Dec 2022			
No.	Month - Year	Certified CPO (MT)	Certified PK (MT)
1	Jan 2022	1,861.26	430.55
2	Feb 2022	1,504.82	334.13
3	March 2022	2,149.43	499.83
4	April 2022	1,635.73	397.37
5	May 2022	1,547.09	338.25
6	June 2022	1,825.38	403.68
7	July 2022	1,567.24	361.93

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8	August 22	1,592.84	357.65
9	Sept 2022	1,708.39	402.81
10	Oct 2022	1,552.51	366.1
11	Nov 2022	1,637.95	377.97
12	Dec 2022	1,550.76	391.39
TOTAL		20,133.40	4,661.66

11. Summary of Actual Volume sold					
Current License period (Jul 2022 – Dec 2022)					
	RSPO Certified	Other Schemes Certified		Conventional	Total
		ISCC	Others		
CPO (MT)	8,204.10	307.10	-	-	8,511.20
PK (MT)	2,252.58	-	-	-	2,252.58
Credits	-	-	-	-	-
Previous License period (Jan 2022 – Jun 2022)					
CPO (MT)	10,822.03	446.99	-	-	11,269.02
PK (MT)	2,399.24	-	-	-	2,399.24
Credits	-	-	-	-	-

11A. Records of Certified CPO & PK Sold under PalmTrace since the last audit Jan 2022 – Dec 2022				
No.	Buyers Name	PalmTrace Trading License Number	Certified CPO Sold (MT)	Certified PK Sold (MT)
1	Buyer A	RSPO_PO1000000034	13,849.64	-
2	Buyer A	RSPO_PO1000005894	5,176.49	-
3	Buyer B	RSPO_PO1000001551	-	1,314.65
4	Buyer C	RSPO_PO1000002945	-	2,321.82
5	Buyer D	RSPO_PO100012501	-	1,015.35
TOTAL			19,026.13	4,651.82

11B. Records of certified CPO & PK Sold under other schemes since the last audit Jan 2022 – Dec 2022				
No.	Buyers Name	Scheme Name	Certified CPO Sold (MT)	Certified PK Sold (MT)
1	Buyer A	ISCC	754.09	-
TOTAL			754.09	

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11C. Records of CPO & PK Sold as conventional since the last audit Jan 2022 – Dec 2022			
No.	Buyers Name	CPO Sold (MT)	PK Sold (MT)
	N/A	N/A	N/A
TOTAL		N/A	N/A

11D. Records of Certified CPO Sold under RSPO Credits since the last audit Jan 2022 – Dec 2022			
No.	Buyers Name	PalmTrace Trading License Number	RSPO Credits of Certified CPO Sold
	N/A	N/A	N/A
TOTAL			N/A

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

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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 (key in period)							
Credits							
Physical							
Previous License period (key in 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							

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 02/01/2023-06/01/2023. The audit programme is included as Section 2.3. The approach to the audit was to treat the mill and supply base as an RSPO Certification Unit. A range of occupational health and safety, environmental, best practice management, and social factors were covered. This includes consideration of topography, palm age, proximity to areas with HCVs, declared conservation areas, local communities engagement and workers welfare and safety.

The Critical NC close out on-site assessment was conducted on 23/03/2023. 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.

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

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

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

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

Assessment Program					
Name (Mill / Supply Base)	Year 1 (Certification)	Year 2 (ASA 2_1)	Year 3 (ASA 2_2)	Year 4 (ASA 2_3)	Year 5 (ASA 2_4)
Carotino Palm Oil Mill	✓	✓	✓	✓	✓
Asia Oil Palm Estate 1	✓				✓
Hwa Li 1 Estate				✓	
Carotino Estate		✓	✓	✓	✓
Maran Estate	✓			✓	✓
Pahang Oil Palm Estate 1		✓	✓	✓	✓

Tentative Date of Next Visit: January 2, 2024 - January 6, 2024

Total Number of Mandays: 15 Mandays

2.2 BSI Assessment Team

Name	Role	Competency
Muhammad Fadzli Masran	Team Leader	<p>Education: Holds a Bachelor Degree in Forestry Science, graduated from University Putra Malaysia.</p> <p>Work Experience: He started his career as Assistant Manager at Kulim Plantations Sdn. Bhd. managing the day to day plantation operations. In his career at Kulim Plantation, Fadzli had accumulated more than 10 years of sustainability implementation experience including workers’ welfare, workers’ occupational, health & safety, environment conservation and protection at buffer areas and continuous improvement management plans. Fadzli had accumulated auditing experience when he was the internal auditor for ISO 9001 and ISO 14001 at Kulim Plantations.</p> <p>Training attended: He has completed ISO IMS 9001, 14001, 45001 (OHS 18001) Lead Auditor Course in April 2018, endorsed RSPO Lead Auditor Course in July 2018, MSPO Lead Auditor Course in October 2018, endorsed RSPO Supply Chain Certification training course in January 2019, MSPO Supply Chain Certification System (SCCS) Auditor training Course (MPOCC Endorsed), CQI and IRCA Certified ISO 9001:2015 Lead Auditor Training Course in April 2019, HCV and</p>

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		<p>GIS Training in November 2019 and SMETA Requirements Training in April 2021.</p> <p>Language proficiency: Fluent in in both verbal/written Bahasa Malaysia and English.</p> <p>Aspect covered in this audit: Economic management plan, mill best practices, estate best practices, Legal Requirements, land & Legal issue, Occupation Health Safety requirement, HIRARC, training, and RSPO supply chain requirements. Fluent in English and Bahasa Malaysia.</p>
<p>Nor Halis Abu Zar (NHA)</p>	<p>Team Leader</p>	<p>Education: Bachelor of Science, Plantation Technology and Management, graduated from Universiti Teknologi Mara in 2012.</p> <p>Work Experience: He started his career as Assistant Manager at Kulim Plantations Sdn. Bhd. managing the day to day plantation operations. In his career at Kulim Plantation. He had accumulated more than 6 years of sustainability implementation experience. He is a qualified Lead Auditor for MS 2530:2013 and has accumulated more than 400 audit days throughout his current career as the auditor for multiple disciplines covering Malaysia.</p> <p>Training attended: He has completed RSPO P&C Lead Auditor Course in Oct 2020, Refresher RSPO P&C Lead Auditor Course in May 2022, RSPO ISH Standard 2019 in December 2021, RSPO SCC 2020 in September 2022, QMS 9001:2015 Lead Auditor Course in April 2019, OSH 45001:2018 Lead Auditor Course in June 2021, IMS (ISO 9001:2015 & ISO 14001:2015) Lead Auditor Course, HCV & HCS Training in August 2022, MSPO 2530:2013 Lead Auditor Course in February 2019, , MSPO SCCS Auditor in February 2019 and also trained in SMETA Requirement Training on May 2021.</p> <p>Language proficiency: Fluent in in both verbal/written Bahasa Malaysia and English.</p> <p>Aspect covered in this audit: Environment responsibility, Environment impact assessment and management plan, natural and biodiversity conservation, Waste management, GHG, HCV, and RSPO supply chain requirements. Fluent in English and Bahasa Malaysia.</p>
<p>Mohd Razaleigh Mohamad (MRM)</p>	<p>Team Member</p>	<p>Education: Graduated Bachelor in (Scs.) Plantation Management and Agrotechnology from Universiti Teknologi Mara (UiTM) in 2012.</p>

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		<p>Work Experience: He gained his working exposure in the plantation sector, serving as Senior Assistant Manager with Tradewinds Plantation Berhad from 2012 until 2017 and has been doing audit for RSPO P&C, MSPO, Global G.A.P and Organic since 2017 until now.</p> <p>Training attended: Successfully completed ISO 9001:2015 (2020), ISO 14001:2015 (2017), ISO 45001:2018 (2021), Endorsed RSPO P&C Lead Auditor Course (2018), Endorsed MSPO P&C Lead Auditor Course (2017), Social Accountability SA8000 (2019), Endorsed RSPO Independent Smallholder (IHS), (2022).</p> <p>Language proficiency: Fluent in in both verbal/written Bahasa Malaysia and English.</p> <p>Aspect covered in this audit: Policy and commitment, Social requirements, contract agreement, human rights, workers' welfare, smallholder welfare, Stakeholder Consultation, and RSPO supply chain requirements. Fluent in English and Bahasa Malaysia.</p>
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Accompanying Persons:

Name	Role
Ahmad Rofi Abu Talib Khan	Observer

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2.3 Assessment Plan

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

On-Site Assessment

Date	Time	Subjects	MFM	NHAZ	MRM
Sunday, 07/11/2022	PM	Auditors travel to Segamat and check in at Hotel.	√	√	√
Monday, 02/01/2023 Hwa Li 1 Estate	0900 - 0930	Opening meeting: • Opening presentation by audit team leader Confirmation of assessment scope and finalize audit plan (including stakeholder’s consultation)	√	√	√
	0930 - 1300	Field visit, boundary inspection, field operations, staff & workers interview, buffer zone, HCV area, IPM implementation, OSH & ERP, workshop, storage area (agrochemical, fertilizer, lubricant etc), agrochemical mixing area, Schedule waste management, worker housing, clinic, Landfill etc. Meeting with stakeholders (Government, village rep, smallholders, Union Leader, contractor etc.)	√	√ √	√
	1300 - 1400	Lunch break	√	√	√
	1400 - 1630	Document review P1 – P7: (General Documentation e.g. Legal, Manual and Procedure, production & monitoring records, IPM & HCV records, SEIA documents & records, OSH records, review pay documents, records of communication with stakeholder/workers representatives, new planting, CIP and implementation & etc.)	√	√	√
	1630 - 1700	Interim closing briefing	√	√	√
Tuesday, 03/01/2023 Carotino Estate	0900 - 1300	Field visit, boundary inspection, field operations, staff & workers interview, buffer zone, HCV area, IPM implementation, OSH & ERP, workshop, storage area (agrochemical, fertilizer, lubricant etc), agrochemical mixing area, Schedule waste management, worker housing, clinic, Landfill etc. Meeting with stakeholders (Government, village rep, smallholders, Union Leader, contractor etc.)	√	√ √	√
	1300 - 1400	Lunch break	√	√	√

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Date	Time	Subjects	MFM	NHAZ	MRM
	1400 - 1630	Document review P1 – P7: (General Documentation e.g. Legal, Manual and Procedure, production & monitoring records, IPM & HCV records, SEIA documents & records, OSH records, review pay documents, records of communication with stakeholder/workers representatives, new planting, CIP and implementation & etc.)	√	√	√
	1630 - 1700	Interim closing briefing	√	√	√
	PM	Auditors travel to Kuantan and check in at Hotel.			
Wednesday, 04/01/2023 Carotino POM	0900 - 1300	Inspection: FFB receiving, warehouse, workshop, wastes management & Landfill, Effluent Ponds, OSH & ERP, Environment issues, POME application, water treatment. Laboratory, weighbridge and palm product storage area, staff, workers and contractor interview, housing and facility inspection, clinic, etc. Meeting with stakeholders (Government, village rep, smallholders, Union Leader, contractor etc.)	√	√ √	√
	1300 - 1400	Lunch break	√	√	√
	1400 - 1630	Document Review P1 – P7: SOPs, Supply chain for CPO mill, Review on SEIA documents and records, wage records, employee data, training records, legal permits, mill inspection and internal monitoring records, CIP & implementation.	√	√	√
	1630 - 1700	Interim closing briefing	√	√	√
Thursday, 05/01/2023 Pahang Oil Palm Estate 1	0900 - 1300	Field visit, boundary inspection, field operations, staff & workers interview, buffer zone, HCV area, IPM implementation, OSH & ERP, workshop, storage area (agrochemical, fertilizer, lubricant etc), agrochemical mixing area, Schedule waste management, worker housing, clinic, Landfill etc. Meeting with stakeholders (Government, village rep, smallholders, Union Leader, contractor etc.)	√	√ √	√
	1300 - 1400	Lunch break	√	√	√

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Date	Time	Subjects	MFM	NHAZ	MRM
	1400 - 1630	Document review P1 – P7: (General Documentation e.g. Legal, Manual and Procedure, production & monitoring records, IPM & HCV records, SEIA documents & records, OSH records, review pay documents, records of communication with stakeholder/workers representatives, new planting, CIP and implementation & etc.)	√	√	√
	1630 - 1700	Interim closing briefing	√	√	√
Friday, 06/01/2023 Maran Estate	0900 - 1300	Field visit, boundary inspection, field operations, staff & workers interview, buffer zone, HCV area, IPM implementation, OSH & ERP, workshop, storage area (agrochemical, fertilizer, lubricant etc), agrochemical mixing area, Schedule waste management, worker housing, clinic, Landfill etc. Meeting with stakeholders (Government, village rep, smallholders, Union Leader, contractor etc.)	√	√ √	√
	1300 - 1400	Lunch break	√	√	√
	1400 - 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	Audit team discussion & preparation for closing meeting	√	√	√
	1630 - 1700	Closing Meeting	√	√	√
Saturday 07/01/2023	AM	Auditors travel back			

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Major Non-conformity Close Out Visit

Date	Time	Subjects	MFM
Monday 20/03/2023	PM	Auditor Travelling	√
Tuesday 21/03/2023	09.00 – 09.15	Opening Meeting: Opening Presentation by Audit team leader. Confirmation of assessment scope and finalize Audit plan	√
	09.00 – 12.00	Verification on previous Major NC: 1. 2294507-202301-M1 a. Site observation ,workers interview (individual and group session) if necessary b. Document review – implemented evidence	√
	12.00 – 13.00	Closing Meeting	√
	13.00	Auditor travel back	√

Section 3: Assessment Findings

3.1 Multiple Management Units and Time Bound Plan

Requirement	Assessment	Compliance
<p>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?</p>	<p>The plan includes all current subsidiaries, estates and mills that is under management control.</p>	<p>Complied</p>
<p>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</p>	<p>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 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. These new properties yet to be certified under JC Chang Group due to waiting for Land Use Changes Analysis (LUCA) to be carried out which has been planned next year.</p>	<p>Complied</p>
<p>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.</p>	<p>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 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. These new properties yet to be certified under JC Chang Group due to waiting for Land Use Changes Analysis (LUCA) to be carried out which has been planned next year.</p>	<p>Complied</p>

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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.	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.	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 13-15/6/2022. Positive assurance can be seen as no negative recommendation made on the issue under	Complied

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	clause 2.1 4.2, 4.4, 4.5, 4.6, 4.7, 4.8 and 7.12.	
Are there any Critical (Major) non-compliance raised against any of the RSPO P&C criterion 2.1 4.2, 4.4, 4.5, 4.6, 4.7, 4.8 and 7.12 during the last internal audit of the uncertified estates? If yes is the NC(s) actively addressed with RSPO?	No. There is no any Critical (Major) non-compliance raised during the last internal audit.	Complied
Have there been any stakeholder (including NGO) consultation conducted?	Yes. Stakeholder Consultation has been conducted annually at each operating unit.	Complied

3.2 Progress of scheme smallholders and/or outgrowers

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

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>	RSPO, ISCC, MSPO	RSPO	ISCC	MSPO
Carotino Palm Oil Mill Asia Oil Palm Estate 1 Pahang Oil Palm Estate 1 Maran Estate Hwa Li Estate 1 Carotino Estate		03-06/01/2022	21-24/08/2022	08-11/08/2022
<u>Asia Production Unit</u>	RSPO, ISCC, MSPO	RSPO	ISCC	MSPO
Asia Palm Oil Mill Asia Oil Palm Estate 2 Melewar Estate 2 Hwa Li Estate 3		28/11-1/12/2022	12-14/12/2022	03-06/10/2022
	RSPO, ISCC, MSPO	RSPO	ISCC	MSPO

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<p><u>Melewar Production Unit</u></p> <p>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</p>		<p>05-09/12/2022</p>	<p>27-30/03/2023</p>	<p>13-16/03/2023</p>
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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 One (1) Critical; Two (2) Minor nonconformities and one (1) Opportunity For Improvement raised. The Carotino Palm Oil Mill (Carotino Production Unit) Certification unit submitted Corrective Action Plans for the nonconformity. Corrective action plans with respect to the nonconformity was reviewed by the BSI audit team and accepted.

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

Non-conformity			
NCR Ref #	2294507-202301-M1	Issued Date	07/01/2023
Due Date	07/04/2023	Closure Date	23/03/2023
Indicator & Category (Critical / Minor)	3.4.3 (Critical)		
Statement of Nonconformity:	The Social and Environmental Management Plan was not effectively implemented.		
Requirement Reference:	(C) The social and environmental management and monitoring plan is implemented, reviewed and updated regularly in a participatory way. - Critical (Major) compliance.		
Objective Evidence:	<p><u>Hwa Li 1 Estate</u></p> <p>During site visit at oil trap for workshop, sighted that all 4 compartments of the oil trap were filled with oil and water emulsion. There is also evidence of the oil and water emulsion overflow from the oil trap contaminated adjacent soil.</p> <p>As per Environmental and Social Improvement Plan dated 29/06/2022 section Pollution (4) Lubricant & Greases (5) Diesel Spillage: Soil Contamination due to lubricant and grease spillage: Oil Trap to be built at storage area to trap the lubricant / greases before the water flow into the monsoon drain / Oil Trap to be build and maintain at appropriate interval to prevent oil spillage reach second compartment of the trap.</p> <p><u>Carotino Palm Oil Mill</u></p> <p>Social management plan for Carotino POM has been established and documented in "Carotino Palm Oil Mill, environmental and social improvement plan" updated on 01/11/2021 and signed by POM manager, Mr Kenny Alvin Ligungjang which stated that line site inspection need to be done on weekly basis. However, it has been verified that line site inspection has been conducted every 2 weeks latest has been done on 26/11/2022, 10/12/2022 and 24/12/2022.</p>		
Corrections:	<p>Hwa Li 1 Estate</p> <ol style="list-style-type: none"> 1. Removed oil, cleaning oil trap and drain, ensure no oil flowing into drain. 2. Training on handling trapped oil to the workshop attendants and staff in-charge was done on 7 January 2023. (Appendix 3.0) 		

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	<p>Carotino Palm Oil Mill</p> <p>1. Carotino P.O.M will appoint 2nd personnel to carry out site inspection as per schedule and stated in Social management plan. Schedule will be prepared, briefed & given to both personnel in-charge. Whenever 1st P.I.C on leave 2nd personnel will take in-charge to carry out line site inspection.</p>
<p>Root Cause Analysis:</p>	<p>Hwa Li 1 Estate</p> <p>1. Lacked of supervision monitoring by staff in charge which lead to maintenance of oil trap were not properly done.</p> <p>2. Lack of briefing to Person in-charge which caused Environmental Improvement Plan not effectively implemented.</p> <p>Carotino Palm Oil Mill</p> <p>1. Currently Carotino P.O.M appointed 1 personnel only to carry out line site inspection. So whenever in-charge person on leave line site inspection for that week will be carried over to next week. Other than that management presumed appointed person understood his duty. No verification done by management personnel (Manager/ Assistant) immediately after inspection done by appointed person. Management personnel only verified the inspection book after action taken by P.I.C.</p> <p>2. Lack of briefing to Person in-charge which caused social Improvement Plan not effectively implemented</p>
<p>Corrective Actions:</p>	<p>Hwa Li 1 Estate</p> <p>1. Oil trap maintenance and inspection will be performed on a weekly basis. Checklist of monitoring oil trap & chemical trap will be develop and implemented accordingly to ensure the oil trap is effectively function to trap any oil spillage overflow from the oil trap and contaminated the adjacent soil. Staff in charge will ensure oil trap maintenance will be performed properly. Appointment letter has been given to person in-charge for monitoring oil and chemical trap (Appendix 4.0) Person in-charge: Mr. Lee Yew Hin Appointment Date: 03.01.2023</p> <p>2. The staff in-charge will handle the waste as per estate waste management. The current oil trap is sufficient to control the oil over flow as cleaning will be done on weekly basis base on waste amount.</p> <p>3. In-house EIA improvement plan had been improve and make additions to the shortcoming found. (Appendix 5.0)</p> <p>4. Re-training and briefings to be given to personnel in charge and to ensure the maintenance is properly done as per plan. (Appendix 6.0)</p> <p>Carotino Palm Oil Mill</p> <p>1. Both appointed person will be given appointment letter stated clearly on their duty. (Appendix 1.0 & 1.1)</p> <p>2. Briefing will be given for both P.I.C and Management in-charge on line site inspection schedule and their duties. (Appendix 2.0 & 2.1)</p> <p>3. P.I.C will be carried out Line site inspection as per schedule.</p>

	<p>4. After line site inspection done by P.I.C , management (Manager/ Assistant) will verify and ensure that Line site inspection is as per requirement.</p> <p>5. Environmental & social plan in the aspect of line site will be reviewed accordingly with the participant from person in-charge to ensure the inspection is properly done as per plan.</p>
<p>Assessment Conclusion:</p>	<p>Major NC verification visit: During Major NC verification visit, the evidence sighted and reviewed as follows:</p> <p>Hwa Li 1 Estate</p> <ol style="list-style-type: none"> 1. The estate has appointed the field staff, Mr. Lee Yew Hin as person responsible to conduct monitoring of oil trap and chemical trap on weekly basis as per appointment letter dated 03/01/2023 signed by the Estate Manager. 2. The oil trap maintenance and cleaning was conducted on weekly basis by the workshop attendance. Reviewed the weekly oil trap maintenance records for the months of February (03/02/2023, 13/02/2023, 20/02/2023 and 27/02/2023) and March (03/03/2023, 10/03/2023, 13/03/2023 and 17/03/2023) documented in Oil Trap Maintenance Records Book. 3. The estate has established checklist for oil trap and chemical trap monitoring. The monitoring includes the structure condition, evidence of spillage, water condition and cleanliness. The field staff appointed (PIC) conducted the monitoring in weekly basis. Reviewed the records of monitoring for oil trap and chemical trap for the month of February and March 2023 for workshop, chemical store, and fertilizer store and genset room. 4. Waste collected form the oil trap/ chemical trap were collected and disposed as scheduled waste. Reviewed the Scheduled Waste inventory records for the month of January and February 2023. The inventory was notified to DOE through ESWISS. Reviewed the Fifth Schedule dated 28/02/2023 and 31/01/2023. 5. Sighted during site visit at the oil trap for workshop, the condition was satisfactory. No evidence of oil and water emulsion overflow from the oil trap to the adjacent ground. The condition was consistent with the report. 6. The estate has reviewed the Environmental Improvement Plan dated 03/01/2023 with addition of Aspect Identified: Oil Trap Spillage. 7. The estate has conducted training to the workshop attendance on the procedure to conduct oil trap maintenance. Reviewed the training summary and attendance records of Oil Trap/ Chemical Trap Handling training dated 07/01/2023. 8. The estate has conducted training to the PIC appointed on the Environmental Improvement Plan and procedure to conduct the Oil Trap/ Chemical Trap monitoring. Reviewed the training summary and attendance records of Oil Trap/ Chemical Trap monitoring briefing dated 07/01/2023. <p>Carotino Palm Oil Mill</p> <ol style="list-style-type: none"> 1. The mill has appointed the mill supervisor, Mr. Mohd Naim b. Azmi and boillerman, Mr. Abdul Qaiyyum b. Abdul Rashid as "Ketua Kampung"/ person responsible to conduct linesite inspection on weekly basis. 2. The mill has conducted training to the "Ketua Kampung"/ person responsible on their jobs description. Reviewed the training material and attendance records conducted on 13/01/2023.

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	<p>3. The estate has established checklist for linesite inspection. The "Ketua Kampung"/ person responsible conducted the linesite inspection on weekly basis as per checklist established and recorded in the linesite inspection book. Reviewed the records for the month of February 2023 (05/02/2023, 11/02/2023, 18/02/2023 and 25/02/2023) and March 2023 (04/03/2023, 11/03/2023, and 18/03/2023).</p> <p>4. Any issues found during the inspection recorded in the linesite inspection book. The report was submitted to the Asst. Manager and Mill Manager for verification and approval.</p> <p>5. The mill has reviewed the Social and Environmental Plan on 15/02/2023 with reviewed on the action plan for Aspect Identified: Accommodation. The reviewed was conducted with involvement of "Ketua Kampung"/ person responsible and they have been brief on the Social and Environmental Plan during briefing dated 13/01/2023.</p> <p>The evidence was found adequate. Thus the major non-conformity was effectively closed on 23/03/2023.</p>
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Non-conformity			
NCR Ref #	2294507-202301-N1	Issued Date	07/01/2023
Due Date	Next Assessment	Closure Date	Open
Indicator & Category (Critical / Minor)	7.3.2 (Minor)		
Statement of Nonconformity:	Labelling for waste storage and disposal according to the procedures were not effectively implemented.		
Requirement Reference:	Proper disposal of waste material, according to procedures that are fully understood by workers and managers, is demonstrated.		
Objective Evidence:	<p>Carotino Palm Oil Mill and Pahang Oil Palm Estate 1</p> <p>During site visit at Schedule waste store, Carotino POM, it was found that SW305 has been generated on 28/12/2022 and stored in the SW store. However, some information in the labelling was not correct (Labelled with SW409 instead of SW305) not accordance with the procedures. Other than that, sighted during site visit at Schedule waste store, Pahang Oil Palm Estate 1. Estate was yet to generate any Schedule waste, but they already prepared Labelling for each drum for SW305 without inserting the date generation. However, the Hazard Label used was inflammable liquids instead of Toxic Substance as per procedures.</p> <p>Every container of scheduled waste must be properly label for identification and warning purposes. It has been clearly mentioned Regulation 10, of Environmental Quality (Scheduled Waste) Regulation 2005. (2) Containers of scheduled wastes shall be clearly labelled in accordance with the types applicable to them as specified in the Third Schedule and marked with the scheduled waste code as specified in the First Schedule for identification and warning purposes.</p>		
Corrections:	<p>Carotino Palm Oil Mill</p> <p>1. Specific checklist will be created to cover all criteria requirement of "Regulation 10, of Environmental Quality (Scheduled Waste) Regulation 2005". The code label of SW409 has been corrected to SW305</p>		

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	<p>Pahang Oil Palm Estate 1</p> <p>1. The Hazard Label of the 'Inflammable' has been changed to Hazard Label of 'Toxic' .</p>
Root Cause Analysis:	<p>Carotino Palm Oil Mill</p> <p>1. Lack of understanding from Person handle scheduled waste store according the code due to the briefing given didn't cover all aspect of requirement. Further to that, existing checklist didn't cover the all criteria of "Regulation 10, of Environmental Quality (Scheduled Waste) Regulation 2005".</p> <p>Pahang Oil Palm Estate 1</p> <p>1. The Hazard Label used was inflammable and not toxic due to misinterpretation of the person in-charge handling the scheduled waste where any one of the labels can be used for SW305. This is due to the previous training provided does not specifically cover for hazard label characteristic.</p>
Corrective Actions:	<p>Carotino Palm Oil Mill</p> <p>1. New checklist will be prepared to cover all criteria and will be monitored on weekly basis by competent person of Scheduled waste</p> <p>2. Briefing will be given by competent person of scheduled waste to personnel in charge of schedule waste store and will cover all the criteria requirement of 'Regulation 10 of Environmental Quality (Scheduled Waste) Regulation 2005'</p> <p>Pahang Oil Palm Estate 1</p> <p>1. The management will re-train person in-charge on schedule waste handling to be more aware on the scheduled waste management. The management also will review the scheduled waste training to captured topic of the hazard label characteristic for better understanding</p> <p>2. The management will re-train person in-charge on scheduled waste training specifically on the hazard label characteristic and to be more aware on the scheduled waste management.</p>
Assessment Conclusion:	<p>The corrective action plan submitted found adequate to addressed the minor non-conformity. The effectiveness implementation of the corrective action plan will be assessed during next assessment.</p>

Non-conformity			
NCR Ref #	2294507-202301-N2	Issued Date	07/01/2023
Due Date	Next Assessment	Closure Date	Open
Indicator & Category (Critical / Minor)	3.5.2 (Minor)		
Statement of Nonconformity:	Employment procedures has not been properly implemented.		
Requirement Reference:	Employment procedures are implemented, and records are maintained. - Minor Compliance -		

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Objective Evidence:	<p>Carotino POM</p> <p>As per stated in the SOP title "Guidelines on procedure of recruitment, selection, hiring, promotion, retirement and termination" dated 12/08/2019 document reference number E020-01/2019" that selection of new workers is subject to medical fitness. Sample of 2 workers has been taken that has been recruited on 01/10/2022 and 13/09/2022 found out that there is no medical and physical fitness screening has been conducted for both sample workers.</p> <p>Details as per below</p> <p>a. Date joined: 13/09/2022, ID: G043X</p> <p>b. Date joined: 01/10/2022, ID G0442X</p>
Corrections:	All new workers appointed will go through estates or mill HA health examination regardless to their nationality and recorded in their personnel files.
Root Cause Analysis:	<ol style="list-style-type: none"> 1. Current practice management carry out medical and physical fitness screening for foreign workers only. As for local workers management just determine their health and fitness base on verbal interview only and physical observation. 2. Person in-charge misunderstood on SOP and carried out medical and Physical screening on foreign workers and missed out on local workers. SOP is available and briefing is provided but due to lack of understanding on the SOP, the requirement to carry our medical and physical fitness screening to the local workers not cover during the briefing.
Corrective Actions:	<ol style="list-style-type: none"> 1. Management will prepare health examination form and HA will fill up and carry out medical and physical fitness screening for new local workers. 2. Management will studied through the existing SOP and briefing to be given to Person In-charge involved to carry out medical and physical screening on all new workers upon recruitment.
Assessment Conclusion:	The corrective action plan submitted found adequate to addressed the minor non-conformity. The effectiveness implementation of the corrective action plan will be assessed during next assessment.

Opportunity for Improvements	
OFI #	Description
OFI 1	<p>OFI Statement:</p> <p><u>2294507-202301-I1 (Indicator 6.2.6)</u></p> <p>Assessment of decent living wages has been conducted and documented in the document number E/027-01/2019 title " Implementation plan for decent living wages" document date 29/11/2019. Base on household expenditure survey 2016, wages survey, RSPO guidance for implementing a decent living wages. Management plan has been established to conduct re- assessment on 16/01/2023 by using latest household expenditure survey 2019 and documented in document title " Action Plan for decent wages review as per E027" updated on 12/12/2022 OFI has been raised to ensure that the management implement of the management plan that has been established.</p>

Positive Findings	
PF #	Description
PF 1	Good cooperation given by ICT and site management team
PF 2	Good estate and mill management practices effectively demonstrated

3.3.1 Status of Nonconformities Previously Identified and Observations

NCR Ref #	2156930-202201-M1	Issued Date	21/01/2022
Due Date	21/04/2022	Closure Date	05/04/2022
Indicator & Category (Critical / Minor)	6.7.3 (Critical)		
Statement of Nonconformity:	Appropriate personal protective equipment (PPE) was not provided to workshop personnel at the place of work to cover all potentially hazardous operations		
Requirement Reference:	Workers use appropriate personal protective equipment (PPE), which is provided free of charge to all workers at the place of work to cover all potentially hazardous operations, such as pesticide application, machine operations, land preparation, and harvesting. Sanitation facilities for those applying pesticides are available, so that workers can change out of PPE, wash and put on their personal clothing.		
Objective Evidence:	<p>Hwa Li 2 Estate</p> <p>Based on PPE issuance records, no records of safety boots provided to the workshop personnel. Only rubber boots given to them based on date of issuance; 1/3/21 and 23/11/20 for the foreman and his assistant.</p> <p>HIRARC register, rev:3_2021 dated 10/9/2021 for workshop activity stated that proper footwear to be provided and contrary with the established SOP, PBDS – Mekanik and Pekerja Bengkel (Bahasa Malaysia), doc. Ref. no. M/009 -01/2007 dated 13/2/2007</p> <p>a) Mekanik mesti memakai but keselamatan dan topi keselamatan setiap masa semasa berada didalam bengkel dan ketika bekerja di luar bengkel.</p>		
Corrections:	HIRARC has been reviewed on 24/01/2022, the workshop PPE requirement is identified and proper footwear has been changed to safety boots. Safety boots has been issued by person in-charge to workshop foreman on 27/01/2022 as per SOP and HIRARC requirement.		
Root Cause Analysis:	The person in-charge of PPE issuance did not followed the SOP guidelines on proper PPE implementation required for workshop foreman. HIRARC registered for workshop activity was not reviewed according to SOP guidelines.		
Corrective Actions:	<p>Briefing on issuance of PPE according to type of work has been conducted to all management staff on 24/01/2022 to instill awareness on PPE issuance to workers and the importance of proper recording to avoid misleading information.</p> <p>Refreshment training of SOP guidelines and workshop operations for foreman and person in-charge has been conducted to instill awareness on proper PPE requirement and its usage when working at workshop dated 27/01/2022.</p> <p>PPE issuance form has been revised based on type of work and workshop PPE requirement as per SOP guidelines and HIRARC to avoid improper PPE issuance in the future.</p>		

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Assessment Conclusion:	<p>Critical NCs closure visit has been done on 05/04/2022. As verified, HIRARC updated on 24/01/2022 and change from footwear safety boots and issuance of safety boots done 27/04/2022. It also verified during the site visit to workshop, confirmed that foreman wear safety boots and as per interview with the foreman, safety boots provided by the management. Sighted also training records to all management staff on awareness of PPE issuance and on SOPs to workshop workers on 27/01/2022. Interview with management staff and workers, shows their understanding on the training. Correction and corrective action has been identified sufficient to close the NC.</p>						
Effectiveness Closure (for previous audit closed Critical NC):	<p>All operating units has reviewed the HIRARC as per guidelines established. Reviewed the latest HIRARC FY 2022/2023.</p> <p>The operating units has conducted training on PPE awareness at the workshop area. reviewed the training records titled Standard Operating Procedure and PPE awareness for workshop operators training dated 29/05/2022 at Carotino Palm Oil Mill, Safety work procedure and PPE awareness for workshop operator training dated 15/11/2022 at Hwa Li 1 Estate, Safety work procedure and PPE awareness for genset and water pump operator dated 12/10/2022, SOP for workshop training dated 19/09/2022 at Pahang Oil Palm 1 Estate and SOP for tractor driver, machineries and workshop training dated 21/11/2022 and 09/11/2022 at Maran Estate.</p> <p>All operating units has issued PPE as per HIRARC. Reviewed the PPE issuance records as follows:</p> <table border="1" style="width: 100%; border-collapse: collapse;"> <tr> <td style="width: 33%;"> <p>Carotino Palm Oil Mill</p> <ol style="list-style-type: none"> 1. G0351 2. G0386 3. G0353 4. G0333 </td> <td style="width: 33%;"> <p>Hwa Li 1 Estate</p> <ol style="list-style-type: none"> 1. HE 100134 2. HE 100062 3. HE 000927 4. HE 100386 5. HE 100176 6. HE 100267 </td> <td style="width: 33%;"> <p>Carotino Estate</p> <ol style="list-style-type: none"> 1. HTO01804 2. HE200490 3. HE200488 4. HE020444 </td> </tr> <tr> <td> <p>Pahang Oil Palm Estate</p> <ol style="list-style-type: none"> 1. POP2279 2. PE100342 3. PE100105 4. PE100230 5. PE100137 </td> <td> <p>Maran Estate</p> <ol style="list-style-type: none"> 1. MR 100519 2. MR 100521 3. MR 100518 4. MR 100517 5. MR100493 </td> <td></td> </tr> </table> <p>Sighted during site visit at the workshop and workstation at all sampled operating units, the workers were wearing the appropriate PPE as per HIRARC. There was no recurrence of non-conformity and therefore the non-conformity report remains closed.</p>	<p>Carotino Palm Oil Mill</p> <ol style="list-style-type: none"> 1. G0351 2. G0386 3. G0353 4. G0333 	<p>Hwa Li 1 Estate</p> <ol style="list-style-type: none"> 1. HE 100134 2. HE 100062 3. HE 000927 4. HE 100386 5. HE 100176 6. HE 100267 	<p>Carotino Estate</p> <ol style="list-style-type: none"> 1. HTO01804 2. HE200490 3. HE200488 4. HE020444 	<p>Pahang Oil Palm Estate</p> <ol style="list-style-type: none"> 1. POP2279 2. PE100342 3. PE100105 4. PE100230 5. PE100137 	<p>Maran Estate</p> <ol style="list-style-type: none"> 1. MR 100519 2. MR 100521 3. MR 100518 4. MR 100517 5. MR100493 	
<p>Carotino Palm Oil Mill</p> <ol style="list-style-type: none"> 1. G0351 2. G0386 3. G0353 4. G0333 	<p>Hwa Li 1 Estate</p> <ol style="list-style-type: none"> 1. HE 100134 2. HE 100062 3. HE 000927 4. HE 100386 5. HE 100176 6. HE 100267 	<p>Carotino Estate</p> <ol style="list-style-type: none"> 1. HTO01804 2. HE200490 3. HE200488 4. HE020444 					
<p>Pahang Oil Palm Estate</p> <ol style="list-style-type: none"> 1. POP2279 2. PE100342 3. PE100105 4. PE100230 5. PE100137 	<p>Maran Estate</p> <ol style="list-style-type: none"> 1. MR 100519 2. MR 100521 3. MR 100518 4. MR 100517 5. MR100493 						

Non-conformity			
NCR Ref #	2156930-202201-M2	Issued Date	21/01/2022
Due Date	21/04/2022	Closure Date	05/04/2023

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Indicator & Category (Critical / Minor)	3.3.1 (Major)
Statement of Nonconformity:	Standard Operating Procedures (SOP) for confined space entry programme was not in place.
Requirement Reference:	Standard Operating Procedures (SOPs) for the unit of certification are in place.
Objective Evidence:	Carotino POM No SOP for confined space entry programme available for verification. Furthermore, based on PTW for boiler no.3 (furnace entry) dated 2/1/22, health requirements for persons working in confined space, section 11 of ICOP for Confined Space for not fully adhered. Health surveillance programme has yet to be established for the competent person (AGT and AESP). No health declaration made by authorized entrant on the said date for confined space entry programme.
Corrections:	Mill management has established SOP Confine Space entry programme for authorized entrant as per ICOP Guideline. Training has been provided to authorized entrant according to ICOP guideline requirement. Management has arranged and sent authorized entrant for Health surveillance.
Root Cause Analysis:	SOP for confined space entry programme was not properly documented. Mill management refer ICOP books as per guideline but not fully implemented.
Corrective Actions:	Mill management will identify the confined space works/ activities as per law requirement. Once identification process done SOP will established for the confined space works/activities. SOP Confine Space entry programme is implemented by mill management as required by ICOP for Confine Space 2010. Training is provided to authorized entrant as per requirement particularly health surveillance program and Health declaration. All SOP will send to HQ for approval and registration and properly documented for reference.
Assessment Conclusion:	Critical NCs closure visit has been done on 05/04/2022. New SOPs on confined space has been established in document number P/034-01/2022 title Standard Operation Procedure at Confine Space dated 28/01/2022. Medical surveillance program for workers working at confined space workstation established and planned on February 2022 and it is verified that all workers has done medical surveillance and declared as fit. Training for all workers done on 19/02/2022 and as per interview, shows their understanding on the training. Correction and corrective action has been identified sufficient to close the NCs.
Effectiveness Closure (for previous audit closed Critical NC):	Medical surveillance for confined space was conducted on 01 – 12/04/2022 OHD with DOSH reg. no. HQ/17/DOC/00/00068. 16 workers were sent for surveillance and 14 were found fit to work in confine space. The mill has established training plan include training on confine space. Reviewed training plan FY 2022/2023. The mill has conducted training for SOP for Boiler Room dated 27/09/2022 There was no recurrence of non-conformity and therefore the non-conformity report remains closed.

Opportunity for Improvement	
OFI#	Description

OFI 1	<p>OFI Statement:</p> <p>The mechanism to check implementation of procedures could be improved although there is shortage of workers at (a) estates visited and mill due to Covid-19 pandemic and (b) damages sighted in the field in flood prone areas.</p> <p>Verification / Follow-up actions:</p> <p>Based on interview and document verification, estate was managed to get new workers and all operation were conducted according to the company procedures. Maintenance of road has been conducted as per Year Road maintenance Programme. For any urgent damage due to flood, will be repaired immediately. Granite and Crusher run were placed at strategic placed in the estates for road repair purpose.</p>
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3.3.2 Summary of the Nonconformities and Status

CAR Ref.	Category (Critical / Minor)	P&C Indicator	Issued Date	Status & Date (Closure)
1729621-201901-N1	Major	4.1.2	17/01/2019	17/01/2019
RSPO P&C MYNI 2019				
1871353-202001-M1	Critical	7.10.1	10/01/2020	Closed out on 06/03/2020
1871353-202001-M2	Critical	D.5.1	10/01/2020	Closed out on 06/03/2020
1871353-202001-N1	Minor	2.1.3	10/01/2020	Closed out on 22/01/2021
1871353-202001-N2	Minor	3.3.2	10/01/2020	Closed out on 22/01/2021
2014302-202101-M1	Critical	3.4.3	22/01/2021	Closed out on 25/02/2021
2014302-202101-M2	Critical	7.8.2	22/01/2021	Closed out on 25/02/2021
2014302-202101-N1	Minor	6.2.4	22/01/2021	Closed out on 21/01/2022
2156930-202201-M1	Critical	6.7.3	21/01/2022	Closed out on 05/04/2022
2156930-202201-M2	Critical	3.3.1	21/01/2022	Closed out on 05/04/2022
2294507-202301-M1	Critical	3.4.3	06/01/2023	Closed out on 23/03/2023
2294507-202301-N1	Minor	7.3.2	06/01/2023	"Open"
2294507-202301-N2	Minor	3.5.2	06/01/2023	"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 Carotino Palm Oil Mill (Carotino 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.

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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)
Internal audit	Gender representative for each operating unit	Face to face
Neighbouring estate	FGVPM Lepar Utara Estate	Face to face
Government Agency	Balai Polis Melati	Phonecall
Local communities	Tok Batin Kampung Pasa,	Phonecall
Local communities	JPKK Kampung Cenderawasih	Phonecall
Contractor	Eng Lee Seng Sdn Bhd	Phonecall
Government Agency	Sekolah Kebangsaan Ulu Luit	Phonecall

Stakeholders comment	
1	<p>Feedbacks: Gender representative for each operating unit</p> <p>5 gender representatives for each operating have been interviewed. Based on the interview, there is evidence that all female workers can participate in gender committee and has been invited for meeting that will be conducted every 6 months. As per interview, it has been confirmed that grievance procedure for any harassment has been communicated and all representatives can demonstrate their understanding on the procedure. Other than that, pregnancy test has not been conducted for female workers but only self-assessment on pregnant symptom such as period delay will be submitted online on monthly basis. Representative also has been asked on discrimination and has been confirmed there is no discrimination has been practiced. All workers have been paid as per Minimum Wages Order 2022. All female workers received same benefits, leave and others. New mother assessment has been conducted for Carotino Estate and there is no new mother at other operating units</p> <p>Audit Team verification and response: No further verification required</p>
2	<p>Feedbacks: Neighbouring estate (FGVPM Lepar Utara Estate)</p> <p>FGVPM Lepar Utara 05 Estate located next to Pahang Oil Palm Estate 01. The estate manager, Mr Azhari Ahmad newly transferred to the FGVPM Lepar Utara 05 Estate. Boundaries for both estates has been well maintained by both parties and can be clear seen base on boundary markers and 10ft drain that has been constructed. Mr Azhari Ahmad confirmed that there is no dispute or land issues between both companies. He also aware method/mechanism of communication if there is any issues related to land.</p> <p>Audit Team verification and response: No further verification required</p>
3	<p>Feedbacks: Government Agency (Balai Polis Melati)</p> <p>Good relationship has been maintained by both parties. Communication has been done through phone call and consultation with stakeholders. There is no issues of civil crime has been convicted by any of the workers in IOI Pamol Kluang Certifications Units.</p>

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	Audit Team verification and response: No further verification required
4	<p>Feedbacks: Local communities (Tok Batin Kampung Pasal, JPKK Kampung Cenderawasih)</p> <p>Both head of village for Kampung Pasal and Kampung Cenderawasih has been interviewed. Most of the villagers works as public and government servant, fisherman, village works. Based on the on the interview, it has been confirmed that good relationships have been between both parties. They also mentioned that there are no operation/ activities in estates and POM that give adverse effect to the local communities. Any vacancies in estate/POM will be posted at notice board and nearby coffee shops at the village area. As per interview, some villagers work in the estate and POM. There is 1 river that flowing from Carotino Estate to Kampung Cenderawasih and there is no issues of pollution effect from the estate operations.</p>
	Audit Team verification and response: No further verification required
5	<p>Feedbacks: Contractor (Eng Lee Seng Sdn Bhd)</p> <p>As per interview, Eng Lee Seng is contractors for FFB transport for Hwa Li 01 estate and Carotino Estate and transporting PK from Carotino POM. Mr Ng Chee King is the director for the company. He said he have signed contract agreement and he also mentioned that they are aware the statement of compliance of legal requirement and prohibition of child labour, force labour and others.</p> <p>Mr Ng has been asked on payment, where payment will be done within 30 days after the invoices. Payment made based on tonnage mentioned in the weighbridge tickets. He also confirmed that there is no pending payment and payment has been made based on the payment terms,</p>
	Audit Team verification and response: No further verification required
6	<p>Feedbacks: Sekolah Kebangsaan Ulu Luit</p> <p>Mr Jasmi Jaapar is the headmaster for Sekolah Kebangsaan Ulu Luit since 2018. The school is located around 35km from Carotino POM, Pahang Oil Palm Estate 01 and kids travel by van to school. He also mentioned good relationship has been maintained between both parties and he also mentioned that he aware about consultation and communication procedure and know who need to be contacted for any communication/consultation. He also hopes that there will be activities together with estate and POM</p>
	Audit Team verification and response: No further verification required

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
Note: There is no customary rights land in the Carotino Palm Oil Mill (Carotino Production Unit) Certification Unit. Moreover, the most of the planting cycles had passed their second cycle of planting.					



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

3.5 Impartiality and conflict of interest

During this assessment there was no circumstances or pressure that had influenced the independence or confidentiality of the assessment team.

Formal Signing-off of Assessment Conclusion and Recommendation

The audit objectives have been achieved and the certificate scope is appropriate. Based on the results of this audit, it is concluded that Carotino Palm Oil Mill (Carotino Poduction 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 Carotino Palm Oil Mill (Carotino Poduction Unit) is remain certified.

Report prepared by	Acceptance of Assessment Conclusion
Name: Muhammad Fadzli Masran	Name: Wong Chun Wei
Company Name: BSI Services Malaysia Sdn Bhd	Company Name: Carotino Sdn. Bhd.
Title: Client Manager	Title: AM
Signature: 	Signature: <i>(I the undersigned, being the most senior relevant management representative of the operation seeking or holding certification, agree with the contents of this report and accept the liability in execution of the procedure in the report.)</i> 
Date: 24/03/2023	Date: 30/03/2023

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>All document that has been specified in the RSPO P&C has been made available for each operating units under J.C Chang Group. It can be access through company website www.carotino.com/publicity-available-documents-97.aspx and through the consultation and communication procedure document number E/004-08/2019 dated 12/08/2019. Listed list of publicly available but not limited too as per below</p> <ul style="list-style-type: none"> a. Environmental information b. Social information c. Legal information d. Other information such as CIP, Public Summary Assessment Report and other policies. 	Complied
1.1.2	<p>Information is provided in appropriate languages and accessible to relevant stakeholders.</p> <p>- Minor compliance -</p>	<p>All the company policies are available in dual language, i.e., Bahasa Malaysia and English. Information requested by government department stakeholders are prepared in Bahasa Malaysia. Refer to Indicator 1.1.3 below</p>	Complied
1.1.3	<p>(C) Records of requests for information and responses are maintained.</p> <p>- Critical (Major) compliance -</p>	<p>Records of requests for information and responses are duly maintained and verified during the surveillance audit. Reviewed were requests for information and the responses: Carotino Estate</p>	Complied

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		<p>There is no information request has been received since 2017 and only request by stakeholders. Latest request for assistance is from Balai Polis Bandar 32 for contribution to hold an event.</p> <p><u>Pahang Oil Palm Estate 01</u> There is no information request has been received since 2017 and only request by stakeholders. Latest assistance request is on 15/12/2022 requested by Cermat Aman Sdn. Bhd requested to use roads in Pahang Oil Palm Estate 01 and has been approved by the estate manager.</p> <p><u>Maran Estate</u> There is no information request has been received only request of assistance. Latest records updated on 24/12/202 in the document title "Stakeholders Request (RSPO Indicator 1.1.1). Sample has been taken from Mr Diki, Mandor requesting for extension of electricity on public holiday which is Eid Fitri and Deepavali. 02/05/2022-03/05/2022 and 24/10/2022.</p>	
1.1.4	<p>(C) Consultation and communication procedures are documented, disclosed, implemented, made available, and explained to all relevant stakeholders by nominated representative.</p> <p>- Critical (Major) compliance -</p>	<p>Consultation and communication procedure document number E/004-08/2019 dated 12/08/2019. It has been disclosed through the company website www.carotino.com and has been explained to the stakeholders.</p> <p><u>Carotino Estate</u></p> <ul style="list-style-type: none"> a) Communication of the procedure to the workers conducted during the morning muster call on 08/07/2022 b) Communication of the procedure to the stakeholders through due diligence form that has been provided to all stakeholders documented "Sustainability compliances contract with operating units under J.C Chang Group". Sample has been taken a per below <ol style="list-style-type: none"> 1. Kampung Jeram Panjang dated 20/07/2022 	Complied

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		<p>2. Kampung Pasal, 27/11/2019 3. Ladang Pertanian, 27/11/2019</p> <p><u>Carotino POM</u> a) Communication of the procedure has been done to all stakeholders through email that has been sent to all stakeholders and sighted evidence of respond by the stakeholders itself. Sample has been taken stakeholders as per below</p> <ol style="list-style-type: none"> 1. FGVPI Makmal Analisa Bukit Goh dated 31/01/2021 2. Klinik Kuantan, 05/01/2022 3. Tanner Industrial and Technologies, 31/12/2021 4. MPOB Wilayah Timur, 30/12/2021 <p><u>Pahang Oil Palm Estate 1</u> Communication of the procedure has been done latest on 19/10/2022 during the morning muster call. While for stakeholders it has been explained through visit to each stakeholder, sample has been taken for Cermat Aman Sdn Bhd on 03/01/2023 and Alur Seri Estate, LKPP on 04/01/2022.</p> <p><u>Maran Estate</u> Communication of the procedure has been done on 17/10/2022 17/11/2022 for all workers</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>List of stakeholders for each operating unit has been documented and maintained by the management. There are few categories has been listed which are surrounding estates details, contractor, government bodies and NGO`s. For Carotino Estate, there are 5 surrounding estate which are Kampung Pasal, Ladang Pertanian, Proseper commodity estate, Kampung Jeram Panjang and Havys Oil Mill Sdn Bhd. While for Carotino POM, Maran Estate and Pahang Oil</p>	Complied

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		Palm Estate 1, it is located in the same area and have same local communities/neighboring estates which are estate canteen, Kampung Bekapor and FGVPM Lepar Utara 5 Estate.	
Criterion 1.2: The unit of certification commits to ethical conduct in all business operations and transactions.			
1.2.1	A policy for ethical conduct is in place and implemented in all business operations and transactions, including recruitment and contracts. - Minor compliance -	Carotino / JC Chang has documented its Corruption Prevention Policy that incorporated various aspect of commitment to a code of ethical conduct and integrity. It was established on 04 September 2015 and signed by the estate director and is made applicable to any and all form of business operations and transactions, including recruitment and contracts. The policy has been communicated and implemented to all Operating Units and all levels of the workforce. Sighted the policy had been displayed at the offices of each operating units	Complied
1.2.2	A system is in place to monitor compliance and the implementation of the policy and overall ethical business practice. - Minor compliance -	Internal audit is one of the systems in order to monitor compliance and the implementation of the policy and overall ethical business practice and other than that through whistle blowing policy J.C Chang has established internal procedure for internal audit documented in the document title "Audit procedures & management review" document number 01/12/2022. For Carotino Estate, internal audit has been conducted on 16-18/06/2022 by Ms Hasirah Tahir and Pn Kavitha A/P Muniaddy While for Carotino POM, internal audit has been conducted on 20-22/07/2022. For Pahang Oil Palm Estate 01, internal audit has been done on 26-28/07/2022 and for Maran Estate on 20-22/06/2022 There is no nonconformities has been raised for incompliance of the policy.	Complied
Principle 2: Operate legally and respect rights			
Criterion 2.1: There is compliance with all applicable local, national and ratified international laws and regulations.			

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<p>2.1.1</p>	<p>(C) The Unit of Certification complies with legal requirements - Critical (Major) compliance -</p>	<p>The operating units continued to comply with the legal requirements. Among the evidence of legal compliance as follows:</p> <p><u>Carotino POM</u></p> <ol style="list-style-type: none"> 1. DOE License no. 005110 with compliance schedule no. JAS.CHQ 600-3/1/2/60(39), valid till 30/06/2023 2. MPOB License no. 500356604000 valid till 31/10/2023 3. Permit for Scheduled Controlled Goods, Diesel and Petrol Purchase and Storage permit no. KPDNHEP TLH 600-5/2/16/90, valid till 17/05/2024 4. Fitness Certificate for Water Tube Boiler no. PMD-PH/22 52679, valid till 01/09/2023 5. Fitness Certificate for BI Drum Water Tube Boiler no. PMD-PH/22 49398, valid till 31/05/2023 6. Weighbridge calibration Certificate no. 164950031 with safety sticker no. 2.1KQ 026072 7. License for private Installation no. 2022/00178 valid till 27/02/2023 8. Water resource use certificate no. 0032 expired on 31/12/2022. The renewal application has been conducted on 25/11/2022. 9. Competent Person <ol style="list-style-type: none"> a. Authorised Entrant and Standby Person for Confined Space <ol style="list-style-type: none"> i. NW-ECRO-AE-3840-U valid till 19/05/2024 ii. NW-ECRO-AE-3841-U valid till 19/05/2024 iii. NW-ECRO-AE-3842-U valid till 19/05/2024 iv. NW-ECRO-AE-R-3308-U valid till 15/04/2024 v. NW-ECRO-AE-R-3307-U valid till 25/04/2024 b. CePPOME <ol style="list-style-type: none"> i. CePPOME/00196 	<p>Complied</p>
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		<p>c. CePSO i. CePSO/2216749</p> <p><u>Hwa Li 1 Estate</u></p> <ol style="list-style-type: none"> 1. MPOB License no. 501381202000 valid till 31/03/2023 2. License for private Installation no. 2022/03692 valid till 29/11/2023 3. Permit for Scheduled Controlled Goods, Diesel Purchase and Storage permit no. JH(SGT) 0072/99 PSK, valid till 24/06/2023 4. Weighbridge calibration Certificate no. S-44609 with safety sticker no. DE18 005448 5. Air Compressor Certificate of Fitness no. PMT-PH/21 47005 valid till 06/03/2023 6. Water resource use certificate no. 0011 expired on 31/12/2022. The renewal application has been conducted on 18/10/2022. As per communication email with Pahang Water and Energy Resource Sdn. Bhd. dated 29/12/2022, the application is in progress as they are waiting approval for Pahang State Government. <p><u>Carotino Estate (Hwa Li 2 Estate)</u></p> <ol style="list-style-type: none"> 1. MPOB License no. 504216202000 valid till 30/06/2023 2. Permit for Scheduled Controlled Goods, Diesel Purchase and Storage permit no. PKPDNHEP.PHG.BERA 600-5/2/23, valid till 16/06/2023 3. License for private Installation no. 2022/01080 valid till 12/05/2023 4. Weighbridge calibration Certificate no. 150250443 with safety sticker no. 2.1KQ 012650 5. Air Compressor Certificate of Fitness no. PMT-PH/22 54120 valid till 20/10/2023 	
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		<p><u>Pahang Oil Palm 1 Estate</u></p> <ol style="list-style-type: none"> 1. MPOB License no. 501382102000, valid till 31/03/2023 2. Permit for Scheduled Controlled Goods, Diesel Purchase and Storage permit no. KPDNHEP TLH 600/5/2/321/81, valid till 21/04/2023 3. Air Compressor Certificate of Fitness no. PMT-PH/22 47899, valid till 13/04/2023 4. Weighbridge calibration Certificate no. 194550152 with safety sticker no. 2.1KQ 031780 <p><u>Maran Estate</u></p> <ol style="list-style-type: none"> 1. MPOB License no. 502407502000, valid till 30/04/2023 2. Air Compressor Certificate of Fitness no. PMT-PH/22 52779, valid till 12/09/2023 3. License for private Installation no. 2022/02062 valid till 05/07/2023 4. Permit for Scheduled Controlled Goods, Petrol Purchase and Storage permit no. KPDNHEP TLH 600/5/2/330/16, valid till 10/03/2023 5. Permit for Scheduled Controlled Goods, Diesel Purchase and Storage permit no. KPDNHEP TLH 600/5/2/22/19, valid till 27/06/2023 	
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>Carotino Productions Units adopt the JC Chang Group SOP on Mechanism to Trace Changes in Legal Requirements. Refer doc. no. E/005-08/2021 dated 13/12/2021.</p> <p>In the SOP stated that the Headquarters has subscribed with Malaysia Gazette On – Line with website www.lawnet.com.my. The Lead Auditor for Internal Control Team will access the subscribed website at the end of every month to track any relevant changes. The Lead Auditor will notify the Plantation Department on any changes. The Plantation Department will convey any changes and</p>	Complied

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		<p>the appropriate action to be taken via email and hardcopy letters to the operating units.</p> <p>Reviewed the latest update on the list of laws and other regulations dated 15/11/2022. Latest update FY 2022 include as follows:</p> <ol style="list-style-type: none"> 1. Windfall Profit Levy Oil Palm Fruit Amendment Order 2021 2. Minimum Wages Order 2022 3. Employment Amendment Act 2022 (Act 265) 4. Employment Act 1955 (Act 265) Employment (Amendment) Act 2022 (Act 1651) 5. Employees' Social Security Act 1969 (Act 4) 6. Employment Insurance System Act 2017 (Act 800) 7. Anti-Sexual Harassment Act 2022 (Act 840) 	
2.1.3	<p>Legal or authorised boundaries are clearly demarcated and visibly maintained, and there is no planting beyond these legal or authorised boundaries.</p> <p>- Minor compliance -</p>	<p>Guidelines on Legal or Authorised Boundaries are guided by the documented procedure Guidelines On Field Blocking and Boundary Maintenance; Doc Ref Number: B/003-04/2017; Doc Date: 07/07/2017. Legal boundaries were well maintained and clearly demarcated at the below assessed estates.</p> <p><u>Hwa Li 1 Estate:</u> Sighted boundary peg at PM12A04, Neighbouring to Lesong Forest Reserve. Verified that there is no planting beyond these legal or authorised boundaries.</p> <p><u>Carotino Estate:</u> Sighted boundary peg at PM90/08, Neighbouring to Ladang Pertanian Kelapa Sawit Sdn Bhd and Hutan Nukit Kerisik. Verified that there is no planting beyond these legal or authorised boundaries.</p> <p><u>Pahang Oil Palm Estate:</u></p>	Complied

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		<p>Sighted boundary peg at PM97/U01, Neighbouring to Smallholders. Verified that there is no planting beyond these legal or authorised boundaries.</p> <p><u>Maran Estate:</u> Sighted boundary peg at PM12 A4, Neighbouring to Berkelah Forest Reserve. Verified that there is no planting beyond these legal or authorised boundaries.</p>	
Criterion 2.2: All contractors providing operational services and supplying labour, and Fresh Fruit Bunch (FFB) suppliers, comply with legal requirements.			
2.2.1	<p>A list of contracted parties is maintained.</p> <p>- Minor compliance -</p>	<p>List of contracted parties has been maintained in the stakeholders list for each operating unit. For Hwa Li 1 Estate, there is 3 contracted parties which are Kedai Runcit Hwa Li 1, Kedai Makan Hwa Li 1 and FFB transport to mill, Eng Lee Sing Sdn Bhd.</p> <p>While for Carotino Estate, there are 3 contracted parties which is restaurant, sundry shops and FFB transporters.</p> <p>For Carotino POM, there are 2 contracted parties which are Hup Shing Berjaya Enterprise for CPO transporter and En Lee Sing Sdn Bhd for palm kernel and FFB transporter.</p> <p>While for Pahang Oil Palm Estate 01, there is only 1 contracted parties which is shopkeeper, Mr Zulkifli bin Abdullah and for Maran Estate, only one contracted parties which is Maran shopkeeper, Mr Wong Nyuk Lim.</p> <p>There are 4 recruitment agent for JC Chang Group as per below</p> <ol style="list-style-type: none"> a. PT Tekad Jaya Abadi b. PT Genta Gumi Selapawis c. PT Teja Mukti Utama d. PT Sekar Tanjung Lestari. 	Complied

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<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>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>Contract agreement for contracted parties sighted for each operating units and has been signed by both parties. Other than that the management, the contractor need to signed additional agreement title "Kontrak pematuhan kemampanan dengan unit operasi di bawah kumpulan JC Chang Stated in the compliance contract that contractor will comply with the legal requirement , disallowing child labour, force labour and trafficked labour in the business activities. Details as per below</p> <p><u>Carotino Estate</u></p> <p>a) Kedai Carotino Estate 04/11/2019, b) Kedai Makan Carotino Estate, 04/11/2019 c) Eng Lee Sing Sdn Bhd, 22/10/2019</p> <p>Pahang Oil Palm Estate 01 Contract agreement for shopkeeper, Mr Zulkifli bin Abdullah sighted dated 04/12/2019</p> <p><u>Maran Estate</u> Contract agreement sighted on 04/12/2019 for Maran shopkeeper, Mr Wong Nyuk Lim. Contract agreement for 4 recruitment agent for JC Chang Group sighted as per below</p> <p>a. PT Tekad Jaya Abadi-18/09/2019 b. PT Genta Gumi Selapawis- 19/09/2019 c. PT Teja Mukti Utama- 18/09/2019 d. Windbond management- 09/12/2022</p> <p>Legal due diligence of recruitment agent has been sighted and verified during the audit.</p>	<p>Complied</p>
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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>Contract agreement for contracted parties sighted for each operating units and has been signed by both parties. Other than that the management, the contractor need to signed additional agreement title "Kontrak pematuhan kemampunan dengan unit operasi di bawah kumpulan JC Chang" Stated in the compliance contract that contractor will comply with the legal requirement , disallowing child labour, force labour and trafficked labour in the business activities. For detail, refer 2.2.2</p>	Complied																		
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>Carotino POM received only crop from own supply bases within the certification scope. All estates from the same certification scope possessed the following information were sighted and verified during the audit</p> <p>1. Geo locations are as follows:</p> <table border="1" data-bbox="1182 890 1930 1302"> <thead> <tr> <th>Estate</th> <th>Latitude</th> <th>Longitude</th> </tr> </thead> <tbody> <tr> <td>Asia Oil Palm Estate 1</td> <td>3° 48' 59.86" N</td> <td>102° 49' 5.57" E</td> </tr> <tr> <td>Hwa Li 1 Estate</td> <td>2° 44' 40.73" N</td> <td>103° 01' 59.41" E</td> </tr> <tr> <td>Carotino Estate</td> <td>2° 50' 43.25" N</td> <td>102° 43' 29.21" E</td> </tr> <tr> <td>Maran Estate</td> <td>3° 44' 31.28" N</td> <td>102° 50' 42.93" E</td> </tr> <tr> <td>Pahang Oil Palm Estate 1</td> <td>3° 48' 35.70" N</td> <td>102° 49' 15.59" E</td> </tr> </tbody> </table> <p>2. All FFB from the supply base estates was supported by the delivery documents and weighbridge tickets.</p>	Estate	Latitude	Longitude	Asia Oil Palm Estate 1	3° 48' 59.86" N	102° 49' 5.57" E	Hwa Li 1 Estate	2° 44' 40.73" N	103° 01' 59.41" E	Carotino Estate	2° 50' 43.25" N	102° 43' 29.21" E	Maran Estate	3° 44' 31.28" N	102° 50' 42.93" E	Pahang Oil Palm Estate 1	3° 48' 35.70" N	102° 49' 15.59" E	Complied
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		<p>3. Valid land title with ownership status (refer indicator 4.4.1)</p> <p>4. Valid MPOB licence</p> <table border="1" data-bbox="1182 459 1935 801"> <thead> <tr> <th>Estate</th> <th>MPOB Licence</th> </tr> </thead> <tbody> <tr> <td>Asia Oil Palm Estate 1</td> <td>501433902000</td> </tr> <tr> <td>Hwa Li 1 Estate</td> <td>501382102000</td> </tr> <tr> <td>Carotino Estate</td> <td>504216202000</td> </tr> <tr> <td>Maran Estate</td> <td>502407502000</td> </tr> <tr> <td>Pahang Oil Palm Estate 1</td> <td>501382102000</td> </tr> </tbody> </table>	Estate	MPOB Licence	Asia Oil Palm Estate 1	501433902000	Hwa Li 1 Estate	501382102000	Carotino Estate	504216202000	Maran Estate	502407502000	Pahang Oil Palm Estate 1	501382102000	
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2.3.2	<p>For all indirectly sourced FFB, the unit of certification obtains from the collection centres, agents or other intermediaries, the evidence as listed in Indicator 2.3.1.</p> <p>- Minor compliance -</p>	<p>Inspected and verified delivery records showed there is no indirect sourced FFB at Carotino POM.</p>	Complied												
<p>Principle 3: Optimise productivity, efficiency, positive impacts and resilience</p>															
<p>Criterion 3.1: There is an implemented management plan that aims to achieve long-term economic and financial viability.</p>															
3.1.1	<p>(C) A business or management plan (minimum three years) is documented that includes, where applicable, a jointly developed business case for Scheme Smallholders.</p> <p>- Critical (Major) compliance -</p>	<p>Carotino Certification Units has established long term sustainability and improvements through operational and capital expenditure program. Annual budget and management plan were documented with three years projection (FY 2023/24, 2024/25 and 2025/2026). Details in business plan were involved:</p> <ol style="list-style-type: none"> 1. Mature Upkeep and Cultivation 2. Mature Harvesting Collection 3. Total cost of Mature upkeep 4. Total Expenditure Before GC 5. General Charges 	Complied												

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		6. Total Expenditure before GC 7. Depreciation 8. Total Expenditure After Depreciation 9. Amortisation of oil palm trees 10. Total Expenditure The business plan for mill contains. 1. FFB Estimate 2. CPO Estimate 3. Kernel Estimate 4. % OER, % KER 5. Mill Expenditure 6. Mill Capital Expenditure Grand Total Expenditure																															
3.1.2	An annual replanting programme projected for a minimum of five years with yearly review, is available. - Minor compliance -	Estates visited have developed their annual replanting programme projected till the year 2026. The projection for the next 5 years is shown in the table below: <table border="1" data-bbox="1137 879 1926 1082"> <thead> <tr> <th>Estate</th> <th>2022</th> <th>2023</th> <th>2024</th> <th>2025</th> <th>2026</th> </tr> </thead> <tbody> <tr> <td>Hwa Li 1</td> <td>0.00</td> <td>0.00</td> <td>0.00</td> <td>156.98</td> <td>0.00</td> </tr> <tr> <td>Carotino</td> <td>175.26</td> <td>196.61</td> <td>210.88</td> <td>0.00</td> <td>0.00</td> </tr> <tr> <td>Pahang Oil Palm</td> <td>0.00</td> <td>0.00</td> <td>103.65</td> <td>73.87</td> <td>130.33</td> </tr> <tr> <td>Maran</td> <td>0.00</td> <td>0.00</td> <td>0.00</td> <td>0.00</td> <td>0.00</td> </tr> </tbody> </table>	Estate	2022	2023	2024	2025	2026	Hwa Li 1	0.00	0.00	0.00	156.98	0.00	Carotino	175.26	196.61	210.88	0.00	0.00	Pahang Oil Palm	0.00	0.00	103.65	73.87	130.33	Maran	0.00	0.00	0.00	0.00	0.00	Complied
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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 -	The Carotino Production Unit holds management review guided by Group Guideline for Internal Auditing and Management Review of the Sustainability and Supply Chain System; Doc Ref Number: T/001-04/2022; Doc Date: 01/12/2022. Management review meeting was conducted on centralized basis. Refer Minutes of Meeting dated 18/07/2022 conducted at Conference Room (Pahang Oil Palm Estate 1) The issue discussed were: 1. Discussion on the last MRM	Complied																														

		<ol style="list-style-type: none"> 2. Discussion of external audit findings 3. Briefing result of internal audit findings 4. Customer feedback 5. Process performance 6. Complaint and grievances 7. Proposed CAP on Non-Conformities reported 8. Time Bound Plan for CAP and NC Reported 9. Discussion on status of CAP and follow up 10. Any Changes that could affect management system 11. Improvement of the effectiveness of the management system Resources needed 	
<p>Criterion 3.2: The unit of Certification regularly monitors and reviews their economic, social and environmental performance and develops and implements action plans that allow demonstrable Continuous improvement in key operations.</p>			
<p>3.2.1</p>	<p>(C) The action plan for continuous improvement is implemented, based on consideration of the main social and environmental impacts and opportunities of the unit of certification.</p> <p>- Critical (Major) compliance -</p>	<p>The operating units has established continuous improvement plan base on social and environmental impacts identified. Among the plan established as follows:</p> <ol style="list-style-type: none"> 1. Environmental Estate <ol style="list-style-type: none"> a. Only provided 3 rounds of circle spraying and 1 round of selective spraying mainly to reduced and control of the usage of pesticides b. To maintain and upkeep barn owl boxes in order to maintain population of nature enemies for rats c. Continue upkeep and maintain od Cassia Cobenensis – increase caterpillars predators d. To plant more Guatemala grass and jungle trees along river riparian to reduce erosion and also as well as wildlife path corridor e. To reduce herbicide usage and prevent bare field ground by using rotoslasher to cut weeds in the field 	<p>Complied</p>

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		<p>Mill</p> <ul style="list-style-type: none"> a. Bunch ash from boiler were disposed through field application at sister estate b. EFB were disposed through field application at sister estate c. Roofing for Empty Bunch Hopper and leachate <p>2. Waste reduction</p> <ul style="list-style-type: none"> a. Continuous maintain and improving on waste segregation and 3R b. training will be provided to the garbage collector on Waste Segregation c. Disposed of the plastic herbicide containers after triple rinse through chemical supplier <p>3. Social impacts on communities workers and smallholders</p> <ul style="list-style-type: none"> a. To provide good working environment for staff and their family by arranging special events and social gathering b. Sundry building such as Surau, Shop, temple and others will be maintained in good condition by providing annual upkeep fund and upgrading c. Continue providing education aid to workers and staff 	
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.</p>	<p>RSPO metric template version 2.1 is used for the reporting of Carotino Palm Oil Mill certification unit’s metrics (economic, social and environment). Data reporting period is January to December 2022 for (social and environment metrics) and economic metrics from December 2021 – November 2022 (counting back 2 months from audit month). Based on verification with input data, no discrepancies of data reported for the said period for all metrics.</p>	Complied

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	<p>Until such metrics is agreed and developed, companies will carry on with existing reporting e.g. PalmGHG, Annual Communication of Progress (ACOP) reporting, and information provided to Certification Body and feedback via RSPO Secretariat is required.</p> <p>- Minor Compliance -</p>		
<p>Criterion 3.3: Operating procedures are Appropriately documented, consistently implemented and monitored.</p>			
3.3.1	<p>(C) Standard Operating Procedures (SOPs) for the unit of certification are in place.</p> <p>- Critical (Major) compliance -</p>	<p>Standard Operating Procedure (SOPs) has been established for Carotino Certification Units. Refer Procedure And Guidelines Register. Sample of SOPs as below:</p> <p>Estate</p> <ol style="list-style-type: none"> 1. Guidelines on naming and declaring maturity for replanted fields, A/012-02/2013 dated 11/06/2013 2. Guidelines on weeding regime and practices, B/004-02/2019 3. Justification for weedicides usage, B/009-04/2011 dated 13/09/2011 4. HCV Identification and Management Plan, C/015-04/2014 dated 05/09/2014 5. Code of GAP for Oil Palm Estates <p>Mill</p> <ol style="list-style-type: none"> 1. Safety Operation Procedure at Storage Tanks, P/001-01/2010 dated 12/12/2010 2. Standard Operating Procedure at Reception Station, Q/001-02/110 dated 05/03/2010 3. Standard Operation Procedure Supply Chain Calculation, SCC/10-05/2019-CPOM dated 01/07/2019 4. Standard Operation Procedure at Despatch CPO Station, CCP/08-07/2019 dated 15/07/2019 5. Mechanism for handling Non-Conforming FFB, CCP11-04/2019 dated 16/07/2019 	Complied
3.3.2	<p>A mechanism to check consistent implementation of procedures is in place.</p> <p>- Minor Compliance -</p>	<p>To ensure procedures are always followed the Mechanism to Check Consistent Implementation of SOP Doc Ref No. U/025-01/2015 Effective date 08/09/2015 is used.</p>	Complied

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		<p>At the assessed Operating Units of Estates and Mill, Supervision and routine checks was conducted by respective Supervisor Staff, Assistant Manager and Manager. For example, the Field/Mill Supervisor conduct on-site visit to check, Assistant Manager to confirm and Estate/Mill Manager to approve. Regional Controller Visit, Mill Controller Visit and Agronomist Visit reports was a sample of mechanism to check the consistency of the implementation of procedure. Refer Visit Report as per dated below: Hwa Li Estate 1 - 16/11/2022 Carotino Estate – 30/11/2022 Pahang Palm Oil Estate – 12-14/04/2021 Maran Estate – 20-23/09/2022 Carotino POM – 06/07/2020</p>	
3.3.3	<p>Records of monitoring and any actions taken are maintained and available. - Minor Compliance -</p>	<p>Operating units visited maintain all records of monitoring and were made available for review. The Mill Manager and Estate Managers are accountable to monitor the estates compliance towards the SOP, Budget and Productivity. Various checklists were available and being used by the estates and mill for operations, health and safety monitoring, workers' welfare and environmental issues.</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 stakeholders and including the impacts of any smallholder/out-grower scheme, is documented. - Critical (Major) compliance -</p>	<p>There is no new planting in any of the sampled estates nor is there new operations at the mill assessed. Nonetheless, the assessment of environmental impact of its existing activities and Management Plan is documented in the following documents. Refer Environmental and Social Improvement Plan dated 23/06/2022 with reference number N/009-02/2019. Main topics discussed as below: 1. Boundary Stone, Demarcation, maintenance and Mapping 2. HCV Assessment 3. Non-Renewable energy</p>	Complied

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		<ul style="list-style-type: none"> 4. Pollution 5. Waste 6. Soil 7. Water course and wetland <p>Refer Environmental and social Impact Assessment was done through SEIA conducted by Wild Asia where report dated 14/1/2009 was available for verification. Main topics discussed were:</p> <ul style="list-style-type: none"> 1. Ecological and Biodiversity 2. Air Pollution 3. Waste pollution 4. Water Pollution <p>There is no new operations and new planting for each operating units in Carotino Production Units. Social and environmental impact assessment has been conducted by Wild Asia Sdn Bhd on 14/01/2009 and has been documented in "Social & environmental impact assessment, scoping assessment for Carotino Palm Oil Mill (JC Chang Group) and associated supply bases. As stated in the report, the assessment conducted through 2 methodology which is stakeholders' analysis and social fact finding onsite. In additional information collection is through field observation, documentation, one to one interview.</p>	
3.4.2	<p>For the unit of certification, a SEIA is available and social and environmental management and monitoring plans have been developed with participation of affected stakeholders.</p> <p>- Minor Compliance -</p>	<p>The continuous implementation of the improvement activities was checked during the field visit and documents review. The environmental management plan has been established to monitor the identified significant activities that give impacts to the environment. Assistant Manager of each estate/mill has been appointed the task of monitoring to ensure the plan is effectively implemented.</p>	Complied

		<p>Management plan for social and environmental has been established with participation of affected parties and documented in the document title "Carotino Palm Oil Mill, environmental and social improvement plan" updated on 01/11/2021 and signed by POM manager, Mr Kenny Alvin Ligungjang. While for Pahang Oil Palm Estate 1, social management plan has been updated it has been updated on 22/11/2021 and for Maran Estate, updated on 02/12/2022.</p>	
<p>3.4.3</p>	<p>(C) The social and environmental management and monitoring plan is implemented, reviewed and updated regularly in a participatory way. - Critical (Major) compliance -</p>	<p>Refer Environmental and Social Improvement Plan dated 23/06/2022 with reference number N/009-02/2019. Management Action Plans was being implemented and reviewed done in a participatory way as evidenced from minutes of meetings, discussions, written feedbacks/responses from stakeholders. Each Management Action Plan has identified the Social and Environmental Aspects-Impacts, Action Plan undertaken (solution and method involved), Action Plan Review, Time frame, PIC and Further Action Required After Review.</p> <p>Sample of management plan and implementation as per below Carotino POM</p> <ul style="list-style-type: none"> a. To conduct stakeholders visits to local community to identify the need required by them- stakeholder consultation conducted on 28/11/2019 b. Foreign workers permit- to appoint PIC to monitor foreign workers permit, Madam Kauthaman <p>Maran and Pahang Oil Palm Estate 1</p> <ul style="list-style-type: none"> a. To conduct post arrival orientation for all newly workers until the workers is competence to do job. Based on the interview with newly recruited workers, there is evidence 	<p>Non-compliance</p>

		<p>that all newly recruited workers undergo post orientation and will paid on daily wages. The management for each operating units also persuades them to try new activities such harvesting and spraying to familiarize them with the estate operations.</p> <ul style="list-style-type: none"> b. Estate management will provide single bed with mattress and locker to all workers. It has been verified through site visit to line site and sighted that all rooms have two beds and two lockers c. To provide free electricity and water- For Pahang Oil Palm Estate 01, Water extracted from Sungai Berlayar and electric generated from Biogas Plant while for Maran Estate, water extracted from tube well and electric from genset from 430am to 0700am and 1700pm to 2300pm. As per verification, there is no deduction of salary for all workers for electric and water and it has been further confirmed through interview with the workers. d. To recruit hospital assistant for each assistant- vacancies has been posted at social media, 02/12/2022 <p>Hwa Li 1 Estate During site visit at oil trap for workshop, sighted that all 4 compartments of the oil trap were filled with oil and water emulsion. There is also evidence of the oil and water emulsion overflow from the oil trap contaminated adjacent soil. As per Environmental and Social Improvement Plan dated 29/06/2022 section Pollution (4) Lubricant & Greases (5) Diesel Spillage: Soil Contamination due to lubricant and grease spillage: Oil Trap to be built at storage area to trap the lubricant / greases before the water flow into the monsoon drain / Oil Trap to be build and maintain at appropriate interval to prevent oil spillage reach second compartment of the trap.</p>	
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		<p>Carotino Palm Oil Mill Social management plan for Carotino POM has been established and documented in "Carotino Palm Oil Mill, environmental and social improvement plan" updated on 01/11/2021 and signed by POM manager, Mr Kenny Alvin Ligungjang which stated that line site inspection need to be done on weekly basis. However, it has been verified that line site inspection has been conducted every 2 weeks latest has been done on 26/11/2022, 10/12/2022 and 24/12/2022. Thus, non-conformity were raised</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. - Minor Compliance -</p>	<p>Employment procedures for recruitment, selection, hiring, promotion, retirement and termination are documented in the document title "Guidelines on procedure of recruitment, selection, hiring, promotion, retirement and termination" dated 12/08/2019 document reference number E020-01/2019. Sighted memo from headquarters for J.C Chang dated 28/10/2022 and 05/12/2022 title "Guidelines on newly recruited migrant workers". Stated in the guidelines several steps that need to be taken by the operating units as per below</p> <ol style="list-style-type: none"> a. One (1) paid rest day for all newly arrived workers b. To conduct post orientation one day after arrival, wages paid to the workers as daily wages c. To ensure all new workers signed employment contract as per endorsed by embassy/consulate. One copy will be kept by workers/management d. Registration for SOCSO under Employment Injury Scheme e. To send new workers for FOMEMA within 7 days from arrival 	<p>Complied</p>

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		<p>f. To ensure workers housing is in good condition with necessity as mentioned in the guideline. The procedures and guidelines were available for review upon request.</p>	
<p>3.5.2</p>	<p>Employment procedures are implemented, and records are maintained. - Minor Compliance -</p>	<p><u>Pahang Oil Palm Estate 01</u> Sample of newly recruited workers recruited on 01/03/2022 as van driver. Sighted application form, records of interview and medical test results. As records, newly recruited worker has work experience as a driver previously and as medical check-up is fit to work.</p> <p><u>Maran Estate</u> Sample of newly recruited workers has been taken for foreign workers recruited on 17/11/2022 and one local worker recruited on 01/11/2022 Local workers that has been recruited as gatekeeper and sighted application form, medical checkup which mentioned fit to work and interview records. While for foreign workers, sighted the demand letter, orientation questionnaire form, passport consent and advance deduction consent form.</p> <p><u>Carotino POM</u> Sample of 2 workers has been taken that has been recruited on 01/10/2022 and 13/09/2022. As per stated in the SOP title "Guidelines on procedure of recruitment, selection, hiring, promotion, retirement and termination" dated 12/08/2019 document reference number E020-01/2019" that selection of new workers is subject to medical fitness and stated in the SIA management plan that new worker need to undergo medical screening on medical and physical fitness. However, there is no</p>	<p>Non-compliance</p>

		<p>medical and physical fitness screening has been conducted for both sample workers. Details as per below</p> <ul style="list-style-type: none"> a. Date joined: 13/09/2022, ID: G043X b. Date joined: 01/10/2022, ID G0442 <p>Thus, non-conformity were raised.</p>	
<p>Criterion 3.6: An occupational health and safety (H&S) plan is documented, effectively communicated and implemented.</p>			
<p>3.6.1</p>	<p>(C) All operations are risk assessed to identify H&S issues. Mitigation plans and procedures are documented and implemented.</p> <p>- Critical (Major) compliance -</p>	<p>JC Chang Group has established Occupational Safety and Health Policy signed by the Plantation Director on 03/01/2022. In the policy stated the commitment of the group to provide a harmonious, safe and healthy work environment for all workers.</p> <p>The policy has been communicated to the workers through induction training for new workers, morning briefing and displayed at various notice board within the mill and estate.</p> <p>JC Chang Group has established Guideline on Hazard Assessment, Prevention and Control (Risk Management and Mitigation Plan). Refer doc. ref. no. U029-01/2019 dated 15/08/20219. As per SOP, under section 6.0 Requirement for review stated that the reviewing is required if more than 3 years have lapsed since las assessment, whenever there are changes in process or activities or Directed by the Director General, Deputy Director General or the Director of Occupational Safety and Health.</p> <p>The operating units has conducted assessment for risk covers all main operations and support operations. Reviewed the risk assessment as follows:</p> <p><u>Carotino Palm Oil mill</u></p> <ol style="list-style-type: none"> 1. The mill has conducted Chemical Health Risk Assessment on 24/01/2018 by assessor with DOSH reg. no. HQ/09/ASS/00/102. Refer report no. HQ/09/ASS/00/102-2017/019. 	<p>Complied</p>

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		<ol style="list-style-type: none"> 2. The mill has conducted Baseline Noise Risk Assessment Report (Area) on 15 - 16/01/2020 and Baseline Noise Risk Assessment Report (Personal Monitoring) on 7/09/2020 by assessor with DOSH reg. no. HQ/15/PEB/00/146. Refer report no. NRA 200105 and NRA 200902. 3. The mill has established HIRARC register covering all main estate operation and support operation. FY 2022 review was conducted on 27 - 29/06/2022 for all operation and 01/11/2022 for accident cases occur in cleaning and maintenance of machineries operation on 18/10/2022. <p><u>Hwa Li 1 Estate</u></p> <ol style="list-style-type: none"> 1. The estate has established HIRARC register covering all main estate operation and support operation. Latest review was conducted on 25/05/2021. No review was conducted in 2022 as there is no accident cases occur and no changes in the estate operations. 2. The estate has conducted Baseline Noise Risk Assessment Report (Area) on 13/01/2020 and Baseline Noise Risk Assessment Report (Personal Monitoring) on 12/09/2020 by assessor with DOSH reg. no. HQ/15/PEB/00/146. Refer report no. PH/07/04/1508 and PH/07/04/1600. 3. The estate has conducted Chemical Health Risk Assessment (CHRA) on 08/12/2021 by assessor with reg. no. JKKP HQ/10/ASS/00/8. Refer report no. JKKP HQ/10/ASS/00/8 2021/118. <p><u>Carotino Estate</u></p> <ol style="list-style-type: none"> 1. The estate has conducted Chemical Health Risk Assessment (CHRA) on 08/12/2021 by assessor with reg. no. JKKP HQ/10/ASS/00/8. Refer report no. JKKP HQ/10/ASS/00/8 2021/119. 	
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		<ol style="list-style-type: none"> 2. The estate has conducted Baseline Noise Risk Assessment Report (Area) on 14/01/2020 and Baseline Noise Risk Assessment Report (Personal Monitoring) on 11/09/2020 by assessor with DOSH reg. no. HQ/15/PEB/00/146. Refer report no. PH/07/04/1508 and PH/07/04/1486. 3. The estate has established HIRARC register covering all main estate operation and support operation. FY 2022, review was conducted on 24/01/2022 and 06/07/2022. <p><u>Pahang Oil Palm Estate 1</u></p> <ol style="list-style-type: none"> 1. The estate has conducted Chemical Health Risk Assessment (CHRA) on 07/12/2021 by assessor with reg. no. JKPP HQ/10/ASS/00/8. Refer report no. JKPP HQ/10/ASS/00/8 2021/115. 2. The estate has conducted Baseline Noise Risk Assessment Report (Area) on 15/01/2020 and Baseline Noise Risk Assessment Report (Personal Monitoring) on 10/09/2020 by assessor with DOSH reg. no. HQ/15/PEB/00/146. Refer report no. NRA 200104 and NRA 200905. 3. The estate has established HIRARC register covering all main estate operation and support operation. FY 2022, review was conducted on 25/04/2022 due to accident occur in 23/04/2022 in harvesting operation. <p><u>Maran Estate</u></p> <ol style="list-style-type: none"> 1. The estate has conducted Baseline Noise Risk Assessment Report (Area) on 15/01/2020 and Baseline Noise Risk Assessment Report (Personal Monitoring) on 08/09/2020 by assessor with DOSH reg. no. HQ/15/PEB/00/146. Refer report no. NRA 200106 and NRA 200903. 	
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		<ol style="list-style-type: none"> 2. The estate has conducted Chemical Health Risk Assessment (CHRA) on 07/12/2021 by assessor with reg. no. JKPP HQ/10/ASS/00/8. Refer report no. JKPP HQ/10/ASS/00/8 2021/117. 3. The estate has established HIRARC register covering all main estate operation and support operation. Latest review was conducted on 10/07/2022. The review was conducted through meeting by the Safety and Health committee. No changes were made during the review as there is no changes in operation since last review. 	
3.6.2	<p>(C) The effectiveness of the H&S plan to address health and safety risks to people is monitored. - Critical (Major) compliance -</p>	<p>JC Chang Group has established Safety and Health (OSH) Plan and Improvement (Estate). Refer doc. ref. no. M/013-03/2015 dated 09/11/2015.</p> <p>The operating units has established and monitored Occupational Safety and Health Plan 2022. Reviewed the implementation of the management plan as follows:</p> <p><u>Carotino Palm oil Mil</u></p> <p>Reviewed the implementation of OSH Management Plan dated 01/07/2022 as follows:</p> <ol style="list-style-type: none"> 1. The mill has conducted latest Chemical Health Risk Assessment on 16/12/2022 by assessor with DOSH reg. no. JKPP HQ/10/ASS/00/8. 2. As per recommendation in CHRA report, the mill conducted medical surveillance on annually basis. Latest medical surveillance was conducted in May and June 2022. 5 workers were sent for surveillance and found fit to work in current job position. 	Complied

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		<ol style="list-style-type: none"> 3. The mill conducted LEV Examination on annually basis as per requirement. Latest examination was conducted on 19/12/2022 by assessor with DOSH reg. no. JKPP JIE – 127/171-2(129) 4. The mill updated the chemical register on annually basis. reviewed the latest chemical register dated 11/11/2022 5. The mill has placed 121 fire extinguisher at designated places at mill compound and housing area. The fire extinguisher monitoring was conducted on Monthly basis. Reviewed the monitoring records FY 2022. <p><u>Hwa Li 1 Estate</u> Reviewed the implementation of OSH Management Plan dated 23/06/2022 as follows:</p> <ol style="list-style-type: none"> 1. As per recommendation in CHRA report, the estate conducted Medical Surveillance on annually basis. Latest surveillance was conducted on 14/12/2022 by OHD with reg. no. HQ/08/DOV/00/545. 3 workers were sent for surveillance and found fit to work as chemical handlers. 2. As per recommendation in NRA report, the estate conducted Audiometric Test on annually basis. Latest test was conducted in June 2022 as per report ref no. 200-ArRAZIKTNMT(MKT.1/30) dated 08/09/2022 by OHD with reg. no. 4HQ/18/DOC/00/00223. 17 workers were send for test and 6 workers were found with STS. Notification to DOSH was conducted on 26/12/2022. 3. As per recommendation in NRA report, the estate conducted Re-Identification of Excessive Noise on yearly basis. Reviewed the latest re-identification conducted on 20/09/2022. 	
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		<p>4. The estate conducted workplace inspection on monthly basis for chemical store and diesel skid tank and quarterly basis for other works station. Reviewed the inspection record dated 23/09/2022 and 30/12/2022.</p> <p><u>Carotino Estate</u> Reviewed the implementation of OSH Management Plan dated 06/07/2022 as follows:</p> <ol style="list-style-type: none"> 1. The estate conducted workplace inspection on monthly basis for chemical store and diesel skid tank and quarterly basis for other works station. Reviewed the inspection record dated 05/12/2022, 03/09/2022, 07/06/2022 and 11/03/2022. 2. To ensure the estate vehicle and machinery works in good and safe condition, the estate conducted vehicle service and maintenance every month. Reviewed the records of vehicle maintenance and engine running records FY 2022 for vehicle registration no. VJG 7870 and VGM 9480. 3. As per recommendation in NRA report, the estate conducted Audiometric Test on annually basis. Latest test was conducted in June 2022 as per report ref no. 200-ArRAZIKTNMT(MKT.1/30) dated 13/06/2022 by OHD with reg. no. 4HQ/18/DOC/00/00223. 12 workers were send for test and 3 workers were found with STS. Notification to DOSH was conducted on 28/07/2022. 4. As per recommendation in NRA report, the estate conducted Re-Identification of Excessive Noise on yearly basis. Reviewed the latest re-identification conducted on 20/09/2022. 5. As per recommendation in CHRA report, the estate conducted Medical Surveillance on annually basis. Latest surveillance was conducted on 15 – 22/07/2022 by OHD with reg. no. 	
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		<p>HQ/08/DOV/00/545. Refer report no. 064/OHD/2022. 19 workers were sent for surveillance and found fit to work as chemical handlers.</p> <p>Pahang Oil Palm Estate 1</p> <p>Reviewed the implementation of OSH Management Plan dated 06/07/2022 as follows:</p> <ol style="list-style-type: none"> 1. As per recommendation in CHRA report, the estate conducted Medical Surveillance on annually basis. Latest surveillance was conducted on 15 – 21/10/2022 by OHD with reg. no. HQ/19/DOC/00/00350. 9 workers were sent for surveillance and found fit to work as chemical handlers. 2. The estate conducted workplace inspection on monthly basis by Safety and Health committee members. The results of inspection was discussed during safety and health committee meeting. Reviewed the inspections records dated 07/12/2022, 09/11/2022, 05/10/2022 and 07/09/2022 3. As per recommendation in NRA report, the estate conducted Audiometric Test on annually basis. Latest test was conducted in 12/04/2022 by OHD with reg. no. 4HQ/17/DOC/00/00068. 13 workers were send for test and 10 workers were found abnormal results. Retest were conducted on 12/07/2022 and 7 workers were found with STS. Notification to DOSH was conducted on 05/10/2022. 4. The estate has provided 14 first aid kit and placed and handled by trained first aider. The first aid kit monitoring was conducted on monthly basis by the Estate Hospital Assistant. Reviewed the monitoring records FY 2022. 	
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		<p><u>Maran Estate</u></p> <p>Reviewed the implementation of OSH Management Plan dated 01/01/2022 as follows:</p> <ol style="list-style-type: none"> 1. As per NRA recommendation, hearing conservation training was conducted on annually basis. reviewed the training records includes training attendances and training material and training evaluation for training conducted on 09/06/2022 2. As per CHRA recommendation, medical surveillance for workers involve in pesticides handling was conducted on annually basis. Latest surveillance was done ion 21/10/2022 by OHD with DOSH reg. no. HQ/19/DOC/00/00365. 6 workers were send for surveillance and fit to work as chemical handlers. 3. The estate conducted workplace inspection on monthly basis for shower room condition, diesel tank, chemical store and fire extinguisher and quarterly basis for other workstation. The results of inspection were discussed in the safety and health committee meeting. Reviewed the inspection records dated 02/12/2022, 02/11/2022, 04/10/2022 and 04/09/2022. 4. Annual audiometric test was conducted on 38/04/2022. 16 workers were send for test. 3 workers were fond with baseline hearing impairment. DOSH has been notified by submission of JKPP 7 form through MyKKP system on 20/06/2022. 	
<p>Criterion 3.7: All staff, workers, Scheme Smallholders, out-growers, and contract workers are appropriately trained.</p>			
<p>3.7.1</p>	<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>All operating units within Carotino Production Unit has established and documented a training plan base on training need analysis conducted on annual basis. Reviewed the Training Plan 2022 which covers all job designation including the contractors.</p>	<p>Complied</p>

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	- Critical (Major) compliance -	No scheme smallholders and out-growers within Carotino Production Unit.	
3.7.2	Records of training are maintained. - Minor Compliance -	<p>The operating units maintained the training records conducted. Reviewed the training records as follows:</p> <p><u>Carotino Palm Oil Mill</u></p> <ol style="list-style-type: none"> 1. First aid training dated 02/08/2022 2. Chemical and waste handling training dated dated 02/08/2022 3. PPE and chemical handling training dated 27/11/2022 4. SOP, PPE and chemical handling training at biogas plant training dated 04/10/2022 5. SOP for Biogas Engine Room training dated 24/09/2022 6. SOP for Boiler Room training dated 27/09/2022 7. Hearing conservation training dated 17/11/2022 8. Firefighting, fire extinguisher usage and fire drill training dated 08/01/2022 and 01/01/2023 9. Scheduled waste handling training dated 23/12/2022 10. SOP for Kernel Plant training dated 17/11/2022 <p><u>Hwa Li 1 Estate</u></p> <ol style="list-style-type: none"> 1. Emergency Response Plan training dated 23/12/2022, 06/12/2022 and 18/11/2022 2. Safety work procedure and PPE awareness for fertiliser application by manual and mechanical training dated 23/12/2022 3. Safety work procedure and PPE awareness for tractor driver training dated 07/12/2022, 21/11/2022 4. Safety work procedure and PPE awareness for harvesting FFB training dated 07/12/2022, 21/11/2022 5. Company policy briefing dated 06/12/2022, 18/11/2022 	Complied

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		<ol style="list-style-type: none"> 6. Awareness on HCV, open burning, recycle of waste, and save energy and water training dated 06/12/2022, 18/11/2022 7. First aid training dated 02/12/2022 8. Safety work procedure and PPE awareness for sprayers (mechanization) training dated 21/11/2022 9. Safety work procedure and PPE awareness for workshop operator training dated 15/11/2022 10. Safety work procedure and PPE awareness for genset and water pump operator dated 12/10/2022 <p><u>Carotino Estate</u></p> <ol style="list-style-type: none"> 1. Safety work procedure for harvesting and traceability system training dated 21/03/2022 2. Safety work procedure for mechanical fertiliser application training dated 12/04/2022 3. Safety work procedure for rt baiting training dated 20/05/2022 4. First aid training dated 27/05/2022 5. Safety work procedure for mechanise chemical spray, GEO ST training dated 21/06/2022 6. Oil pollution management training dated 27/06/2022 7. Hearing conservation training dated 15/07/2022 8. Genset operator training dated 18/07/2022 9. Firefighting and emergency response plan training dated 18/07/2022 10. HCV and environmental protection training dated 25/07/2022 <p><u>Pahang Oil Palm Estate 1</u></p> <ol style="list-style-type: none"> 1. Loose fruit picker training dated 17/12/2022 	
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		<ol style="list-style-type: none"> 2. Lubricant handling and containment training dated 18/11/2022 3. First Aid training dated 22/07/2022 4. Firefighting training dated 03/08/2022 5. PPE awareness training dated 20/10/2022 6. SOP for manuring training7 dated 15/10/2022 7. SOP for workshop training dated 19/09/2022 8. Environmental awareness and environmental policy training dated 17/12/2022 9. HCV awareness training dated 17/12/2022 10. After spraying r-entry period training dated 12/12/2022 11. Chemical mixing, triple rinsing and surplus and spraying training dated 12/12/2022 12. Chemical labelling and calibration training dated 12/12/2022 <p><u>Maran Estate</u></p> <ol style="list-style-type: none"> 1. Emergency case handling and first aid box training dated 15/12/2022 and 19/04/2022 2. Oil trap handling and maintenance and scheduled waste training dated 13/12/2022 3. Fire drill and firefighting training dated 25/11/2022 4. Firefighting training dated 29/11/2022 5. Safety work procedure for FFB harvesting, pruning, FFB quality, traceability and awareness training dated 21/11/2022, 18/10/2022 and 12/09/2022 6. SOP for tractor driver, machineries and workshop training dated 21/11/2022 and 09/11/2022 7. Safety work procedure for rat baiting and IPM awareness training dated 01/11/2022 8. Safety work procedure, PPE and chemical handling for store keeper training dated 19/09/2022 	
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		<p>9. Emergency response training dated 08/06/2022</p> <p>10. Safety work procedure for sprayers and triple rinsing training dated 21/04/2022</p>	
3.7.3	<p>Appropriate training is provided for personnel carrying out the tasks critical to the effective implementation of the Supply Chain Certification Standard (SCCS). Training is specific and relevant to the task(s) performed.</p> <p>- Minor Compliance -</p>	<p>The mill conducted training for identified personnel involve in RSPO supply Chain Certification Standard as per Critical Control Point. Reviewed the sampled training attendance, training material and training evaluations as follows: CCP Standard Operation Procedure at Biogas training dated 15/11/2022</p>	Complied
<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 without physically separating them, then only Mass Balance Module is applicable.</p>	<p>Carotino POM only receives certified FFB. Therefore, qualifies for the Identity Preserved supply chain system and module. During the P&C assessment, the audit team verified the volumes and sources of certified FFB entering the mill, the implementation of processing controls and volume sales of RSPO certified products.</p>	Complied
3.8.2	<p>Mass Balance Module</p> <p>A mill is deemed to be Mass Balance (MB) if the mill process FFB from both RSPO certified and uncertified plantations/estates. A mill may be taking delivery of FFB from uncertified growers, in addition to those from its own and 3rd party certified supply base. In that scenario, the mill can claim only the volume of oil palm products produced from processing of the certified FFB as MB.</p>	<p>Not applicable as Carotino POM opted for IP model.</p>	Not Applicable

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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 (see Table 10).	Complied
3.8.4	The mill shall also meet all registration and reporting requirements for the appropriate supply chain through the RSPO IT platform.	The parent company (JC Chang Group) is the member of RSPO. Membership No.: 2-0029-06-000-00 since 5/3/2010. Palmtree member ID: RSPO_PO1000000128 (Carotino Sdn Bhd).	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> <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>	<p>a) Mill has been established documented procedures on supply chain. List of SOP as below:</p> <ul style="list-style-type: none"> • CCP/01-05/2019 (SOP at Reception Station) dated 15/07/2019. • CCP/08-07/2019 (SOP at dispatch CPO & PK), dated 15/07/2019. • SCC/10-05/2019-CPOM (SOP for RSPO SCC standard products calculation, dated 01/07/2019) • Mechanism for Handling Non-Conforming FFB, CCP11-04/2019 dated 16/07/2019 • SOP for reporting and documentation, CCP/12-43/2018. dated 10/07/2019. <p>b) Training for supply chain has been conducted for each work station that related to receiving and despatching products. Training for weighbridge station has been done on 29/04/2022 by Mr Kenny Alvin Ligungjang.</p>	Complied

		<p>c) Identification of the role of the PIC for supply chain has been done and sighted in the appointment letter to Mr Kenny Alvin Ligungjang dated 07/07/2014.</p> <p>d) Refer (a)</p>	
3.8.6	<p>Internal Audit</p> <p>i) The mill shall have a written procedure to conduct annual internal audit to determine whether the mill:</p> <p>a. Conforms to the requirements in the RSPO Supply Chain Certification Standard and the RSPO Market Communications and Claims Documents.</p> <p>b. Effectively implements and maintains the standard requirements within its organisation.</p> <p>ii) Any non-conformities found as part of the internal audit shall be issued corrective action. The outcomes of the internal audits and all actions taken to correct non-conformities shall be subject to management review at least annually. The mill shall maintain the internal audit records and reports.</p>	<p>The internal audit conducted was in accordance with the Internal Audit written procedure. Refer Group Guideline for Internal Auditing and Management Review of the Sustainability and Supply Chain System; Doc Ref Number: T/001-04/2022; Doc Date: 01/12/2022</p> <p>Internal audit has been done on 20-22/07/2022 by Mrs. Hasirah Tahir and Ms. Kavitha A/P Muniaddy which cover all requirement in the RSPO. There is 1 nonconformity has been raised for supply chain during the audit. The Root Cause Study and Corrective Action Planned by Carotino POM has been documented.</p>	Complied
3.8.7	<p>Purchasing and Goods In</p> <p>i) The mill shall verify and document the tonnage and sources of certified and the tonnage of non-certified FFBs received.</p> <p>ii) The mill shall inform the CB immediately if there is a projected overproduction of certified tonnage.</p> <p>iii) The mill shall have a mechanism in place for handling non-conforming FFB and/or documents.</p>	<p>Carotino POM only received FFB from own supply bases (Asia Oil Palm Estate, Hwa Li 1 Estate, Carotino Estate, Pahang Oil Palm Estate 1, Maran Estate). When FFB delivered to the mill from the estate, the transporters presented FFB despatch report to the mill weighbridge clerk in order the FFB to be received by the mill. Sample of weighbridge ticket as below:</p> <p><u>Sample 1</u></p> <ol style="list-style-type: none"> 1. FFB despatch no. – 60163 2. Estate's names – Pahang Oil Palm Estate 1 3. Date of delivery – 21/11/2022 4. Field No. – PM 02A 09 5. Lorry No – BJS2677 	Complied

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		<p>6. Weight – 2.31 MT 7. WB ticket: FFB22003946W 8. Traceability Identification - RSPO certified FFB (RSPO 649410) <u>Sample 2</u> 1. FFB despatch no. – FFB22004402W 2. Estate’s names – Carotino Estate 3. Date of delivery – 26/11/2022 4. Field No. – PM 17A, PM18A, PM91A and PM90A 5. Lorry No – JUV6808 6. Weight – 32.72 MT 7. WB ticket: FFB22010340W 8. Traceability Identification - RSPO certified FFB (RSPO 649410) The mill management are ware that they are to inform the CB if there are any overproduction of certified tonnage. It was verified that there was no overproduction in certified tonnage recorded in the mill. Mechanism for handling non-conforming FFB and/or documents were documented in Mechanism for Handling Non-Conforming FFB, CCP11- 04/2019 dated 16/07/2019</p>	
3.8.8	<p>Sales and Goods Out</p> <p>The supplying mill shall ensure that the following minimum information for RSPO certified products is made available in document form. The information shall be complete and can be presented either on a single document or across a range of documents issued for RSPO certified oil palm products (for example, delivery notes, shipping documents and specification documentation):</p> <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; 	<p>Carotino POM ensured the required information is available in document form. Sampled of CPO despatch – Transporter Pritam Agency Sdn Bhd</p> <ul style="list-style-type: none"> a) The name and address of the buyer: XXX b) The name and address of the seller: Carotino POM c) The delivery date: 01/11/2022 d) The date on which the documents were issued: 01/11/2022 e) RSPO Certificate Number: RSPO 649410 f) A description of the product, including the applicable supply chain model: CSPO/IP g) The quantity of the products delivered: 38.69 MT h) Any related transport documentation: NDA6880 / TN9582 	Complied

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	<ul style="list-style-type: none"> 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. 	<ul style="list-style-type: none"> i) A unique identification number: Weighbridge Ticket Number: CPO22000440W Sampled of PK despatch – Transporter Eng Lee Sing Sdn Bhd a) The name and address of the buyer: XXX b) The name and address of the seller: Carotino POM c) The delivery date: 11/08/2022 d) The date on which the documents were issued: 11/08/2022 e) RSPO Certificate Number: RSPO 649410 f) A description of the product, including the applicable supply chain model: CSPK/IP g) The quantity of the products delivered: 38.59 MT h) Any related transport documentation: JUS8078 A unique identification number: Weighbridge Ticket Number: PK22000076W 	
3.8.9	<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. 	<p>No CPO and PK process, bulking facilities outsourced by the mill. Outsourcing activities in Carotino POM only involves transportation of products for CSPO and CSPK, subjected to the buyers' contractual requirements. For CPO, contract agreement with a few contractors as per below:</p> <ol style="list-style-type: none"> 1. Pritam Singh Agency Sdn Bhd dated 01/01/2022, Type of work: CPO Transporter, Valid until 30/12/2024 2. Eng Lee Sing Sdn Bhd dated 19/05/2021, Type of work: PK Tranporter, Valid until 30/06/2024 <p>Mostly delivered contracts involved CSPO and CSPK. Implementation for Outsourcing activities was based on the System Management & Documentation CCP14 Outsourcing Activities; Version 2 (CCP/14-02/2019) Document Date: 13/09/2019.</p> <ul style="list-style-type: none"> a) The Procedure System Management & Documentation; CCP14 Outsourcing Activities; Version 2 (CCP/14-02/2019) Document Date: 13/09/2019 states that the site has legal ownership of all input materials to be included in outsourced processes 	Complied

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	<p>c) The mill has a documented control system with explicit procedures for the outsourced process which is communicated to the relevant contractor.</p> <p>d) The mill shall furthermore ensure (e.g. through contractual arrangements) that independent third parties engaged provide relevant access for duly accredited CBs to their respective operations, systems, and all information, when this is announced in advance.</p>	<p>b) The mill has established a Transportation Agreement with the outsourced transporter as per sample above.</p> <p>c) There is an additional clause addendum dated 27/12/2019 stating that the transport shall at all times reserve the right of the CB to audit the outsourced contractor under SCCS (RSPO) and Requirement. The Procedure System Management & Documentation; CCP14 Outsourcing Activities; Version 2 (CCP/14-02/2019) Document Date: 13/09/2019 has been communicated internally and to the transporter on 01/01/2020.</p> <p>d) Stated in the agreement on clause related Carotino POM shall furthermore ensure (e.g. through contractual arrangements) that independent third parties engaged provide relevant access for duly accredited CBs to their respective operations, systems, and all information, when this is announced in advance.</p>	
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.	There are 3 transporters has been recorded in the stakeholders list for Carotino POM. Refer Stakeholder List 2022/2023. There are no additional contractors assigned to handle RSPO certified products since last audits.	Complied
3.8.11	The mill shall inform its CB in advance prior to conduct of its next audit of the names and contact details of any new contractor used for the physical handling of RSPO certified oil palm products.	No change of names and contract details of transporter for the physical handling of RSPO certified oil palm products. The mill was aware that the CB are to be informed if there are any changes of updates.	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</p>	<p>Carotino Palm Oil Mill adopted the JC Chang Group of Standard Operation procedure for Reporting and Documentation for record keeping. Refer document no. CP/12-04/2019 dated 10/07/2019. In the SOP under section 3. Records Keeping stated as follows:</p> <p>“The company must keep all relevant records and documents for the period of seven years.”</p>	Complied

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	<p>requirements and be able to confirm the certified status of raw materials or products held in stock.</p> <p>iii) For Identity Preserved Module, the mill shall record and balance all receipts of RSPO certified FFB and deliveries of RSPO certified CPO and PK on a real-time basis.</p> <p>iv) For Mass Balance Module, the mill:</p> <p>a) Shall record and balance all receipts of RSPO certified FFB and deliveries of RSPO certified CPO and PK on a real-time basis and / or three-monthly basis.</p> <p>b) All volumes of certified CPO and PK that are delivered are deducted from the material accounting system according to conversion ratios stated by RSPO.</p> <p>c) The mill can only deliver Mass Balance sales from a positive stock. Positive stock can include product ordered for delivery within three (3) months. However, a mill is allowed to sell short (i.e. product can be sold before it is in stock).</p>	<p>The mill maintained the records of all related documents to RSPO SCCS. Reviewed the sample documents as follows:</p> <ol style="list-style-type: none"> 1. Mass Balance Sheet for the period July 2020 – June 2021 and July 2021 – June 2022 2. Real time basis mass balance records and handling non-sustainable CPO/PK training dated 21/01/2020 <p>The mill record and balance all receipts of RSPO certified FFB and deliveries of RSPO certified CPO and PK on a real-time basis. Reviewed the summary mass balance for CPO and PK 2021/2022 and 2022/2023 for the period of January 2022 – December 2022 found that the sales of certified CPO and certified PK were always delivered from positive stock. Sampled as follows:</p> <table border="1" data-bbox="1151 783 1845 1319"> <thead> <tr> <th></th> <th></th> <th>CPO</th> <th>PK</th> </tr> </thead> <tbody> <tr> <td rowspan="2">Jan 2022</td> <td>Opening stock</td> <td>1323.30</td> <td>192.32</td> </tr> <tr> <td>Closing Stock</td> <td>867.79</td> <td>152.86</td> </tr> <tr> <td rowspan="2">Feb 2022</td> <td>Opening stock</td> <td>867.79</td> <td>152.86</td> </tr> <tr> <td>Closing Stock</td> <td>475.21</td> <td>138.19</td> </tr> <tr> <td rowspan="2">Mar 2022</td> <td>Opening stock</td> <td>475.21</td> <td>138.19</td> </tr> <tr> <td>Closing Stock</td> <td>775.98</td> <td>101.65</td> </tr> </tbody> </table>			CPO	PK	Jan 2022	Opening stock	1323.30	192.32	Closing Stock	867.79	152.86	Feb 2022	Opening stock	867.79	152.86	Closing Stock	475.21	138.19	Mar 2022	Opening stock	475.21	138.19	Closing Stock	775.98	101.65	
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3.8.13	<p>Extraction Rate The oil extraction rate (OER) and the kernel extraction rate (KER) shall be applied to provide a reliable estimate of the amount of certified CPO and PK from the associated inputs. Mill shall determine and set their own extraction rates based upon past experience, documented and applied it consistently.</p>	<p>Conversion factor of CPO and PK production is depending on the actual OER and KER. The conversion factors were reported daily in the Daily Production Report. Reviewed the daily production report as follows:</p> <table border="1"> <thead> <tr> <th>Date</th> <th>OER</th> <th>KER</th> </tr> </thead> <tbody> <tr> <td>31/10/2022</td> <td>18.21</td> <td>4.30</td> </tr> <tr> <td>30/11/2022</td> <td>18.82</td> <td>4.34</td> </tr> <tr> <td>31/12/2022</td> <td>18.16</td> <td>4.58</td> </tr> </tbody> </table>	Date	OER	KER	31/10/2022	18.21	4.30	30/11/2022	18.82	4.34	31/12/2022	18.16	4.58	Complied									
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31/12/2022	18.16	4.58																						
3.8.14	<p>Extraction rates shall be updated periodically to ensure accuracy against actual performance or industry average if appropriate.</p>	<p>The facility is using the actual extraction rate and therefore updating of rates is not necessary.</p>	Complied																					
3.8.15	<p>Processing For Identity Preserved Module, the mill shall assure and verify through documented procedures and record keeping that the RSPO certified oil</p>	<p>As per Standard Operation Procedure for RSPO SCC Standard Products Calculation, refer doc. no. MBC/10-04/2018-CPOM dated 06/12/2018 under section 1. Function stated as follows:</p>	Complied																					

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	<p>palm product is kept separated from non-certified oil palm products, including during transport and storage to strive for 100% separation.</p>	<p>"A mill deemed to be Identity Preserved (IP) if the FFB used by the mill are sourced from the plantation/ estates are certified against the RSPO Principle and Criteria."</p> <p>Identity Preserved has explained the processing of RSPO material to prohibit non-certified products processed. The mill is 100% received certified FFB from own certified supplying estate and produced 100% certified products. There are no non-certified materials will be received and processed as verified through summary mass balance 2021/2022 (CPO & PK)</p>	
<p>3.8.16</p>	<p>Registration of Transactions</p> <p>i) Shipping Announcement in the RSPO IT platform shall be carried out by the mills when RSPO certified products are sold as certified to refineries, crushers, and traders not more than three months after dispatch with the dispatch date being the Bill of Lading or the dispatch documentation date.</p> <p>ii) Remove: RSPO certified volumes sold under different scheme or as conventional, or in case of underproduction, loss or damage shall be removed in the RSPO IT platform.</p>	<p>Shipping announcement in the RSPO IT platform carried out by the Trading Department when RSPO certified products are sold as certified to refineries. Details of transaction summarized under table 10 and 10A.</p> <p>Sampled the shipping announcement as below:</p> <p>CSPK</p> <ol style="list-style-type: none"> 1. Transaction Date: 01/11/2022 Transaction ID: TR-41a9bbbe-1c7e Tonnage: 40.06 MT 2. Transaction Date: 06/12/2022 Transaction ID: TR-6785eb8d-6a28 Tonnage: 40.28 MT <p>CSPK</p> <ol style="list-style-type: none"> 1. Transaction Date: 13/12/2022 Transaction ID: TR-6c847cc7-7216 Tonnage: 38.91 MT 	<p>Complied</p>
<p>3.8.17</p>	<p>Claims</p> <p>The mill shall only make claims regarding the production of RSPO certified oil that are in compliance with the RSPO Rules on Market Communications and Claims.</p>	<p>RSPO trademark was not use. Nonetheless, the facility is aware with the requirements of the RSPO Rules on Market Communications and Claims.</p>	<p>Complied</p>

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.	No off-product claim made by Carotino Palm Oil Mill and verified through document and site review (notice board, business card, shipping documentation, procurement/ purchasing document and promotional material etc). Check in the company website; http://www.carotino.com/ , no RSPO trademark used so far.	Complied
4.2	In corporate communications a member is allowed to: a. Display its RSPO membership status b. Display the RSPO web address (www.rspo.org) 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.	Not applicable as no off-product claim made by Carotino Palm Oil Mill as to date.	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.	Not applicable as no off-product claim made by Carotino Palm Oil Mill as to date.	Not Applicable
4.4	Members must ensure that all communication is consistent, clear and cannot mislead consumers or other stakeholders as to the certified content of oil palm products in the member's own products.	Not applicable as no off-product claim made by Carotino Palm Oil Mill as to date.	Not Applicable
4.5	Members are not allowed to use the RSPO corporate logo as shown in the RSPO Rules on Market Communications & Claims document. This is for the sole use of the RSPO secretariat.	No evidence of RSPO corporate logo used by Carotino Palm Oil Mill and verified through document and site review (notice board, business card, shipping documentation, procurement/ purchasing document and promotional material etc.)	Complied
Business to business communications			

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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 was demonstrated via shipping documentation and invoices 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.	As per interview with weighbridge operator, she said that the weighbridge ticket will be stated the info i.e: product/commodity with SCC model (Crude Palm Oil RSPO IP) and will stamp the RSPO certificate number. Verified the documents found that the supply chain model and certificate number were stated on the ticket.	Complied
5.3	<p>Where a distributor or wholesaler takes title to products containing certified sustainable oil palm products, the requirements of the RSPO SCCS can follow either of two options:</p> <p>a. If the distributor or wholesaler holds only a Distributor license, it may only communicate RSPO-certified oil palm products by linking the product to the manufacturer using the manufacturer’s SCCS certificate number. This covers both brand and own brand products. However, in the case of own brand products it is essential that customers are aware that the product has been made on behalf of the distributor or wholesaler, with specific evidence either through on-pack claims or documentation.</p> <p>b. If the distributor or wholesaler is supply chain-certified they should follow the requirements outlined in section 5.2.</p>	Carotino POM was not under distributor or wholesaler category. Thus, this requirement is not applicable.	Not Applicable
MODULE A – IDENTITY PRESERVED & SEGREGATED SPECIFIC RULES			
Certified oil palm content (IP)			
	For IP, 95% or above of the oil palm content must be RSPO IP-certified.	No business to consumer communication on product specific claim made Carotino Palm Oil Mill and only producing crude and unfinished product. This is not applicable for Palm Oil Mill.	Not Applicable

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	For SG, 95% or above of the oil palm content must be SG, or a combination of SG and IP.	No business to consumer communication on product specific claim made Carotino Palm Oil Mill and only producing crude and unfinished product. This is not applicable for Palm Oil Mill.	Not Applicable
	Where there is any percentage of non-certified oil palm within the product, the reason for this must be fully justified and an action plan for moving to fully certified oil palm must be in place, in accordance with the requirements of the RSPO SCCS. In addition, the volume of non-certified oil palm products must be covered by the purchase of RSPO Credits of equivalent volume.	No business to consumer communication on product specific claim made Carotino Palm Oil Mill and only producing crude and unfinished product. This is not applicable for Palm Oil Mill.	Not Applicable
Labelling and trademark (IP)			
	<p>Members are allowed to use the RSPO label in one of the following ways:</p> <ul style="list-style-type: none"> • RSPO trademark which includes the tag 'CERTIFIED' or • RSPO trademark which includes the tag 'This product contains certified sustainable palm oil'. Wherever a RSPO trademark is displayed, the applicable trademark license number must be shown immediately under or next to the trademark or the 'statement'. Font must be Calibri, font size must be at least 4pt (1.4 mm or 0.06 inch). In on-pack communications, the RSPO trademark can be printed anywhere on the pack. 	No business to consumer communication on product specific claim made Carotino Palm Oil Mill and only producing crude and unfinished product. This is not applicable for Palm Oil Mill.	Not Applicable
Messaging (IP)			
	<p>Messaging ALLOWED in storytelling in product-related communications may include some or all of the following elements:</p> <ul style="list-style-type: none"> • The oil palm products contained in this product have been certified to come from RSPO sources. www.rspo.org • By choosing this product, you are sure it contains RSPO-certified palm oil. For more information: www.rspo.org 	No business to consumer communication on product specific claim made Carotino Palm Oil Mill and only producing crude and unfinished product. This is not applicable for Palm Oil Mill.	Not Applicable

	<ul style="list-style-type: none"> • RSPO-certified sustainable oil palm products were kept apart from other oil palm products throughout the supply chain. www.rspo.org • Certified sustainable oil palm products can be traced back to RSPO-certified mills and plantations. www.rspo.org • The entire supply chain is monitored by independent, RSPO-accredited auditors. www.rspo.org • RSPO-certified sustainable palm oil has been produced to stringent environmental and social criteria. www.rspo.org • References to (or images of) particular RSPO-certified production units, if the relationship to those units can be shown by company records. 		
<p>Principle 4: Respect community and human rights and deliver benefits</p>			
<p>Criterion 4.1: The unit of Certification respects human rights, which includes respecting the rights of Human Rights Defenders.</p>			
<p>4.1.1</p>	<p>(C) A policy to respect human rights, including prohibiting retaliation against Human Rights Defenders (HRD), is documented and communicated to all levels of the workforce, operations, FFB suppliers and local communities and prohibits intimidation and harassment by the unit of certification and contracted services, including contracted security forces.</p> <p>- Critical (Major) compliance -</p>	<p>Carotino/JC Chang Group has established the Social & Human Rights Policy; Date: 14/11/2019; Signed by Mr Tee Swee Kee dated 14/11/2019. Stated in the policy that the management is committed to</p> <ol style="list-style-type: none"> Respect the rights to associate and free to join union Respect the rights to live with life free of discrimination Respect the rights to freely exercise of religion and practice belief Respect the rights to be free from prejudice on the basis of race, gender, national origin, color or age Respect and protect the reproductive rights. <p>It also has been stated in the document title "SOP on mechanism for complaints and grievances" dated 12/08/2019 document reference number E-001-07/2019 stated that the management should ensure that the identity complainants, human right</p>	<p>Complied</p>

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		defenders, community spokespersons and whistleblower would not be revealed unless it legally impossible to do it. Communication of the policy has been done during the morning muster call. For Carotino Estate, training has been done on 14/07/2022. While for Carotino POM, briefing on the policy has been done on 01/12/2022	
4.1.2	The unit of certification does not instigate violence or use any form of harassment in their operations. - Minor compliance -	JC Chang prohibits any form of harassment in their operation as per the policy above. Interviewed with the workers confirmed that no harassment by the management.	Complied
Criterion 4.2: There is a mutually agreed and documented system for dealing with complaints and grievances, which is implemented and accepted by all affected parties			
4.2.1	(C) The mutually agreed system, open to all affected parties, resolves disputes in an effective, timely and appropriate manner, ensuring anonymity of complainants, HRD, community spokespersons and whistleblowers, where requested, without risk of reprisal or intimidation and follows the RSPO policy on respect for HRD. - Critical (Major) compliance -	The system was based on SOP Mechanism for Complaints and Grievances; Doc. Ref. No.: E/001-07/2019; Doc. date: 12/08/2019 which found effective, timely, appropriate and open to any affected parties. The complaint and grievances is open to affected parties including internal and external stakeholders. The management should ensure the identity of complainants, human right defender, community spokespersons and whistleblowers would not be revealed unless it is legally impossible to do so or with his/her consent and permission. The complainants, human right defender, community spokepersons and whistleblowers will be treated fairly and given whatever protection is possible, without risk of reprisal or intimidation.	Complied
4.2.2	Procedures are in place to ensure that the system is understood by the affected parties, including by illiterate parties. - Minor compliance -	Carotino Estate a) Communication of the procedure to the workers conducted during the morning muster call on 08/07/2022 b) Communication of the procedure to the stakeholders through due diligence form that has been provided to all stakeholders documented "Sustainability compliances	Complied

		<p>contract with operating units under J.C Chang Group". Sample has been taken a per below</p> <ol style="list-style-type: none"> 1. Kampung Jeram Panjang dated 20/07/2022 2. Kampung Pasa, 27/11/2019 3. Ladang Pertanian, 27/11/2019 <p>Carotino POM</p> <p>b) Communication of the procedure has been done to all stakeholders through email that has been sent to all stakeholders and sighted evidence of respond by the stakeholders itself. Sample has been taken stakeholders as per below</p> <ol style="list-style-type: none"> 5. FGVPI Makmal Analisa Bukit Goh dated 31/01/2021 6. Klinik Kuantan, 05/01/2022 7. Tanner Industrial and Technologies, 31/12/2021 8. MPOB Wilayah Timur, 30/12/2021 <p>c) Communication of the procedure to the workers conducted during the morning muster call on 01/12/2022</p> <p>Pahang Oil Palm Estate 1 Communication of the procedure has been done latest on 19/10/2022 during the morning muster call. While for stakeholders it has been explained through visit to each stakeholder, sample has been taken for Cermat Aman Sdn Bhd on 03/01/2023 and Alur Seri Estate, LKPP on 04/01/2022.</p> <p>Maran Estate Communication of the procedure has been done on 17/10/2022 17/11/2022 for all workers. While for stakeholders it has been explained through visit to each stakeholder, sample has been taken</p>	
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		for Sri Jaya Hardware & Timber Trading on 26/10/2022 and Kedai Loong Hing on 01/11/2022. As per interview with workers and stakeholders, there is evidence that communication of the procedure has been done and all workers and stakeholders that has been interviewed can demonstrate their understanding on the procedure. There is no illiterate workers/stakeholders has been identified in each operating units.	
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 -	Records of complaint have been maintained in log book title "Buku Aduan" and has been maintained since 2019 for each operating units. Verification done and found out that that the major complaint is on replacement for harvesting equipment and damage at workers housing. There is evidence that all complaints has been responded immediately after the complaint received. It has been confirmed through interview with the workers itself.	Complied
4.2.4	The conflict resolution mechanism includes the option of access to independent legal and technical advice, the ability for complainants to choose individuals or groups to support them and/or act as observers, as well as the option of a third-party mediator. - Minor compliance -	The complaint and grievance resolution has 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.	Complied
Criterion 4.3: The unit of Certification contributes to local sustainable development as agreed by local communities.			
4.3.1	Contributions to community development that are based on the results of consultation with local communities are demonstrated. - Minor compliance -	Consultation with local communities has been conducted for all operating units through email and memo which has been sent to all stakeholders and queries if there any contribution required. However, there is no contribution required at the time of consultation. It has been confirmed through interview with stakeholders, that contribution is upon request and stakeholders able to demonstrate the consultation and communication procedure Summary list of donations sighted and details as per below	Complied

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		<ul style="list-style-type: none"> a. Donation for organizing breaking fast ceremony in conjunction of Eid Fitri b. Donation to ex-army officer for Eid Fitri celebrations c. Donation for road construction to J.K.K.K Sri Jaya Pahang d. Donations to SJK (C) Pei Min Sri Jaya for school activities e. Charity donation to "Majlis Sukan Kebajikan dan Kebudayaan Jabatan Bomba dan Penyelamat" 																	
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>Hwa Li 1 Estate Total 13 land titles for Hwa Li 1 Estate with total 2,157.40Ha which all converted from jungle and leased for 99 years</p> <table border="1" data-bbox="1137 801 1928 986"> <thead> <tr> <th>Land title</th> <th>District</th> <th>Land use</th> <th>hectare</th> </tr> </thead> <tbody> <tr> <td>HS (D) 1450</td> <td>Rompin</td> <td>Oil Palm</td> <td>252.12</td> </tr> <tr> <td>HS (D) 1452</td> <td>Rompin</td> <td>Oil Palm</td> <td>314.04</td> </tr> <tr> <td>HS (D) 1453</td> <td>Rompin</td> <td>Oil Palm</td> <td>2502</td> </tr> </tbody> </table> <p>Carotino Estate Land for Carotino Estate has been leased for 99 years since 19/06/1988 until 13/05/2086 land title number H.S.(D) 2850 under Carotino Sdn. Bhd. which mentioned "Syarat Nyata Tanah" is for oil palm plantation under Carotino Sdn Bhd with total area 1659.21Hectare and total 1509.09Ha planted area.</p> <p>Carotino POM/Pahang Oil Palm Estate 01 Documents showing legal ownership available for Carotino POM that located within Pahang Oil Palm Estate 1 and owns a total of</p>	Land title	District	Land use	hectare	HS (D) 1450	Rompin	Oil Palm	252.12	HS (D) 1452	Rompin	Oil Palm	314.04	HS (D) 1453	Rompin	Oil Palm	2502	Complied
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		<p>2,153.10 ha under 9 titles. Sighted sample copy of land titles for Pahang Estate kept by the mill as following: a) Title # 27263; District: Kuantan; Sub-district: Mukim Ulu Lepar; Lot # 23605; Area: 296.2 ha b) Title # 27262; District: Kuantan; Sub-district: Mukim Ulu Lepar; Lot # 23604; Area: 202.6 ha c) Title # 27260; District: Kuantan; Sub-district: Mukim Ulu Lepar; Lot # 23607; Area: 69.67 ha</p> <p>Maran Estate Land under Maran Estate owned by Richley Corporation Sdn Bhd which is one of subsidiaries for JC Chang Group acquired since 1976 from Pahang State Government.</p> <table border="1" data-bbox="1137 783 1926 981"> <thead> <tr> <th>Land title</th> <th>District</th> <th>Land use</th> <th>hectare</th> </tr> </thead> <tbody> <tr> <td>HS (D) 672</td> <td>UluLepar</td> <td>Oil Palm</td> <td>404.50Ha</td> </tr> <tr> <td>HS (D) 1166</td> <td>UluLepar</td> <td>Oil Palm</td> <td>404.10Ha</td> </tr> <tr> <td>HS (D) 3975</td> <td>UluLepar</td> <td>Oil Palm</td> <td>279.20Ha</td> </tr> </tbody> </table>	Land title	District	Land use	hectare	HS (D) 672	UluLepar	Oil Palm	404.50Ha	HS (D) 1166	UluLepar	Oil Palm	404.10Ha	HS (D) 3975	UluLepar	Oil Palm	279.20Ha	
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4.4.2	Copies of documents evidencing agreement-making processes and negotiated agreements detailing the FPIC process are available and include:	No issues of land dispute issue occur in all estates within CPU that requires FPIC process since the last audit. Consultation with relevant stakeholders conducted on-site confirmed the information.	Complied																
4.4.2a	Evidence that a plan has been developed through consultation and discussion in good faith with all affected groups in the communities, with particular assurance that vulnerable, minorities' and gender groups are consulted, and that information has been provided to all affected groups, including information on the steps that are taken to involve them in decision making. - Minor compliance -	No issues of land dispute issue occur in all estates within CPU that requires FPIC process since the last audit. Consultation with relevant stakeholders conducted on-site confirmed the information.	Complied																

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 -	No issues of land dispute issue occur in all estates within CPU that requires FPIC process since the last audit. Consultation with relevant stakeholders conducted on-site confirmed the information.	Complied
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 -	No issues of land dispute issue occur in all estates within CPU that requires FPIC process since the last audit. Consultation with relevant stakeholders conducted on-site confirmed the information.	Complied
4.4.3	(C) Maps of an appropriate scale showing the extent of recognised legal, customary or user rights are developed through participatory mapping involving affected parties (including neighbouring communities where applicable, and relevant authorities). - Critical (Major) compliance -	No issues of land dispute issue occur in all estates within CPU that requires FPIC process since the last audit. Consultation with relevant stakeholders conducted on-site confirmed the information.	Complied
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 -	No issues of land dispute issue occur in all estates within CPU that requires FPIC process since the last audit. Consultation with relevant stakeholders conducted on-site confirmed the information.	Complied
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 -	No issues of land dispute issue occur in all estates within CPU that requires FPIC process since the last audit. Consultation with relevant stakeholders conducted on-site confirmed the information.	Complied
4.4.6	There is evidence that implementation of agreements negotiated through FPIC is annually reviewed in consultation with affected parties. - Minor compliance -	No issues of land dispute issue occur in all estates within CPU that requires FPIC process since the last audit. Consultation with relevant stakeholders conducted on-site confirmed the information.	Complied

Criterion 4.5: No new plantings are established on local peoples' land where it can be demonstrated that there are legal, customary or user rights, without their FPIC. This is dealt with through a documented system that enables these and other stakeholders to express their views through their own representative institutions.																			
4.5.1	<p>(C) Documents showing identification and assessment of demonstrable legal, customary and user rights are available.</p> <p>- Critical (Major) compliance -</p>	<p>JC Chang Carotino POM and estates can demonstrate legal rights to the land title that has been verified during the audit. Details as per below</p> <p><u>Hwa Li 1 Estate</u></p> <p>Total 13 land titles for Hwa Li 1 Estate with total 2,157.40Ha which all converted from jungle and leased for 99 years</p> <table border="1"> <thead> <tr> <th>Land title</th> <th>District</th> <th>Land use</th> <th>hectare</th> </tr> </thead> <tbody> <tr> <td>HS (D) 1450</td> <td>Rompin</td> <td>Oil Palm</td> <td>252.12</td> </tr> <tr> <td>HS (D) 1452</td> <td>Rompin</td> <td>Oil Palm</td> <td>314.04</td> </tr> <tr> <td>HS (D) 1453</td> <td>Rompin</td> <td>Oil Palm</td> <td>2502</td> </tr> </tbody> </table> <p>Carotino Estate</p> <p>Land for Carotino Estate has been leased for 99 years since 19/06/1988 until 13/05/2086 land title number H.S.(D) 2850 under Carotino Sdn Bhd which mentioned "Syarat Nyata Tanah" is for oil palm plantation under Carotino Sdn Bhd with total area 1659.21Hectare and total 1509.09Ha planted area.</p> <p>Carotino POM/Pahang Oil Palm Estate 01</p> <p>Documents showing legal ownership available for Carotino POM that located within Pahang Oil Palm Estate 1 and owns a total of 2,153.10 ha under 9 titles. Sighted sample copy of land titles for Pahang Estate kept by the mill as following:</p> <p style="text-align: right;">a) Title # 27263; District: Kuantan; Sub-district: Mukim Ulu Lepar; Lot # 23605; Area: 296.2 ha</p>	Land title	District	Land use	hectare	HS (D) 1450	Rompin	Oil Palm	252.12	HS (D) 1452	Rompin	Oil Palm	314.04	HS (D) 1453	Rompin	Oil Palm	2502	Complied
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4.5.2	<p>(C) FPIC is obtained for all oil palm development through a comprehensive process, including in particular, full respect for their legal and customary rights to the territories, lands and resources via local communities’ own representative institutions, with all the relevant information and documents made available, with option of resourced access to independent advice through a documented, long-term and two-way process of consultation and negotiation.</p> <p>- Critical (Major) compliance -</p>	<p>There is no new planting for all estates under Carotino Production Unit. Evidence of legal ownership of the land including the history of land tenure was verified during the audit. Sighted land title for each estates that has been verified by auditor.</p>	Complied																
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>There is no new planting for all estates under Carotino Production Unit. Evidence of legal ownership of the land including the history of land tenure was verified during the audit. Sighted land title for each estates that has been verified by auditor.</p>	Complied																

	- Minor compliance -		
4.5.4	To ensure local food and water security, as part of the FPIC process, participatory SEIA and participatory land-use planning with local peoples, the full range of food and water provisioning options are considered. There is transparency of the land allocation process. - Minor compliance -	There is no new planting for all estates under Carotino Production Unit. Evidence of legal ownership of the land including the history of land tenure was verified during the audit. Sighted land title for each estates that has been verified by auditor.	Complied
4.5.5	Evidence is available that the affected communities and rights holders have had the option to access to information and advice that is independent of the project proponent, concerning the legal, economic, environmental and social implications of the proposed operations on their lands. - Minor compliance -	There is no new planting for all estates under Carotino Production Unit. Evidence of legal ownership of the land including the history of land tenure was verified during the audit. Sighted land title for each estates that has been verified by auditor.	Complied
4.5.6	Evidence is available that the communities (or their representatives) gave consent to the initial planning phases of the operations prior to the issuance of a new concession or land title to the operator. - Minor compliance -	There is no new planting for all estates under Carotino Production Unit. Evidence of legal ownership of the land including the history of land tenure was verified during the audit. Sighted land title for each estates that has been verified by auditor.	Complied
4.5.7	New lands are not acquired for plantations and mills after 15 November 2018 as a result of recent (2005 or later) expropriations without consent under the right of eminent domain of the federal and state land acquisition legislations. - Minor compliance -	There is no new planting for all estates under Carotino Production Unit. Evidence of legal ownership of the land including the history of land tenure was verified during the audit. Sighted land title for each estates that has been verified by auditor.	Complied
4.5.8	(C) New lands are not acquired in areas inhabited by communities in voluntary isolation. - Critical (Major) compliance -	There is no new planting for all estates under Carotino Production Unit. Evidence of legal ownership of the land including the history of land tenure was verified during the audit. Sighted land title for each estates that has been verified by auditor.	Complied
Criterion 4.6: Any negotiations Concerning compensation for loss of legal, customary or user rights are dealt with through a documented system that enables indigenous peoples, local communities and other stakeholders to express their views through their own representative institutions.			

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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>There is no update of SOPs for identifying legal, customary or user rights, and a procedure for identifying people entitled to compensation that been documented in the document "Guideline for Identifying Legal and Customary Rights and Identifying People Entitled to Compensation Documents;" Doc. Ref. # E/002-05/2019; Doc. Date: 12/8/2019 in case of land dispute issue occurs</p>	Complied
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>There is no update of SOPs for calculating and distributing fair compensation (monetary or otherwise). It has been documented in the document "Guideline for Identifying Legal and Customary Rights and Identifying People Entitled to Compensation Documents;" Doc. Ref. # E/002-05/2019; Doc. Date: 12/8/2019 in case of land dispute issue occurs</p>	Complied
4.6.3	<p>Evidence is available that equal opportunities are provided to both men and women to hold land titles for scheme small holdings.</p> <p>- Minor compliance -</p>	<p>No issues related to loss of legal customary rights with indigenous peoples, local communities, settlers and other stakeholders reported during the time of audit through interviewed with the local communities. Painting of oil palm trees, boundary stone and trenches were available to demarcate the boundary of land between the neighbouring stakeholders</p>	Complied
4.6.4	<p>The process and outcomes of any negotiated agreements, compensation and payments are documented, with evidence of the participation of affected parties, and made publicly available to them.</p> <p>- Minor compliance -</p>	<p>No issues related to loss of legal customary rights with indigenous peoples, local communities, settlers and other stakeholders reported during the time of audit through interviewed with the local communities. Painting of oil palm trees, boundary stone and trenches were available to demarcate the boundary of land between the neighbouring stakeholders</p>	Complied
<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.</p>	<p>There is no update of SOPs for identifying legal, customary or user rights, and a procedure for identifying people entitled to compensation that been documented in the document "Guideline</p>	Complied

	- Critical (Major) compliance -	for Identifying Legal and Customary Rights and Identifying People Entitled to Compensation Documents;" Doc. Ref. # E/002-05/2019; Doc. Date: 12/8/2019 in case of land dispute issue occurs	
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.</p> <p>- Critical (Major) compliance -</p>	There is no update of SOPs for calculating and distributing fair compensation (monetary or otherwise). It has been documented in the document "Guideline for Identifying Legal and Customary Rights and Identifying People Entitled to Compensation Documents;" Doc. Ref. # E/002-05/2019; Doc. Date: 12/8/2019 in case of land dispute issue occurs	Complied
4.7.3	<p>Communities that have lost access and rights to land for plantation expansion are given opportunities including employment and supply contracts to benefit from plantation development.</p> <p>- Minor compliance -</p>	No issues related to loss of legal customary rights with indigenous peoples, local communities, settlers and other stakeholders reported during the time of audit through interviewed with the local communities. Painting of oil palm trees, boundary stone and trenches were available to demarcate the boundary of land between the neighbouring stakeholders	Complied
<p>Criterion 4.8: The right to use the land is demonstrated and is not legitimately contested by local people who can demonstrate that they have legal, customary, or user rights.</p>			
4.8.1	<p>Where there are or have been disputes, proof of legal acquisition of title and evidence that mutually agreed compensation has been made to all people who held legal, customary, or user rights at the time of acquisition is available and provided to parties to a dispute, and that any compensation was accepted following a documented process of FPIC.</p> <p>- Minor compliance -</p>	<p>Carotino Production Units implemented the company's Guideline for Identifying Legal and Customary Rights and Identifying People Entitled to Compensation Documents; Doc. Ref. # E/002-05/2019; Doc. Date: 12/8/2019 in case of land dispute issue occurs.</p> <p>There are no customary right land for all estates under Carotino Production Units. It has been confirmed through land title for each operating units. Interview with neighbouring estates and local communities confirmed the statement. Therefore, the clause is not applicable.</p>	Not Applicable
4.8.2	<p>(C) Land conflict is not present in the area of the unit of certification. Where land conflict exists, acceptable conflict resolution processes (see Criteria 4.2 and 4.6) are implemented and accepted by the parties</p>	Carotino Production Units implemented the company's Guideline for Identifying Legal and Customary Rights and Identifying People	Not Applicable

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	involved. In the case of newly acquired plantations, the unit of certification addresses any unresolved conflict through appropriate conflict resolution mechanisms. - Critical (Major) compliance -	Entitled to Compensation Documents; Doc. Ref. # E/002-05/2019; Doc. Date: 12/8/2019 in case of land dispute issue occurs. There are no customary right land for all estates under Carotino Production Units. It has been confirmed through land title for each operating units. Interview with neighbouring estates and local communities confirmed the statement. Therefore, the clause is 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 -	Carotino Production Units implemented the company's Guideline for Identifying Legal and Customary Rights and Identifying People Entitled to Compensation Documents; Doc. Ref. # E/002-05/2019; Doc. Date: 12/8/2019 in case of land dispute issue occurs. There are no customary right land for all estates under Carotino Production Units. It has been confirmed through land title for each operating units. Interview with neighbouring estates and local communities confirmed the statement. Therefore, the clause 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 -	Carotino Production Units implemented the company's Guideline for Identifying Legal and Customary Rights and Identifying People Entitled to Compensation Documents; Doc. Ref. # E/002-05/2019; Doc. Date: 12/8/2019 in case of land dispute issue occurs. There are no customary right land for all estates under Carotino Production Units. It has been confirmed through land title for each operating units. Interview with neighbouring estates and local communities confirmed the statement. Therefore, the clause 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	Current and previous period prices paid for FFB are publicly available and accessible by smallholders. - Minor compliance -	FFB pricing has been mentioned in the weighbridge tickets where copy of weighbridge tickets will be given to the smallholder as reference. Other than that, FFB pricing has been posted at the notice board nearby the weighbridge ramp.	Complied
5.1.2	(C) Evidence is available that the unit of certification explains the FFB pricing to smallholders on request from individual smallholders (at least once a year or upon request). - Critical (Major) compliance -	Not applicable since Carotino Pom operate under Identity preserve module and there is no smallholders supplying to POM and at the surrounding area.	Not Applicable
5.1.3	(C) Fair pricing, calculated as a portion of the international CPO price less costs is provided to smallholders in the supply base and documented. - Critical (Major) compliance -	Not applicable since Carotino Pom operate under Identity preserve module and there is no smallholders supplying to POM and at the surrounding area	Not Applicable
5.1.4	(C) Evidence is available that all parties, including women and independent representative organisations assisting smallholders where requested, are involved in decision-making processes and understand the contracts. These include those involving finance, loans/credits, and repayments through FFB price reductions for replanting and or other support mechanisms where applicable. - Critical (Major) compliance -	Not applicable since Carotino Pom operate under Identity preserve module and there is no smallholders supplying to POM and at the surrounding area	Not Applicable
5.1.5	Contracts are fair, legal and transparent and have an agreed timeframe. - Minor compliance -	Not applicable since Carotino Pom operate under Identity preserve module and there is no smallholders supplying to POM and at the surrounding area	Not Applicable
5.1.6	(C) Agreed payments are made in a timely manner and receipts specifying price, weight, deductions and amount paid are given. - Critical (Major) compliance -	Not applicable since Carotino Pom operate under Identity preserve module and there is no smallholders supplying to POM and at the surrounding area	Not Applicable
5.1.7	Weighbridges used for determining payment to smallholders are verified by an independent third party on a regular basis (this can be government).	Not applicable since Carotino Pom operate under Identity preserve module and there is no smallholders supplying to POM and at the surrounding area	Not Applicable

	- Minor compliance -		
5.1.8	The unit of certification supports Independent Smallholders with certification, where applicable, ensuring mutual agreements between the unit of certification and the smallholders on who runs the internal control system (ICS), who holds the certificates, and who holds and sells the certified material. - Minor compliance -	Not applicable since Carotino Pom operate under Identity preserve module and there is no smallholders supplying to POM and at the surrounding area	Not Applicable
5.1.9	(C) The unit of certification has a grievance mechanism for smallholders and all grievances raised are dealt with in a timely manner. - Critical (Major) compliance -	Not applicable since Carotino Pom operate under Identity preserve module and there is no smallholders supplying to POM and at the surrounding area	Not Applicable
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 -	Not applicable since Carotino Pom operate under Identity preserve module and there is no smallholders supplying to POM and at the surrounding area	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 -	Not applicable since Carotino Pom operate under Identity preserve module and there is no smallholders supplying to POM and at the surrounding area	Not Applicable
5.2.3	Where applicable, the unit of certification provides support to smallholders to promote legality of FFB production. - Minor compliance -	Not applicable since Carotino Pom operate under Identity preserve module and there is no smallholders supplying to POM and at the surrounding area	Not Applicable

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5.2.4	(C) Evidence exists that the unit of certification trains Scheme Smallholders on pesticide handling. - Critical (Major) compliance -	Not applicable since Carotino Pom operate under Identity preserve module and there is no smallholders supplying to POM and at the surrounding area	Not Applicable
5.2.5	The unit of certification regularly reviews and publicly reports on the progress of the Smallholder support programme. - Minor compliance -	Not applicable since Carotino Pom operate under Identity preserve module and there is no smallholders supplying to POM and at the surrounding area	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 -	Carotino POM and estates implemented the company’s Equal Opportunity Policy; Date: 12/8/2019; Signed by both Plantation Director and Mill Director respectively. Regular briefing also conducted to all employees as per sample sighted for Sustainability awareness – Company Policy (OSH, Social & Human Right, Equal Opportunity, Environmental, Corruption Prevention, Sexual Harassment, Reproductive Right; Date: 19/10/2020.	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 -	Interviewed and verified through salary slips shows that there is no discrimination in terms of salary payment especially for similar work scope. There is also no recruitment fee has been charged for new recruitment. Details as per below: Carotino POM Sample of 2 workers has been taken that has been recruited on 01/10/2022 and 13/09/2022. Date joined: 13/09/2022, ID: G043X Pahang Oil Palm Estate 01 Sample of newly recruited workers recruited on 01/03/2022 as van driver. Sighted application form, records of interview and medical test results. As records, newly recruited worker has work experience as a driver previously and as medical check-up is fit to work. Maran Estate	Complied

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		<p>Sample of newly recruited workers has been taken for foreign workers recruited on 17/11/2022 and one local worker recruited on 01/11/2022</p> <p>Local workers that has been recruited as gatekeeper and sighted application form, medical check-up which mentioned fit to work and interview records.</p> <p>While for foreign workers, sighted the demand letter, orientation questionnaire form, passport consent and advance deduction consent form</p>	
6.1.3	<p>The unit of certification demonstrates that recruitment selection, hiring, access to training and promotion are based on skills, capabilities, qualities and medical fitness necessary for the jobs available.</p> <p>- Minor compliance -</p>	<p>Employment procedures for recruitment, selection, hiring, promotion, retirement and termination are documented in the document title "Guidelines on procedure of recruitment, selection, hiring, promotion, retirement and termination" dated 12/08/2019 document reference number E020-01/2019 has explained the criteria of promotion based on the capability, qualification and performance of interview of the candidates. There is evidence that operating units can demonstrate that recruitment, selection, and hiring based on the requirement, medical fitness and people suit with the jobs offer from the evidence of interview and medical check-up that has been done. Detail of sample verification as per below</p> <p>Carotino POM Sample of 2 workers has been taken that has been recruited on 01/10/2022 and 13/09/2022.</p> <ul style="list-style-type: none"> a. Date joined: 13/09/2022, ID: G043X b. Date joined: 01/10/2022, ID G0442 <p>Pahang Oil Palm Estate 01</p>	Complied

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		<p>Sample of newly recruited workers recruited on 01/03/2022 as van driver. Sighted application form, records of interview and medical test results. As records, newly recruited worker has work experience as a driver previously and as medical check-up is fit to work.</p> <p>Maran Estate Sample of newly recruited workers has been taken for foreign workers recruited on 17/11/2022 and one local worker recruited on 01/11/2022</p> <p>Local workers that has been recruited as gatekeeper and sighted application form, medical check-up which mentioned fit to work and interview records.</p> <p>While for foreign workers, sighted the demand letter, orientation questionnaire form, passport consent and advance deduction consent form</p>	
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><u>Carotino Estate</u> Pregnancy test only been conducted to female workers that handling workers. Previously it has been done for ex-storekeeper and sighted her written approval. For new storekeeper, sighted a letter dated 15/07/2021 that disagree for pregnancy test. There is no pregnancy test has been done since then.</p> <p><u>Pahang Oil Palm Estate 1</u> Previous estate practices, pregnancy test will be conducted for those female workers that exposed to chemical. There is only 1 female worker exposed to chemical which is Puan Noor Hasniza. However, sighted letter dated 01/07/2019 from Puan Nor Hasniza disagree to be tested for pregnancy. There is no pregnancy test has been done since then.</p>	Complied

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		<p><u>Maran Estate</u> Previous estate practices, pregnancy test will be conducted for those female workers that exposed to chemical. There is only 1 female worker exposed to chemical which is Puan Yarati A/P Nordin. However, sighted letter dated 03/ from Puan Yarati A/P Nordin disagree to be tested for pregnancy. There is no pregnancy test has been done since then.</p>	
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. - Critical (Major) compliance -</p>	<p><u>Hwa Li 1 Estate</u> There are only 9 female workers in Hwa Li 1 Estate which consist of general clerk, weighbridge clerk and general workers. Sighted appointment letter for each individual and Mdm. R. Abigil Sharlini has been appointed as chairmen. As per schedule, it has been planned to conduct meeting twice a year where latest meeting conduct on 21/12/2022 and 28/06/2022.</p> <p><u>Pahang Oil Palm Estate</u> Total 11 female staff and workers working in Pahang Oil Palm Estate 1 where gender committee has been raised established and meeting has been conducted once in 6 months. Minutes meeting sighted on 15/12/2022</p> <p><u>Maran Estate</u> Total 4 female and 3 female workers in Maran Estate and gender committee has been established chaired by Puan Rikasutreate and Puan Shalani as secretary. Latest meeting has been done on 31/12/2022 with attendance of all female staff and workers. During the latest meeting, all participant has been explained on domestic violence and procedure made any complaint.</p>	Complied

6.1.6	<p>There is evidence of equal pay for the same work scope.</p> <p>- Minor compliance -</p>	<p>All units within Carotino POM and its supply base were able to demonstrate evidence of equal pay for the same work scope where all units pays the workers paid base accordance with minimum wages order 2022 of RM57.70per day per person. While for piece rate works, it has been documented and has been fixed irrespective of gender and nationality. This was demonstrated by comparing sampled employment contracts and pay slips for sample workers for each operating unit</p>	Complied
<p>Criterion 6.2: Pay and conditions for staff and workers and for contract workers always meet at least legal or industry minimum standards and are sufficient to provide decent living wages (DLW).</p>			
6.2.1	<p>(C) Applicable labour laws, union and/or other collective agreements and documentation of pay and conditions are available to the workers in national languages (English or Bahasa Malaysia) and explained to them in language they understand.</p> <p>- Critical (Major) compliance -</p>	<p>All operating units commit to comply with employment Act 1955 and minimum wages order 2022 where has outline the pays and conditions of each worker. For piece rate workers, it has been documented in the "Kadar Upah untuk pelbagai jenis kerja ladang" updated on 01/10/2022 documented in appendix 2.0. There is no collective agreement between JC Chang Group with any union.</p>	Complied
6.2.2	<p>(C) Employment contracts and related documents detailing payments and conditions of employment (e.g. regular working hours, deductions, overtime, sick leave, holiday entitlement, maternity leave, reasons for dismissal, period of notice, etc. in compliance with national legal requirements) and payroll documents give accurate information on compensation for all work performed. This includes a form of record for work done by family members.</p> <p>- Critical (Major) compliance -</p>	<p>Sample for workers has been taken for each operating units base on different workers category which is gender, types of works, origin of countries and length of services. For all estates, there workers from Indonesia, India, Pakistan and Bangladesh. Sighted employment contract for all workers that has been established from origin countries (Indonesia, Bangladesh and India). Pays and benefits has been clearly outline in the employment contract. As per interview with the management for estates, workers salary will be monitored through pocket checkroll which clearly stated types of works, productivity and total amount of salary achieved. Sample has been taken payslips, checkroll and "kad kong" for month December 2021, March 2022 and September 2022 which base on low crop, peak crop and medium crop season. While for Carotino POM, workers salary has been monitored through punch card.</p>	Complied

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6.2.3	<p>(C) There is evidence of legal compliance for regular working hours, deductions, overtime, sickness, holiday entitlement, maternity leave, reasons for dismissal, period of notice and other legal labour requirements.</p> <p>- Critical (Major) compliance -</p>	<p>For all operating, stated in the employment contract working hours, deduction, overtime and leave entitlement. Mentioned in the employment contract that entitlement of leave is depending on length of services. For workers less than 2 years services, entitled 14 days of sick leave and 8 days of annual leave. Highlighted in the contract reasons for dismissal, period of notice and other legal labour requirements. There is no deduction has been practices for all operating units under JC Chang Group. There is evidence compliance of legal requirement on working hours where workers work from 630am to 1430am with 30minutes break for 6 days with total 45hours/weeks. There is also evidence compliance to maternity leave for 60 days. It has been confirmed for one staff delivered in year 2022 in Maran Estate and Carotino Estate</p>	Complied
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>Hwa Li 1 Estate</p> <p>Total 10 of housing blocks is available in the estates with 2@3 rooms per house. As per interview with workers, electric and water has been provided for free. Water has been collected from Sungai Jekatik. Latest water sampling for clean water has been done on 16/08/2022 sent to Allied Chemist Laboratory with no E. coli detected. Electricity has been generated from genset. School van has been provided for free to all school kids to Bandar Cendarawasih around 30 minutes from the estates. Hospital assistant just resigned in August 2022 and the estate management is still looking for replacement. VMO visit from panel clinic in Lee clinic from Segamat every Wednesday. Linesite inspection has been done on weekly basis latest on 05/12/2022, 12/12/2022, 19/12/2022 and 26/12/2022.</p> <p>Carotino Estate</p>	Complied

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		<p>Total 25 of housing blocks is available in the estates with 2@3 rooms per house. As per interview with workers, electric and water has been provided for free. Water has been extracted from water bore. Electric has been generated by genset. Nearest school is at Felda Palong and Felda Keratong. There is hospital assistant has been appointed in Carotino Estate and available for any treatment.</p> <p>Carotino POM/ Pahang Oil Palm Estate</p> <p>For Carotino POM, Total 32 workers quarters and for is available. Water extracted from Sungai Berlayar and electric generated from Biogas Plant which also shared with Pahang Oil Palm Estate 1 for 24 hours daily. Line site inspection has been conducted latest has been done on 26/11/2022, 10/12/2022 and 24/12/2023. Drinking water analysis has been done on 14/12/2022. Nearest school is located at Ulu Piol around 35 kms and POM/Estate management provided free school bus to school. Drinking water analysis has been sent 16/12/2022 and report received on 27/12/2022. Sighted that there is off spec for Sulphate and investigation still pending due to holiday season and rainy season.</p> <p>There is 54 housing for Pahang Oil Palm Estate 01. Line site inspection has been conducted on weekly basis by hospital, Mr Vejayakumar. Latest inspection has been on 16/12/2022, 21/12/2022 and 27/12/2022.</p> <p>Maran Estate</p> <p>There is total 40 house for workers and weekly line site inspection done on 15/12/2022, 22/12/2022, 29/12/2022 and 05/01/2022. Water extracted from tube well and electric from genset from</p>	
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		430am to 0700am and 1700pm to 2300pm. Drinking water analysis done on 24/08/2022 and all parameter is complied.	
6.2.5	<p>The unit of certification makes efforts to improve workers' access to adequate, sufficient and affordable food.</p> <p>- Minor compliance -</p>	<p>Hwa Li 1 Estate located in Segamat district which the nearest town is Segamat and Muadzam Shah which nearly 1 hour travel from the estate. There is one sundry shop has been established in the estate area as part of effort to improve workers access for food. Monitoring of pricing has been done every 6 months by the estate management prepared by Mr Chin Khin Pooh. Site visit to the shops confirms that pricing has been monitored. Basic foods have been sell such as chicken, fish, vegetables and others.</p> <p>Pahang Oil Palm Estate 01/ Carotino POM/Maran Estate is located far from town around 23km to Sri Jaya town. The management has taken initiative to established sundry store for each operating units. Sighted basic needs has been such as chicken, rice and vegetables. Sighted pricing monitoring has been done on monthly basis.</p>	Complied
6.2.6	<p>A DLW is paid to all workers, including piece rate/quotas, for whom the calculation is based on achievable quotas during regular work hours.</p> <p>PROCEDURAL NOTE: STATEMENT FROM THE RSPO STANDARDS STANDING COMMITTEE REGARDING INDICATOR 6.2.6 ON DECENT LIVING WAGE</p> <p>With reference to procedural note of indicator 6.2.6, the RSPO has published a guidance on the DLW calculation in June 2019. The RSPO Secretariat will endeavour to carry out DLW country benchmarks for palm oil producing countries in which RSPO members operate and for which no Global Living Wage Coalition (GLWC) benchmarks exist (As of September 2019, GLWC has developed national benchmarks in Bangladesh, Belize, Brazil, China, Colombia, Costa Rica, Dominican Republic, Ecuador, Ethiopia, Ghana, Guatemala, India, Kenya, Malawi, Mexico, Nicaragua, Pakistan, South Africa, Sri Lanka, Uganda and Vietnam These benchmarks are developed based on banana, coffee, floriculture, textile, manufacturing, seafood processing and tea industry. The RSPO is in the process of commissioning benchmarks for Malaysia and Indonesia for the palm oil sector and will develop methods to</p>	<p>Assessment of decent living wages has been conducted and documented in the document number E/027-01/2019 title " Implementation plan for decent living wages" document date 29/11/2019. The assessment has include all POM and estate under JC Chang Group which located in Pahang and Sabah. Average wages has been calculated for 5 months (February 2019 until June 2019), benefits in kind (housing, electric, water) and DLW base on household expenditure survey 2016, wages survey, RSPO guidance for implementing a decent living wages.</p> <p>Management plan has been established to conduct re- assessment on 16/01/2023 and documented in document title " Action Plan for decent wages review as per E027" updated on 12/12/2022</p>	Complied

	<p>calculate and/or define DLW applicability for all palm oil producing countries in which RSPO members operate).</p> <p><i>Where a GLWC living wage standard (benchmark), or one that fulfils the basic requirements of the RSPO-endorsed living wage methodology, has been established in the country or region of operation, the same should be used as benchmarks.</i></p> <p>In the absence of such benchmarks, the RSPO will collaborate with the GLWC and/or local experts on developing oil palm industry benchmarks (Benchmark in this context may include other approaches and/or methods to calculate the applicability of DLW in the country or region in accordance to the RSPO endorsed method for determining a DLW. Local applicability for benchmarks is important and it may differ based on the needs of each locality or country). These benchmarks will be developed in collaboration and consultation with relevant stakeholders such as palm oil industry members, workers’ union, authorities and/or relevant organisations.</p> <p><i>For countries where no living wage standard is established, until such time that an RSPO endorsed benchmark for the country is in place, national minimum wages shall be paid to all workers. In addition to the payment of minimum wages, the Unit of Certification (UoC) shall conduct an assessment of the prevailing wages and in-kind benefits provided to workers in the Unit of Certification aligned with the RSPO Guidance for Implementing a Decent Living Wage (RSPO Guidance for Implementing a Decent Living Wage. The RSPO will also develop further guidance and tools to calculate DLW in line with the RSPO endorsed methodology which may include independent studies by local experts in their respective region or country).</i></p> <p>Once these benchmarks are available, this procedural note is no longer applicable. UoC shall have an implementation plan towards the payment of a DLW with specific targets, and a phased implementation process including:</p> <ul style="list-style-type: none"> • Updated assessment on prevailing wages and in-kind benefits • There is annual progress on the implementation of living wages • Where a minimum wage, based on equivalent of baskets of goods, is stipulated in Collective Bargaining Agreements (CBAs), this should be used as the foundation for the gradual implementation of the living wage payment • The UoC may choose to implement the living wage payment in a specific section as a pilot project; the pilot will then be evaluated and adapted before eventual scale up of the living wage implementation. <p>- Minor compliance -</p>		
6.2.7	<p>Permanent, full-time employment including contractors’ workers and contracted workers is used for all core work performed by the unit of</p>	<p>All the estates and mill employ full-time employees, and based on records reviewed and interviews conducted, there are no casual,</p>	<p>Complied</p>

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	certification. Casual, temporary and day labour is limited to jobs that are temporary or seasonal - Minor compliance -	temporary and day labour employed within Pamol POM and its supply base	
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.			
6.3.1	(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. - Critical (Major) compliance -	A statement on recognising freedom of association was published in the Social & Human Rights Policy; Date: 14/11/2019; Signed by both Plantation Director and Mill Director respectively. The policy stated that the management will respect the right of employees to join any association freely and has been documented in both Bahasa and English. Communication of the policy has been done during the morning muster call. For Carotino Estate, training has been done on 14/07/2022. While for Carotino POM, briefing on the policy has been done on 01/12/2022.	Complied
6.3.2	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. - Minor compliance -	There is no union has been identified in all operating units but there is workers representative has been elected. Meeting with workers representative has been done during the JCC meeting that will be done 3 months once. There is evidence that management did not interfere with the formation and selection of workers representative that can be sighted through election evidence records .It has been confirmed through interview with the workers representative.	Complied
6.3.3	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. - Minor compliance -	There is evidence that the management did not interfere with the election of the workers representative and has been confirmed base on election process document and interview with the workers.	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>Formal policy for child protection and prohibition of child labour has been documented in the document title "Polisi Perlindungan kanak-kanak" that has been signed by Plantation director, Tee Swee Kee dated 20/02/2020.</p> <p>For contracted parties, they need to sign additional agreement title "Kontrak pematuhan kemampanan dengan unit operasi di bawah kumpulan JC Chang" that has been signed on 22/10/2019. While for Carotino POM, contract agreement for CPO and PK transporters is available during the audit for 2 transporters which are Hup Shing Berjaya Enterprise and Eng Lee Sing Sdn Bhd.</p> <p>Stated in the compliance contract that contractor will comply with the legal requirement, disallowing child labour, force labour and trafficked labour in the business activities.</p>	Complied
6.4.2	<p>(C) There is evidence that minimum age requirements are met. Personnel files show that all workers are above the national minimum age or above company policy minimum age, whichever is higher. There is a documented age screening verification procedure.</p> <p>- Critical (Major) compliance -</p>	<p>Based on interviews, documentation review and observations in the field, evidence is available that minimum age requirements of 18 years old are met throughout Carotino POM and supply base.</p> <p>Personnel files contain copies of the workers' NRIC (for Malaysians) and passports (for non-Malaysians). These documents were used to 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.</p>	Complied
6.4.3	<p>(C) Young persons may be employed only for non-hazardous work, with protective restrictions in place for that work.</p> <p>- Critical (Major) compliance -</p>	<p>There was no evidence that any young persons were employed in at Carotino POM and its supply base as evidenced from documentation review, field observations, line site observations and audit interviews.</p>	Complied
6.4.4	<p>The unit of certification demonstrates communication about its 'no child labour' policy and the negative effects of child labour, and promotes child protection to supervisors and other key staff, smallholders, FFB suppliers and communities where workers live.</p> <p>- Minor compliance -</p>	<p>The policy which pledges to eliminate all forms of child labour is displayed at prominent places near the office and workers' housing. Based on the documents sighted, communication about its no child labour policy were communicated to all levels of employees as evidenced from training records. Communication of the policy has been done during the morning muster call. For Carotino Estate,</p>	Complied

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		training has been done on 14/07/2022. While for Carotino POM, briefing on the policy has been done on 01/12/2022	
Criterion 6.5: There is no harassment or abuse in the workplace, and reproductive rights are protected.			
6.5.1	<p>(C) A policy to prevent sexual and all other forms of harassment and violence is implemented and communicated to all levels of the workforce.</p> <p>- Critical (Major) compliance -</p>	Sexual harassment policy has been documented in the document title "Polisi Gangguan Seksual" dated 01/07/2012 that has been signed by plantation director, Mr Tee Swee Kee. Stated in the policy that the management will promote a workplace that is free of sexual harassment and sexual harassment of employees in the workplace is not tolerated. Communication of the policy has been done during the morning muster call. For Carotino Estate, training has been done on 14/07/2022. While for Carotino POM, briefing on the policy has been done on 01/12/2022.	Complied
6.5.2	<p>(C) A policy to protect the reproductive rights of all, especially of women, is implemented and communicated to all levels of the workforce.</p> <p>- Critical (Major) compliance -</p>	Policy for reproductive right has been documented in document number E/015-01/2015 title "Policy of reproductive right" that has been signed by plantation director. As stated in the policy that women`s reproductive rights may include right to birth control, freedom from coerced sterilization and contraception, right for education and access in order to make free and informed reproductive choices. Communication of the policy has been done during the morning muster call. For Carotino Estate, training has been done on 14/07/2022. While for Carotino POM, briefing on the policy has been done on 01/12/2022.	Complied
6.5.3	<p>Management has assessed the needs of new mothers, in consultation with the new mothers, and actions are taken to address the needs that have been identified.</p> <p>- Minor compliance -</p>	There is no new mother at Hwa Li 01 Estate, Pahang Oil Palm Estate 1 and Carotino POM and it has been confirmed through interview with female workers at the estate. While for Carotino Estate, there is one new mother while Puan Siti Nadiah binti Abu Bakar, general clerk delivered on 16/04/2022. New mother assessment has been done 05/07/2022 by estate manager, Mr Muhammad Saufi bin Salim and chairman of gender committee, Puan Muniammah A/P Sivaganan. New mother requested for changes of working hours from 6.30am to 8.00am, but the management allow her husband to	Complied

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		change the working hours to send their kids to the kindergarten. For Maran Estate, new mother assessment has been done on 09/06/2022 for one office staff delivered on 09/03/2022.	
6.5.4	<p>A grievance mechanism, which respects anonymity and protects complainants where requested, is established, implemented and communicated to all levels of the workforce.</p> <p>- Minor compliance -</p>	<p>The management has established specific grievance procedure for sexual harassment issues that has been documented in document reference number E/003/-01/2008 dated 01/10/2008 title "SOP on mechanism for the prevention and eradication of sexual harassment and violence in the workplace". As per stated in the SOPs, any sexual harassment can be deal through "Mechanism for complaints and grievances". Also stated that complainer can also make complaints through government agencies and the management for each operating units will give full support and cooperation's for investigation. There is no issues or complaint of sexual harassment for each operating and it has been confirmed through interview with female workers. Communication of the SOPs has been done during the gender committee meeting and morning muster call.</p>	Complied
Criterion 6.6: No forms of forced or trafficked labour are used.			
6.6.1	<p>(C) All workers have entered into employment voluntarily and the following are prohibited:</p> <ul style="list-style-type: none"> • Retention of identity documents or passports (except for administration purposes including legalisation and renewal processes) • Charging the workers for recruitment fees. • Contract substitution • Involuntary overtime • Lack of freedom of workers to resign • Penalty for termination of employment • Debt bondage • Withholding of wages 	<p>Employment contracts detailing payments and conditions of employment available to the workers for sample employees sighted as per indicator 6.2.2 above. Each employment contracts were agreed and signed by both employee and employer which confirmed that all work is voluntary and force labour are prohibited. It also has been verified base on the interview with the workers.</p>	Complied

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	- Critical (Major) compliance -																										
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>	It has been verified that no temporary or migrant workers has been employed. All workers has been employed permanently by the management.	Complied																								
Criterion 6.7: The unit of certification ensures that the working environment under its control is safe and without undue risk to health.																											
6.7.1	<p>(C) The responsible person(s) for H&S is identified. There are records of regular meetings between the responsible person(s) and workers. Concerns of all parties about health, safety and welfare are discussed at these meetings, and any issues raised are recorded.</p> <p>- Critical (Major) compliance -</p>	<p>The respective Estate/ Mill Manager were appointed as Chairman of Safety and Health Committee as per appointment letter signed by Sr. Manager, Administrative and Sustainability Department.</p> <p>The operating unit management has established Safety Committee Member consist of Secretary, representatives from Employer and representatives from Employee as per appointment letter by the Estate/Mill Manager.</p> <p>The OSH committee discussed regarding the safety and health of the workers on quarterly basis during the OSH committee meeting. In the meeting discussed on the matters arising from the previous meetings, accident and incident report, first aid kit usage and risk assessment.</p> <p>Reviewed the minutes meeting conducted on dated as follows:</p> <table border="1" style="width: 100%; border-collapse: collapse; text-align: center;"> <thead> <tr> <th>OU</th> <th>Carotino POM</th> <th>Hwa Li 1 Estate</th> <th>Carotino Estate</th> <th>Pahang Estate 1</th> <th>Maran Estate</th> </tr> </thead> <tbody> <tr> <td>1st quarter</td> <td>15/03/2022</td> <td>16/03/2022</td> <td>16/02/2022</td> <td>09/03/2022</td> <td>15/03/2022</td> </tr> <tr> <td>2nd quarter</td> <td>23/06/2022</td> <td>23/06/2022</td> <td>25/05/2022</td> <td>09/06/2022</td> <td>23/06/2022</td> </tr> <tr> <td>3rd quarter</td> <td>26/09/2022</td> <td>12/09/2022</td> <td>24/08/2022</td> <td>09/09/2022</td> <td>23/09/2022</td> </tr> </tbody> </table>	OU	Carotino POM	Hwa Li 1 Estate	Carotino Estate	Pahang Estate 1	Maran Estate	1 st quarter	15/03/2022	16/03/2022	16/02/2022	09/03/2022	15/03/2022	2 nd quarter	23/06/2022	23/06/2022	25/05/2022	09/06/2022	23/06/2022	3 rd quarter	26/09/2022	12/09/2022	24/08/2022	09/09/2022	23/09/2022	Complied
OU	Carotino POM	Hwa Li 1 Estate	Carotino Estate	Pahang Estate 1	Maran Estate																						
1 st quarter	15/03/2022	16/03/2022	16/02/2022	09/03/2022	15/03/2022																						
2 nd quarter	23/06/2022	23/06/2022	25/05/2022	09/06/2022	23/06/2022																						
3 rd quarter	26/09/2022	12/09/2022	24/08/2022	09/09/2022	23/09/2022																						

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		4 th quarter	28/12/2 022	22/12/2 022	23/11/2 022	09/12/2 022	19/12/2 022	
6.7.2	<p>Accident and emergency procedures are in place and instructions are clearly understood by all workers. Accident procedures are available in national languages (English and/or Bahasa Malaysia) and explained in the language understandable to the workforce. Assigned operatives trained in first aid are present in both field and other operations, and first aid equipment is available at worksites. Records of all accidents are kept and periodically reviewed.</p> <p>- Minor compliance -</p>	<p>Additional Safety and Health Committee meeting was conducted for accident investigation. Reviewed minutes meeting conducted on 19/10/2022 at Carotino Palm Oil Mill and 25/04/2022 for Pahang Oil Palm Estate 1.</p> <p>JC Chang has established standard operating procedure for accident reporting and investigation documented in Guidelines on Accident Reporting and Investigation. Refer doc. no. M/015-03/2018 dated 12/12/2018.</p> <p>Operating units has established flow chart for emergency occurrence. Reviewed the flow chart as follows:</p> <ol style="list-style-type: none"> 1. Animal attacks and poisonous insects 2. Theft, riot, fight 3. Chemical poisoning 4. Fire 5. Chemical spillage 6. Accident 7. Flood 8. Explosion 9. COVID-19/ Pandemic <p>The operating units has established Emergency Response Unit lead by the Estate/ Mill Manager. Training was conducted for the Emergency Response Team and all workers to ensure awareness on the ERP. Reviewed the training records in the criteria 3.7.2. The emergency contact no. was displayed at designated places in the operating units.</p>						Complied

		<p>Carotino Palm Oil Mill The mill has placed 13 first aid box and placed at designated placed and handled by trained first aider. The latest training was conducted on 02/08/2022. The mill conducted first aid box monitoring on monthly basis. Reviewed the monitoring records for the month of June 0 December 2022.</p> <p>Hwa Li 1 Estate The estate has trained selected worker as first aider in the estate. The estate has provided 23 first aid box in the estate and placed and designated places and handled by trained first aider. Latest training was conducted on 02/12/2022. The estate conducted first aid kit monitoring on monthly basis. Reviewed the records for first aid kit box no. HLE1 001 –A, HLE1 009-A and HLE1 019B.</p> <p>Carotino Estate The estate has provided 25 first aid box and placed at designated area and handled by trained first aider. Latest first aider training was conducted on 27/05/2022 by Estate Hospital Assistant. The estate conducted first aid box monitoring and replenishing on monthly basis. Reviewed the records of monitoring conducted by Estate Hospital Assistant for first aid box no. CRE 006A, CRE 011B and CRE 022A.</p> <p>Pahang Oil Palm The estate has provided 14 first aid kit and placed and handled by trained first aider. Latest first aider training was conducted on 22/07/2022 by Estate Hospital Assistant. The first aid kit monitoring</p>	
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		<p>was conducted on monthly basis by the Estate Hospital Assistant. Reviewed the monitoring records FY 2022.</p> <p>Maran Estate</p> <p>The estate has provided 20 first aid kit. The first aid kit was handled by trained first aider. Latest training was conducted on 15/12/2022 and 19/04/2022. The first aid kit monitoring was conducted on monthly basis by Estate Hospital Assistant. Reviewed the monitoring records dated 18/10/2022, 20/11/2022 and 07/12/2022.</p> <p>Records of all accidents are kept at the operating units' office. Accident incidences are reviewed during the safety meetings. Records on Lost Time Accident (LTA) metrics was maintained. Accident records are found to be updated recorded in the Safety Piano Chart. For accident or occupational disease cases, the operating units has submitted the JKPP 6 and JKPP 7 form to notify DOSH regarding the incident within the time period through MyKKP system. The copy of the form and communication email was available for review.</p> <p>For accident eligible for SOCSO claim, the operating units has made claim to SOCSO. Reviewed the application as follows:</p> <p>Carotino Palm Oil Mill</p> <ol style="list-style-type: none"> 1. Application letter and "Borang 34 – Butiran Notis dan Tuntutan Faedah" for accident occur on 18/10/2022 submitted to SOCSO on 23/11/2022 and letter notification of payment from SOCSO as per letter ref. no. F74HUS220008xxx dated 12/12/2022. <p>Pahang Oil Palm Estate 1</p>	
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		<p>Application letter and "Borang 34 – Butiran Notis dan Tuntutan Faedah" for accident occur on 23/04/2022 submitted to SOCSO on 12/05/2022 and letter notification of payment from SOCSO as per letter ref. no. Y73HUS220002xxx dated 16/12/2022. Additional request of for temporary disablement benefit has been submitted to SOCSO as per communication email dated 05/12/2022 and 19/12/2022.</p>							
<p>6.7.3</p>	<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. - 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. Reviewed the PPE issuance records for workers for employee id as follows:</p> <table border="1" data-bbox="1137 743 1928 1321"> <tr> <td data-bbox="1137 743 1402 1034"> <p>Carotino Palm Oil Mill</p> <p>5. G0351</p> <p>6. G0386</p> <p>7. G0353</p> <p>8. G0333</p> </td> <td data-bbox="1402 743 1666 1034"> <p>Hwa Li 1 Estate</p> <p>7. HE 100134</p> <p>8. HE 100062</p> <p>9. HE 000927</p> <p>10. HE 100386</p> <p>11. HE 100176</p> <p>12. HE 100267</p> </td> <td data-bbox="1666 743 1928 1034"> <p>Carotino Estate</p> <p>5. HTO01804</p> <p>6. HE200490</p> <p>7. HE200488</p> <p>8. HE020444</p> </td> </tr> <tr> <td data-bbox="1137 1034 1402 1321"> <p>Pahang Oil Palm Estate</p> <p>6. POP2279</p> <p>7. PE100342</p> <p>8. PE100105</p> <p>9. PE100230</p> <p>10. PE100137</p> </td> <td data-bbox="1402 1034 1666 1321"> <p>Maran Estate</p> <p>6. MR 100519</p> <p>7. MR 100521</p> <p>8. MR 100518</p> <p>9. MR 100517</p> <p>10. MR100493</p> </td> <td data-bbox="1666 1034 1928 1321"></td> </tr> </table> <p>All estates has provided sanitation facilities for pesticides operators for wash out after works.</p>	<p>Carotino Palm Oil Mill</p> <p>5. G0351</p> <p>6. G0386</p> <p>7. G0353</p> <p>8. G0333</p>	<p>Hwa Li 1 Estate</p> <p>7. HE 100134</p> <p>8. HE 100062</p> <p>9. HE 000927</p> <p>10. HE 100386</p> <p>11. HE 100176</p> <p>12. HE 100267</p>	<p>Carotino Estate</p> <p>5. HTO01804</p> <p>6. HE200490</p> <p>7. HE200488</p> <p>8. HE020444</p>	<p>Pahang Oil Palm Estate</p> <p>6. POP2279</p> <p>7. PE100342</p> <p>8. PE100105</p> <p>9. PE100230</p> <p>10. PE100137</p>	<p>Maran Estate</p> <p>6. MR 100519</p> <p>7. MR 100521</p> <p>8. MR 100518</p> <p>9. MR 100517</p> <p>10. MR100493</p>		<p>Complied</p>
<p>Carotino Palm Oil Mill</p> <p>5. G0351</p> <p>6. G0386</p> <p>7. G0353</p> <p>8. G0333</p>	<p>Hwa Li 1 Estate</p> <p>7. HE 100134</p> <p>8. HE 100062</p> <p>9. HE 000927</p> <p>10. HE 100386</p> <p>11. HE 100176</p> <p>12. HE 100267</p>	<p>Carotino Estate</p> <p>5. HTO01804</p> <p>6. HE200490</p> <p>7. HE200488</p> <p>8. HE020444</p>							
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<p>6.7.4</p>	<p>All workers are provided with medical care and covered by accident insurance. Costs incurred from work- related incidents leading to injury or sickness are covered in accordance with Malaysian law.</p> <p>- Minor compliance -</p>	<p>Medical care is provided to all the employees. Reviewed on workers profile records found that all workers are covered by the accident insurances.</p> <p>Local and foreign workers covered by SOCSO or Perkeso (Pertubuhan Keselamatan Sosial). Reviewed the form 8A, "Jadual Caruman" for the month of October 2022 and November 2022.</p> <p>For accident eligible for SOCSO claim, the operating units has made claim to SOCSO. Reviewed the application as follows:</p> <p>Carotino Palm Oil Mill</p> <ol style="list-style-type: none"> 1. Application letter and "Borang 34 – Butiran Notis dan Tuntutan Faedah" for accident occur on 18/10/2022 submitted to SOCSO on 23/11/2022 and letter notification of payment from SOCSO as per letter ref. no. F74HUS220008xxx dated 12/12/2022. <p>Pahang Oil Palm Estate 1</p> <p>Application letter and "Borang 34 – Butiran Notis dan Tuntutan Faedah" for accident occur on 23/04/2022 submitted to SOCSO on 12/05/2022 and letter notification of payment from SOCSO as per letter ref. no. Y73HUS220002xxx dated 16/12/2022. Additional request of for temporary disablement benefit has been submitted to SOCSO as per communication email dated 05/12/2022 and 19/12/2022.</p>	<p>Complied</p>
<p>6.7.5</p>	<p>Occupational injuries are recorded using Lost Time Accident (LTA) metrics.</p> <p>- Minor compliance -</p>	<p>Records of all accidents are kept. Accident incidences are reviewed during the safety meetings. Records on Lost Time Accident (LTA) metrics was maintained.</p>	<p>Complied</p>

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		<p>Accident records are found to be updated recorded in the Safety Piano Chart. Reviewed the accidents records at FY 2022 at all operating units sampled.</p> <p>JKKP 8 form were submitted to DOE through MyKKP systems. Sighted the samples of accident statistic FY 2021 as reported to DOSH as follows:</p> <table border="1" data-bbox="1137 587 1901 983"> <thead> <tr> <th>Operating units</th> <th>Accident Cases</th> <th>LTA</th> </tr> </thead> <tbody> <tr> <td>Carotino Palm Oil Mill</td> <td>1</td> <td>58</td> </tr> <tr> <td>Hwa Li 1 Estate</td> <td>4</td> <td>32</td> </tr> <tr> <td>Carotino Estate</td> <td>22</td> <td>96</td> </tr> <tr> <td>Pahang Oil Palm Estate 1</td> <td>0</td> <td>0</td> </tr> <tr> <td>Maran Estate</td> <td>4</td> <td>4</td> </tr> </tbody> </table> <p>JKKP 8 form FY 2022 was yet to be submitted to DOE as the due date is on 31/01/2023.</p>	Operating units	Accident Cases	LTA	Carotino Palm Oil Mill	1	58	Hwa Li 1 Estate	4	32	Carotino Estate	22	96	Pahang Oil Palm Estate 1	0	0	Maran Estate	4	4	
Operating units	Accident Cases	LTA																			
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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.

7.1.1	<p>(C) IPM plans are implemented and monitored to ensure effective pest control.</p> <p>- Critical (Major) compliance -</p>	<p>IPM/Plan Practices through Monitoring, Prevention and Intervention.</p> <p>Hwa Li 1 Estate</p> <ol style="list-style-type: none"> 1. Rat census was conducted once every 6 months. Latest rat census conducted in December 2022. Results was recorded below 5% and not required to conduct rat baiting. 	Complied
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		<p>2. Barn owl census was conducted once every 6 months. Reviewed latest barn owl census conducted in December 2022.</p> <p>Carotino Estate</p> <ol style="list-style-type: none"> 1. Rat baiting was conducted base of results of rat census. Reviewed the latest rat baiting conducted in December 2022 for field PM15B 2. The estate conducted Rhinoceros Beetle census records on weekly basis. Reviewed the census records for PM18A dated 20/11/2022, 27/11/2022, 04/12/2022 and 11/12/2022. <p>Pahang Oil Palm Estate 1</p> <ol style="list-style-type: none"> 1. Bagworm census was conducted when there is evidence of fresh attack in the field. Reviewed the census conducted on 04/04/2022. 2. Bagworm treatment was conducted if the census results at more than 5%. Reviewed the treatment record conducted for field PM08A dated 07/04/2022, 23/04/2022, 16 – 21/05 2022 and 18/06/2022. 3. Rat census was conducted once every 6 months. Reviewed the latest census for field PM08A dated 30/08/2022 and PM07A dated 12/09/2022. <p>Maran Estate</p> <ol style="list-style-type: none"> 1. The estate conducted barn owl census twice a year. Reviewed the census records conducted in June and 	
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		<p>December 2022 with population recorded at 156 and 135 respectively</p> <p>2. The estate conducted rat damage census once a year or visual observation of fresh damage. If the results is more than 5%, rat baiting will be conducted. Review the rat census conducted in October and November 2022 and rat baiting application conducted in November 2022.</p>	
7.1.2	<p>Species referenced in the Global Invasive Species Database and CABI.org are not to be used in managed areas, unless plans to prevent and monitor their spread are implemented.</p> <p>- Minor compliance -</p>	<p>The estates has conducted assessment on list of species invasiveness used for biological control. No invasive species listed in the CABI.org introduced in the estate.</p> <p>Flora species were used for IPM such as Tunera subulata, Cassia cobanensis, and Antigonan leptopus.</p> <p>Fauna species were used for IPM were Tyto alba.</p>	Complied
7.1.3	<p>There is no use of fire for pest control unless in exceptional circumstances such as plantation sanitation, i.e. where no other effective methods exist, and with prior approval of government authorities.</p> <p>- Minor compliance -</p>	<p>No evidence and records of fire usage for pest control at all estate visited.</p>	Complied
Criterion 7.2: Pesticides are used in ways that do not endanger health of workers, families, communities or the environment.			
7.2.1	<p>(C) Justification of all pesticides used is demonstrated. Selective products and application methods that are specific to the target pest, weed or disease are prioritised.</p> <p>- Critical (Major) compliance -</p>	<p>Justification of pesticides usage were documented in document as follows:</p> <ol style="list-style-type: none"> 1. Justification for Insecticides, Fungicide and Rodenticide usage under integrated Pest Management. Doc. ref no. B/008-15/2019 dated 02/08/2019 2. Justification for Weedicide Usage. Doc. ref. no. B/009-12/2018 dated 19/04/2018 <p>In the justification stated as follows:</p> <ol style="list-style-type: none"> 1. Type of Spraying Works 	Complied

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		<ol style="list-style-type: none"> 2. A.I of Chemicals 3. Rate and application 4. Re-entry period after application 5. Justification for using pesticides. 																										
7.2.2	<p>(C) Records of pesticides use (including active ingredients used and their LD50, area treated, amount of active ingredients applied per ha and number of applications) are provided.</p> <p>- Critical (Major) compliance -</p>	<p>Records of pesticides use (including active ingredients used and their LD50, area treated, amount of active ingredients applied per ha and number of applications) summarized FY 2021/2022 as per below:</p> <table border="1" style="width: 100%; border-collapse: collapse; text-align: center;"> <thead> <tr> <th></th> <th>Ally</th> <th>Glyphosate</th> <th>Garlon</th> <th>Storm</th> </tr> </thead> <tbody> <tr> <td>Hwa Li 1 Estate</td> <td>0.0100</td> <td>0.2500</td> <td>0.0300</td> <td>0.0000</td> </tr> <tr> <td>Carotino Estate</td> <td>0.0114</td> <td>0.4095</td> <td>0.0852</td> <td>0.00013</td> </tr> <tr> <td>Pahang Oil Palm Estate 1</td> <td>0.00314</td> <td>0.0800</td> <td>0.0200</td> <td>0.00820</td> </tr> <tr> <td>Maran Estate</td> <td>0.0700</td> <td>1.5300</td> <td>0.1400</td> <td>0.0100</td> </tr> </tbody> </table>		Ally	Glyphosate	Garlon	Storm	Hwa Li 1 Estate	0.0100	0.2500	0.0300	0.0000	Carotino Estate	0.0114	0.4095	0.0852	0.00013	Pahang Oil Palm Estate 1	0.00314	0.0800	0.0200	0.00820	Maran Estate	0.0700	1.5300	0.1400	0.0100	Complied
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7.2.3	<p>(C) Any use of pesticides is minimised as part of a plan, eliminated where possible, in accordance with IPM plans.</p> <p>- Critical (Major) compliance -</p>	<p>The estates has implemented a Continuous Improvement Plan where they have stated the intention to reduce the usage of chemical through implementation of Integrated Pest Management Plan. Among the plan as follows:</p> <ol style="list-style-type: none"> 1. Only provided 3 rounds of circle spraying and 1 round of selective spraying mainly to reduced and control of the usage of pesticides 	Complied																									

		<p>2. To maintain and upkeep barn owl boxes in order to maintain population of nature enemies for rats</p> <p>3. Continue upkeep and maintain od Cassia Cobenensis – increase caterpillars predators</p> <p>To reduce herbicide usage and prevent bare field ground by using rotoslasher to cut weeds in the field</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 was no prophylactic use of pesticides in the estates. The application of pesticides was based on level of attack severity which was normally obtained through census.</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> <ul style="list-style-type: none"> a) Judgment of the threat and verify why this is a major threat b) Why there is no other alternative which can be used c) Which process was applied to verify why there is no other less hazardous alternative d) What is the process to limit the negative impacts of the application e) Estimation of the timescale of the application and steps taken to limit application to the specific outbreak. <p>- Minor compliance -</p>	<p>JC Chang Group has established Standard Operating Procedure titled Guidelines on Weeding Regime and Practices. Refer SOP with doc. no. B/004-02/2019 dated 12/08/2019.</p> <p>In the SOP under section 15 stated as follows:</p> <p>Pesticides that are categorised as World Health Organisation Class 1A or 1B, or that are listed by the Stockholm or Rotterdam Conventions, are not used, unless in exceptional circumstances, as validated by a due diligence process, or when authorised by government authorities for pest outbreaks.</p> <p>The due diligence refers to:</p> <ul style="list-style-type: none"> 15.1. Judgment of the threat and verify why this is a major threat 15.2. When there is no other alternative which can be used 15.3. Which process was applied to verify why there is no other less hazardous alternative 15.4. What is the process to limit the negative impacts of the application 15.5. Estimation of the timescale of the application and steps taken to limit application to the specific outbreak. 	Complied

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		<p>Reviewed the Chemical Registers showed that only class II, III & IV pesticides were used at the mill and estate as follows:</p> <table border="1" data-bbox="1137 432 1928 683"> <thead> <tr> <th>Estate</th> <th>Date of chemical register</th> </tr> </thead> <tbody> <tr> <td>Hwa Li Estate 1</td> <td>23/12/2022</td> </tr> <tr> <td>Carotino Estate</td> <td>22/06/2022</td> </tr> <tr> <td>Pahang Oil Palm 1 Estate</td> <td>02/01/2023</td> </tr> <tr> <td>Maran Estate</td> <td>01/12/2022</td> </tr> </tbody> </table> <p>During the site visit to the chemical stores, it was justified that there were only class II, III and IV chemicals being used. Paraquat was eliminated. In its place, alternatives such as Glyphosate was used instead.</p>	Estate	Date of chemical register	Hwa Li Estate 1	23/12/2022	Carotino Estate	22/06/2022	Pahang Oil Palm 1 Estate	02/01/2023	Maran Estate	01/12/2022	
Estate	Date of chemical register												
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Pahang Oil Palm 1 Estate	02/01/2023												
Maran Estate	01/12/2022												
7.2.6	<p>(C) Pesticides are only handled, used or applied by persons who have completed the necessary training and are always applied in accordance with the product label. All precautions attached to the products are properly observed, applied, and understood by workers (see Criteria 3.6). Personnel applying pesticides must show evidence of regular updates on the knowledge about the activity they carry out.</p> <p>- Critical (Major) compliance -</p>	<p>The pesticides operators has been given training regarding the usage safety and health issue and proper way for chemical application. The training was conducted by the personnel with knowledge on pesticide application such as Estate Manager, Asst. Manager and pesticide supplier. Reviewed the training records as per criteria 3.7.2.</p>	Complied										
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 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 clerk was seen to unlock the pad-lock to open entrance door for auditor to inspect the store. At the entrance door, signage requiring donning of PPE were visibly posted. The Chemical Store signage with required Hazard Symbols were available at the entrance. The facility ventilation fan was found working with adequate ventilation</p>	Complied										

		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 scheduled waste and disposed through waste contractors. The visited estates use the empty chemical containers as premix containers to transport chemical premix to the field for chemical spraying operations. The accumulated chemical containers are then disposed through licensed waste collector. Verified the records of disposal as below: Hwa Li 1 Estate – Disposal through G-Planter dated 23/12/2022 Carotino Estate – Disposal through Indah Agro Sdn Bhd dated 29/12/2022 Pahang Oil Palm Estate 1 – Disposal through Indah Agro Sdn Bhd dated 21/12/2022 Maran Estate – Disposal through Indah Agro Sdn Bhd dated 05/01/2023	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 -	Pesticide application by aerial spraying is not practiced by the estates in Carotino Production Unit.	Complied
7.2.10	(C) Specific annual medical surveillance for pesticide operators, and documented action to treat related health conditions, is demonstrated. - Critical (Major) compliance -	The estate conducted medical surveillance for workers involve in pesticides handling on annually basis. Reviewed the medical surveillance report as follows: <u>Hwa Li Estate</u>	Complied

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		<p>As per recommendation in CHRA report, the estate conducted Medical Surveillance on annually basis. Latest surveillance was conducted on 14/12/2022 by OHD with reg. no. HQ/08/DOV/00/545. 3 workers were sent for surveillance and found fit to work as chemical handlers.</p> <p><u>Carotino Estate</u> As per recommendation in CHRA report, the estate conducted Medical Surveillance on annually basis. Latest surveillance was conducted on 15 – 22/07/2022 by OHD with reg. no. HQ/08/DOV/00/545. Refer report no. 064/OHD/2022. 19 workers were sent for surveillance and found fit to work as chemical handlers.</p> <p><u>Pahang Oil Palm Estate 1</u> As per recommendation in CHRA report, the estate conducted Medical Surveillance on annually basis. Latest surveillance was conducted on 15 – 21/10/2022 by OHD with reg. no. HQ/19/DOC/00/00350. 9 workers were sent for surveillance and found fit to work as chemical handlers.</p> <p>Maran Estate As per CHRA recommendation, medical surveillance for workers involve in pesticides handling was conducted on annually basis. Latest surveillance was done on 21/10/2022 by OHD with DOSH reg. no. HQ/19/DOC/00/00365. 6 workers were sent for surveillance and found fit to work as chemical handlers.</p>	
7.2.11	<p>(C) No work with pesticides is undertaken by persons under the age of 18, pregnant or breastfeeding women or other people that have medical restrictions and they are offered alternative equivalent work.</p> <p>- Critical (Major) compliance -</p>	<p>The estates has erected signboards on prohibition of persons under the age of 18, pregnant or breastfeeding women to handle chemicals in front of the chemicals store. Noted during interview with women store keeper, the understanding on the matters were satisfactory.</p>	Complied

Criterion 7.3: Waste is reduced, recycled, reused and disposed of in an environmentally and socially responsible manner.			
7.3.1	<p>A waste management plan which includes reduction, recycling, reusing, and disposal based on toxicity and hazardous characteristics, is documented and implemented.</p> <p>- Minor compliance -</p>	<p>Waste Management Plan has been established for sampled estates and mill as per Guidelines on Waste Management Plan, F/001-04/2015 dated 23/07/2015.</p> <p>Identification of waste was conducted as per Guidelines Wastes and waste products identification and disposal plan for estates and mill. F/007-05/2016 dated 18/08/2016.</p> <p>Waste management plan was established and incorporated under Environmental and Social Improvement Plan – West Pahang, doc. ref. N/009-2/2019 dated 23/06/2022. The plan was discussed were:</p> <p>Recycle waste</p> <ul style="list-style-type: none"> i) Waste segregation bin to be provided to facilitate the procedure of waste segregation ii) A designated area to be constructed to keep those recycle waste from the site. iii) When the volume of recyclable waste enough for disposal, it should be disposed according to disposal method identified as per guideline <p>Non-recycle waste</p> <ul style="list-style-type: none"> i) The non-recyclable waste are to be collected and dispose off as per guideline ii) An appropriate landfill should be selected which within the estate / mill own title based on best practices mentioned in the guidelines <p>Schedule waste</p> <ul style="list-style-type: none"> i) A designated storage as per guidelines to be build for waste storage <p>The scheduled waste are to be managed and dispose off as per guidelines</p>	Complied

<p>7.3.2</p>	<p>Proper disposal of waste material, according to procedures that are fully understood by workers and managers, is demonstrated.</p> <p>- Minor compliance -</p>	<p>Procedure of Schedule waste management has been established. Refer Guidelines Wastes and waste products identification and disposal plan for estates and mill. F/007-05/2016 dated 18/08/2016. Labelling of Schedule Waste and Storage was addressed in the Guidelines Schedule Waste Storage & Labelling, F/014-02/2016 dated 01/06/2016. Other than that, refer Guidelines On Scheduled Wastes Labelling, Storage and Documentation, F/014-04/2017 dated 07/01/2017.</p> <p>Awareness training on Schedule waste has been conducted as per date below: Hwa Li Estate 1: 01/03/2022 Carotino Estate: 22/06/2022 Maran Estate: 13/12/2022 Carotino POM: 23/12/2022</p> <p>Generally, the workers have demonstrated good understanding in proper disposal of wastes.</p> <p>Record of Inventory of Schedule Waste and Disposal Record as per details below:</p> <p>Hwa Li Estate 1 Inventory</p> <ul style="list-style-type: none"> • File reference Number: 06L7HWAT • Date Reporting: 31/12/2022 • Waste Generated: SW305, SW404, SW408, SW409, SW410. <p>Disposal Sample 1</p> <ul style="list-style-type: none"> • Disposal consignment note: 2022123114XGC5P3 • Date Disposal: 31/12/2022 • SW305 - Spent Lubricating Oil: 1.850 MT by Pentas Flora (Kuantan) Sdn Bhd <p>Sample 2</p> <ul style="list-style-type: none"> • Disposal consignment note: 2022123114XGC5P3 	<p>Non-compliance</p>
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		<ul style="list-style-type: none"> • Date Disposal: 31/12/2022 • SW409 – Mineral Oils: 0.0750 MT by Pentas Flora (Kuantan) Sdn Bhd <p>Carotino Estate Inventory</p> <ul style="list-style-type: none"> • File reference Number: JAS.CHQ.600-3/4/418 • Date Reporting: 31/12/2022 • Waste Generated: SW305, SW404, SW408, SW409, SW410. <p>Disposal Sample 1</p> <ul style="list-style-type: none"> • Disposal consignment note: 20221201183DNQSV • Date Disposal: 01/12/2022 • SW305 - Spent Lubricating Oil: 1.400 MT by Pentas Flora (Kuantan) Sdn Bhd <p>Carotino POM Inventory</p> <ul style="list-style-type: none"> • File reference Number: JAS.CHQ.600-3/1/60 • Date Reporting: 27/12/2022 • Waste Generated: SW305, SW404, SW409, SW410. <p>Disposal Sample 1</p> <ul style="list-style-type: none"> • Disposal consignment note: 2022120515035ZQF • Date Disposal: 05/12/2022 • SW404 – Pathogenic Wastes: 0.0007 MT by Kualiti Alam Sdn Bhd <p>Sample 2</p> <ul style="list-style-type: none"> • Disposal consignment note: 2022121514ZE72WD • Date Disposal: 15/12/2022 • SW305 – Spent Lubricating Oil: 0.9110 MT by Kualiti Alam Sdn Bhd 	
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		<p>Pahang Oil Palm Estate 1 Inventory</p> <ul style="list-style-type: none"> • File reference Number: AS:C111/123/000/069 • Date Reporting: 03/01/2023 • Waste Generated: SW305, SW404, SW409, SW410. <p>Disposal Sample 1</p> <ul style="list-style-type: none"> • Disposal consignment note: 202212311337T9HI • Date Disposal: 31/12/2022 • SW410 – Rags, Plastics, Papers contaminated with scheduled waste: 0.0550 MT by Pentas Flora (Kuantan) Sdn Bhd <p>Maran Estate Inventory</p> <ul style="list-style-type: none"> • File reference Number: JAS.CHQ.600-4/4/419 • Date Reporting: 22/12/2022 • Waste Generated: SW305, SW404, SW409, SW410. <p>Disposal Sample 1</p> <ul style="list-style-type: none"> • Disposal consignment note: 2023010112264DH4 • Date Disposal: 01/01/2023 • SW305 – Spent Lubricating Oil: 0.5000 MT by Pentas Flora (Kuantan) Sdn Bhd <p>Some of the Labelling for waste storage and disposal according to the procedures were not effectively implemented. During site visit at Schedule waste store, Carotino POM, it was found that SW305 has been generated on 28/12/2022 and stored in the SW store. However, some information in the labelling was not correct (Labelled with SW409 instead of SW305) not accordance with the procedures.</p>	
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		<p>Other than that, sighted during site visit at Schedule waste store, Pahang Oil Palm Estate. Estate was yet to generate any Schedule waste, but they already prepared Labelling for each drum for SW305 without inserting the date generation. However, the Hazard Label used was inflammable liquids instead of Toxic Substance as per procedures.</p> <p>Every container of scheduled waste must be properly label for identification and warning purposes. It has been clearly mentioned Regulation 10, of Environmental Quality (Scheduled Waste) Regulation 2005. (2) Containers of scheduled wastes shall be clearly labelled in accordance with the types applicable to them as specified in the Third Schedule and marked with the scheduled waste code as specified in the First Schedule for identification and warning purposes.</p> <p>Thus, non-conformity were raised.</p>													
7.3.3	<p>The unit of certification does not use open fire for waste disposal.</p> <p>- Minor compliance -</p>	<p>No open burning (Including domestic wastes) is allowed under group policy. Landfill was the method used by the estates for domestic waste disposal. Refer Guidelines on Garbage Disposal, F/006-06/2016 dated 21/12/2016. fire was noted use and sightings at field and line site confirm no burnt marks sighted. Sample of landfill were observed and found in order.</p> <table border="1" data-bbox="1137 1066 1930 1299"> <thead> <tr> <th>Estate</th> <th>Block No</th> <th>Date Open</th> </tr> </thead> <tbody> <tr> <td>Hwa Li Estate 1</td> <td>PM01 A02</td> <td>31/12/2022</td> </tr> <tr> <td>Carotino Estate</td> <td>PM91A 02</td> <td>31/12/2022</td> </tr> <tr> <td>Pahang Oil Palm 1</td> <td>PM97 03</td> <td>31/12/2022</td> </tr> </tbody> </table>	Estate	Block No	Date Open	Hwa Li Estate 1	PM01 A02	31/12/2022	Carotino Estate	PM91A 02	31/12/2022	Pahang Oil Palm 1	PM97 03	31/12/2022	Complied
Estate	Block No	Date Open													
Hwa Li Estate 1	PM01 A02	31/12/2022													
Carotino Estate	PM91A 02	31/12/2022													
Pahang Oil Palm 1	PM97 03	31/12/2022													
<p>Criterion 7.4: Practices maintain soil fertility at, or where possible improve soil fertility to, a level that ensures optimal and sustained yield.</p>															

<p>7.4.1</p>	<p>Good agriculture practices, as contained in SOPs, are followed to manage soil fertility to optimise yield and minimise environmental impacts. - Minor compliance -</p>	<p>The assessed estates continued to use the JC Chang / Carotino established SOP as below: i) Methods of nutrient assessment for oil palm fertilizer recommendation - B/012-02/2012 ii) Guidelines for Compost Application - B/028-01/2017 iii) Guidelines for Semi-Decomposed EFB Application - B/030-01/2019 iv) SOP-Soil and water conservation - C/002-01/2008) Soil analysis and foliar analysis are monitored on yearly basis by Agronomist. The recommendations for improvements are given to maintain the sustainable practices. They include use of chemical fertilizers, EFB and decanter cake. The visited estates operate in accordance with the Agriculture Manual and standard operating procedures. The practices are consistently monitored by estate operation management and Regional Controller.</p>	<p>Complied</p>															
<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. - Minor compliance -</p>	<p>Foliar and soil sampling was carried out by Applied Agricultural Resources Sdn Bhd prior to the fertilizer recommendation for the next financial year. Leaf and soil nutrient analysis are commonly used in the diagnosis of fertilizer requirements in oil palms. The frequency for leaf sampling and soil sampling must be conduct for every year. Reviewed the sampling records as follows:</p> <table border="1" data-bbox="1137 1066 1930 1345"> <thead> <tr> <th>Estates</th> <th>Foliar Sampling</th> <th>Soil Sampling</th> </tr> </thead> <tbody> <tr> <td>Hwa Li Estate 1</td> <td>08/02/2022</td> <td>17/03/2022</td> </tr> <tr> <td>Carotino Estate</td> <td>16/03/2022</td> <td>11/04/2022</td> </tr> <tr> <td>Pahang Oil Palm 1</td> <td>14/03/2022</td> <td>27/04/2022</td> </tr> <tr> <td>Maran Estate</td> <td>17/03/2022</td> <td>27/04/2022</td> </tr> </tbody> </table>	Estates	Foliar Sampling	Soil Sampling	Hwa Li Estate 1	08/02/2022	17/03/2022	Carotino Estate	16/03/2022	11/04/2022	Pahang Oil Palm 1	14/03/2022	27/04/2022	Maran Estate	17/03/2022	27/04/2022	<p>Complied</p>
Estates	Foliar Sampling	Soil Sampling																
Hwa Li Estate 1	08/02/2022	17/03/2022																
Carotino Estate	16/03/2022	11/04/2022																
Pahang Oil Palm 1	14/03/2022	27/04/2022																
Maran Estate	17/03/2022	27/04/2022																

7.4.3	<p>A nutrient recycling strategy is in place, which includes the recycling of Empty Fruit Bunches (EFB), Palm Oil Mill Effluent (POME), palm residues and optimal use of inorganic fertilisers.</p> <p>- Minor compliance -</p>	<p>EFB was applied at Carotino Estate, PM90A. Application rate was 35MT/Ha. Refer Monthly record EFB Month End Costing dated 01-30/11/2022. Application of EFB was discussed in the Soil management Plan FY 2022.</p> <p>EFB was applied at Pahang Oil Palm 1 Estate, PM02 A, PM06 A and PM09 A. Application rate was 40MT/Ha. Refer Monthly record EFB Month End Costing dated 01-31/12/2022. Application of EFB was discussed in the Soil management Plan FY 2022.</p> <p>Refer Guidelines on Disposal off EFB To Fields, File reference F/003-01/2009 dated 20/04/2009 (EFB Application 30-40MT/Ha). The application in the field was based on Agronomist Recommendation.</p> <p>Effluent discharge at Carotino POM was through the Sprinkler System. Verified through site visit at PM 06 Pahang Oil Palm Estate 1 found the system were monitored and compliance with Jadual Pematuhan #005110.</p>	Complied
7.4.4	<p>Records of fertiliser inputs are maintained.</p> <p>- Minor compliance -</p>	<p>The fertiliser application was conducted as per recommendation by agronomist base on foliar and soil sampling conducted. Refer record of Manuring Programme and Application record. The fertiliser application records were available at the estate visited for review. The estate reported the fertiliser application to the Progress Report on monthly basis.</p>	Complied
Criterion 7.5: Practices minimise and control erosion and degradation of soils.			
7.5.1	<p>(C) Maps identifying marginal and fragile soils, including steep terrain, are available.</p> <p>- Critical (Major) compliance -</p>	<p>Soil maps were available at all estates identifying the type of soil series and its area percentage in the estate. There were no marginal and fragile soils identified at the assessed estates. During field visit at the estates, it was sighted there was no oil palm planting on steep terrains as well. Please see indicator 7.6.3 for landscape topography information.</p>	Complied

7.5.2	<p>No replanting on steep slopes (above 25 degrees) unless approved by state governments. In case of replanting is permitted, no replanting in contiguous area of steep terrain (greater than 25 degrees) larger than 25 Ha within the Unit of Certification.</p> <p>- Minor compliance -</p>	<p>There is no replanting conducted on steep slopes. Verified through site visit and interview. Verification with Topography Map by Jabatan Pertanian, there is no areas above 25° at Hwa Li Estate. For Carotino Estates, the existing areas 10.08 ha that more >25° will be abandoned during 2023 replanting programme. For Pahang Oil Palm Estate, the existing areas 44.53 that more >25° will be abandoned during 2024 replanting programme. There is no area more than >25° at Maran Estate.</p>	Complied
7.5.3	<p>There is no new planting of oil palm on steep terrain.</p> <p>- Minor compliance -</p>	<p>There is no new planting of oil palm conducted on steep terrain. Verified through site visit and interview at all estates visited.</p>	Complied
<p>Criterion 7.6: Soil surveys and topographic information are used for site planning in the establishment of new plantings, and the results are incorporated into plans and operations.</p>			
7.6.1	<p>(C) To demonstrate the long-term suitability of land for palm oil cultivation, soil maps or soil surveys identifying marginal and fragile soils, including steep terrain, are taken into account in plans and operations.</p> <p>- Critical (Major) compliance -</p>	<p>There is no new planting at audited estates. Hence, the indicator 7.6.1, 7.6.2 and 7.6.3 are not applicable. Further, based on the soil maps presented and field visit verification, there was no fragile soil or marginal soil existence at the estates assessed. Soil series and topography map available for estate sampled. No fragile soil categorized in the estates sampled.</p>	Complied
7.6.2	<p>Extensive planting on marginal and fragile soils, is avoided, or, if necessary, done in accordance with the soil management plan for best practices.</p> <p>- Minor compliance -</p>	<p>There is no new planting at audited estates. Hence, the indicator 7.6.1, 7.6.2 and 7.6.3 are not applicable. Further, based on the soil maps presented and field visit verification, there was no fragile soil or marginal soil existence at the estates assessed. Soil series and topography map available for estate sampled. No fragile soil categorized in the estates sampled.</p>	Complied
7.6.3	<p>Soil surveys and topographic information guide the planning of drainage and irrigation systems, roads and other infrastructure.</p> <p>- Minor compliance -</p>	<p>There is no new planting at the assessed estates, hence this indicator is not applicable. Sampled topography information at estates sited as follows:</p>	Complied

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Degree	Hectarage, Ha		
	Hwa Li Estate 1	Carotino Estate	Pahang Oil Palm Estate 1
0°-2°	515.21	509.78	564.51
2°-6°	201.48	1030.20	296.92
6°-12°	848.18	125.72	126.73
12°-20°	642.62	0.00	219.21
20°-25°	32.05	0.00	888.85
>25°	0.00	10.08	44.53

Sampled of Soil series in the estates visited as below:
Hwa Li Estate 1 – Siri Beserah, Siri Gong Chenak, Siri Rengam, Siri Tebok and Siri Tai Tak
Carotino Estate – Sekutuan Bungor – Melaka 2, Siri Bungor, Siri Durian, Siri Jempol, Sekuruan katong – Melaka, Sekutuan Katong – Segamat, Siri Lunas, Sri Melaka, Siri Renggam, Curam, and Siri Tebok.
Pahang Oil Palm Estate – Siri Awang, Colluvium, Siri Kawang, Kompleks Lanar Setempat, Siri Penambang, Siri Rengam, Steepland, Siri Tebok and Siri Tok Yong.

Criterion 7.7: No new planting on peat, regardless of depth after 15 November 2018 and all peatlands are managed responsibly.			
7.7.1	(C) There is no new planting on peat regardless of depth after 15 November 2018 in existing and new development areas.	Not applicable as there was neither new planting nor presence of peat soil.	Not Applicable

	- Critical (Major) compliance -		
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>	Not applicable as there was neither new planting nor presence of peat soil.	Not Applicable
7.7.3	<p>(C) Subsidence of peat is monitored, documented and minimised.</p> <p>- Critical (Major) compliance -</p>	Not applicable as there was neither new planting nor presence of peat soil.	Not Applicable
7.7.4	<p>(C) A documented water and ground cover management programme is in place.</p> <p>- Critical (Major) compliance -</p>	Not applicable as there was neither new planting nor presence of peat soil.	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 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>	Not applicable as there was neither new planting nor presence of peat soil.	Not Applicable

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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>	Not applicable as there was neither new planting nor presence of peat soil.	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>	Not applicable as there was neither new planting nor presence of peat soil.	Not Applicable
Criterion 7.8: Practices maintain the quality and availability of surface and groundwater.			
7.8.1	<p>A water management plan is in place and implemented to promote more efficient use and continued availability of water sources and to avoid negative impacts on other users in the catchment. The plan addresses the following:</p> <p>a) The unit of certification does not restrict access to clean water or contribute to pollution of water used by communities.</p> <p>b) Workers have adequate access to clean water.</p> <p>- Minor compliance -</p>	<p>Water management plan was established and incorporated under Environmental and Social Improvement Plan – West Pahang, doc. ref. N/009-2/2019 dated 23/06/2022. The plan was discussed on.</p> <ol style="list-style-type: none"> 1. Waterways/water source 2. Water for household consumption 3. Wastewater from operational activities (Chemical) 4. Rainfall 5. Flood 6. Riparian buffer zone <p>Water management plan has included the availability of water sources and to avoid negative impacts on other users in the catchment. No restriction of access to clean water or contribute to pollution of water used by communities. Access to clean water is adequately provided to workers for household consumption.</p> <p>Water quality analysis has been conducted at estates and mill. Site visit all sampling points were maintained and completed with proper signage.</p>	Complied

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7.8.2	<p>(C) Water courses and wetlands are protected, including maintaining and restoring appropriate riparian and other buffer zones in line with 'RSPO Manual on BMPs for the management and rehabilitation of riparian reserves' (April 2017) or applicable National legislation or specific environmental permit. Smallholders may replant existing planted areas provided there is no evidence of environmental deterioration having occurred during the previous cycle.</p> <p>- Critical (Major) compliance -</p>	<p>Guidelines on establishment of riparian buffer zone, doc. ref. C/001-03/2019, dated 27/4/19 in line with Department of Drainage and Irrigation's guidelines. Width of zones are guided by the followings:</p> <table border="1" style="width: 100%; border-collapse: collapse; text-align: center;"> <thead> <tr> <th rowspan="2">River Width (M)</th> <th colspan="2">Width of Riparian Buffer Zone (M)</th> </tr> <tr> <th>Peninsular Malaysia</th> <th>Sabah</th> </tr> </thead> <tbody> <tr> <td>>40</td> <td>50</td> <td rowspan="5">20 (for river width >3 metres)</td> </tr> <tr> <td>20-40</td> <td>40</td> </tr> <tr> <td>10-20</td> <td>20</td> </tr> <tr> <td>5-10</td> <td>10</td> </tr> <tr> <td>1-5</td> <td>5</td> </tr> </tbody> </table> <p>There is no activities carried out at the riparian zone which has been identified during the site visit. Annual training for workers has been done on riparian zone by the management.</p> <p>Foe water sampling Guidelines on River Water Sampling Procedure, C/011-01/2010, dated 4/2/2010 has been established. Parameters tested were pH, BOD, COD, SS, AN and DO.</p> <p>Water quality analysis has been conducted at estates and mill. Site visit all sampling points were maintained and completed with proper signage. Refer latest water sampling report:</p> <p>Hwa Li 1 Estate</p> <ol style="list-style-type: none"> 1. Domestic drinking water analysis has been conducted on 16/08/2022 by Allied Chemist Laboratory with report refence dated ACL/WAT-POT221659. All parameters were accordance to Water, 25th A Schedule of Malaysian Food Act 1983 (Act 281) & Regulation (Sub regulation 394(1)). 2. Industrial Effluent (Water) Analysis conducted on 18/07/2022 by Sime Darby Plantation Research Sdn Bhd with report reference IE874/2022. Results were within perimeter as Malaysia DOE Water Quality Index (WQI). 	River Width (M)	Width of Riparian Buffer Zone (M)		Peninsular Malaysia	Sabah	>40	50	20 (for river width >3 metres)	20-40	40	10-20	20	5-10	10	1-5	5	Complied
River Width (M)	Width of Riparian Buffer Zone (M)																		
	Peninsular Malaysia	Sabah																	
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20-40	40																		
10-20	20																		
5-10	10																		
1-5	5																		

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		<p>Carotino Estate</p> <ol style="list-style-type: none"> 1. Water source for Carotino Estate was from Tube Well. Sighted Tube well Monitoring Book Record. Refer latest record dated August 2022. 2. Drinking water analysis has been conducted on 08/07/2022. Refer report by Allied Chemist Laboratory Sdn Bhd with ACL/WAT-POT221524. All parameters were accordance to Water, 25th A Schedule of Malaysian Food Act 1983 (Act 281) & Regulation (Sub regulation 394(1)). <p>Carotino POM</p> <ol style="list-style-type: none"> 1. Industrial Effluent (Water) Analysis for UPSTREAM, INTAKE and DOWNSTREAM conducted on 04/08/2022 by Drew Ameroid (M) Sdn Bhd with report refence dated AL2201-C21856T1. Results were within perimeter as Environmental Quality (Industrial Effluent) Regulation 2009, Fifth and Seventh Schedule, Standard A. <p>Pahang Oil Palm Estate 1</p> <ol style="list-style-type: none"> 1. Water source for Pahang Oil Palm Estate was from Mill water treatment. 2. Industrial Effluent (Water) Analysis conducted on 13/12/2022 by Sime Darby Plantation Research Sdn Bhd with report reference IE1553/2022. Results were within perimeter as Malaysia DOE Water Quality Index (WQI). <p>Maran Estate</p> <ol style="list-style-type: none"> 1. Drinking water analysis has been conducted on 27/07/2022. Refer report by Permulab Sdn Bhd with 22-347716. All parameters were accordance to Water, 25th A Schedule of Malaysian Food Act 1983 (Act 281) & Regulation (Sub regulation 394(1)). 	
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		<p>2. Industrial Effluent (Water) Analysis conducted on 19/09/2022 by Sime Darby Plantation Research Sdn Bhd with report reference IE1118/2022. Results were within perimeter as Malaysia DOE Water Quality Index (WQI).</p>														
<p>7.8.3</p>	<p>Mill effluent is treated to be in compliance with national regulations. Discharge quality of mill effluent, especially Biochemical Oxygen Demand (BOD), is regularly monitored. - Minor compliance -</p>	<p>The effluent treatment plant was made in accordance and interview with operator in charge revealed that the operation was in accordance with standard operation procedure and legal requirements. No overflow was observed, and flow meter reading was recorded daily.</p> <p>Discharge quality of mill effluent, especially Biochemical Oxygen Demand (BOD), is quarterly monitored as per OER. Effluent Analysis conducted by accredited laboratory and submitted to DOE every 3 months through OER (Online Environmental Report) and in compliance with mill's compliance schedule for quarterly submission. Refer to the latest report for dated October 2022. Monthly analysis was done for final discharge point. Total of 8 parameters (pH, BOD3, COD, TS, SS, TN, AN and O&G) were tested. Latest analysis report for 1st, 2nd, and 3rd Quarter quarters of year 2022.</p> <table border="1" data-bbox="1137 1018 1921 1348"> <thead> <tr> <th>Report Date</th> <th>Quarter/Week</th> <th>BOD (Limit=5000 mg/L)</th> </tr> </thead> <tbody> <tr> <td rowspan="3">11/10/2022</td> <td>1stweek/1stmonth</td> <td>12.00</td> </tr> <tr> <td>5thweek/2ndMonth</td> <td>29.00</td> </tr> <tr> <td>9thweek/3rdMonth</td> <td>40.00</td> </tr> <tr> <td>14/07/2022</td> <td>1stweek/1stmonth</td> <td>30.00</td> </tr> </tbody> </table>	Report Date	Quarter/Week	BOD (Limit=5000 mg/L)	11/10/2022	1 st week/1 st month	12.00	5 th week/2 nd Month	29.00	9 th week/3 rd Month	40.00	14/07/2022	1 st week/1 st month	30.00	<p>Complied</p>
Report Date	Quarter/Week	BOD (Limit=5000 mg/L)														
11/10/2022	1 st week/1 st month	12.00														
	5 th week/2 nd Month	29.00														
	9 th week/3 rd Month	40.00														
14/07/2022	1 st week/1 st month	30.00														

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		<table border="1"> <tr> <td></td> <td>5thweek/2ndMonth</td> <td>12.00</td> </tr> <tr> <td></td> <td>9thweek/3rdMonth</td> <td>30.00</td> </tr> <tr> <td>07/04/2022</td> <td>1stweek/1stmonth</td> <td>30.00</td> </tr> <tr> <td></td> <td>5thweek/2ndMonth</td> <td>30.00</td> </tr> <tr> <td></td> <td>9thweek/3rdMonth</td> <td>30.00</td> </tr> </table> <p>Effluent discharge at Carotino POM was through the Sprinkler System. Verified through site visit at PM 06 Pahang Oil Palm Estate 1 found the system were monitored and compliance with "Jadual Pematuhan" #005110.</p>		5 th week/2 nd Month	12.00		9 th week/3 rd Month	30.00	07/04/2022	1 st week/1 st month	30.00		5 th week/2 nd Month	30.00		9 th week/3 rd Month	30.00	
	5 th week/2 nd Month	12.00																
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07/04/2022	1 st week/1 st month	30.00																
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	9 th week/3 rd Month	30.00																
7.8.4	Mill water use per tonne of FFB is monitored and recorded. - Minor compliance -	<p>Mill has maintained monitoring of water usage for processing FFB which are recorded monthly. Water for processing is abstracted from water catchment by using pump. The trend of water usage is tandem with volume of FFB process. Refer Water Usage Record Carotino POM. Average data as below:</p> <table border="1"> <thead> <tr> <th>Year</th> <th>FFB Processed, MT</th> <th>Water/L</th> <th>Water/FFB</th> </tr> </thead> <tbody> <tr> <td>July 2021 to June 2022</td> <td>124,793.24</td> <td>146,090.00</td> <td>1.25</td> </tr> </tbody> </table>	Year	FFB Processed, MT	Water/L	Water/FFB	July 2021 to June 2022	124,793.24	146,090.00	1.25	Complied							
Year	FFB Processed, MT	Water/L	Water/FFB															
July 2021 to June 2022	124,793.24	146,090.00	1.25															
Criterion 7.9: Efficiency of fossil fuel use and the use of renewable energy is optimised																		
7.9.1	A plan for efficiency of the use of fossil fuels and to optimise renewable energy is implemented, monitored and documented. - Minor compliance -	<p>Management Plan for efficiency of the use of fossil fuels and to optimise renewable energy is implemented, monitored and documented in Environmental And Social Improvement plan Carotino Estate/ Mill dated 29/06/2022. Among plan related to energy was:</p>	Complied															

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		<p>1. Monitoring fuel consumption to facilitate the program of fuel/energy campaign</p> <p>2. Provide schedule for road maintenance to avoid inefficiency of fuel usage.</p> <p>There is no opportunity for the estates to capitalize the utilisation of fibre/shell produced from the mill as part of their energy production in replacement of fossil fuel with the current technology limitation.</p> <p>The Carotino POM and estate continued to monitor its diesel consumption and records were documented.</p> <p>The biogas plant has been commencing which generates electricity in future will improve the efficiency of fossil fuel consumption.</p> <p>The diesel utilisation for the mill and estates is provided in the below table for period July 2021 - June 2022.</p> <table border="1" data-bbox="1137 813 1926 1200"> <thead> <tr> <th>Estate / Mill</th> <th>Diesel, (MT)</th> <th>FFB, (MT)</th> <th>Diesel / FFB (MT)</th> </tr> </thead> <tbody> <tr> <td>Hwa Li Estate 1</td> <td>97792.00</td> <td>7951.99</td> <td>12.30</td> </tr> <tr> <td>Carotino Estate</td> <td>177,760.00</td> <td>21,942.98</td> <td>8.10</td> </tr> <tr> <td>Pahang Oil Palm Estate</td> <td>99,240.00</td> <td>37,732.59</td> <td>2.63</td> </tr> <tr> <td>Maran Estate</td> <td>196,322.00</td> <td>30,377.05</td> <td>6.46</td> </tr> <tr> <td>Carotino POM</td> <td>46,910.00</td> <td>124,793.24</td> <td>0.38</td> </tr> </tbody> </table>	Estate / Mill	Diesel, (MT)	FFB, (MT)	Diesel / FFB (MT)	Hwa Li Estate 1	97792.00	7951.99	12.30	Carotino Estate	177,760.00	21,942.98	8.10	Pahang Oil Palm Estate	99,240.00	37,732.59	2.63	Maran Estate	196,322.00	30,377.05	6.46	Carotino POM	46,910.00	124,793.24	0.38	
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<p>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.</p>																											
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>The GHG emissions are identified and assessed for the unit certification by sustainability team. RSPO GHG Calculator version 4</p>	<p>Complied</p>																								

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	- Critical (Major) compliance -	is used. The consumption of fertilisers and diesel were verified through Estates: <ul style="list-style-type: none"> • FFB record book • Stock book • Monthly stock issue • Stock requisition note Mill • Mill Month End Production Report • Monthly production report • Flowmeter & running hours record book • Bio-gas generation daily monitoring log sheet • Effluent analysis report Based on the verification of records; all the sampled issuance was traceable 	
7.10.2	<p>(C) Starting 2014, the carbon stock of the proposed development area and major potential sources of emissions that may result directly from the development are estimated and a plan to minimise them prepared and implemented (following the RSPO GHG Assessment Procedure for New Development).</p> <p>- Critical (Major) compliance -</p>	Not applicable since no new development by the certification unit	Not Applicable
7.10.3	<p>(C) Other significant pollutants are identified and plans to reduce or minimise them implemented and monitored.</p> <p>- Critical (Major) compliance -</p>	<p>Management Plan for pollution is implemented, monitored and documented in Environmental And Social Improvement Plan for Mill and Estates dated 29/06/2022. Among plan related to pollution was: Sludge & Oil Spillage</p> <ol style="list-style-type: none"> 1. Bund wall was built to prevent spillage of oil/sludge that flow into monsoon drain 2. Provide appropriate spill kit for spill containment 3. Supervisors / mandora must monitor and supervise the operator when performing blowdown for oil tanks during mill process <p>Leachate from domestic waste</p> <ol style="list-style-type: none"> 1. Establish procedure for domestic waste management 	Complied

		<ol style="list-style-type: none"> 2. Records of domestic waste collection and disposal to be maintained 3. Training should be provided on domestic waste disposal <p>Diesel spillage</p> <ol style="list-style-type: none"> 1. Containment sump to be built at the rate 10% higher than the actual physical stock. The outlet valve must be closed at all times except during maintenance to prevent spillage flow into the monsoon drain 2. The diesel pump should be maintained with no leak, the hose connected to pump to be inside the sump when not using. <p>Chemical spillage</p> <ol style="list-style-type: none"> 1. Spill kit to be readily available at the storage area for spillage containment 2. Spillage tray to be used during issuance of chemical 3. Training should be provided to person in charge on method of handling chemical spillage <p>Noise</p> <ol style="list-style-type: none"> 1. Identification of noise hazard at workplace and conducting NRA with consultant 2. Implementation of engineering control based on NRA report 3. Installation of warning sign at appropriate location and identify hearing protection zone within the workplace <p>Assessment of all polluting activities was conducted under Environmental Risk Assessment for identifying activities that contributes significant impact to environment including gaseous emission. As prescribed under DOE's Compliance Schedule, the mill is obliged to conduct stack sampling minimum once a year. Below are the verified reports: 2nd Half 2022</p>	
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		<ul style="list-style-type: none"> • Boiler: No.3 • Report no.: PE3-44/11/22 • Report date: 21/11/2022 • Result: Dust: 107 mg/m3 (B5) vs limit 150, CO: 324 mg/m3 vs limit 1000 @ 12% CO2 <p><u>2nd Half 2022</u></p> <ul style="list-style-type: none"> • Boiler: No.2 • Report no.: PE2-44/11/22 • Report date: 21/11/2022 • Result: Dust: 60 mg/m3 (B5) vs limit 150, CO: 445 mg/m3 vs limit 1000 @ 12% CO2 <p>Continuous Emissions Monitoring System (CEMS) which link to the DOE on real time base were monitored. Sighted Online Environmental Reporting (OER) has been submitted to DOE on quarterly basis. The result within parameter as per "Jadual Pematuhan" JAS.CHQ 600-3/1/2/60(39), Licence No: 005110 Environmental audit by 3rd party has been conducted dated 04/08/2022 with reference number JAS.CHQ 600-3/1/2/60(18)/2022/EA.</p>	
Criterion 7.11: Fire is not used for preparing land and is prevented in the managed area			
7.11.1	<p>(C) Land for new planting or replanting is not prepared by burning. - Critical (Major) compliance -</p>	<p>Commitment towards new planting or replanting is not prepared by burning were stated in the Policy On Replanting For The Group. As per statement in the policy "All old palms standing in the field will be felled, chipped, stalked and decomposed in the field naturally without using fire as our Group prohibited the form of replanting by using fire as part of field preparation".</p>	Complied
7.11.2	<p>The unit of certification establishes fire prevention and control measures for the areas directly managed by the unit of certification. - Minor compliance -</p>	<p>Estates have established fire prevention and control measures in areas directly managed by them. Water bowser, firewater pump and fire squad were sighted available. On top of that, Estates already</p>	Complied

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		established ERP team and will perform Estate Patrol. The record of the patrolling was sighted. The patrolling is conducted daily by watchman according to the patrolling schedule and also be conducted by Staff and Mandore during daily operation.	
7.11.3	The unit of certification engages with adjacent stakeholders on fire prevention and control measures. - Minor compliance -	<p>The certification units have engaged with adjacent stakeholders on fire prevention and control measures. Estates has conducted visit to neighbouring stakeholders by Assistant Manager to communicate on fire prevention.</p> <p>Refer Section Engagement to Stakeholder for Fire Prevention and Control Measures. Sample of communication sighted at Hwa Li Estate 1 to Kuantan Trading Company Sdn Bhd (Mill Manager) dated 20/12/2022.</p> <p>Refer item (m) Discussion on the engagement for Fire Prevention and Control Measures. Sample of communication sighted at Carotino Estate to Prosper Community Sdn Bhd (Estate Manager) dated 21/07/2022.</p> <p>For Pahang Oil Palm Estate and Maran Estate, communication on fire prevention with stakeholders has been given during Stakeholder’s meeting dated 25/08/2022. Refer minutes of meeting section (3).</p>	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	<p>(C) Land clearing since November 2005 has not damaged primary forest or any area required to protect or enhance HCVs. Land clearing since 15 November 2018 has not damaged HCVs or HCS forests.</p> <p>A historic Land Use Change Analysis (LUCA) is conducted prior to any new land clearing, in accordance with the RSPO LUCA guidance document.</p>	There was no HCV area identified within property of Carotino Certification Units. Refer A Conservation Assessment of Carotino’s Peninsular Malaysian Estates – Conservation values and recommendations” dated 22/01/2008 prepared by Wild Asia.	Complied

	<p>- Critical (Major) compliance -</p>		
<p>7.12.2</p>	<p>(C) HCVs, HCS forests and other conservation areas are identified as follows:</p> <p>a) For existing plantations with an HCV assessment conducted by an RSPO-approved assessor and no new land clearing after 15 November 2018, the current HCV assessment of those plantations remains valid.</p> <p>b) Any new land clearing (in existing plantations or new plantings) after 15 November 2018 is preceded by an HCV-HCS assessment, using the HCSA Toolkit and the HCV-HCSA Assessment Manual. This will include stakeholder consultation and take into account wider landscape-level considerations.</p> <p>PROCEDURAL NOTE: Requirement is further clarified under the Interpretation of Indicator 7.12.2 and Annex 5 (approved by BOG on 12 June 2019).</p> <p>- Critical (Major) compliance -</p>	<p>HCV Assessment has been conducted. Refer report entitled "A Conservation Assessment of Carotino's Peninsular Malaysian Estates – Conservation values and recommendations" dated 22/01/2008 prepared by Wild Asia. The conservation assessor has recommended some programmes which are considered not only biodiversity protection within the identified key conservation areas, but also within the plantation landscape and areas beyond plantation boundaries. In general, among the recommendations are:</p> <ul style="list-style-type: none"> • Setting objectives – Building Conservation Plan • Conservation of Natural Areas • Enhancing local biodiversity within plantations • Assessing plantation policies • Education and awareness <p>As per HCV Management Plan, among the solution planned by estates were:</p> <ol style="list-style-type: none"> 1. Identify all significant / potential areas for HCV protection / conservation 2. Assessment of Biodiversity values as a basic tool for rehabilitation program / plan. 3. Estate boundary which adjacent to forest reserve or protected area to be visibly maintained 4. Any access to the HCV areas should be 'cut off' or limited to avoid any activities done in the HCV area 5. Training on HCV including the protection of RTE value and related species as part of agenda of environmental meeting 6. Awareness and warning signboard to be posted at strategic place (Main gate) to instil awareness. <p>Consultation with authority and adjacent stakeholders (if require) to need of HCV protection.</p>	<p>Complied</p>

7.12.3	<i>Indicator is not applicable in Malaysia context</i>		Not Applicable
7.12.4	<p>(C) Where HCVs, HCS forests after 15 November 2018, peatland and other conservation areas have been identified, they are protected and/or enhanced. An integrated management plan to protect and/or enhance HCVs, HCS forests, peatland and other conservation areas is developed, implemented and adapted where necessary, and contains monitoring requirements. The integrated management plan is reviewed at least once every five years. The integrated management plan is developed in consultation with relevant stakeholders and includes the directly managed area and any relevant wider landscape level considerations (where these are identified).</p> <p>- Critical (Major) compliance -</p>	The audit findings have confirmed that there is no new HCVs, HCS forests peatland and other conservation areas been identified after 15 Nov 2018 in Carotino Certification Units Estates (refer 7.3.1 to 7.4.2).	Complied
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>	The audit findings have confirmed that there is no new HCVs, HCS forests peatland and other conservation areas been identified after 15 Nov 2018 in Carotino Certification Units Estates (refer 7.3.1 to 7.4.2).	Complied
7.12.6	<p>All rare, threatened or endangered (RTE) species are protected, whether or not they are identified in an HCV assessment. A programme to regularly educate the workforce about the status of RTE species is in place. Appropriate disciplinary measures are taken and documented in accordance with company rules and national law if any individual working for the company is found to capture, harm, collect, trade, possess or kill these species.</p> <p>- Minor compliance -</p>	<p>The HCV Assessment report indicated that there is no threatened or endangered (RTE) species, or HCVs, are present or are affected by plantation or mill operations. There is only common bird, presence of wild boar, elephants and monkeys occasionally sighted. The appropriate measures that are expected to maintain and/or enhance them were implemented through an action plan reviewed in 29/06/2022.</p> <p>Despite the slope of the area, this forest is classed as a "production forest" since it has been mined and no wildlife is reported sighted. Stated in the estate's management plan, among the protection measures established were create Biodiversity awareness, through</p>	Complied

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		<p>regular training to workforce, put up warning signage at strategic boundary line “No Hunting, No Fishing, No Trapping or Collecting of Wild Species” and regular monitoring of animal sightings.</p> <p>Awareness training had been conducted on and regular reminders were normally given to all workforce during muster call. Records of training were well maintained by the operating units. Based on interview with workers, it was noted that they have a good understanding on the protection of RTE. Animal sightings has been recorded. Refer latest record on December 2022.</p>	
7.12.7	<p>The status of HCVs, HCS forests after 15 November 2018, other natural ecosystems, peatland conservation areas and RTE species is monitored. Outcomes of this monitoring are fed back into the management plan.</p> <p>- Minor compliance -</p>	<p>The audit findings have confirmed that there is no new HCVs, HCS forests peatland and other conservation areas been identified after 15 Nov 2018 in Carotino Certification Units Estates (refer 7.3.1 to 7.4.2). Monitoring of these areas are made through the daily field supervision by the field staff and executives. There were also visits by the Plantation Controller and also personnel from the Sustainability unit. Sighting of RTE are made and recorded if any.</p>	Complied
7.12.8	<p>(C) Where there has been land clearing without prior HCV assessment since November 2005, or without prior HCV-HCSA assessment since 15 November 2018, the Remediation and Compensation Procedure (RaCP) applies.</p> <p>- Critical (Major) compliance -</p>	<p>The audit findings have confirmed that there is no new HCVs, HCS forests peatland and other conservation areas been identified after 15 Nov 2018 in Carotino Certification Units Estates (refer 7.3.1 to 7.4.2).</p>	Complied

Appendix B: GHG Reporting Executive Summary

The GHG emissions that were produced in 2021 for Carotino POM and supply base was calculated using the PalmGHG Calculator version 3.0.1. The assessment team had verified the data input in the PalmGHG Calculator against operations records. PalmGHG Calculation Options selected 'Full version' and 'Exclude LUC Emission' calculation option is not applied. The records verified includes:

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

The summary of the Net GHG emitted in 2021 for Carotino POM and supply base are as following:

Emission per product	tCO ₂ e/tProduct
CPO	0.48
PKO	0.48

Extraction	%
OER	20.02
KER	4.42

Production	t/yr
FFB Process	124,793.24
CPO Produced	24,980.93
PKO Produced	5,515.60

Land Use	Ha
OP Planted Area	9,015.88
OP Planted on peat	0.00
Conservation (forested)	20.22
Conservation (non-forested)	198.01
Total	9,234.11

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	63,961.62	0.51	0.00	0.00	0.00	0.00	63,961.62	0.51
CO ₂ Emission from fertilizer	5,835.75	0.05	0.00	0.00	0.00	0.00	5,835.75	0.05
NO ₂ Emission	3,623.41	0.03	0.00	0.00	0.00	0.00	3,623.41	0.03
Fuel Consumption	1,537.01	0.01	0.00	0.00	0.00	0.00	1,537.01	0.01
Peat Oxidation	0.00	0.00	0.00	0.00	0.00	0.00	0.00	0.00
Sink								
Crop Sequestration	-59,053.37	-0.47	0.00	0.00	0.00	0.00	-59,053.37	-0.47
Conservation Sequestration	0.00	0.00	0.00	0.00	0.00	0.00	0.00	0.00
Total	15,904.43	0.13	0.00	0.00	0.00	0.00	15,904.43	0.13

Summary of Mill Emission and Credit

	tCO ₂ e	tCO ₂ e/tFFB
Emission		
POME	2,719.75	0.02
Fuel Consumption	146.36	0.00
Grid Electricity Utilization	0.00	0.00
Credit		
Export of Grid Electricity	0.00	0.00
Sales of PKS	-4,237.20	-0.03
Sales of EFB	0.00	0.00
Total	-1,371.09	-0.01

Summary of Kernel Crusher Emission and Credit (if applicable)

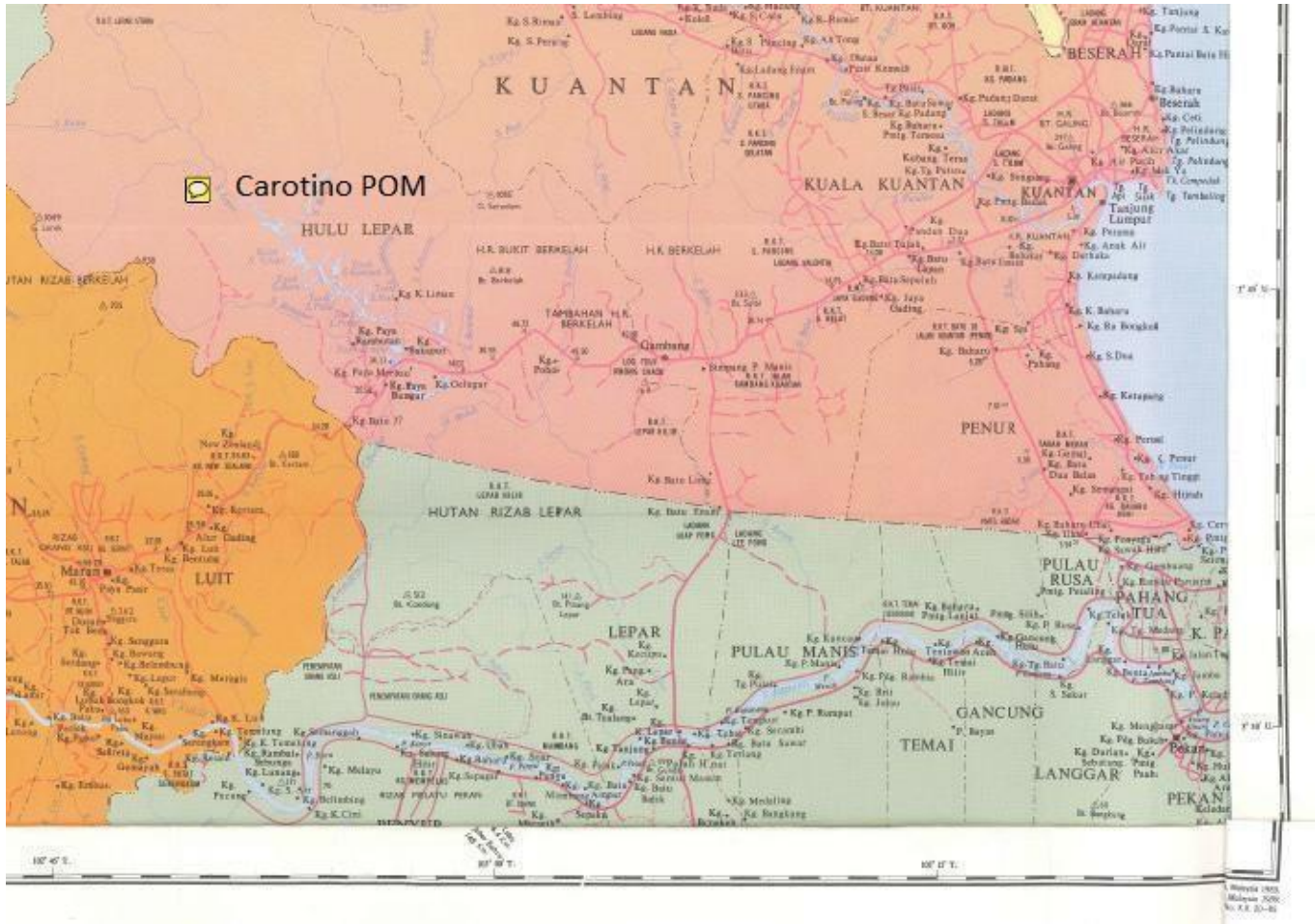
Emissions	tCO ₂ e
PK from own mill	0.00
PK from other source	0.00
Fuel Consumptions	0.00
Total Crusher emissions	0.00

*This mill has no kernel crusher operation.

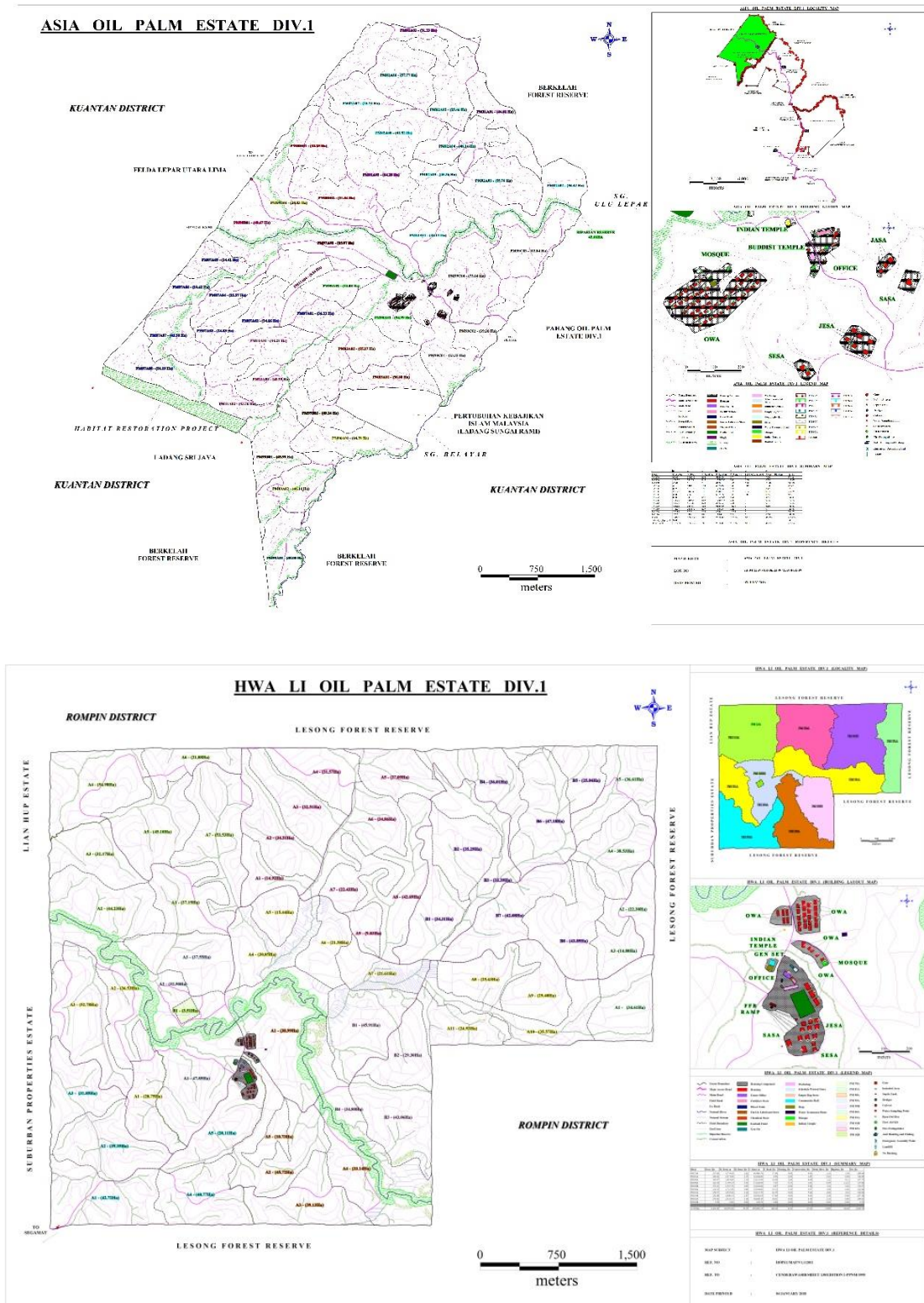
Palm Oil Mill Effluent (POME) Treatment:	
Divert to Compost (%)	0.00
Divert to anaerobic diversion (%)	100.00

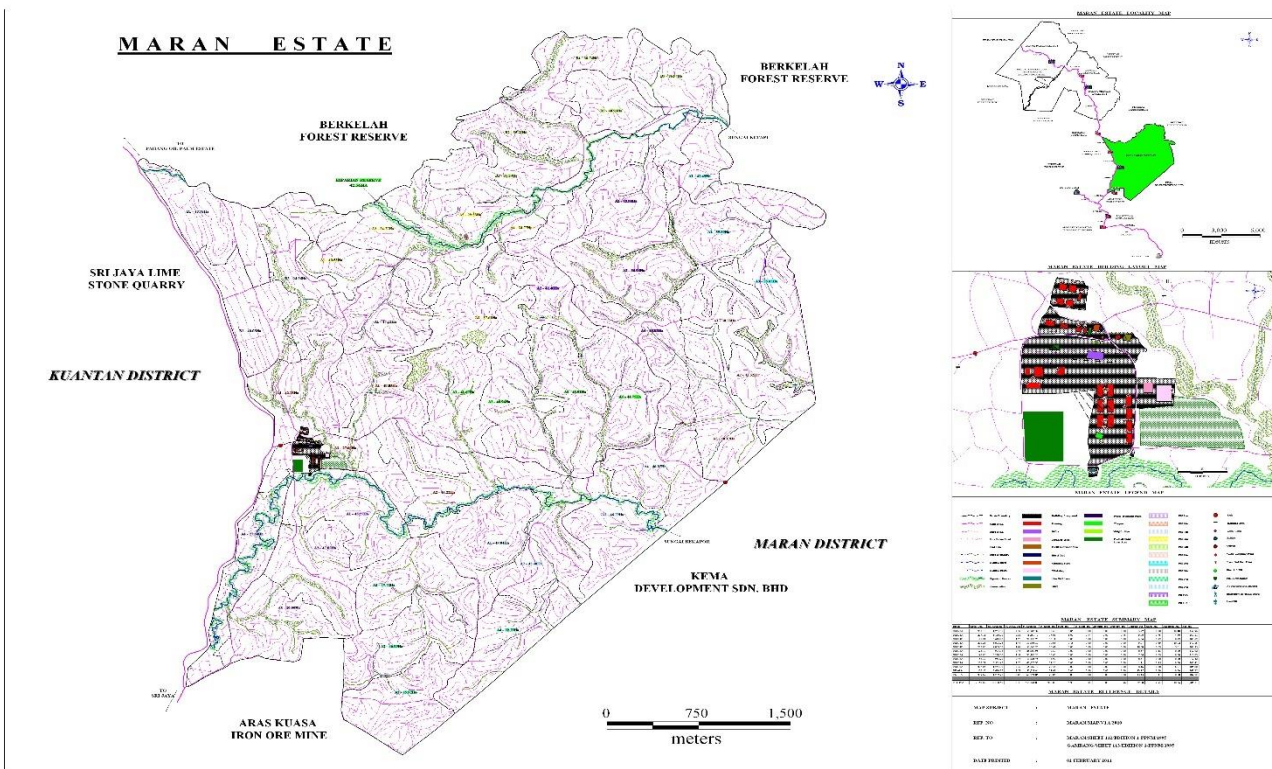
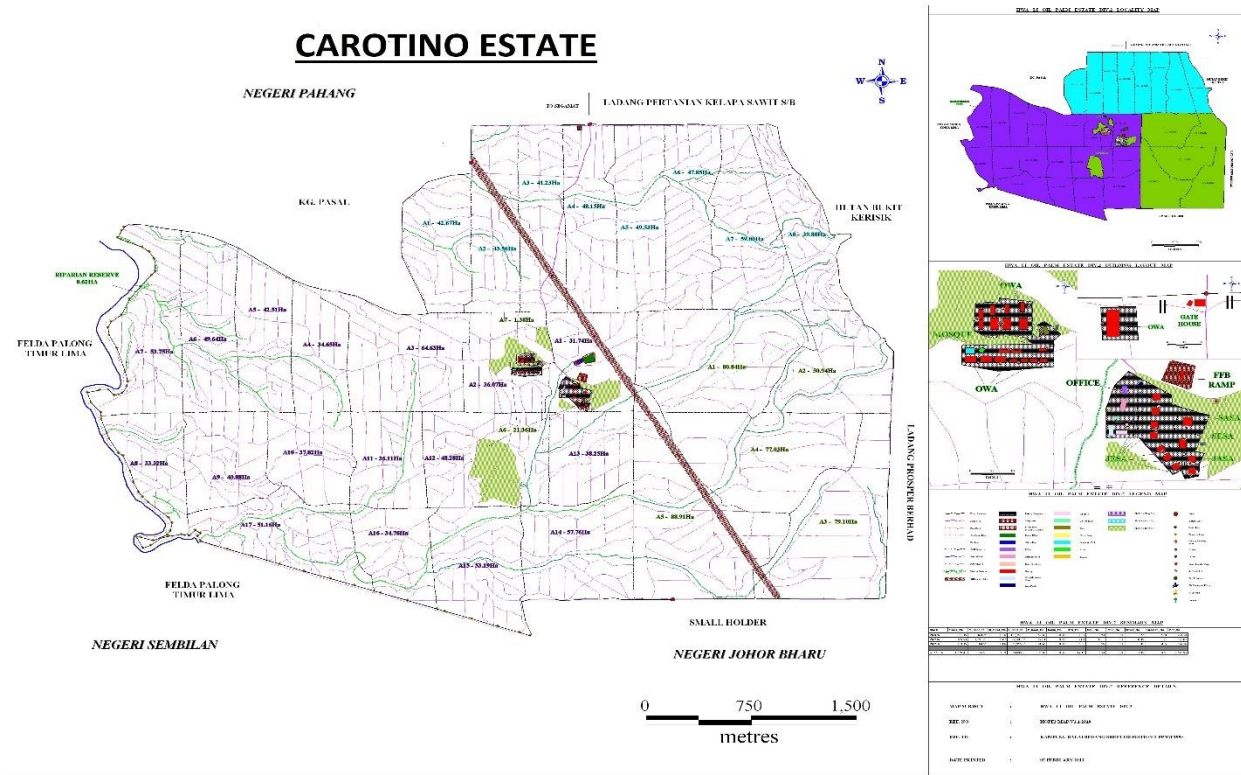
POME Diverted to Anaerobic Digestion:	
Divert to anaerobic pond (%)	0.00
Divert to methane captured (flaring) (%)	0.00
Divert to methane captured (energy generation) (%)	100.00

Appendix C: Location Map of Certification Unit and Supply bases

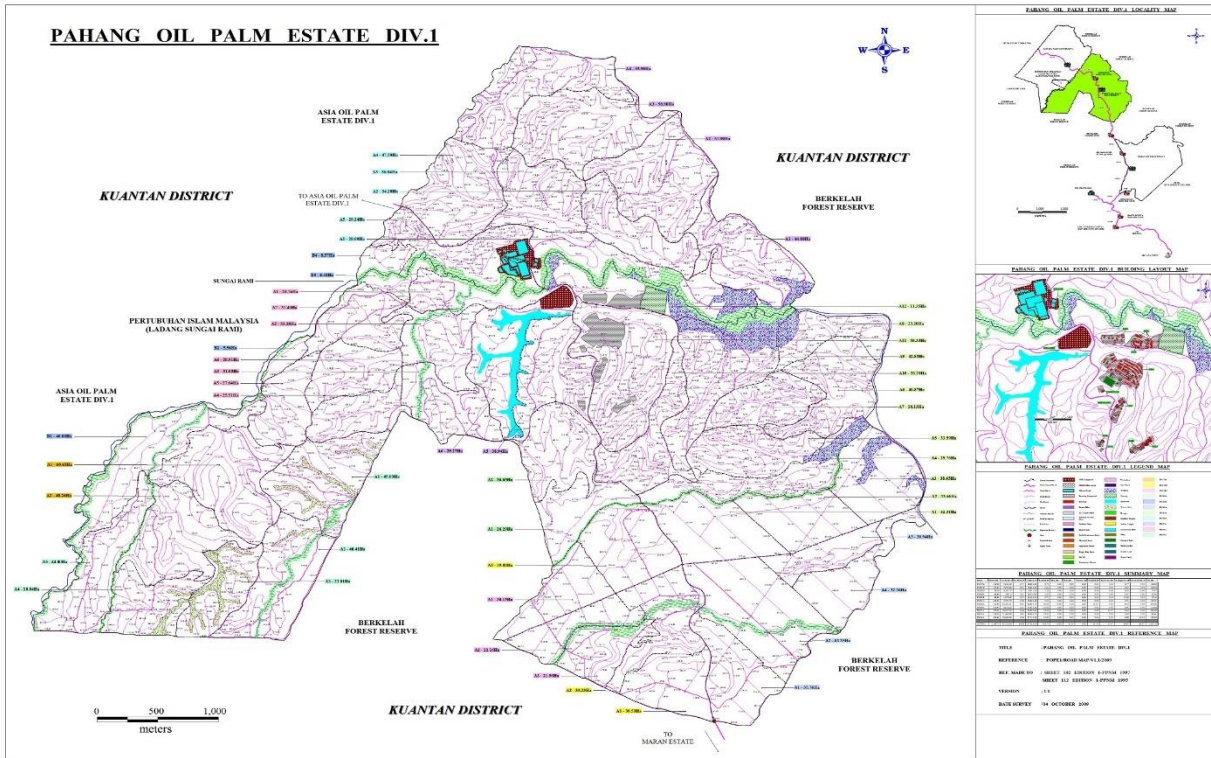


Appendix D: Estate Field Map





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Appendix E: List of Smallholder Registered and/or sampled

No	Name of farmer	Location	GPS Reference		Area Summary (Ha)		Forecasted annual FFB Production (MT)	Date of joining	Smallholder ID
			Latitude (N)	Longitude (E)	Total Certified Area	Planted Area			
Not Applicable									
					Total				
Note: * are smallholders sampled in this audit.									

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